



The Sizewell C Project

9.1 Relevant Representations Report

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EXECUTIVE SUMMARY

The purpose of this report is to provide SZC Co.'s response to the key issues raised in relevant representations submitted by Interested Parties in relation to the Sizewell C Project's DCO Application. A total of 1,280 relevant representations were submitted to the Examining Authority by Interested Parties between 8 July 2020 and 30 September 2020.

The relevant representations received have been responded to by SZC Co. as follows:

- **Section 2** of this report lists out Interested Parties with whom SZC Co. is seeking to achieve Statements of Common Ground. The relevant representations of these Interested Parties have been responded to through the Statements of Common Ground.
- **Section 3** of this report lists out other individual and technical stakeholders, with whom no Statements of Common Ground have been prepared to date. Individual responses to the relevant representations of these Interested Parties have been provided within **Appendix A** of this report.
- **Section 4** of this report comprises SZC Co.'s responses to relevant representations received from members of the public, and all remaining organisations and businesses. Relevant representations in this group have raised similar concerns, and thus comments received have been grouped and summarised into common matters raised, and an overarching response has been prepared.

1 INTRODUCTION

1.1 Purpose of this report

1.1.1 The purpose of this report is to provide SZC Co.'s response to the key issues raised in relevant representations submitted by Interested Parties in relation to the Application.

1.1.2 Registration of Interested Parties and the submission of relevant representations began on 8 July 2020 and closed on 30 September 2020. The Examining Authority has also accepted a number of late relevant representations at their discretion.

1.1.3 A total of 1,280¹ relevant representations were submitted to the Examining Authority by 30 September 2020, broken down as set out below.

- four from local authorities;
- seventeen from other statutory organisations;
- sixty-two from parish councils;
- eighty-one from other organisations (including non-statutory consultees, undertakers and international organisations); and;
- one thousand, one hundred and sixteen from members of the public and businesses.

1.1.4 A full list of all relevant representations received can be found on the Planning Inspectorate's website (Ref. 1). The Examining Authority has allocated a reference number to each Interested Party that submitted a relevant representation. These references have been used within this report, where relevant, to allow cross-referencing. The Sizewell C Project Application documents that have been referred to throughout this document are also accessible on the Planning Inspectorate's website.

1.1.5 All the relevant representations received have been reviewed and considered in this report. The level of detail included within the relevant representation submissions varies between the Interested Parties; some representations provide extensive and detailed comments, other representations comprise

¹ It is noted that the Examining Authority's relevant representation numbers run up to 1,282, however RR-0269 and RR-0474 registration numbers are missing in between. Therefore, the total number of relevant representations registered between 8 July and 30 September 2020 is 1,280.

short statements outlining why a given party has an interest in the examination process.

1.2 Structure of the report

1.2.1 SZC Co.'s responses to the relevant representations have been split into three groups depending on the nature of the representations and the issues raised:

- **Section 2 Statements of Common Ground Parties:** This group comprises Interested Parties with whom SZC Co. is seeking to achieve a Statement of Common Ground, as directed by the Examining Authority's Rule 6 letter [\[PD-011\]](#) and Rule 8 letter [\[PD-015\]](#)..
- **Section 3 Other Individual and Technical Stakeholder Responses:** This group includes other local authorities, parish councils for areas where the proposed development would take place, elected representatives, international agencies, statutory consultees, undertakers and non-statutory organisations. It excludes those Interested Parties with which SZC Co. is seeking to develop a Statement of Common Ground. Individual responses have been prepared to each matter raised.
- **Section 4 Themed Responses:** This group comprises SZC Co.'s responses to relevant representations received from members of the public, and all remaining organisations and businesses. Relevant representations in this group have raised similar concerns, and thus comments received have been grouped and summarised into common matters raised, and an overarching response has been prepared to avoid unnecessary repetition in responses.

2 STATEMENTS OF COMMON GROUND PARTIES

2.1.1 The Statements of Common Ground being developed through engagement with relevant parties cover issues raised by those parties within their relevant representations, as well as through ongoing engagement. Therefore, issues raised by these Interested Parties will be responded to within the Statements of Common Ground to be submitted to the Examining Authority at Deadline 2.

2.1.2 SZC Co. is developing Statements of Common Ground with the following Interested Parties:

- Anglian Water Services Limited;
- Essex and Suffolk Water;
- East Suffolk Internal Drainage Board;
- Environment Agency;
- Highways England;
- Historic England;
- Natural England;
- National Grid Electricity Transmissions Plc (NGET);
- Cadent Gas Ltd;
- Network Rail;
- Royal Mail;
- East Suffolk Council and Suffolk County Council;
- Suffolk Fire and Rescue;
- Office for Nuclear Regulation (ONR);
- Ipswich and East Suffolk Clinical Commissioning Group;
- East of England Ambulance Trust;
- Suffolk Constabulary;

- Marine Management Organisation;
- Magnox Limited and Nuclear Decommissioning Authority (NDA);
- Suffolk Coast and Heaths AONB Partnership;
- Pro Corda Trust / Leiston Abbey;
- Public Health England;
- Together Against Sizewell (TASC);
- Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust;
- National Trust;
- National Farmers Union;
- Minsmere Levels Stakeholders Group;
- East Anglia One North and Two;
- Stop Sizewell C (Theberton and Eastbridge Action Group);
- EDF Nuclear Generation Limited;
- English Heritage Trust;
- B1122 Action Group;
- Suffolk Coast Destination Management Organisation;
- Suffolk Coastal Friends of the Earth; and
- Department for Transport.

2.1.3 As requested by the Examining Authority in the Rule 6 letter [\[PD-011\]](#), SZC Co. invited the Suffolk Preservation Society to enter into a Statement of Common Ground, who later confirmed that they ‘will not be making further representations or taking any further involvement in the Examination process’. Responses to comments raised by the Suffolk Preservation Society are provided within Section 4 of this report.

3 RESPONSES TO SELECTED INDIVIDUAL AND TECHNICAL CONSULTEES

3.1 Overview

- 3.1.1 This section lists the relevant representations received from other local authorities, parish councils for areas where the proposed development takes place, elected representatives, international agencies, statutory consultees, undertakers and non-statutory organisations, excluding those Interested Parties with whom SZC Co. is seeking to develop a Statement of Common Ground. The full response to the relevant representations received from these Interested Parties is included within **Appendix A** of this report. The paragraphs below provide a full list of these Interested Parties.

3.2 Local Authorities

- Norfolk County Council ([RR-0906](#));
- Babergh and Mid-Suffolk District Councils ([RR-0125](#)).

3.3 Parish Councils

- Leiston-cum-Sizewell Town Council ([RR-0679](#));
- Theberton and Eastbridge Parish Council ([RR-1214](#));
- Marlesford Parish Council ([RR-0758](#));
- Wickham Market Parish Council ([RR-1266](#));
- Farnham with Stratford St Andrew Parish Council ([RR-0379](#));
- Middleton Cum Fordley Parish Council ([RR-0795](#));
- Kelsale cum Carlton Parish Council ([RR-0655](#));
- Yoxford Parish Council ([RR-1277](#));
- Campsea Ashe Parish Council ([RR-0170](#));
- Levington & Stratton Hall Parish Council ([RR-0686](#));
- Darsham Parish Council ([RR-0267](#));

- Hacheston Parish Council ([RR-0447](#));
- Benhall and Sternfield Parish Council ([RR-0134](#));
- Melton Parish Council ([RR-0780](#)).

3.4 Elected Representatives

- Thérèse Coffey MP for Suffolk Coastal ([RR-1215](#));
- Dr Daniel Poulter MP ([RR-0610](#));
- County Councillor Christopher G Hudson ([RR-0259](#));
- Caroline Page County Councillor for Woodbridge ([RR-0177](#));
- Councillor Mary Schedrin ([RR-0258](#));
- Councillor Alexander Nicoll ([RR-0257](#));
- Councillor Tony Cooper ([RR-0247](#));
- Councillor Louise Gooch for East Suffolk ([RR-0701](#));
- Councillor T J Haworth-Culf ([RR-0246](#));
- Richard W L Smith, MVO, County Councillor for Blything Division ([RR-1029](#)).

3.5 International Agencies

- Ministry of Energy, Agriculture, the Environment, Nature and Digitalization (Germany) ([RR-0801](#));
- Danish Emergency Management Agency ([RR-0265](#));
- Belgian State ([RR-0127](#));
- Ministry for the Environment and Natural Resources National Planning Agency (Iceland) ([RR-0876](#));
- Swedish Environmental Protection Agency (Naturvårdsverket) ([RR-1196](#));

- Ministry of Infrastructure and Water Management for Netherlands ([RR-0802](#));
- Department of Housing, Planning and Local Government (Ireland) ([RR-1280](#)).

3.6 Other Statutory Consultees

- Ministry of Defence ([RR-0800](#));
- Suffolk Local Access Forum ([RR-1175](#));
- The Maritime and Coastguard Agency ([RR-0747](#)).

3.7 Other Statutory Undertakers

- British Telecommunications plc ([RR-0159](#));
- National Grid Ventures ([RR-0875](#)).

3.8 Other Non-Statutory Consultees

- Eastern Inshore Fisheries and Conservation Authority ([RR-0348](#));
- National Air Traffic Services (NATS) (RR-n/a)²;
- New Anglia Local Enterprise Partnership ([RR-0883](#));
- NHS Norfolk & Waveney Clinical Commissioning Group ([RR-0886](#));
- Ramblers Association – Suffolk Area ([RR-1005](#));
- Suffolk Coast Acting for Resilience (SCAR) ([RR-1171](#), [RR-1172](#));
- Trinity House ([RR-0255](#)).

² The submission from NATS was not registered by the Examining Authority as a formal relevant representation, however, as an additional submission. For completeness, the response to the submission from NATS is included within **Appendix A** of this report.

4 THEMED RESPONSES

4.1 Overview

4.1.1 Relevant representations received from members of the public and all remaining organisations and businesses have raised a number of similar concerns. Therefore, the comments received have been grouped by topic and an overarching response has been prepared to avoid unnecessary repetition in responses.

4.1.2 The following key themes raised in these relevant representations, along with the SZC Co.'s response have been provided in **Sections 4.2 to 4.32** of this report:

- Section 4.2 Land Interest and Compulsory Acquisition;
- Section 4.3 Draft Development Consent Order, planning process and consultation;
- Section 4.4 Freight Management Strategy;
- Section 4.5 Project Funding and Mitigation Funding;
- Section 4.6 General Project;
- Section 4.7 General Environmental Impact Assessment;
- Section 4.8 Main Development Site;
- Section 4.9 Associated Developments – northern park and ride;
- Section 4.10 Associated Developments – southern park and ride;
- Section 4.11 Associated Developments – two village bypass;
- Section 4.12 Associated Developments – Sizewell link road;
- Section 4.13 Associated Developments – Yoxford roundabout;
- Section 4.14 Associated Developments – Freight Management Facility;
- Section 4.15 Associated Developments – Rail;
- Section 4.16 Air Quality;

- Section 4.17 Amenity and Recreation;
- Section 4.18 Climate Change;
- Section 4.19 Ecology and Biodiversity;
- Section 4.20 Geology and Land Quality;
- Section 4.21 Health and Wellbeing;
- Section 4.22 Historic Environment;
- Section 4.23 Landscape and Visual Impact Assessment;
- Section 4.24 Major Accidents and Disasters;
- Section 4.25 Marine and Coastal;
- Section 4.26 Materials and Waste;
- Section 4.27 Noise and Vibration;
- Section 4.28 Radiological Considerations;
- Section 4.29 Socio-economic effects;
- Section 4.30 Soils and Agriculture;
- Section 4.31 Transport; and
- Section 4.32 Water Resources, Flood Risk and Drainage.

4.2 Land Interest and Compulsory Acquisition

a) Overview

4.2.2 A total of 15 Interested Parties raised matters regarding land interest and/or compulsory acquisition.

4.2.3 **Table 4.1** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.1: Land Interest and Compulsory Acquisition

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Access arrangements not adhered to Agreed access arrangements for surveys have not been adhered to.	SZC Co.'s agents, Dalcour Maclaren, have engaged with landowners and their agents to agree access to land by agreement for surveys wherever possible. Dalcour Maclaren continue to liaise with instructed agents for landowners and landowners directly with regard to survey access, in line with the agreed access licences and land access protocols, to ensure that landowners are notified in advance of any surveys being undertaken. Dalcour Maclaren are available at all times during the period of when surveys are being undertaken to resolve any issues or concerns that may arise.	9
Opposition to compulsory acquisition and termination of tenancy Statements of opposition to compulsory acquisition of land, concerns over severance, land take and the termination of	Engagement/consultation with landowners - All affected landowners have been consulted with regarding the proposed development as well as accepted changes (April 2021) to the Application, and agents acting on behalf of affected landowners have been briefed on the nature and rationale for the proposals.	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
tenancies for properties under EDF Energy ownership.	Detailed engagement with affected landowners has helped to identify measures to limit severance. Where severance cannot be avoided then landowners will be appropriately compensated. With regards to the accepted changes (April 2021) to the Application, the majority of the accepted changes (April 2021) do not introduce additional land interests. However, all affected parties have been advised and, following the acceptance of the accepted changes (April 2021), the newly affected persons have also been formally notified, invited to make representations and have the opportunity to engage fully in the examination. Negotiations with landowners - The draft DCO seeks compulsory acquisition powers to ensure that the construction and operation of the Project can proceed if consent is granted. SZC Co. has engaged in negotiations with all directly affected landowners to secure the land required for the Project by private treaty, with the intention of only using compulsory acquisition powers as a last resort. This has included the issuing of Heads of Terms for agreements and a series of meetings held over many months with landowners' agents to agree terms for the land sought in the Book of Reference (Doc Ref. 4.3) [APP-067 and AS-151] and Land Plans. (Doc Ref. 2.1(A)) [AS-108 and AS-290]. Landowners have had the reasonable costs of suitably qualified surveyors reimbursed to assist in these negotiations, and SZC Co. has underwritten the cost of legal review of documents on behalf of the landowners. Further, a representative from the National Farmers Union (NFU) has been present at many of the agent meetings to negotiate terms and ensure that technical interface matters between landholdings and the Project are appropriately managed and documented. SZC Co. has taken a proportionate approach to the Application for compulsory acquisition powers in the draft DCO, and it is not the intention to acquire more land than is required for the Project. However, the private treaty negotiations have proposed that any land acquired for the Project that is later identified as surplus to the needs of the Project will be returned to the landowner, reflecting the <i>Crichel Down</i> principles that apply in respect of land acquired compulsorily. Further, the draft	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	DCO provides for all Order land to be occupied temporarily (prior to land being acquired permanently). This ensures that only land confirmed as being required permanently is acquired, with land occupied temporarily returned to the landowner. Compensation for parties outside of the Order limits - SZC Co. has included parties within the Book of Reference (Doc Ref. 4.3) [APP-067 and AS-151] that it has identified (though diligent inquiry) as parties that may be eligible to make a claim under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 or section 152(3) of the Planning Act 2008. However, the inclusion of these parties does not confirm that a claim would be successful, and parties not included in the Book of Reference but who later believe they are eligible to make a claim would not be prevented from so doing. SZC Co. has liaised with its tenants and kept them informed of progress of the Project and will continue to engage positively with them as the Project progresses.	

4.3 Draft Development Consent Order, Planning Process and Consultation

a) Overview

4.3.2 A total of 343 Interested Parties raised matters regarding the draft Development Consent Order (DCO), consultation and process.

4.3.3 **Table 4.2** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.2: Draft Development Consent Order, planning process and consultation

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Development Consent Order and Planning Process		
Inadequate wording in Explanatory Memorandum, Planning Statement and status of DCO plans Suggestion that the wording in the Explanatory Memorandum and Planning Statement is inadequate, and concerns that the status of DCO plans is generally described as 'Not for Approval' and 'an excessive use of the Rochdale envelope'. Concerns raised over the lack of Application of certain policy requirements (e.g. UK Marine Policy Statement 2011, the consideration of local and regional planning policy and failure to comply with Defra's 25-year environment plan). There is a need for a clearly defined and mandatory 'Management Change Protocol', which tracks regulatory compliance and mitigation commitments. Council enforcement powers must ensure clarity and transparency of the process for an appropriate use of DCO requirements and an appropriate remit under the Section 106 Agreement.	Sizewell C is a large-scale infrastructure Project and the Planning Inspectorate has recognised that Projects of this scale require an element of flexibility within clearly defined parameters (see PINS Advice Note 9 on "Using the Rochdale Envelope" (Ref. 2)). SZC Co. has complied with this Advice Note in preparing its Application. The Environmental Statement (Doc Ref. Book 6) set out the defined parameters clearly and the environmental impact assessment considered the full extent of those parameters. The parameters themselves are secured through the draft DCO (Doc Ref. 3.1(B)) [AS-143]. This ensures that the flexibility that the proposed development has is limited to the parameters and impacts which have been assessed. SZC Co. considers that these are sufficient to ensure there is control over the development. However, there are certain cases, where it has been agreed with the local planning authority and other stakeholders, that further detail is needed for approval. Requirements are included in the draft DCO for SZC Co. to obtain approval of further detail before development can begin. The Planning Statement (Doc Ref. 8.4) [APP-590] explains the policy relevant to Sizewell C and explains how it has been complied with. The enforcement bodies under the draft DCO have been given authority through statute. The draft DCO clearly identifies the appropriate enforcement authority for various obligations, as	22

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	well as any further approvals that are necessary under the DCO.	
Validity of the National Policy Statement EN-6 National Policy Statement (NPS) EN-6 does not have effect for the purposes of determining Applications for new nuclear build sites not deployed by 2025, including the Application for Sizewell C. Instead the Project is to be determined under Section 105 of Planning Act 2008, having regard to a 'wide variety of matters'. Significant weight can only be attached to the prescription of the NPS, if there have been 'no relevant change in circumstances'. However, a variety of changes to circumstances have occurred, including the climate emergency, urgent need for low carbon energy (which new nuclear is unable to deliver due to slow construction), excessive cost, renewable alternatives, and the legacy of nuclear waste for which there is no long-term storage solution. Reliance on the 2017 Ministerial Statement and on the consultation on a proposed new nuclear NPS would not appear material. Neither document complies fully with	The 2017 Ministerial Statement indicated that the Government considers that neither NPS EN-1 nor NPS EN-6 "has effect" for the Sizewell C DCO Application and that if the decision on the Application were made today, it would be made pursuant to section 105 of the Act. However, EN-1 and EN-6 incorporate information, assessments and statements, including concerning the need for nuclear power, which continue to be important and relevant to the Sizewell C Project. Section 3 of the Planning Statement (Doc Ref. 8.4) [APP-590] explains there has been no relevant change of circumstances which would suggest that anything less than significant weight should be given to the policy in EN-1 and EN-6. Indeed, the need for new nuclear power is now even greater than when NPS EN-1 and NPS EN-6 were designated. Any changes to circumstances are matters for the Government to consider as it reviews the NPSs. In the meantime, the Energy White Paper (Ref.3) has confirmed that the current NPSs provide a proper basis on which the Application can be examined. The need for a new power station at Sizewell C is firmly established within the Government's policy on national significant energy infrastructure. The National Policy Statement for Nuclear Power Generation (EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and	10

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
requirements of section 6(7) of the Planning Act 2008. Furthermore, the Government's response to its recent consultation on siting of nuclear facilities stated a clear outstanding requirement on EDF Energy to demonstrate how the Sizewell site will conform to new, more stringent site selection criteria before being accepted as a suitable site.	Wales by 2025. The strength and relevance of the need case has been endorsed in the Government's Energy White Paper: Powering our Net Zero Future (2020), which also identifies an <i>'aim to bring at least one further large scale nuclear Project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals'</i>. The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – was set out in the Planning Statement (Doc Ref. 8.4) [APP-590] that accompanied the Application and remains valid. If a new Nuclear NPS or new Energy NPS is designated before the Secretary of State makes their decision on the Sizewell C DCO, the decision will be based on the NPSs that have effect at that time.	
Draft DCO The following facilities should be considered as standalone non-NSIP developments in their own right and should not be granted permission under the DCO: intermediate level waste store, including associated structures and plant, interim spent fuel store, including associated structures and plant, and interim spent fuel store equipment storage building. It is inappropriate for these buildings to be included under the DCO, as insufficient information on design details,	Sizewell C is a nationally significant infrastructure Project meeting the thresholds in the Planning Act 2008 to apply for a development consent order. All associated buildings and structures, such as those listed here, meet the criteria for associated development set out in "Guidance on associated development Applications for major infrastructure Projects", issued by the Planning Inspectorate in April 2013. The DCO process enables development to be assessed in full and in an appropriate way for a Project of this scale. This allows for all the development required for the delivery of the Project to be consented under one regime. Appropriate detail has been provided as part of the Application. In certain cases,	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
elevation and construction commencement has been provided.	where it is considered that approval of more detailed design is appropriate in due course, mechanisms have been included in the draft DCO to provide for SZC Co. submitting additional details to the appropriate authority for further consent before development of that part is started.	
Section 56 Public Notice Section 56 Public Notice was misleading and inadequate, as it failed to inform the public of proposed on-site storage of highly radioactive waste.	The section 56 notice included the information required by Regulation 9 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. It included a link to the full Application as well as information on how hard copies or USBs could be obtained. This level of detail was included within the Application which was made available to the public.	1
Enforcement and funding of commitments for mitigation Concern that mitigation committed to will not be implemented. For example, at Hinkley Point C many mitigation measures have been disregarded, with no enforcement or sanction from the Government. Funding and monitoring of effects should be made available in the long term until the end of decommissioning.	SZC Co. is committed to complying with the policy requirements for mitigation. This is secured through the draft DCO itself and the section 106 Agreement. A breach of the DCO would be a criminal offence. The section 106 Agreement will set up various review groups with the local authorities and relevant stakeholders to ensure that there is visibility on the delivery of mitigation and that enforcement bodies have the information that they need to carry out their function. Monitoring and funding commitments are made through the DCO and the section 106 Agreement. The costs of decommissioning, waste and spent fuel management (post end of generation) and disposal of all higher activity waste will be funded through a Funded Decommissioning Programme (FDP), which will need to be	7

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	approved by the Secretary of State (Department for Business, Energy and Industrial Strategy) before construction work on buildings with nuclear safety significance commences. Through the FDP, SZC Co. must demonstrate that it has a robust plan in place to decommission the station and manage any liabilities (including waste), a robust cost estimate to deliver the plan, and arrangements that ensure that SZC Co. sets aside funds over the operating life of the Sizewell C power station to cover these costs in full. The legal framework that implements these arrangements has been established through the Energy Act 2008 and the Nuclear Decommissioning and Waste Handling (Finance and Fees) Regulations 2013.	
Consultation		
Digital examination and consultation Digital examination and consultation are not suitable for the Project. An extension of the consultation period should be granted as a direct result of the COVID-19 emergency. The planning process is inappropriate during the COVID-19 period and should be put on hold until the pandemic is over. The subset of residents who have been self-isolating and do not have digital access to documents have been seriously hampered (and in some cases completely disenfranchised) in their ability to respond to the consultation. As many of that subset will	Extended pre-examination period The Application for development consent is subject to the same process and timescale as other DCO applications. SZC Co. has understood concerns regarding the timing of the Application in recognition of the ongoing COVID-19 pandemic and in this context: - Whilst the Sizewell C Application was ready for submission in February 2020, SZC Co. took the decision to defer its submission until May 2020 in recognition that the pandemic would impact upon the resources available to all stakeholders. - Nevertheless, SZC Co. shared the Application material in draft in October 2019 with the Defra family and in its full form on its submission in May, prior to its acceptance.	240

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
be elderly and/or disabled, this restriction is discriminatory and does not comply with the Equality Act 2010. Closures of local and national archives and libraries have also meant that the general public have not had access to information from other sources and have been completely reliant on the documents created by SZC Co. COVID-19 lockdown has restricted the ability to view the plans and to organise objections to the Sizewell C Project, thereby, limiting the ability of the public to fully participate in the process. SZC Co. are progressing with the Sizewell C Project during the COVID-19 lockdown to avoid full publicity.	• The period provided for relevant representations then ran for 12 weeks until 30 September – again in recognition of the scale of the Application but also the continuing implications of the pandemic. • A number of measures compliant with COVID-19 restrictions were put in place to aid the local community in accessing the information. For example, SZC Co. provided a mobile library (a single decker bus) with hard copies of the Application, laptops and printing facilities, where residents booked appointments or could collect information from the mobile library. The Sizewell C Information Office was open for booked appointments with facilities to read documents and in line with COVID-19 restrictions. Posters directing people to where the information was accessible were placed in local libraries, which were open but not fully operational. SZC Co. also operated a laptop lending service with all the information uploaded and a delivery and collection service for any respondents who were self-isolating. • There has been an extended timeframe before the preliminary meeting was held, to ensure stakeholders had sufficient time to prepare for the examination. The Application proposals have already had an unusually long period between submission and examination, substantially so that parties may have sufficient time to study the Application material.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	However, the UK has an urgent need for new energy infrastructure and the region also has a clear need for the economic benefits that the proposals would bring. This is further supported by the Government's Energy White Paper: Powering our Net Zero Future (2020) that identifies an '<i>aim to bring at least one further largescale nuclear Project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals</i>'. It is therefore essential that the planning process continues in a timely manner. SZC Co. also notes that the number of relevant representations received on the Application is equivalent to the number of responses received at the pre-submission consultation stages (Stages 1 to 4). This suggests that Interested Parties have been able to consistently engage throughout the pre-examination period. Consultation on accepted changes (April 2021) Since the submission of the Application in May 2020, SZC Co. has continued to engage closely with the local authorities, environmental organisations, local stakeholder groups and the public with regard to the Application. This process has identified potential opportunities for changing the Application to further minimise impacts on the local area and environment in many cases, whilst reflecting the additional design detail that has come forward in preparation for implementation of the Sizewell C Project and SZC Co. submitted a request to change	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	the proposals to reflect this additional consultation in January 2021. In order to make sure that statutory consultees, the local community and the general public had an opportunity to understand and comment on the proposals throughout the extensive pre-Application consultation stages as well as the accepted changes (April 2021) to the Application, SZC Co. undertook a period of consultation between 18 November and 18 December 2020. The Consultation Report (Doc Ref. 5.1) [APP-068 to APP-092] and Consultation Report Addendum (Doc Ref. 5.1Ad) [AS-153 to AS-156] contain details of the consultation materials, consultation activities and how SZC Co. had regard to feedback received. The consultation exercise for the accepted changes (April 2021) to the Application was designed to ensure that consultees were able to access the consultation material notwithstanding the ongoing COVID-19 pandemic. Measures were put in place to help anyone who wished to respond, having careful regard to COVID-19 restrictions in place during the consultation period. Access to documents The Planning Inspectorate encourages Interested Parties to view information online on the Project pages on its website. Accessing information on a digital platform provides free access for all but where anyone might struggle to access the information, SZC Co. has a freephone helpline and has provided information in hard copy to anyone who requires it.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The Sizewell C Information Office on Leiston High Street operates under the latest COVID-19 restrictions but should public access be permitted, anyone requesting hard copies of information can make a request for it there.	
Addressing stakeholder suggestions / questions Concern that the consultation process has failed to engage with local communities and issues sufficiently. Issues raised at previous consultation stages have been inadequately answered. Constructive suggestions have been ignored and the Application documents fail to address many important issues. For example, “Road-Led” proposals have been widely rejected by statutory consultees in consultations, the risk of salt water ingress has not been fully addressed or acknowledged during the consultation period, and no contact with the Neighbourhood Plan committee had taken place regarding Wickham Market. Furthermore, SZC Co. have failed to ask for suggestions for mitigation measures and rural parishes' input lacks acknowledgement and productive action from the Applicant. Landowners under compulsory purchase have requested meetings with SZC Co., but these meetings have not been forthcoming.	Throughout the pre-Application stage for Sizewell C, SZC Co. has always listened carefully to feedback from consultation and on-going engagement. Multiple stages of pre-Application consultation between 2012 and 2020 helped to inform significant changes to the proposals, particularly in respect of transport, accommodation and the visual impact of the power station. SZC Co.'s commitment to listening and acting did not end with submission of the Application. The accepted changes (April 2021) submitted in January 2021 were in response to helpful feedback, particularly from local councils, on issues such as transport and the environment. Feedback from all of our consultation and engagement has helped inform the proposals in the change request. In relation to the accepted changes' (April 2021) consultation for instance, a briefing was sent to all parishes in East Suffolk at the start of consultation. The briefing was clear that any parish council who would like to have a meeting or presentation from the Sizewell C Project Team could have one. Meetings were requested by and took place with Suffolk Coastal Friends of the Earth, the Sizewell Residents Association, Leiston-cum-Sizewell Town Council, Theberton and Eastbridge Parish Council and the AONB Partnership. No other parish council or community group requested a meeting.	93

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Concern that the consultation process has been used to SZC Co.'s advantage only.	Information was sent to Wickham Market Parish Council. It is for the parish council to notify its councillors and committees in turn. SZC Co. meets monthly with Wickham Market and neighbouring parishes in a Transport and Traffic Working Group chaired by Suffolk County Council. A similar group is established and meets regularly at Leiston. The Consultation Report (Doc Ref. 5.1) [APP-068 to APP-092] and Consultation Report Addendum (Doc Ref. 5.1Ad) [AS-153 to AS-156] contain details of the consultation materials, consultation activities and how SZC Co. has had regard to feedback received. Responses have been carefully considered by SZC Co. and will also be taken into account by the Examining Authority and the Secretary of State. All affected landowners have been consulted with regarding the proposed development and the accepted changes (April 2021), and agents acting on behalf of affected landowners have been briefed on the nature and rationale for the proposals. The majority of the accepted changes (April 2021) do not introduce additional land interests. However, following the acceptance of the accepted changes (April 2021), the newly affected persons have been additionally formally notified, invited to make representations and have the opportunity to engage fully in the examination. SZC Co.'s appointed agents (Dalcour Maclaren) have been and will continue to meet with landowners and their instructed agents to assess and understand their concerns in relation to	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	the proposals. Responses have and continue to be provided to these concerns in attempt to alleviate these.	
Consultation on two-village bypass There has been no serious attempt at consultation on how the more easterly route of two village bypass could avoid impact on properties. Despite concerns having been raised during each stage of consultation, SZC Co. have ignored them or proposed inappropriate or inadequate mitigation.	The design of the route proposes to avoid direct loss of Foxburrow Wood. The Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591] explains the route selection for the two village bypass, including amendments made to the boundary of Farnham Hall. The alternative alignment put forward by Farnham with Stratford St Andrew Parish Council suggests routing the two-village bypass (travelling from west to east) to the south of Pond Barn Cottages before curving northwards, passing Foxburrow Wood on its east side, and meeting the proposed Friday Street roundabout to the north. The alternative alignment put forward by the Parish Council was reviewed carefully, taking into account the impacts on woodland, environment and nearby receptors as well as operational matters, such as its suitability as an effective bypass, but it was not considered to be a better solution, particularly given the mitigation proposed for the properties at Farnham Hall. Chapter 3 (Alternatives and design evolution) of Volume 5 of the ES (Doc Ref. 6.6) [APP-414] provides information regarding the alternatives considered from an environmental perspective.	4
People feel powerless or ignored People feel powerless against the Project or have not had previous consultation responded to, and therefore, are no longer	Throughout the development of Sizewell C, SZC Co. has always listened carefully to feedback from consultation and has conducted on-going engagement. Multiple stages of formal pre-Application consultation which took place between 2012 and	26

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
participating in the planning process. The mental wellbeing of residents is being affected, as the Project has been periodically consulted on over the last 8 years. The stress and strain requires recognising and assistance should be provided.	2020 helped to inform significant changes to the proposals, particularly in respect of transport, accommodation and the visual impact of the power station. Respondents have not been ignored. It was noted at all stages of formal consultation that all issues raised would be considered and accepted or answered in a detailed Consultation Report submitted with the Application (refer to Consultation Report (Doc Ref 5.1) [APP-068 to APP-092] and Consultation Report Addendum (Doc Ref. 5.1Ad) [AS-153 to AS-156]). The proposals at each stage of consultation were informed by previous feedback. SZC Co.'s commitment to listening and acting did not end with submission of the Application. The accepted changes (April 2021) were made in response to helpful feedback on issues such as transport, severance and the environment. Feedback from the consultation helped inform the proposals in the change request.	
Consultation with members of the public internationally Suggestion that consultation should have taken place with members of the public internationally under the transboundary procedure, together with a public hearing and the publication of documents in other European languages. Emphasis on the importance of sharing information with neighbouring countries.	Consultation with the international community has been undertaken in accordance with the Espoo and Aarhus Conventions. The Planning Inspectorate wrote to all Espoo parties on 31 October 2019 notifying them of the proposed development. This went beyond the Secretary of State's legal duty, but is consistent with PINS Advice Note 12 on Transboundary Impacts. Following the acceptance of the Application on 24 June 2020, the Planning Inspectorate publicised the Application through press notices in various national newspapers in local languages across Europe. SZC	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Co. also gave notice of the Application in various national newspapers in local languages across Europe. These notices included a link to the Application and explained the opportunity to participate in the DCO examination process.	
No sight of important documents / documents being withheld on purpose The full Environmental Statement is not available nor are the other more critical documents, such as the Transport Strategy. The monitoring and mitigation plan, being discussed with local authorities, needs to be made public for assessment at the examination and the Marine Technical Forum responsibilities, powers and transparency need to be defined.	An Environmental Statement (ES) (Doc Ref. Book 6) [APP-159 to APP-582] was submitted alongside the Application for development consent to the Planning Inspectorate in May 2020. The ES was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and the requirements of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended), and included consideration of the transport strategy for the Project in presenting the assessment of likely environmental and socio-economic effects of the Sizewell C Project. The Application (including the ES) was accepted for examination in June 2020 and subsequently the Planning Inspectorate published the Application on the Planning Inspectorate's website. Following the submission of the Application, SZC Co. has continued to engage with the local authorities, environmental organisations, local stakeholder groups and the public with regard to the Application, which identified potential opportunities for changing the Application to further minimise impacts on the local area and environment in many cases, whilst reflecting the further design detail that has come forward in preparation for implementation of the Sizewell C Project. SZC Co. submitted a request for changes to the Application to the Planning Inspectorate on 12 January 2021, which included	7

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	an ES Addendum that presented an assessment of any new or different significant effects that are likely to result from the accepted changes (April 2021) to the Application, which the Planning Inspectorate subsequently published on its website. The ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects, and monitoring requirements. The mitigation measures and monitoring requirements identified within the ES and ES Addendum are all summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the DCO, if granted, and the Section 106 Agreement. All of this information has been made public through the Planning Inspectorate's website. In accordance with best practice, SZC Co. continues to engage with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation and others to develop mitigation and monitoring for the Sizewell C Project. The Marine Technical Forum is the name used for joint meetings with the Environment Agency, Marine Management Organisation, Natural England and East Suffolk Council to discuss the marine assessments at pre-submission stage.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Communication and complaints during construction Lack of confidence that SZC Co. would act promptly and effectively on serious complaints during construction. Measures for the communication of works are inadequate, as is proposed system for complaints monitoring, analysis and resolution.	SZC Co. intends to put in place similar measures to those that are in place for the Hinkley Point C Project, where complaints are responded to quickly and monitored. The freephone community line and local engagement will continue throughout construction. Details are provided and committed to in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] .	1
Conflicts of Interest There are potential conflicts of interest through the Councils' roles in the Transport Review Group and making decisions to discharge requirements under the enforcement regimes for the DCO and EIA regulations, without clear commitments to transparency and clarity before public impacting decisions are taken.	The Councils have clear remits by virtue of the authority given to them. The Transport Review Group (TRG) is proposed to assist the Councils in discharging their responsibility as the enforcement authorities. The structure, scope and responsibility of the TRG is set out within the draft Section 106 Agreement [PDB-004] and agreed with the Councils. The Councils are both elected bodies and will share the level of information that they feel is appropriate and necessary for accountability and transparency.	1

4.4 Freight Management Strategy

a) Overview

4.4.2 A total of 268 Interested Parties raised matters regarding the freight management strategy.

4.4.3 **Table 4.3** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.3: Freight Management Strategy

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Proposed freight management and transport strategy SZC Co.'s proposed freight management and transport strategy is not acceptable or sustainable with an unreasonable adverse impact on local communities. The number of Heavy Goods Vehicles (HGVs) proposed is equivalent to the road-led scenario that was consulted on previously and it has been rejected by statutory consultees. The road network is unable to accommodate the road-based strategy; the Orwell Bridge and the A12 north are already at capacity at peak times. The changes to existing transport infrastructure will cause disruption themselves and are not proposed to be built before construction on the main development site starts. The limited bypasses proposed simply join bottlenecks and destroy and sever communities, there is no legacy benefit and alternative alignments have not been sufficiently considered. There is insufficient justification for the rejection of extensive rail and sea use. The proposals encourage a culture of car use.	SZC Co. has continued engagement and Project development to optimise the movement of materials by rail and sea. The accepted changes (April 2021) to the Application allow an increase in rail movements to 4 trains per day and to provide an additional temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport. To reduce the effects of construction traffic on the local road network, the principal mitigation proposed is in the form of associated developments submitted with the Application. SZC Co. have undertaken a robust site selection process for each of the associated developments proposed, including the park and rides, two-village bypass, Sizewell link road, green rail route, East Suffolk line improvements and freight management facility. Need and proposals for highway improvements have been informed by transport modelling. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591]. The permanent associated developments (i.e. two village bypass, Sizewell link road, rail and highway improvements) will leave a lasting beneficial legacy to the local area by reducing traffic travelling through Farnham, Stratford St Andrew and on B1122, improving traffic flows on the A12 and local roads, and providing permanent improvements to rail and highway infrastructure.	231

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
The proposals miss opportunities to provide legacy benefits, such as dualling of the railway between Saxmundham and Woodbridge and a four village bypass.	A phasing schedule for the Sizewell C Project as a whole is provided in the Implementation Plan (refer to Appendix 8.4I of the Planning Statement) (Doc Ref. 8.4) [APP-599] . The construction of the associated developments to reduce the impact of construction traffic would be undertaken early in the programme (within approximately the first two years of the construction period) and be in place prior to the peak of construction on the main development site.	
Inadequate consideration and use of transport via sea More materials should be moved by sea through the introduction of temporary marine facilities, in order to reduce road traffic associated with the Project. The possibility of bringing supplies in by sea has been dropped, whilst the environmental impact of doing so would be much less and would last over a shorter period of time. A firm commitment to maximising deliveries by sea should be made.	SZC Co. has continued engagement and Project development to optimise the movement of materials by rail and sea. In January 2021, SZC Co. submitted changes to the Application (referred to as 'accepted changes (April 2021)'), including to provide an additional temporary beach landing facility (BLF). The temporary BLF along with the proposed increase in rail deliveries would enable 60% of materials to be brought onto the site by other modes than road transport. An update to the freight management strategy is provided within (Doc Ref. 8.18) [AS-280] .	55
Inadequate consideration and use of transport via rail Insufficient use of rail. Disagreement that further rail enhancements or infrastructure cannot be achieved in time available as stated by SZC Co. The Applicant has deliberately failed to progress discussions	SZC. Co has been in discussion with Network Rail since 2011 in relation to the necessary work and agreements required to enable the Sizewell C Project to be served by rail for the delivery of construction materials. The following topics are being discussed with Network Rail: the condition, upgrading, design, implementation and operation of the Saxmundham to Leiston branch line;	42

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
with Network Rail over a period of years and, therefore, there has not been a fair assessment of the rail-led option. There is also a failure to take the opportunity to upgrade public transport, including reopening a passenger service from Ipswich-Saxmundham - Leiston. SZC Co. has failed to adequately demonstrate that further use of rail transport is not feasible. Further clarification is required with regards to (1) the upgrades relating to the Saxmundham to Leiston branch line, (2) compliance with safety and other regulations, including the Railway Group Standards, (3) feasibility of running the proposed number of train movements on the branch line within the existing timetable, (4) the ability of the network to cope with the additional train movements, (5) upgrades required to the Network Rail infrastructure as part of the proposals, (6) details of consultation and agreements with Network Rail about the logistics and scheduling of proposed changes. Irrespective of the feasibility or otherwise of further use of rail, there are particular concerns about the safety of existing level crossings on the East Suffolk line. There is	- the suitability of the East Suffolk line to meet the required demand; - freight logistics, including the freight management strategy, freight operating companies and rail pathing; - the feasibility of procuring “strategic freight paths” which could secure some rail freight capacity on the wider network earlier than using the standard industry processes; - potential enhancements to the East Suffolk line; and - the DCO examination. SZC Co. and Network Rail are working together to agree further details of the anticipated works and rail freight strategy and good progress is being made and reported to the planning authorities on a fortnightly basis. An update on the negotiations with Network Rail was submitted to the Examining Authority in February 2021 [AS-296] and further detail is being worked up as part of the Statement of Common Ground with Network Rail. SZC Co. is therefore proposing an integrated freight management strategy, which includes a combination of rail, sea and road modes for the delivery of materials. Safety issues are a key component of the design development work being undertaken with Network Rail. Designs are being developed using Network Rail's staged GRIP design process, within which safety is a key consideration.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
no mention in SZC Co.'s proposals of any safety enhancements at either of these level crossings.		

4.5 Project Funding and Mitigation Funding

a) Overview

4.5.2 A total of 264 Interested Parties raised matters regarding Project funding and mitigation funding.

4.5.3 **Table 4.4** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.4: Project Funding and Mitigation Funding

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Project funding sources Concerns raised over the funding of the Sizewell C Project, with specific reference to the undesirability of funding from foreign sources (particularly China). Concern that this form of funding raises national security issues, comparable to the concerns of the Government around Huawei. Suggestion that	The ownership of SZC Co. for the construction period is expected to be made up of third-party investors (predominantly pension investment funds which may include foreign investment) but has not yet been fixed. Foreign investment has been used to enable infrastructure development throughout the UK and external finance (equity and debt) is expected to be required to fund the construction of the Sizewell C Project. Although EDF Energy and China General Nuclear (CGN) have funded the development phase	129

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Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
the funding of the Project needs detailed scrutiny. Specifically, a full disclosure of all China General Nuclear (CGN)'s (and its board members') direct and indirect associations and links with the Government of China and other organisations should be provided.	of Sizewell C to date, this will change for construction and operation of Sizewell C. In order to operate Sizewell C, SZC Co. must obtain a Nuclear Site Licence from the Office for Nuclear Regulation who will consider the Project to a great level of detail including considering an assessment of national security.	
Lack of information on Project funding There is a lack of information over the potential sources of funding and costs.	Information on the Project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) [APP-066] . Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-011] and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-150] .	13
Concern that the cost of the Sizewell C Project is not viable The Sizewell C Project is not viable without major subsidies/grants, set within the context that the cost of other alternative energy sources is reducing. SZC Co. cannot demonstrate that it can meet payments for compulsory purchases. The cost of the Project will outweigh any benefits. Furthermore, concern that not all costs have been accounted for, for example the impact of continuing coastal erosion, decommissioning and the cost of dealing with radioactive waste and its permanent storage.	Information on the Project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) [APP-066] . Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-011] and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-150] . These provide details on how the acquisition of additional land necessary to build the Sizewell C Project would be funded and on how the Sizewell C Project generally is to be funded. For new nuclear power stations to be built, the Government has been clear that costs must come down. New nuclear costs are driven by construction and financing and both can be cheaper by replicating the design of Hinkley Point C. Many of the design and qualification costs for Sizewell C have been paid for already at Hinkley Point – as well as the costs of	145

NOT PROTECTIVELY MARKED

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
The Examining Authority should also require the Applicant to provide a detailed independent assessment of the impact of COVID-19 on financial and investment markets for raising prerequisite funds for the Project. Concern that EDF Energy is hugely in debt and may need to sell its assets. What happens if EDF Energy goes bankrupt - what would happen to the Project and what assurances are in place to make sure that mitigation measures continue to be implemented?	setting up elements of the supply chain and training key workers. With the right timing, there can be a direct transfer of skills from Hinkley Point C to Sizewell C. In 2019, the Government carried out a consultation on the use of a Regulated Asset Base model of financing (which was used for the Thames Tideway Tunnel) for new nuclear Projects. This consultation invited responses on all the impacts of using such a model and the Government is now considering the responses that were received in forming its conclusion. The costs of decommissioning, waste and spent fuel management (post end of generation) and disposal of all higher activity waste will be funded through a Funded Decommissioning Programme (FDP), which would need to be approved by the Secretary of State (Department for Business, Energy and Industrial Strategy) before construction work on buildings with nuclear safety significance commences. Through the FDP, SZC Co. must demonstrate that it has a robust plan in place to decommission the station and manage any liabilities (including waste), a robust cost estimate to deliver the plan, and arrangements that ensure that SZC Co. sets aside funds over the operating life of the Sizewell C power station to cover these costs in full. The legal framework that implements these arrangements has been established through the Energy Act 2008 and the Nuclear Decommissioning and Waste Handling (Finance and Fees) Regulations 2013.	
Increased energy cost	Information on the Project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) [APP-	65

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
There is a lack of information on the Projected generation cost per kWh. Concern that the cost of the Sizewell C Project will impact on British taxpayers who will need to pay more for energy, as the pre-fixed electricity price will be too high. Furthermore, British taxpayers will also take on risk as the Project may result in cost and time over runs.	066 . Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-011] and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-150] . In 2019, the Government carried out a consultation on the use of a Regulated Asset Base (RAB) model of financing (which was used for the Thames Tideway Tunnel) for new nuclear Projects. In the consultation, the Government concluded that, by providing regulated returns to investors, a RAB model has the potential to attract new investors to new nuclear Projects and reduce their cost of finance, thereby reducing consumer bills and maximising value for money for consumers and taxpayers. This consultation invited responses on all of the impacts of using such a model and the Government is now considering the responses that were received in forming its conclusion.	
Mitigation funds Seeking details of the promised Jobs Service; Skills fund; Young Sizewell C; Community Fund; Public Services Contingency Fund and Housing Fund	The detail of each of these funds is being developed in close liaison with the local authorities. Full details will be provided in the draft Section 106 Agreement [PDB-004] as it develops through the various examination milestones set by the Examining Authority.	3
General compensation How do I enquire about compensation for the impacts that the Sizewell C Project will have on my property?	SZC Co. has engaged in negotiations with all directly affected landowners to secure the land required for the Project by private treaty. Where an owner-occupier falls outside the Order limits compensation will be in accordance with the 'compensation code', in particular Section 10 of the Compulsory Purchase Act 1965 and Part 1 of the Land	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Compensation Act 1973. The Applicant has included parties within the Book of Reference (Doc Ref. 4.3) [APP-067] and the Book of Reference Addendum (Doc Ref. 4.3Ad) [AS-151] that it has identified (through diligent inquiry) as parties that may be eligible to make a claim. However, the inclusion of those parties in the Book of Reference and the Book of Reference Addendum does not confirm that a claim would be successful, and parties not included in the Book of Reference or the Book of Reference Addendum but who later believe that they are eligible to pursue a claim would not be prevented from doing so. This area of compensation is highly technical and SZC Co. has recommended that advice is sought from a suitably qualified Chartered Surveyor in consideration of any claim who can then get in touch with SZC Co. in this regard.	

4.6 General Project

a) Overview

4.6.2 A total of 774 Interested Parties raised general Project matters.

4.6.3 **Table 4.5** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.5: General Project

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Volume of documents in the Application The volume of documentation is overwhelming. There is a lack of transparency, insufficient time and access to documents. Concern that the Interested Parties lack resource capacity for a full review of the Sizewell C DCO Application.	SZC Co. has made every effort to ensure that the proposals are presented in an accurate, clear and neutral manner. SZC Co. has been committed to an honest and fair approach to consultation throughout the evolution of the Sizewell C Project, the production of the Application submitted in May 2020, as well as the request for Changes to the Application in January 2021. The Application for development consent is subject to the same process and timescale as other DCO applications. SZC Co. has understood concerns regarding the timing of the Application in recognition of the ongoing COVID-19 pandemic and in this context: • Whilst the Sizewell C Application was ready for submission in February 2020, SZC Co. took the decision to defer its submission until May 2020 in recognition that the pandemic would impact upon the resources available to all stakeholders. • Nevertheless, SZC Co. shared the Application material in draft in October 2019 with the Defra family and in its full form on its submission in May, prior to its acceptance. • The period provided for relevant representations then ran until 30 September – again in recognition of the scale of the Application but also the continuing implications of the pandemic.	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	There was an extended timeframe before the preliminary meetings were held, to ensure stakeholders have sufficient time to prepare for the examination. The Application proposals have therefore already had an unusually long period between submission and examination, substantially so that parties may have sufficient time to study the Application material. SZC Co. has also published a Digital Environmental Statement which can be accessed at the following website: https://eeuk.alytics.com/sizewellc-digital-es This allows for the ES material, including figures and assessments, to be interrogated within a digital environment.	
Lack of information and poor quality documents Insufficient, superficial detail and poor quality of information has been provided during consultation and as part of the Application. The Application should not be considered further until new and satisfactory documents are provided. It has been difficult to access SZC Co's documents and the maps are impossible to read. The wording of documents is inaccessible, deliberately evasive and includes many false statements. Of the information provided, much appears to require further challenging and	SZC Co. made every effort to ensure that the proposals were presented in an accurate, clear and neutral manner. SZC Co. considers the level of detail contained within the consultation material and included in the Application was appropriate for consultees to be able to sufficiently understand the proposals and enable them to submit informed responses. SZC Co. has undertaken extensive consultation with the public and key stakeholders, and taken the feedback received into account. Initial informal engagement began in 2008, with formal consultation at Stage 1 commencing in 2012. As part of the public consultation, SZC Co. prepared a number of consultation documents that were available to the public, as well as undertaking a series of public exhibitions. Further details are provided in the Consultation Report (Doc Ref. 5.1) [APP-068 to APP-092], and Consultation Report Addendum	53

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
interrogation. For example, an assessment of health and community impacts has not been provided, the source of potable water for the Project has not been explained, the Acoustic Fish Deterrent (AFD) for the cooling tunnels has been omitted from the consultation, details of consultation and any agreements with Network Rail about the logistics and scheduling of the freight trains have not been provided.	(Doc Ref. 5.1 Ad) [AS-153 to AS-156], which demonstrate that SZC Co. has fully complied with such requirements in accordance with the Planning Act 2008. Since the submission of the Application in May 2020, SZC Co. has continued to engage closely with the local authorities, environmental organisations, local stakeholder groups and the public with regard to the Application. This process identified potential opportunities for changing the Application to further minimise impacts on the local area and environment in many cases, whilst reflecting the additional design detail and survey information that came forward in preparation for implementation of the Sizewell C Project. SZC Co. submitted a request to change the proposals to reflect this additional consultation in January 2021. Additional information on baseline information and design details has also been submitted to the Examining Authority since November 2020. With regards to the examples provided: SZC Co. has produced a Community Impact Report (Doc Ref. 5.13) [APP-156] that was submitted as part of the Application documents, which summarises at a local ward level the effects of the Sizewell C Project on local communities. SZC Co. also recognises that there will be multiple residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. proposes a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	- Additional information on the water supply strategy was submitted to the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.2.D of the ES Addendum (Doc Ref. 6.14) [AS-202]). - The assessment of effects on marine ecology and fisheries finds that effects would be not significant during both the construction and operational phases, as set out in Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3) [AS-035] and Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]. Mitigation measures to help achieve this outcome include Low Velocity Side Entry intake heads to minimise the number of fish entrapped in the cooling system, a Fish Recovery and Return (FRR) system, comprising one FRR tunnel per unit, to recover entrapped fish and return as many to sea as possible unharmed. Details of Project alternatives that were considered and do not form part of this Application, such as Acoustic Fish Deterrents (AFDs) and other forms of biota exclusion technology, are set out in Volume 2, Chapter 6 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.3) [APP-190]. - As part of the ongoing engagement with relevant stakeholders, SZC Co. is working closely with both Network Rail and the Freight Operating Companies with regard to the logistics strategy required to move materials from the point of origin to the construction site. This work focuses on the rail pathing requirements across the rail network including existing paths utilised by the Port of	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Felixstowe. SZC Co. is confident that the necessary rail paths can be provided for Sizewell C trains without impacting existing users of the East Suffolk line. In addition, SZC Co. is working closely with Network Rail to design and develop the required infrastructure to ensure that freight trains can operate along the East Suffolk line and Leiston branch line. That work is continuing but SZC Co. is optimistic that the necessary agreements will be reached and documented with Network Rail. This will be documented in the Statement of Common Ground with Network Rail.	
Alternatives methods of electricity generation / renewables are more favourable over nuclear energy Nuclear power stations are costly and slow to build, and result in a much higher strike price compared to alternative energy sources. Other methods of electricity generation are favourable over nuclear power in terms of cost, carbon footprint and safety. Investment in new nuclear diverts funding from renewable energy, energy efficiency and storage, and smaller scale reactors. Furthermore, large centralised production of electricity from new nuclear challenges the grid integration of renewables.	In the Government's Energy White Paper: Powering our Net Zero Future (2020), it identified an aim to bring at least one further large scale nuclear Project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals. The plant will help provide the essential baseload capacity needed to replace coal and gas and will support the future growth in renewables. Sizewell C will provide 3.34GW of reliable low carbon power for 60 years. To achieve Net Zero, electricity demand will increase substantially by 2050 from today's levels due to electrification of heat, transport and industry – roughly doubling from today's level. Much of this increase in demand is forecast to occur after Sizewell C comes online (reflecting a gradual electrification process) – hence the need for new build generation to come online all the way out to 2050 and beyond to meet the increasing demand. For example, the recent National Grid	371

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
New nuclear is unable to address the 'urgent need' for low carbon energy required under the National Policy Statement, as it is too slow to build. Even if the Project is completed, there will be no benefit to Suffolk, as the energy generated will be unaffordable. The Sizewell C site could be used for a sub-station for the other forthcoming renewable energy Projects within Suffolk instead.	Future Energy Scenarios has three Net Zero forecasts – which showed demand increasing by between 160-250TWh in the years after Sizewell C comes online - equivalent to another 6-10 Sizewell C power stations. Furthermore, the need for new build low carbon generation through to 2050 is also to replace existing low carbon generation that will close. Of all the low carbon plant that is currently generating, only Sizewell B will still be operating in 2035, with the rest of the existing capacity closing throughout the period to 2035 (including after Sizewell C comes online). Therefore, there is a demonstrable need for Sizewell C.	
Need for the Sizewell C Project Justification of the need for the Sizewell C Project is lacking, including the need for 'baseload' capacity which cannot be met by other emerging technologies more efficiently. This Project is not the correct solution for the country's energy needs and it will not be able to provide low carbon energy quickly due to the length of the construction period. The site is also located a considerable distance from areas of high electrical demand. The Habitats Regulations Assessment for the Project argues that despite a significant effect on the Minsmere-Walberswick SPA due to the impact on marsh harriers, Sizewell C should be consented as it has	The need for a new power station at Sizewell C is firmly established within the Government's policy on national significant energy infrastructure. The National Policy Statement for Nuclear Power Generation (EN-6) (NPS EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and Wales by 2025. This is further supported by the Government's Energy White Paper: Powering our Net Zero Future (2020) that identifies an '<i>aim to bring at least one further large scale nuclear Project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals</i>'. The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – was set out in the Planning Statement (Doc	69

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Imperative Reasons of Overriding Public Interest (IROPI). Without the IROPI, the Secretary of State should decline Development Consent.	Ref. 8.4) [APP-590] that accompanied the Application and remains valid.	
The scale of the Sizewell C Project is too large and the site is unsuitable The Sizewell C Project is too large for the area within the context of the present infrastructure, the sensitive and important wildlife habitats in Suffolk and the fact that many other energy Projects are also being proposed. The site is also too close to residential areas and is prone to coastal erosion. This development is inappropriate in such a small but environmentally sensitive and vulnerable location, lacking suitable road and other infrastructure. The main platform area is smaller than the area required for a two reactor station. The Project is not sustainable and will not create lasting wealth.	The Government confirmed in the NPS EN-6 that the Sizewell C site (to the north of Sizewell B) is a potentially suitable location for new nuclear power and recognised that flexibility was needed in relation to the nominated site boundary to safely and securely construct and operate a nuclear power station. NPS EN-6 recognises the visual sensitivity of the location within the Area of Outstanding Natural Beauty (AONB) and the NPS EN-6 annex accepts that there are likely to be some long-lasting adverse direct and indirect effects on the landscape, but that these are not likely to be sufficient to rule out developing a new nuclear power station (paragraph C.8.83 Annex C); (paragraph 3.10.8). SZC Co. has taken steps to address the sensitivity of the AONB by the careful siting and design of the proposals. SZC Co. recognises that the coastline adjacent to the proposed development is part of a changing coastline and our assessments have investigated the potential impact of the proposed power station. SZC Co. has also had to assess the impacts of a potentially changing shoreline on the safety of the power station. EDF Energy have a long history of coastal studies in this area as part of the ongoing shoreline management group of the adjacent power station (Sizewell B) and have a good understanding of the local system. SZC Co.'s own studies/assessments and the opinions of independent	81

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	experts show that the construction and operation of the proposed power station will not have a significant effect on coastal process to the north or south of the site. The coastal defences have been designed to allow for erosion, with sediment lost from the soft coastal defence being replaced. SZC Co.'s proposals for monitoring coastal processes and mitigating effects through the use of a soft coastal defence feature are expected to bring benefits to the coastline. The presence of the hard (rock armour) sea defence, coupled with the management of the soft coastal defence will serve to restrict erosion at the north of the site some way towards Minsmere.	
EDF Energy's track record and examples for delivering nuclear Projects over-budget with delays and technical failings EDF Energy have a poor track record of delivering Projects of this kind and a poor reputation. The Sizewell C nuclear reactor design (EPR™) has caused cost and time over-runs in France and Finland and currently at Hinkley Point. It is likely that the Sizewell C Project will also be delayed and over-budget. A successful completion of EPR™ should be demonstrated elsewhere (e.g. at Hinkley Point C) before considering this scheme.	Construction of the Sizewell C nuclear power station is estimated to take up to 12 years. This has been informed by the experience in delivering Projects of this type and scale across the world. Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. We have a very good understanding of Project risks and how to mitigate them. SZC Co. has been able to learn from the experiences of EPR™ construction and this has informed the construction assumptions set out in the Environmental Statement (ES) (Doc Ref. Book 6). Further details on the anticipated construction timescales for Sizewell C nuclear power station are provided in Volume 2, Chapter 3 of the ES (Doc Ref. 6.3) [APP-184].	105

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Unsafe and outdated technology Concern that the technology proposed is not safe, it is outdated and will be redundant by the time it is built. Other EPR™ reactors under construction in Europe are behind schedule and encountering technical issues. Concern that SZC Co. will cut corners to save money during the construction of Sizewell C. Specific references to EPR™ design being an 'unproven' technology.	The UK EPR™ design is based on the Flamanville EPR™ (FA3) plant being built in France but incorporates a number of design changes agreed through the Generic Design Assessment with the UK Regulators. The EPR™ is a proven reactor design which is now in full commercial operation in China (Taishan 1 and Taishan 2). The EPR™ has been developed from Pressurised Water Reactor (PWR) designs already operating around the world. More than 270 PWRs have safely generated electricity for millions of people over the last 30 years. The EPR™ offers improved safety and enhanced environmental and financial performance: • It is the most powerful reactor design in the world, capable of achieving around 1,650 MW of power output (compared to 1,450 for the most modern reactors). • It requires 17% less fuel and produces 30% less long-term radioactive waste than other PWR designs. • Four safety systems operate alongside each other. Each one can shut down the reactor safely and automatically. • A 'core catcher' has been specially designed to recover, contain and cool the reactor core in the event of an accident. • A concrete shell is constructed over the most sensitive parts of the installation to protect against the risk of external attack. • The EPR™ utilises a containment function made up of the reactor and peripheral buildings structure, and dynamic	134

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	systems including ventilation and filtering. Its purpose is to prevent radioactive releases into the environment, particularly during an accident. In 2012, after more than 850,000 hours of engineering studies, the EPR™ successfully completed the UK regulator's Generic Design Assessment. The EPR™ was then awarded Design Acceptance Confirmation (DAC) by the ONR and received a Statement of Design Acceptability (SoDA) by the Environment Agency. The DAC and SoDA demonstrate that the UK EPR™ power station design meets the UK's stringent safety and regulatory requirements. In the UK, EPR™ reactors are currently under construction at Hinkley Point C. Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. We have a very good understanding of Project risks and how to mitigate them. SZC Co. has been able to learn from the experiences of EPR™ construction and this has informed proposals submitted with the Application. Sizewell C will be both a holder of Environmental Permits granted by the Environment Agency and a Nuclear Site Licence granted by the Office for Nuclear Regulation (ONR) (which have been applied for), and will be strictly regulated throughout its design, construction, commissioning, operation and decommissioning to ensure its safe operations and protection of the public and the environment.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Decommissioning of Sizewell C There is lack of information on the proposals for decommissioning the Sizewell C power station. No plans for what would be done have been presented. In addition, it is unclear what entity is guaranteed to be in place to decommission the on-site facilities. Cost of decommissioning has not been taken into account.	As part of the development of any new build nuclear power plant, it is necessary to develop plans to demonstrate that the facility can be decommissioned in a safe and environmentally acceptable way. It is expected that the Sizewell C power station will have a lifetime of 60 years, following which it will be decommissioned. A description of the decommissioning process for Sizewell C is presented within Volume 2, Chapter 5 of the ES (Doc Ref. 6.3) [APP-189]. Under the Energy Act 2008, the costs of decommissioning, waste and spent fuel management and disposal of all higher activity waste would be funded through a Funded Decommissioning Programme (FDP), approved by the Secretary of State. This is required to have been approved before construction work on buildings with nuclear safety significance commences. Under these arrangements, SZC Co. will ensure that it sets aside funds over the operating life of the power station to cover these costs in full. Further details are provided in Volume 2, Chapter 5 (Description of Decommissioning of Sizewell C) of the ES (Doc Ref. 6.3) [APP-189].	5
Maintenance of nuclear buildings All of the buildings for Sizewell C nuclear installations will require maintenance in order to preserve their integrity for thousands of years, during which time it is impossible to predict the ability of local civilisation to	It is expected that the Sizewell C power station will have a lifetime of 60 years, following which it will be decommissioned. Decommissioning would commence as soon as practicable after end of generation and would proceed without significant delay to complete the process of decommissioning of the site. It is expected that the decommissioning of the site, with the exception of the Interim Spent Fuel Store (ISFS), could be	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
prevent them from falling into a dangerous state of disrepair.	achieved approximately 25 years after the end of generation. Once the reactor and other facilities have been decommissioned, the ISFS would remain on-site to allow for a suitable length of cooling time for fuel prior to its disposal. An additional 30 years of operation of the ISFS has been assumed prior to its decommissioning. It has been assumed that the decommissioning of the ISFS would take 5 years. Therefore, all decommissioning activities would be completed within 60 years from end of generation. Decommissioning of the Sizewell C power station would be carried out under the stringent regulatory requirements of a Nuclear Site Licence granted by the Office for Nuclear Regulation. The Environment Agency regulate the management of the generation and disposal of radioactive waste on nuclear sites via the Environmental Permitting Regulations. This includes the management of waste during decommissioning. Under the Energy Act 2008, the costs of decommissioning, waste and spent fuel management and disposal of all higher activity waste would be funded through a Funded Decommissioning Programme (FDP), approved by the Secretary of State. This is required to have been approved before 'construction work on buildings with nuclear safety significance' commences. Under these arrangements, SZC Co. will be required to set aside funds over the operating life of the power station to cover decommissioning costs in full. Throughout the operation and decommissioning of Sizewell C, SZC Co. will be a holder of the Nuclear Site Licence (NSL)	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	granted by the Office for Nuclear Regulation, and will be required to maintain the facilities to ensure their safe operation and the protection of the public and the environment in accordance with the conditions of the NSL. Further details are provided in the Volume 2, Chapter 5 (Description of Decommissioning of Sizewell C) of the ES (Doc Ref. 6.3) [APP-189].	
Legacy of the Sizewell C Project There will be no lasting legacy from the Sizewell C Project and the legacy value has not been adequately assessed. No net benefit calculation has been undertaken from start of construction to the end of decommissioning.	The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. Therefore, it will result in positive economic effects in terms of employment, as well as for supply chain, spending, and sustainable investment in skills and training pathways from education to in-work upskilling. The benefits of the education and upskilling will be widespread and enduring. In addition, road and rail improvements, including the two village bypass and Sizewell link road, are a significant part of that long-term investment in physical infrastructure, which will improve safety at the narrow bend through Farnham and reduce traffic flows through the villages of Farnham, Stratford St Andrew, Theberton, Yoxford and Middleton Moor, along with improvements and re-provision of habitats, public rights of way and community facilities such as the new 3G sports pitch and Multi-Use Games Area (MUGA) proposed in Leiston for dual use between workers and communities.	18

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The Sizewell C Project also provides other long-term benefits in the form of: a) A Community Fund to help compensate for intangible, residual or in-combination effects through schemes, measures and Projects which promote the economic, social or environmental well-being of communities and enhance their quality of life. b) A Housing Fund that will enable empty properties to return to the market and provide recyclable grants and loans for renovation of homes. c) An Employment, Skills and Education Strategy to support New Anglia LEP and Suffolk County Council's long-term plans for key growth sectors in the region. d) A Tourism Fund to promote the area and support the longevity of the very important and diverse tourist economy of the Suffolk Coast. e) A Natural Environment Fund to secure landscape and ecological improvements over a wide area.	
Reliance and resilience of energy provision Having too much of the UK's electricity coming from Suffolk would make the country overly reliant and vulnerable in events such as storms.	The need for a new power station at Sizewell C is firmly established within the Government's policy on national significant energy infrastructure. The National Policy Statement for Nuclear Power Generation (EN-6) (NPS EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and Wales by 2025. This is further supported by the Government's Energy White Paper: Powering our Net Zero Future (2020) that identifies an 'aim to bring at	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	<i>least one further largescale nuclear Project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals'.</i> The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – was set out in the Planning Statement (Doc Ref. 8.4) [APP-590] that accompanied the Application and remains valid. The safety and security of nuclear installations in the UK is assured by a system of strict regulatory control based on a licensing process by which SZC Co. is required to seek a license from the Office the Nuclear Regulation (ONR). In June 2020, Sizewell C applied for a Nuclear Site License and its Application is currently being assessed by the ONR. Construction of Sizewell C cannot commence should a license not be granted. Under the Nuclear Site License, Sizewell C will need to demonstrate via its 'Safety Case' that the design, construction, commissioning, operation and decommissioning of Sizewell C can be undertaken in a safe and secure manor, and any risks to the workers, public and environment is suitably and sufficiently controlled. This includes due consideration of any potential internal and external hazards, including natural disasters, such as extreme weather events.	
Concern that the site will be used for weapons research	SZC Co. is not proposing to use the site for nuclear weapons research.	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Brexit impact What impact will Brexit have on the Sizewell C Project?	SZC Co is aware that the construction phase of the Project – and Hinkley Point C – could be affected by changes in the economic and political climate, for example as a result of changes in migration patterns and demographics, and legislative changes related to Brexit. At present, there is little evidence to suggest that Brexit would have a substantial impact on the ability of employers to recruit appropriately skilled workers for the construction phase. At Hinkley Point C, main contractors have not experienced labour shortages, and employment and skills initiatives have continued to support local employment/recruitment levels. Sizewell C will have a long construction period and is likely to take place against a background of changing economic conditions. The baseline and assumptions set out in Volume 2, Chapter 9 of the ES (Doc Ref. 6.3) [APP-195] was based on the most up to date information at the time of writing but was also cognisant of changes throughout the preceding economic cycle. This is reflected in the proposed flexible and responsive governance that will deliver the raft of employment skills and education initiatives for the Project and the region. There will be two ways in which socio-economic assumptions could be influenced – the supply of labour and the trade of goods needed for construction. The workforce at Hinkley Point C is nearly 80% 'British' in terms of reported ethnicity, and the Labour Force Survey (ONS) suggests that the UK's construction industry is nearly 85% UK-born, suggesting limited if any effects related to	4

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	increased out-migration. CITB report that overall, ' <i>employers are not concerned about cost of work and ability to recruit workers with the appropriate qualifications</i> ' and for the East of England, c. 85% of firms in the East of England are not 'very or quite' dependent on non-UK workers.	
Endorsement of Other Relevant Representations I would like to endorse the Relevant Representation made by Stop Sizewell C, RSPB, Suffolk Wildlife Trust, Suffolk County Council, East Suffolk Council, Suffolk DMO, Together Against Sizewell C, AONB Partnership, Theberton and Eastbridge Parish Council, Minsmere Levels Statekholder Group, Suffolk Coastal Friends of the Earth, Wickham Market Parish Council and/or National Trust.	Noted. No further action.	249
General support to the Sizewell C Project Suggestion that the Application is in the interests of the local community and the country in general and should be approved. The Project will bring much needed jobs to the area and stimulate the local economy. It is the only low-carbon power source that can match coal and gas in terms of scale and reliability. There have been no major incidents in commercial nuclear power	We would like to thank those who have confirmed their support for the Sizewell C Project.	28

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
generation in the UK since 1950s, nor any measurable public health impacts.		
General opposition to the Sizewell C Project General statement of opposition to nuclear power and the Sizewell C Project.	Noted. No further action.	149

4.7 General Environmental Impact Assessment

a) Overview

4.7.2 A total of 584 Interested Parties raised general matters regarding the Environmental Impact Assessment (EIA).

4.7.3 **Table 4.6** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.6: General Environmental Impact Assessment

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Adequacy of the environmental assessment The Sizewell C Project has not been sufficiently assessed from an environmental	An Environmental Impact Assessment (EIA) of the Sizewell C Project has been carried out in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and the Marine Works (Environmental Impact Assessment) 2007 Regulations and is	43

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
perspective and the assessment / plans are incomplete. There is a lack of independent assessment of the Project, expert opinion should be sought to explain the likely effects of this proposal. There has been no proper assessment of the impact on certain areas like Walberswick or Southwold. There are numerous instances of SZC Co. misrepresenting statistics. There are inconsistencies across disciplines in some places, e.g. the air quality assessment for Yoxford roundabout states that there are no sensitive habitats within 500 metres, yet Roadside Nature Reserve 197 (a non-statutory designated site which the Applicant has assessed to be of national importance) is immediately adjacent. More generally, the criteria used for the assessment of local environmental impacts are strongly biased against local residents. Low sensitivity is associated with “using a resource that is appreciated by the local community but has little or no wider recognition of its value for recreation.” The assessment criteria are set up to undervalue local sensitivities and recreational resources, which are important to village life, defining a sense of place and community.	reported within the Environmental Statement submitted with the Application. An EIA is an environmental assessment process to ensure that planning decisions are made with knowledge of the likely significant environmental effects of a future development. It is a systematic process that examines the potential effects on the environment resulting from the construction and operation of a development, and allows for the identification of measures to prevent, reduce or offset any adverse effects and to enhance any beneficial effects. Establishing the scope of the assessment in a rigorous and transparent manner is an important early step in the EIA. SZC Co. submitted a request to the Planning Inspectorate for an opinion on the proposed scope of the EIA (which includes the spatial, temporal and technical scope for the assessment) initially in 2014, with an updated request issued in 2019. The Secretary of State considered the EIA Scoping Report [APP-168] and, after consulting the prescribed bodies, set out what information should be included in the Environmental Statement in its EIA Scoping Opinion [APP-169]. Comments raised in the EIA Scoping Opinion received in 2014 and 2019 were taken into account in the EIA of the Sizewell C Project, and an Environmental Statement (ES) (Doc Ref. Book 6) [APP-159 to APP-582] was submitted alongside the Application. Details of the assessment methodology used within the EIA are provided in Volume 1, Chapter 6 of the ES and associated appendices (Doc Ref. 6.2) [APP-177 and APP-168 to APP-171].	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The ES (Doc Ref. Book 6) [APP-159 to APP-582] that accompanied the Application identified all the likely significant effects associated with each component of the Sizewell C Project, the Project as a whole and then in-combination with other Projects and plans. Where potentially significant effects are identified, SZC Co. has identified measures to mitigate the impacts. The ES should be read alongside the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] which SZC Co. submitted in January 2021 in support of a request of changes to the Application. SZC Co. considers the EIA undertaken for the Sizewell C Project and presented within the ES and ES Addendum is robust. With specific reference to the example provided as an inconsistency within the ES, the air quality assessment presented within Volume 7, Chapter 5 of the ES (Doc Ref. 6.8) [APP-487] was based on Environment Agency guidance. As such, it defines a '<i>sensitive ecological receptor</i>' as ecological receptors designated under international legislation (including Ramsar sites and Natura 2000 sites) within 10 kilometres (km) from the source; and ecological receptors designated under national legislation (e.g. sites of special scientific interest (SSSI) and national nature reserves (NNR)) and locally designated sites (e.g. county wildlife sites) within 2km from the source. The roadside nature reserve, whilst identified as of national importance under the CIEEM guidelines in the terrestrial ecology and ornithology assessment presented in Volume 7, Chapter 7 of the ES (Doc Ref. 6.8) [APP-494], is a non-statutory designated site	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	and, therefore, does not meet the definition under the Environment Agency guidance. However, SZC Co. recognises the importance of this receptor, and thus modelled the traffic emissions likely to be experienced at this site to support the assessment presented in the terrestrial ecology and ornithology assessment presented in Volume 7, Chapter 7 of the ES (Doc Ref. 6.8) [APP-494]. SZC Co. continues to engage with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation to discuss results of the EIA and develop Statements of Common Ground to agree the mitigation required for the Sizewell C Project, which will be secured as commitments and controls imposed through the DCO, if granted, and the section 106 agreement. In addition to the EIA, in order to aid local residents in understanding the potential effects on their communities, SZC Co. has also developed a Community Impact Report (Doc Ref. 5.13) [APP-156] which summarises at a local ward level the effects of the Sizewell C Project on local communities. SZC Co. also recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
General environmental impacts Statement of concern about the environmental impacts and nuisance caused by the Sizewell C Project, including but not limited to irreparable threat/ damage to natural habitats and wildlife, coastal environment, neighbouring areas and communities, amenity, cultural heritage, landscape, light, noise and air pollution, traffic, impact on designated sites. It is impossible to mitigate or compensate for the damage caused. The environmental impacts will be prolonged over a 12 year construction period and have been understated within the Application documents. Such a period of time should be considered as a permanent impact. If construction is delayed, the impacts will be even further prolonged and the cost and time for recovery will increase.	The ES (Doc Ref. Book 6) [APP-159 to APP-582] and the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260], identify the likely significant effects of the Sizewell C Project, and the mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are all summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the draft DCO and section 106 Agreement. Since the submission of the Application, SZC Co. has continued to engage with the local authorities, environmental organisations, local stakeholder groups and the public with regards to the Application. This process identified potential opportunities for changing the Application to further minimise impacts on the local area and environment in many cases, whilst reflecting the additional design detail that has come forward in preparation for implementation of the Sizewell C Project. For the reasons set out in Part 1 (Doc Ref. 8.19) [AS-281] of the proposed changes submission in January 2021, SZC Co. considers all of the proposed changes (now referred to as 'accepted changes (April 2021)') and Additional Information go some way in positively addressing concerns of stakeholders. SZC Co. continues to engage with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation to discuss results of the EIA and develop Statements of	405

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Common Ground and agree the mitigation required for the Sizewell C Project, which will be secured as commitments and controls imposed through the DCO, if granted, and the section 106 Agreement.	
Mitigation measures (in general) Concerns that the mitigation measures for the Sizewell C Project are not adequate. SZC Co. has not done enough to minimise the impacts and is instead attempting to mitigate them poorly and is relying on compensation. It will be impossible to compensate for all of the landscape and ecological damage that would result from the Sizewell C Project. Concern that SZC Co. will not implement the mitigation measures proposed and will cut mitigation to reduce costs later. Plans for monitoring compliance and environmental damage caused are insufficient. SZC Co. must be held responsible to deliver on all of their promises throughout the lifespan of Sizewell C. A proportionate environmental fund to mitigate and compensate for permanent large-scale heritage, landscape and environmental harm should be established.	SZC Co. has taken steps to identify the likely significant effects on the environment during the Sizewell C Project's construction and operational phases. An extensive and detailed evaluation of the environmental effects of the Sizewell C Project has been undertaken in accordance with the provisions of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Marine Works (Environmental Impact Assessment) Regulations 2007. The ES (Doc Ref. Book 6) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260], identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are all summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1), together with their securing mechanisms. It is considered that the proposals comprise the most sustainable balance between being appropriately located, comprising an acceptable level of land take, and minimising impacts upon the environment and communities, as far as possible. SZC Co. is committed to complying with all requirements for mitigation. These are secured through the draft DCO itself and	112

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	the section 106 Agreement. A breach of the DCO would be a criminal offence. The section 106 Agreement will set up various review groups with the local authorities and relevant stakeholders to ensure that there is visibility on the delivery of mitigation and that enforcement bodies have the information that they need to carry out their function. Monitoring and funding commitments are made through the DCO and the section 106 Agreement. SZC Co. also intends to bring the growing EDF Energy estate into the management of an independent environment trust which will focus on biodiversity and the stewardship of the natural habitat. The trust has the opportunity to extend beyond the estate, which will provide a positive legacy for Suffolk. A Community Fund will be implemented via the Section 106 Agreement to help mitigate and compensate for intangible, residual or in-combination effects on local communities. Full details of the Community Fund are included in the draft Section 106 Agreement [PDB-004] submitted into the examination, on which stakeholders will have the opportunity to comment. SZC Co. continues to engage with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation to agree mitigation and monitoring for the Sizewell C Project.	
Negative effects outweigh benefits	The UK has an urgent need for new energy infrastructure and the region also has a clear need for the economic benefits that the proposals would bring. This is further supported by the	32

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
The negative effects of the Sizewell C Project on the environment greatly outweigh any benefits.	Government's Energy White Paper: Powering our Net Zero Future (2020). Sizewell C Project's effects on the local economy will be overwhelmingly positive – supporting long-term, sustainable careers through employment, skills and training initiatives secured in partnership with Suffolk County Council and New Anglia LEP's strategic plans for the regional economy. In addition, road and rail improvements, including the two village bypass and Sizewell link road, are a significant part of that long-term investment in physical infrastructure, which will improve safety at the narrow bend through Farnham and reduce traffic flows through the villages of Farnham, Stratford St Andrew, Theberton, Yoxford and Middleton Moor, along with improvements and re-provision of habitats, public rights of way and community facilities, such as the new 3G sports pitch and Multi-Use Games Area (MUGA) proposed in Leiston for dual use between workers and communities. The Sizewell C Project also provides other long-term benefits in the form of a community fund, a housing fund, an employment, skills and education strategy, a tourism fund and a natural environment fund. These funds will be used to provide improvements in the region. SZC Co. has undertaken a detailed assessment of the likely significant adverse effects on those receptors directly affected by the Sizewell C Project. The ES (Doc Ref. Book 6) [APP-159 to APP-582] that accompanied the Application identified all the likely significant effects associated with each component of the Sizewell C Project, the Project as a whole	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	and then in-combination with other projects and plans. Where potentially significant effects were identified, SZC Co. has identified measures to mitigate the impacts. The ES was updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] which SZC Co. submitted in January 2021 alongside a request for changes to the Application. SZC Co. considers the EIA undertaken for the Project and presented within the ES is robust. The mitigation measures identified within the ES and ES Addendum are all summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1), together with their securing mechanisms.	
The assessment of environmental effects is disingenuous Concern that the assessment of environmental effects is disingenuous. For example, impacts on the villages of Eastbridge and Theberton, closest to the build, have been understated, as they have been assessed together with Saxmundham (distant from build and main traffic routes).	The ES (Doc Ref. Book 6) [APP-159 to APP-582] and ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260], identifies the likely significant effects of the Sizewell C Project on receptors which fall within the defined study area and scope for each technical environmental assessment for the Project as a whole (Project-wide) or a particular site, and identifies mitigation to avoid, reduce or compensate effects. For each technical environmental assessment, the spatial scope (referred to as the 'study area'), temporal scope (for example, existing and future baseline and specific assessment years for some technical topics) and technical scope and methodology (including assessment criteria) have been defined through a formal EIA scoping process with the Planning Inspectorate and stakeholders through ongoing engagement. There are a number of Project-wide technical environmental assessments, within which the combined impacts of the main	3

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	development site and associated developments were considered due to the larger study area. These assessments include socio-economics; transport; conventional waste management and material resources; climate change; health and wellbeing; and major accidents and disasters, and they are presented in Volume 2 of the ES (Doc Ref. 6.3) [APP-193 to APP-201 and APP-342 to APP-347]. Where relevant, impacts on individual receptors, such as road links within Volume 2, Chapter 10 (Transport) of the ES (Doc Ref. 6.3) [APP-198], are reported. Where the impacts of the proposed development would occur over a smaller study area around specific associated developments, such as the Sizewell link road, these have been are considered separately within the associated developments ES volumes. For example, the village of Theberton, which is in close proximity to the proposed Sizewell link road, includes receptors which fall within the study area for several technical environmental assessments for this site, including noise and vibration, air quality, landscape and visual, amenity and recreation and terrestrial historic environment. Therefore, receptors within the village of Theberton have been considered within the relevant assessments presented in Volume 6 of the ES (Doc Ref. 6.7) [APP-451, APP-454, APP-457, APP-464 and APP-467]. Receptors within the village of Eastbridge have been considered within the main development site assessment presented in Volume 2 of the ES (Doc Ref. 6.3) [APP-178 to APP-347].	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	In addition to the EIA, in order to aid local residents in understanding the potential effects on their communities, SZC Co. has also developed a Community Impact Report (Doc Ref. 5.13) [APP-156] which summarises at a local ward level the effects of the Sizewell C Project on local communities. SZC Co. also recognises that there will be multiple residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected.	
Cumulative Effects (in general) Concern that the cumulative effects assessment is inadequate and potential in-combination effects have been ignored. There are a number of other energy Projects and housing developments planned in the local area. These are uncoordinated with the proposed development and the cumulative effects have not been adequately assessed. East Suffolk already has eight other energy Projects proposed, the Suffolk coast will be turned into an industrial zone with the addition of this Project and the UK's power network will become overly dependent on Suffolk for a large proportion of its energy supply.	The EIA Regulations require that the ES includes consideration of cumulative effects. Schedule 4 of the Infrastructure Planning EIA Regulations and Schedule 3 of the Marine Works EIA Regulations state that the ES should provide a description of: <i>"the cumulation of effects with other existing and/or approved Projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources"</i> . Accordingly, the ES considers: 1) 'Inter-relationships' that occur when the individual environmental effects of the proposed development combine together with one another, with the potential to result in significant effects on a single resource or receptor (e.g. air quality and noise impacts occurring on the same receptor). Inter-relationship effects during the construction and operation	177

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	of the Sizewell C Project are considered within Volume 10, Chapter 2 of the ES (Doc Ref. 6.11) [APP-575]. 2) 'Project-wide effects' that occur when impacts of the main development site and associated developments combine. A number of the assessments presented within Volume 2 of the ES (Doc Ref. 6.3) [APP-193 to APP-201 and APP-311 to APP-347] already included an assessment of the Project-wide environmental effects (e.g. with regards to transport, socio-economics, waste and materials, marine, climate change, major accidents and disasters, and health and wellbeing effects). A consideration of other potential Project-wide effects during the construction and operation of the Sizewell C Project are considered within Volume 10, Chapter 3 of the ES (Doc Ref. 6.11) [APP-577]. 3) 'Cumulative effects with other plans, Projects and programmes' that arise as a result of the proposed development in combination with other Projects and/or development plans within the Zone of Influence (Zol) of the proposed development. Cumulative effects with other Projects are considered within Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578]. A staged process has been followed to assess cumulative impacts with other Projects, plans and programmes which includes: Stage 1: establishing a Zone of Influence (Zol) and 'long list' of non-Sizewell C Projects, plans and programmes.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	- Stage 2: selecting a short list of Projects, plans and programmes for the assessment. - Stage 3: information gathering. - Stage 4: assessment. It is assumed that the identified cumulative schemes will take place as per the descriptions made publicly available at the time of writing this ES, unless otherwise specified in the technical chapter.	
Transboundary Effects Concern regarding potential transboundary effects, including as a result of a severe accident at Sizewell C, and adequacy of assessment.	Volume 10, Chapter 5 of the ES (Doc Ref. 6.11) [APP-580] presents the assessment of transboundary environmental effects associated with the construction and operation of the Sizewell C power station at the main development site and the construction, operation and removal and reinstatement (where applicable) of the associated development sites. The scope of the assessment was established through a formal EIA scoping process undertaken with the Planning Inspectorate. The assessment concluded that no significant transboundary effects are likely. Furthermore, under Article 37 of the Euratom Treaty, the UK Government (on behalf of operators) submits information to the European Commission on plans to dispose of radioactive waste. This includes an assessment of the impacts to Member States from both planned routine discharges and in the event of an accident and allows the Commission to make a determination as to whether implementation of a plan is liable to result in radioactive contamination of a Member State. Operators must await an opinion from the Commission before	9

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	obtaining domestic environmental permits or proceeding with a Project. In August 2020, a General Data Set was submitted by UK Government to the European Commission in relation to Sizewell C. This has been formerly sent to appointed experts from European Member States. Chapter 6 of the submission covers an assessment of the transboundary impacts from unplanned releases of radioactive effluents. This includes an evaluation of the impacts to the most affected member states which in this instance would be France, Netherlands, Belgium and Ireland, on the basis of a variety of factors including their distance, wind direction, deposition and food intake. The bounding dose to a member state from an unplanned release is orders of magnitude times less than the average annual dose from all natural sources (2,400 µSv per year), and is broadly equivalent to a dental x-ray (5 µSv). A copy of Chapter 6 of the Article 37 submission has been provided for information within Appendix B of this report.	
Whole-life cycle assessment The Applicant has not completed a whole-life cycle assessment for the Project. Specifically, the Applicant has not considered the environmental impact of the uranium fuel supply chain and the impact on communities where uranium is fuelled or mined.	The scope of the Environmental Impact Assessment for the Sizewell C Project has been agreed with the Planning Inspectorate and statutory stakeholders through the process of EIA Scoping. The scope of the assessment is defined by the requirements of the Infrastructure Planning (EIA) Regulations 2017 and Marine Works (EIA) Regulations 2007. A whole-life cycle assessment extends beyond the scope of an EIA required for the purposes of examining the Application under the Planning Act 2008.	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	However, SZC Co. is also preparing an Environmental Product Declaration for the Project, which will include a Life Cycle Assessment. This will be made publicly available.	

4.8 Main Development Site

a) Overview

4.8.2 A total of 186 Interested Parties raised matters regarding the main development site.

4.8.3 **Table 4.7** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.7: Main Development Site

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Poor design approach Concerns over the poor design approach of the Sizewell C power station, as evidenced through the Design and Access Statement. Disparate structures across the site area are proposed, with many of the ancillary roads, buildings and car parks intruding beyond the main site area and into the natural landscape	The process of design development and design principles for the main development site are described within the Design and Access Statement (DAS) (Doc Ref. 8.1) [APP-585 to APP-587]. There has been an in-depth undertaking to understand the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and the natural environment, in order to respond in the most appropriate way to this context. Whilst technical and functional layout requirements of a power station must be met,	11

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
setting. Issues with the external design of the buildings and the need for sympathetic cladding to benefit the AONB. The design proposed is of a poorer quality than Sizewell B and does not recognise the national importance of the site.	the principles for the design include the integration of the main development site and associated infrastructure with the surrounding landscape as far as is practicable, to help screen the development with landform, planting and to draw upon the wider EDF Energy Estate landscape to contribute to screening, using existing areas of forestry and natural topography. The design has sought to minimise the land required for construction and operation of the power station and minimise disturbance to as small an area of the landscape as reasonably practicable. The footprint of the operational site has been compressed to reduce land take in the AONB as well as the Sizewell Marshes SSSI and is approximately 30% smaller than Hinkley Point C. Wherever practicable, existing established landscape features have been avoided and in particular where they perform specific strategic landscape functions. For example, the physical extents of the main development site boundary have been configured to exclude and protect existing woodland and forested areas at Ash Wood, Great Mount Wood and the northern extents of Dunwich Forest and Goose Hill that provide screening of views to lower level construction activity / vehicle movements from vantage points to the north, such as from the National Trust Dunwich Coastguard Cottages, within the RSPB Minsmere reserve and the beach. Existing woodland, forested areas and belts of vegetation, for example Kenton Hills and Grimseys, vegetation along Bridleway 19, and in the vicinity of Upper Abbey Farm and Old Abbey Farm and along the	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	western perimeter of the existing power station complex within the Sizewell Belts, that provide screening of views to lower level construction activity / vehicle movements from vantage points to the west have also been retained. Furthermore, landscaped bunds are proposed to contribute to visual screening. Following construction, rather than simply planting trees and hedgerows to reinstate the character and appearance of the pre-construction landscape characterised principally by commercial forestry and arable farmland, SZC Co. would create approximately 121ha of new Sandlings grassland and 51ha mixed woodland, once the temporary construction area has been removed. The selection of appropriate colour and finishes has been and will continue to be a key consideration throughout design development and will align with the proposed Design Principles in the DAS. Consideration of the Suffolk Coast and Heaths AONB 'Guidance on the selection and use of colour in development' has also been considered in the DAS. Refer to Chapter 6 of the Design and Access Statement for further information (Doc Ref. 8.1) [APP-585 to APP-587]. The development of the scheme design has taken place through extensive consultation with the local community, statutory bodies and other relevant stakeholders on its development proposals through numerous events; public exhibitions and workshops, during all stages of the design process. In March 2014 and November 2019, the scheme design was reviewed by the Design Council. The Design	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Council were broadly supportive of the design and design process that the design team was undertaking.	
Accommodation Campus The accommodation campus is unsuitably sited in a rural location in the AONB, it will cause much disruption and will have an adverse impact on the local environment and amenity. It will cause an unacceptable level of development in the deeply rural landscape which will harm the setting of the AONB. The influx of workers staying within the accommodation campus will have a negative impact on the area. Suggestion that alternative sites for the campus have not been properly considered. It will have no legacy benefit.	SZC Co. has developed its proposals for a single, on-site accommodation campus for Sizewell C and considered alternatives, including alternative locations, throughout four stages of consultation. A range of factors have led to the finalisation of a strategy for the on-site accommodation campus. Specifically, it would allow SZC Co. to: • reduce the number of journeys on local roads; • balance the economic benefits of workers integrating within housing markets and communities, without overwhelming local communities with new residents; • allow flexible working patterns and out of hours working that would be necessary to maintain construction productivity and progress. The accommodation campus has also been located outside the boundary of the Suffolk Coast and Heaths AONB. Further details of the site selection process are set out in the Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591] and the Accommodation Strategy (Doc Ref. 8.10) [APP-613]. Appendix A of the Design and Access Statement (Doc Ref. 8.1) [APP-587] sets out the design principles for the accommodation campus to minimise environmental effects on the nearby AONB, including (but not limited to) limiting the height of the buildings, locating taller four-storey buildings	146

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	further away from sensitive receptors and the sympathetic use of the colour palette for facades. As part of the accommodation strategy, SZC Co. will also provide upgraded sports facilities at the Alde Valley School in Leiston, which will provide shared facilities for the school and for use by the Sizewell C construction workforce. The facilities include a full-size 3G pitch suitable for football, non-contact rugby and hockey and two multi-use games areas suitable for basketball, netball, tennis and football. Following the construction period, these facilities would remain as a legacy benefit in Leiston.	
Impact of pylons Concern over the impact of pylons proposed at the main development site on people's health and habitats due to the electromagnetic field from electricity transmission on the overhead lines. There is a need for further evidence that underground cabling is not possible. There will be significant power losses from transmitting the power to the areas of need.	An assessment of effects on health and wellbeing from electromagnetic field (EMF) exposure was undertaken within Volume 2, Chapter 28 (Health and Wellbeing) of the ES (Doc Ref. 6.3) [APP-346]. The effect from the proposed development would fall well within the relevant EMF exposure guidelines which are designed to be protective of public health (as specified in the Department of Energy and Climate Change Code of Practice). Overhead pylons, as opposed to underground power transmission, are proposed following consideration of a range of alternatives. The Site Selection Report, Appendix A to the Planning Statement (Doc Ref. 8.4) [APP-591] presents a description of the site selection process which SZC Co. undertook in relation to development on the main development site, including the approach taken for overhead power lines. SZC Co. considered the potential for gas	25

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	insulated cables (GIL), which are underground, but this was discounted on the basis that: • The insulating gas (SF₆) has 22,000 times the global warming potential of CO₂. Although sealed, industry experience is that it gets 'lost' at a rate of c. 1% per annum on average. This could present a 10% increase to the lifetime carbon footprint of Sizewell C and is contrary to the UK Government's aim of achieving net zero by 2050. • Construction of GIL would require the operational platform to be extended c. 20m into the Sizewell Marshes SSSI, with consequential further loss of 0.6ha of SSSI habitat. • Deeper excavations for the additional galleries (if underground cables were used) may not be practical given the constraints on the main development site. • The GIL life expectancy is not sufficient to cover the life of the power station – full replacement would be required after c. 40 years. Any faults within the GIL during operation would take on average two weeks to repair (compared with a day for the restringing of the wires on overhead lines). • Experience from Hinkley Point C has indicated that the gallery installation would introduce risk to schedule and cost. The use of pylons continues to be the most appropriate solution. The impact of the pylons is assessed in Volume 2 of	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	the ES (Doc Ref. 6.3) [APP-178 to APP-347] and the Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181], most notably the Landscape and Visual assessment, and remains valid. In terms of the pylons themselves, SZC Co. has worked hard to further reduce the visual impact of the pylons, albeit recognising they fall within the backdrop of the power station. The accepted changes (April 2021) include the proposal to reduce the height and visual impact of the southern pylon, so that the Application would then propose three shorter pylons and one taller pylon.	
Impact of the access road to the main development site The new permanent access road and all accompanying ancillary works should be removed. The four lane permanent access road will cut through part of the Suffolk Coast and Heaths AONB, which is remote and environmentally sensitive. A four lane road in this area would be extremely damaging dividing the AONB and leaving a permanent scar. It will change the character of this area forever and impact on the rural setting of many heritage assets. Furthermore, it will cause a barrier to wildlife and loss of connectivity for the many rare and protected species which live, breed and forage in the area. The access road will permanently divide	SZC Co. established at an early stage that the Sizewell C nuclear power station would need to be accessed from the north, from a new access road linking the site to the B1122, both during construction and operation of the power station. The new access road would be needed to meet the regulatory requirement that all new nuclear power station sites must have two separate accesses. The new access road would provide the primary access to the Sizewell C main platform area, with the current route to the existing Sizewell power station complex via Sizewell Gap providing a secondary access. The access road would be used as the primary construction haul road during the construction period, however, it would be downgraded to a two-lane carriageway with a segregated route for cyclists and pedestrians during operation. The effects of the access road are considered within Volume 2 of the ES (Doc Ref. 6.3) [APP-178 to APP-347] and the Volume 1, Chapter 2 of the ES Addendum	14

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
the habitats between Sizewell and Minmere marshes. Mitigations suggested by SZC Co. are not adequate in size or quality and do not reflect the damage it will cause to this unspoilt area. SZC Co. have never considered an alternative access route.	(Doc Ref. 6.14) [AS-181] , most notably the landscape and visual, terrestrial ecology and ornithology and terrestrial historic environment assessments. Since the preparation of the ES, the accepted changes (April 2021) to the design of the SSSI crossing replace the previously proposed culvert with embankments with a single-span bridge with embankments. The bridge structure would provide greater connectivity for species, reduce the potential for habitat fragmentation (specifically for water vole, otter, fish and invertebrates) and also reduce land take within the SSSI by 0.08ha. Further information is provided within Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181] .	
Felling of Coronation Wood It is unacceptable to fell Coronation Wood as it provides valuable mitigation for Sizewell B through noise and visual screening. It is also within the AONB and is valuable for both wildlife as well as local people.	The felling of Coronation Wood was completed early in 2021 under planning permission ref. DC/19/1637/FUL for the relocation of certain Sizewell B facilities. These facilities are currently located within the site nominated for Sizewell C and therefore need to be relocated. Coronation Wood was a plantation internal to the Sizewell power station complex, which was only partially visible from locations off-site and had limited public visual amenity value. The main visual amenity value was to visual receptors within the Sizewell power station complex. In addition, Coronation Wood provided very little noise screening. The proposed development retains existing trees along the outer edge of Coronation Wood, as far as practicable, to retain a visual screening function. Trees lost will be mitigated by new native tree planting within Pillbox Field in the ratio of	9

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	approximately ten new trees planted for every one tree lost, and through the implementation of the Woodland Management Plan across EDF Energy Estate. Over 70% of the trees lost were determined by the arboricultural assessment as being category 'C' or less, i.e. trees of low value and with limited life expectancy. The early planting scheme on Pillbox Field has provided in excess of 2,400 new juvenile woodland trees including a mix of broadleaf and coniferous species which are known to tolerate prevailing soil and coastal conditions, including exposure and salinity. The remaining tree planting proposed on Pillbox Field will add a further 3,700 trees.	
Helipad at Brooms Covert Objection to the location of the helipad at Brooms Covert on Sizewell Gap due to concerns over impact of helicopters on horses and the use of the helipad by the RAF.	SZC Co. considered the option of providing a helipad at Broom's Covert in Stage 3 consultation. However, this option has been excluded from the proposals and does not form part of the proposed development within the Application. Helicopter trips would be limited for both Sizewell B and Sizewell C, and mostly required in the event of an emergency. It has therefore been determined that there is sufficient and suitable space elsewhere on the EDF Energy Estate to land a helicopter, should it be required.	2
Full structural plan A full structural plan formed part of the Application for Hinkley Point C. Why has this not been provided as part of this Application?	Detailed elevation and roof plans (for approval) form part of the DCO submission (Doc Ref. Book 2) [APP-028 to APP-033] for all the key structures within the main platform (nuclear island, conventional island and cooling water pumphouse and associated structures).	4

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Dry fuel store Objection to the inclusion of a dry fuel store, spent fuel should be sent elsewhere.	The UK Government policy requires that for new nuclear builds, the spent fuel is to be stored on-site until the availability of the Geological Disposal Facility. Further information on the proposed approach to spent fuel management is provided within Volume 2, Chapter 7 of the ES (Doc Ref. 6.3) [APP-192].	2

4.9 Associated Developments – park and rides (general)

a) Overview

4.9.2 A total of 32 Interested Parties raised matters regarding the park and ride sites generally.

4.9.3 **Table 4.8** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.8: Associated Developments – park and rides (general)

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Location and impact of the park and ride sites (general) Concern over the location and impact of the proposed park are ride sites. Nearby villages will be adversely affected due to visual	SZC Co. included the proposals for park and ride sites as a means to contribute towards the reduction of the amount of additional traffic generated by the construction workforce on local roads and through local villages and thereby minimise the impact on the local communities. Following completion of	24

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
effects, traffic, road and pedestrian safety, noise and air pollution.	construction of the Sizewell C power station, the use of both park and ride sites would cease and the sites would be restored to agricultural use. SZC Co. has carried out detailed traffic modelling to understand the impacts of the park and ride proposals on adjacent roads and has held close engagement with Suffolk County Council over highway design issues. The purpose of the park and rides is to mitigate against the effects of increased car-based worker trips on local roads, and to enable the construction workforce to use shuttle buses to reach the main development site. The proposals include mitigation measures to ensure that any potential impacts are addressed. For communities close to the park and ride sites, this includes the retention of established vegetation, new planting, screening through bunds and measures set out in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. Further information is available in Volume 3 (Northern Park and Ride at Darsham) and Volume 4 (Southern Park and Ride at Wickham Market) of the ES (Doc Ref. 6.4 and 6.5) [APP-348 to APP-377 and APP-378 to APP-408] in relation to environmental impacts, including noise and vibration, air quality and amenity and recreation. The proposed park and rides would be in place for the duration of the construction of the Sizewell C main development site, but the land would be reinstated to its previous use once the sites are no longer required. These are not permanent development.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Reinstatement Concerns about what happens to the car parks when the Sizewell C Project is complete? Will these be lost from the countryside as new areas for housing or commercial sites?	Requirement 24 of Schedule 2 of the Draft DCO (Doc Ref. 3.1(B)) [AS-143] requires that both the northern and southern park and ride facilities must be demolished 12 months after the construction of Sizewell C is complete. Part 2 of that requirement states that the land must be restored to a condition suitable for agricultural use.	10
Need and use of park and ride sites Concern over the need and use of the facilities. Could the existing facilities not just be expanded? How can it be ensured that the park and ride sites will be used?	The gravity model used to inform transport modelling shows that two park and ride developments are needed to intercept construction worker traffic en-route to the main development site - one for construction workers approaching Sizewell from the north on the A12, and the other for those approaching from the south on the A12. SZC Co.'s Gravity Model, which estimates the residential location of the peak construction workforce, has informed the required number of car parking spaces at each of the park and ride facilities. The existing facility at Martlesham could potentially be used as a direct bus pick up point, if demand exists, and this would be subject to agreement with the Transport Review Group. The Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] sets mode share targets for the construction workers during the peak construction. Sizewell C workers will be allocated to a direct bus or park and ride site and the workers will be required to use the buses provided. Quarterly monitoring reports will be submitted to the Transport Review Group, summarising compliance with the mode share targets, as well as other monitoring data.	2

4.10 Associated Developments – northern park and ride

a) Overview

4.10.2 A total of 15 Interested Parties raised matters regarding the northern park and ride site at Darsham.

4.10.3 **Table 4.9** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.9: Associated Developments – northern park and ride

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Environmental Impacts Concerns the northern park and ride at Darsham will result in a significant detriment to local residents in terms of noise, light pollution, traffic pollution, landscape and views, drainage systems and congestion and will also damage the local environment and habitats. Suggestion that peripheral bunding is not sufficient mitigation.	SZC Co. understands the concerns of residents relating to the construction and operation of the northern park and ride. An assessment of the likely environmental effects arising from construction, operation and removal and reinstatement phases of the proposed northern park and ride at Darsham has been undertaken and is reported within Volume 3, Chapters 4 to 12 of the ES (Doc Ref. 6.4) [APP-354 - APP-377]. The design of the proposed development has evolved to include a number of primary mitigation measures including the retention of existing hedgerows and woodland, where possible, infilling of hedgerows, where absent or gappy, soft landscaping within the car park, and provision of landscape bunds, which would also provide acoustic screening. In addition, lighting within the car parking areas would be restricted to 6m in height to minimise visibility during day and night-time. Lighting columns around the proposed roundabout and along the proposed access road between the roundabout and Willow Marsh Lane would be 8m in height to reduce the	12

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	number of columns necessary to produce a lighting scheme that meets highway authority requirements. The lighting columns would utilise LED base lights with zero-degree tilt to minimise light spill and along the perimeter would be fitted with demountable shields to reduce backward spill of light into properties and adjacent habitats. Measures set out in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] would also reduce impacts arising from construction activity, including measures to reduce potential noise impacts and dust. The assessment identified that there would be the potential for temporary significant effects on visual amenity for users of the cycle way along Willow Marsh Lane and Main Road, minor roads and local residents to the north and east of the park and ride site and immediately adjacent to it. However, these would be removed once the land has been reinstated at the end of construction. No significant effects in relation to noise, air quality, groundwater and surface water and terrestrial ecology and ornithology are anticipated with mitigation in place. The northern park and ride is proposed to be accessed via a new roundabout on the A12. A capacity assessment of the roundabout is included in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and demonstrates that the junction will operate within capacity for all scenarios.	
Impact on the availability of parking at Darsham station	The proposed northern park and ride at Darsham would be in place for the duration of the construction of the Sizewell C main development site, but the land would be reinstated to its	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Concerns that parking for Darsham Station will be made difficult and unpredictable for locals needing to use the train station, as large numbers of Sizewell C workers will be using the station and there is insufficient evidence that the number of car parking spaces provided by the northern park and ride will be sufficient. Suggestion that there could also be an opportunity for the retention of a small part of the northern park and ride for a new permanent station car park.	previous use, once the site is no longer required. It will not be a permanent development. Should there be a need for part of the site to be retained as station car parking, a separate planning Application would need to be made at that time. The northern park and ride has been sized based on the gravity model, used to inform transport modelling, which forecasts the distribution of the workforce and which park and ride workers would use. A parking accumulation for the park and ride site is included in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and demonstrates that it would operate within capacity at peak construction.	
Pedestrian connection to Darsham Station Concerns that no direct pedestrian connection to Darsham station from the northern park and ride or upgrades to existing facilities have been proposed, particularly given the proposal to create a multi-modal hub. Concerns that existing pedestrian infrastructure at Darsham station includes narrow footways and a level crossing, which may present challenges for mobility impaired workers.	There would be a pedestrian route from Darsham railway station along the footway on the A12 to the south-east of the northern park and ride site. Pedestrians accessing the site would leave the A12 and enter through a security gate provided in the security fencing. Once on-site, users would walk via pedestrian walkways to reach the buildings on-site and pass through a secure controlled area for workers to be screened before taking the next available bus to the Sizewell C main development site. Further details of access measures (such as key fobs, CCTV, intercom system) would be agreed at the detailed design stage. The Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] summarises the assessment of the propensity for construction workers to use rail as part of their journey to/from the main development site and concludes that it is not considered likely that workers would travel by rail. This does	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	not preclude them from doing so but the analysis showed that it is unlikely based on the forecast trip distribution, shift pattern, the rail timetable and the alternative free dedicated bus service. As such, no improvements are proposed to Darsham railway station.	
Potential to increase risk rating of Darsham Level Crossing Concern over an increase in accidents at Darsham level crossing; Network Rail's risk rating for Darsham level crossing is already very high and this will be exacerbated by the increase in traffic and the number of rail passengers travelling to the park and ride. Concern that this safety issue has been overlooked and that consequently, the northern park and ride should be located elsewhere.	The northern park and ride is located to the north of Darsham level crossing. The purpose of the park and ride is to intercept construction worker car trips and consolidate construction workers onto buses for the onward journey to the main development site. As discussed above, the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] summarises the assessment of the propensity for construction workers to use rail as part of their journey to/from the main development site and concludes that it is not considered likely that workers would travel by rail. Notwithstanding this, workers would be able to transfer from rail to park and ride bus at Darsham and a pedestrian access is provided to the northern park and ride facility to enable this transfer. The majority of the Sizewell C traffic travelling through the level crossing would therefore be HGVs and buses. In 2017, Network Rail installed cameras at the level crossing as part of the Rail Upgrade Plan. The cameras identify vehicles that fail to comply with the stop signal at the level crossing and, depending on the offence, drivers are issued fines and receive points on their licence or are prosecuted. Given that the majority of Sizewell C traffic crossing the level crossing will be HGVs and buses and that Sizewell C buses and HGVs will undergo an induction and adhere to driver rules, it is considered that the	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Sizewell C Project will not increase the risk at the level crossing.	
Number of car parking spaces within the northern park and ride No evidence has been provided that the northern park and ride needs 1,250 car parking spaces to meet demand. Transport Assessment seems to suggest that a fewer number of car parking spaces is required.	The northern park and ride has been sized based on the gravity model, which forecasts the distribution of the workforce and which park and ride workers would use. A parking accumulation for the park and ride site is included in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and demonstrates that it would operate within capacity at peak construction. It should be noted that a car park is considered to be at theoretical capacity before all of the spaces are utilised. This is because as the car park reaches capacity, the search time for a parking space increases. Therefore, the park and ride sites have been sized to operate with some spare capacity in order to reduce search times for a parking space, particularly given that workers need to transfer to a bus and travel to the main development site.	1

4.11 Associated Developments – southern park and ride

a) Overview

4.11.2 A total of 47 Interested Parties raised matters regarding the southern park and ride site at Wickham Market.

4.11.3 **Table 4.10** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.10: Associated Developments – southern park and ride

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Location of the southern park and ride is unsuitable Concerns that the site is unsuitable for the southern park and ride due to the already congested roads in the vicinity of the site. Concerns that the proposed development will attract traffic into a small concentrated area which will result in congestion, pollution, expose the inadequacy of the B1078 to absorb the volume of traffic, ruin the lives of villagers in Wickham Market and surrounding villages. Suggestion that the southern park and ride should be located further south on the A12. The site is unsuitably located on a hill overlooking special landscape areas.	SZC Co. understands the concerns of residents relating to the construction and operation of the southern park and ride and its location. The temporary southern park and ride at Wickham Market is required to support the construction of Sizewell C through the capture of wider workforce traffic from the south and west of the A12. Potential traffic impacts in Wickham Market are proposed to be mitigated through local measures which have been discussed and agreed in principle with the parish council. The access to the southern park and ride site, which has been designed to Design Manual for Roads and Bridges (DMRB) standards, has been subject to a Stage 1 road safety audit, as reported in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017]. This did not highlight any safety concerns at the access. An assessment of the likely environmental effects arising from construction, operation, removal and reinstatement phases of the proposed southern park and ride at Wickham Market has been undertaken and is reported within Volume 4, Chapters 4 to 12 of the ES (Doc Ref. 6.5) [APP-378 to APP-408]. A large proportion of the effects of the southern park and ride have been assessed to be minor, including effects on heritage assets, soils and land use, as well as effects on the transport network, ecology, groundwater, amenity and noise effects, given the temporary nature of the site's proposed use.	29

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	There are anticipated moderate effects on the visual amenity of the users of footpaths near to the site. This is the only effect that is considered to be significant and is to be mitigated as far as practical. The Fiveways roundabout has been assessed within the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266], which demonstrates that the junction will not exceed operational capacity for all future year scenarios.	
Limited information on the Traffic Incident Management Area and Postal Consolidation Facility There is a lack of information on the proposed traffic incident management area and the postal consolidation facility, including the associated vehicle movements during day and night.	Details of the postal consolidation building and traffic incident management area (TIMA) are provided in Volume 4, Chapter 2 of the ES (Doc Ref. 6.5) [APP-380]. In addition, details of anticipated Light Goods Vehicles (LGV) movements associated with the postal consolidation building are provided in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017]. The TIMA would only be used, if there is an incident within the Sizewell C main development site or external to the Sizewell C main development site on the local road network, which requires construction-related vehicles to be held or diverted. The TIMA could be utilised to manage vehicles, and remove them from the public road network while the incident is being resolved, and would only be used for the parking of HGVs when required due to an incident. For the majority of the time, it would be open in character and unused with no HGVs or other vehicles parked. The postal consolidation building would handle and process postal deliveries for the Sizewell C main development site. On receipt at the postal consolidation building, all mail and courier	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	packages would be checked, sorted and consolidated. Outgoing mail would be collected from the Sizewell C main development site for postal or courier services. The postal consolidation building would typically operate Monday to Saturday. Consolidation of post would result in just two LGVs travelling each way per day from the postal consolidation building to the Sizewell C main development site.	
Environmental Impacts and mitigation Concerns over environmental and transport effects of the southern park and ride at Wickham Market, including but not limited to increased traffic, congestion and delays, noise and vibration, air quality, light pollution, landscape and views, impact on 'dark skies', loss of habitats on site, compromised safety of cyclists, equestrians and pedestrians and increased risk of collisions. The increased traffic will gridlock the local area. Mitigation should be provided to prevent construction traffic using the B1078. Suggestion that peripheral bunding is not sufficient mitigation. Lighting and drainage plans are shown as 'Not for Approval' - how will these aspects be controlled?	SZC Co. understands the concerns of residents relating to the construction and operation of the southern park and ride. An assessment of the likely environmental effects arising from construction, operation, removal and reinstatement phases of the proposed southern park and ride at Wickham Market has been undertaken and is reported within Volume 4, Chapters 4 to 12 of the ES (Doc Ref. 6.5) [APP-378 to APP-408]. The design of the proposed development has evolved to include a number of primary mitigation measures including the retention of existing hedgerows and woodland where possible, infilling of hedgerows where required, soft landscaping within the car park, provision of landscape bunds which would also provide acoustic screening. In addition, lighting within the car parking areas would be restricted to 6m in height to minimise visibility during day and night time. Lighting columns along the proposed access road would be 8m in height to reduce the number of columns necessary to produce a lighting scheme that meets highway authority requirements. The lighting columns would utilise LED base lights with zero-degree tilt to minimise light spill and along the perimeter would be fitted with demountable shields to reduce backward spill of light into	30

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	properties and adjacent habitats. Measures set out in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] would also reduce impacts arising from construction activity, including measures to reduce potential noise impacts and dust. The Fiveways roundabout has been assessed within the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and demonstrates that the junction will not exceed operational capacity for all future year scenarios. The lighting and drainage plans are not for approval at this stage. However, they provide an indication of the likely drainage and lighting that will come forward, and a firm basis for environmental assessment. The final drainage details for each site are secured by Requirement 5 of the Draft DCO (Doc Ref. 3.1(B)) [AS-143] which requires the final surface and foul water drainage design to be submitted to and approved by East Suffolk Council, following consultation with the Environment Agency, the relevant Statutory Nature Conservation Body, the relevant Internal Drainage Board, the Lead Local Flood Authority and the drainage authority. The lighting design is controlled by the Associated Development Design Principles (Doc Ref. 8.3) [APP-589] which detail the requirements for lighting proposals, in accordance with the latest Institution of Lighting Professionals Guidance Note. The Associated Development Design Principles include limits on light spill beyond the site boundaries, light spill onto adjacent habitats, design and height of the lighting columns, as well as additional requirements for sustainable drainage systems.	

4.12 Associated Developments – two village bypass

a) Overview

4.12.2 A total of 45 Interested Parties raised matters regarding the two-village bypass.

4.12.3 **Table 4.11** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.11: Associated Developments – two village bypass

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Insufficient alternatives assessment SZC Co. has not completed a full comparison of the alignment options for the two village bypass. There are several other possible and cheaper solutions.	During the early stages of the design development for the Sizewell C Project, it was identified that the A12 between Ipswich and Lowestoft would be the main route corridor for Sizewell C construction traffic on the highway network. Whilst the majority of the A12 (the preferred main route corridor on the highway network for Sizewell C construction traffic between Ipswich and Lowestoft) was not expected to experience congestion, increased traffic flows on the section of the A12 through the village of Farnham was considered to have the potential to result in local issues due to capacity, amenity and safety concerns at the narrow bend, particularly when two large vehicles are passing at once. SZC Co. considered a variety of options to alleviate traffic impacts through the village, utilising information from previous studies including a review of options considered for the 1995	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Highways Agency route (which was reviewed at a Public Inquiry) and subsequent work undertaken by Suffolk County Council. This included a review of the alignment preferred by Farnham with Stratford St Andrews Parish Council put forward during previous consultation stages. Other options included a 'do minimum' approach, such as signalised controls, widening of the bend as well as a one village bypass. SZC Co. consulted on all of these options through an extensive pre-Application consultation process. The preferred option identified through and supported by the public consultation was for a two village bypass, with the primary benefits perceived by respondents being amenity benefits, reduced noise and pollution, alleviating congestion, enhanced safety and long-term legacy benefits. Many respondents viewed the removal of traffic from the villages as a major benefit. The route alignment was also developed through engagement and consultation to minimise environmental effects whilst ensuring that the route was sufficiently short to operate effectively as a bypass. Volume 5, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.6) [APP-414] and the Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] explain the alternatives and design evolution considered for the two village bypass.	
Opposition to western, preference for eastern alignment	The Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591] and Volume 5, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc	18

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
The proposed alignment is too close to Grade II* listed properties in the Farnham community and SZC Co's own documents demonstrate how devastating the impact will be. The Parish Council have presented (and evidenced) sound arguments why a more easterly route is more favourable to the environment and most importantly highlighting how 20 dwellings will be very badly affected with the current alignment. SZC Co's argument that the two village bypass could not be realigned to the eastern side of Foxburrow Wood was that connecting corridor to Palant's Grove was designated as Ancient Woodland. It has now been officially confirmed by Natural England that this corridor is not Ancient Woodland. This information has not been accounted for in SZC Co's submission. The eastern alignment will be cheaper and easier to build, with much more limited impact on the built and natural environment.	Ref. 6.6) APP-414 explain the route selection for the two village bypass, including amendments made to the site boundary adjacent to Farnham Hall. The alternative alignment put forward by Farnham with Stratford St Andrew Parish Council suggests routing the two village bypass (travelling from west to east) to the south of Pond Barn Cottages, before curving northwards, passing Foxburrow Wood on its east side, and meeting the proposed Friday Street roundabout to the north. This alignment is similar to one of the alternatives presented by the Farnham Hall Resident's Group to the Highways Agency route in 1995 as part of a Public Inquiry; which was discounted by the Inspector on grounds that the damage to Palant's Grove woodland makes it less satisfactory, that it would have significant agricultural severance effects and that it would have a poorer economic return. The significantly greater length of the parish council's alternative alignment would increase its land take but also render it far less successful as a bypass given its longer journey time. Many motorists would be likely to continue using the existing A12. SZC Co. considered the alternative alignment put forward by the Parish Council, taking into account the impacts on woodland (both Foxburrow Wood and Palant's Grove), environment and impact on nearby receptors (including committed development) as well as operational matters, but it was not considered to be a better solution.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	At the time of the developing the route of the two village bypass, Palant's Grove was still considered to be Ancient Woodland by Natural England and therefore a material consideration in the development of the route. Whilst an area of Palant's Grove has now been declassified since the Application was submitted (the central section linking Palant's Grove to Foxburrow Wood Ancient Woodland), an area to the east still remains classified as Ancient Woodland. In addition, the entirety of Palant's Grove still remains a County Wildlife Site (CWS). CWS are non-statutory designated ecological sites and have a key role in the conservation of Suffolk's biodiversity and represent important links in Suffolk's Living Landscape. Passing the bypass through this declassified section of Ancient Woodland would result in the irreversible loss of part of a CWS and it would also result in the permanent ecological severance of two Ancient Woodlands.	
Need for Four Village Bypass SZC Co. is wrong in not also providing a bypass for the villages of Little Glemham and Marlesford. If not bypassed now, the design should accommodate a further extension for them, which an eastern alignment accommodates more readily.	SZC Co. has considered the merits of the proposed alignment relative to alternatives and is satisfied that the two village bypass proposed is appropriate. In particular, the proposed alignment maximises the benefit of a new road in relieving traffic from the Farnham and Stratford St. Andrew communities, whilst limiting landscape and other impacts. Analysis suggests that congestion and road safety issues are only likely within Farnham due to the Farnham bend and that it is the village of Farnham which has its urban form most closely clustered adjacent to the A12. Therefore, SZC Co. concluded that the impact of Sizewell C traffic would not be sufficient to justify a bypass of all four villages. Please refer to	26

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Volume 5, Chapter 3 (Alternatives and design evolution) of the ES (Doc Ref. 6.6) [APP-414] and the Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] for further details. The proposed two village bypass in the Application would also not prejudice the future bypassing of Little Glemham and Marlesford. As detailed in previous studies undertaken (or commissioned) by Suffolk County Council, several options for shorter, staged interventions on this stretch of the A12 have previously been considered and could still come forward following the delivery of the two village bypass. Alternatively, the two village bypass could be adapted in the future to spur off to the south with a bypass of Little Glemham and Marlesford.	
Disagreement on funding and cost SZC Co. inaccurately imply that they are funding the two-village bypass. Furthermore, the cost of the road is excessive in comparison to the time saving.	The two village bypass is required to mitigate the impacts of Sizewell C construction and will be delivered by SZC Co. as part of the associated developments required for the construction of Sizewell C.	2
Environmental Impacts The environmental impact of the two village bypass needs to be fully assessed. The alignment of the two villages bypass will greatly affect wildlife, due to impacts on habitat connectivity, and the living conditions for many dwellings, particularly in terms of noise, pollution, disturbance, visual intrusion,	SZC Co. understands the concerns of stakeholders relating to the effects that construction and operation of the two village bypass will have on the environment. An assessment of the environmental impacts of the two village bypass has been undertaken and is reported in Volume 5 of the ES (Doc Ref. 6.6) [APP-409 to APP-443]. The assessment considers the potential construction and operational impacts of the development. The route and design of the two village bypass	26

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
and severance. Existing drainage for agricultural land will be severed. The environmental assessment has underestimated the importance of the area as a wildlife corridor for species, such as deer, badgers, foxes, hares, owls, bats, wild fowl, newts, and snakes. Furthermore, whichever alignment is selected, the two village bypass will impact on Foxburrow Wood. The proposed working hours, weekend working and working 24-hours-a-day will worsen these effects.	has been developed to minimise the impact on the surrounding environment, including impacts on landscape, heritage and ecological features, noise and emissions impacts on residential properties, and pedestrian amenity. Where potential significant effects have been identified, mitigation measures are proposed, including the implementation of a Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] to control construction impacts, such as risk of pollution, manage noisy activities, and other measures, such as the provision of landscaping, planting and buffer zones to protect receptors and screen the development. It is also proposed to develop a lighting strategy that seeks to minimise the effects of light spill on the surrounding environment whilst meeting necessary safety standards. Full details can be found in Volume 5, Chapters 4 to 12 of the ES (Doc Ref. 6.6) [APP-415 to APP-443]. In addition, the Volume 1, Chapter 5 of the ES Addendum (Doc Ref. 6.14) [AS-184] identifies the likely significant effects of the accepted changes (April 2021), which should be read in conjunction with Volume 5 of ES (Doc Ref. 6.6) [APP-409 to APP-443] that accompanied the Application. The mitigation measures identified within the ES and ES Addendum are all summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and section 106 Agreement. The assessments also identify the permanent environmental	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	benefits that would be brought about by the bypass for the villages of Stratford St. Andrew and Farnham.	
Mitigation is inadequate The proposed mitigation to reduce the impact on properties from the two village bypass is inadequate. The footpath network should not be severed so close to villages. No mitigation has been provided to local landowners/ businesses for severance of drainage ditches or irrigation routes.	SZC Co. understands the concerns of residents relating to the construction and operation of the two village bypass. The route and design of the two village bypass has been developed to minimise the impact on the surrounding environment and on residential properties, and pedestrian amenity. This includes designing the route to pass through a deeper cutting where it passes Foxburrow Wood and Farnham Hall. The cutting would be approximately 4.5m in depth east of Farnham Hall and would help to reduce potential noise impacts on Farnham Hall and surrounding properties. In addition, the proposed landscaping for the site has been designed specifically to minimise potential effects on ecological, heritage and landscape and visual receptors through planting, and diversions for public rights of way have been provided, including temporary diversions, where required, during construction, to maintain the connectivity of the footpath network in the area. Drainage works have been carefully designed and, where agricultural accesses have been severed, SZC Co. has included the provision for alternative accesses in the design proposals and will continue to engage with all land holders to develop mitigation. Where potential significant effects have been identified, mitigation measures are proposed, including the implementation of a Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] to control construction impacts, such as risk of pollution, manage noisy activities, and other	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	measures, such as the provision of landscaping, planting and buffer zones to protect receptors and screen the development. It is also proposed to develop a lighting strategy that seeks to minimise the effects of light spill on the surrounding environment whilst meeting necessary safety standards. Full details can be found in Volume 5, Chapters 4 to 12 of the ES (Doc Ref. 6.6) [APP-415 to APP-443].	
Proposed bund Objection to the proposed large bund, which is an intrusion into the landscape and too close to properties.	No landscape bund is proposed as part of the proposals for the two village bypass. As described in Volume 5, Chapter 2 of the ES and associated figure (Doc Ref 6.6) [APP-411 and APP-413], native tree and shrub planting is proposed along the western side of the cutting, as the route of the proposed two village bypass road passes Farnham Hall, as well as along the western side of the proposed embankment up to the overbridge, to provide visual screening. Native tree and shrub planting is also proposed on the east side of the overbridge, adjacent to Foxburrow Wood and Farnham Hall Farmhouse to provide visual screening and ecological connectivity. The proposed development does include earthworks in this area which comprise a cutting of approximately 4.5m depth as the road passes Farnham Hall which will screen the road from views. In addition, a ramp is required to the Foxburrow Wood footbridge which would be approximately 2.5m in height above ground level to the overbridge surface, approximately 7m in height above the route of the proposed two village bypass (maintaining the minimum headroom clearance of 5.7m for traffic).	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
General opposition to the two-village bypass General statement of opposition to the two-village bypass, noting that the proposals are insufficient to reduce traffic and/ or that existing roads should be improved instead.	The comments are noted.	13
Support for the two village bypass General statement of support for the two-village bypass.	The support is welcomed.	6

4.13 Associated Developments – Sizewell link road

a) Overview

4.13.2 A total of 91 Interested Parties raised matters regarding the Sizewell link road.

4.13.3 **Table 4.12** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.12: Associated Developments – Sizewell link road

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Need case for Sizewell link road The proposed Sizewell link road will have no benefit and it will not solve the local transport impacts. High numbers of HGVs will use the existing B1122 during the 'early years' before the proposed Sizewell link road is constructed. These numbers are close to those planned once the road is complete. This raises the question as to whether the Sizewell link road is really needed at all. The road will provide no legacy value for the local community. The Suffolk County Council have asked for it to be removed following Sizewell C construction or for a substantial payment to be provided for upkeep.	The Sizewell link road would divert substantial construction and operational traffic away from Yoxford, Middleton Moor and Theberton. Should the Sizewell link road not be delivered, the increase in traffic on the B1122 would have a sustained impact on the communities in Theberton, Middleton Moor and Yoxford from increased noise and severance along with impacts on pedestrian and cycling amenity. The narrowness of the B1122 in places, the way in which it bisects communities and safety fears associated with its increased use by HGVs, mean that there are genuine concerns that the B1122 would not be appropriate or sufficiently resilient as the main artery for the construction of Sizewell C. The Sizewell link road is necessary to avoid a significant and unacceptable increase in the use of the B1122 as a primary route for construction traffic. Its construction will bring significant medium-term benefits to the communities of Theberton, Middleton Moor and Yoxford whilst creating the opportunity for long term legacy benefits. Smaller scale interventions to improve the B1122 would not reduce daily HGV movements on the B1122. Following the construction period of Sizewell C, the intensity of traffic along the B1122 if there was no alternative route would reduce, but would be replaced by operational traffic and by construction and maintenance traffic which would occur	19

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	frequently for “outages” at Sizewell B and for the 2 reactors at Sizewell C. SZC Co. considers that there is substantial benefit in retaining the road as a long-term legacy benefit. The Councils (East Suffolk Council and Suffolk County Council) summarised these benefits in their response to the Stage 4 consultation. Paragraph 246 of the Councils’ response states: <i>“The Councils consider the Theberton Bypass as a legacy benefit of the development, by removing through traffic from the village, with likely associated benefits on noise and air quality and greater network resilience, and strongly believe it should be retained following construction.”</i> The Application therefore proposes to leave the road in place and be adopted by SCC as the Highways Authority. SZC Co. anticipates that the existing B1122 would be downgraded to an unclassified road once the Sizewell link road is operational. As the majority of traffic would reassign to use the Sizewell link road, the B1122 will experience much lower traffic volumes, which would enable the road to function as a local rural road with improved amenity and cycling connectivity. SZC Co. is currently undertaking further engagement with East Suffolk Council and Suffolk County Council regarding this proposal.	
Alternatives Alternative routes for the Sizewell link road have not been explored sufficiently and there are better solutions available compared to the	SZC Co. has undertaken a robust site selection process, including consideration of routes further south than the proposed Sizewell link road. This process is explained in the Site Selection Report appended to the Planning Statement	46

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
existing proposals. There is a lack of transparency from SZC Co. on the process and methodology for determining the proposed route. Specifically, SZC Co. has not justified their choice of the routing of the Sizewell link road in preference to the old D2 route, preferred by Suffolk County Council. Alternatively, the B1122 could be improved and affected residents compensated or relocated, overall providing a cheaper and a better scheme in environmental terms. The peer review completed by SZC Co's consultants on the alternative routings is of questionable value and objectivity. Lack of detail made available around road design and poor proposed road layouts.	(Doc Ref. 8.4) [APP-591] and in Volume 6, Chapter 3 (Alternatives and design evolution) of the ES (Doc Ref. 6.7) [APP-450]. The most southerly routes considered were named Route W (north and south) during consultation. Route D2 has a similar alignment to Route W. Route W (before it splits into Route W north and Route W south) would pass through the centre of local plan allocation SCLP12.29, a mixed-use allocation (including approximately 800 dwellings) for South Saxmundham Garden Neighbourhood, one of two proposed in the Suffolk Coastal District Local Plan (Ref. 4). With regard to the two different Route W alignments, Route W (South) is closest to the D2 alignment considered in the 1980s during the construction of Sizewell B. Route W (South) is no longer feasible because it follows the same alignment as the green rail route, from where the route crosses the Saxmundham to Leiston branch line. The green rail route is required as part of the integrated freight management strategy to transport larger quantities of freight by rail. Route W (South) would also intersect the site boundary for an outline planning Application for up to 187 dwellings to include car parking, open space provision with associated infrastructure and access at Land north of B1119 Saxmundham Road, west of Leiston (Application ref: DC/16/1961/OUT).	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Route W (North) is not considered suitable for a number of reasons. Route W North would require a crossing of both the East Suffolk line and the Saxmundham to Leiston branch line (two rail crossings on bridge structures), as well as at least two substantial watercourse crossings of the River Fromus and Hundred River and their floodplains and other tributaries (and would include sections of the road within Flood Zone 3). The crossings of the two rivers would be likely to require large span bridge structures and earthworks to ensure clearance beneath the bridge and facilitate maintenance access and these would be prominent structures which would be visible in the surrounding landscape. Route W (North) is also the longest route of the options considered (8.2km) and would require the greatest amount of agricultural land and result in a larger area of habitat loss. As the objective of the Sizewell link road is to mitigate potential impacts caused from the construction associated with Sizewell C, a route which more closely replicates the role of the B1122 is most likely to be effective. Route 'W North' would not provide as much traffic relief to Yoxford, Middleton Moor or Theberton compared with the proposed Sizewell link road. The potential for providing improvements to the B1122 rather than a dedicated new road were considered as part of the Stage 1 and 2 consultations. Smaller scale interventions (e.g. speed limit reductions, pedestrian enhancements) to improve the B1122 would not reduce daily HGV movements on the	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	B1122 or address the fundamental disbenefits of using the road as the principal means of serving the Sizewell C site. The design of the Sizewell link road has evolved through pre-Application consultation, particularly stages 3 and 4. The design process is explained within Volume 6, Chapter 3 (Alternatives and design evolution) of the ES (Doc Ref. 6.7) [APP-450] and the Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591]. The process has included, for example, consideration of existing topography, land ownership, utilities, landscape and other environmental constraints, highway design standards, drainage and road safety.	
Use of Sizewell link road during emergencies The proposed Sizewell link road does not adequately resolve the challenges associated with the emergency evacuation of the Sizewell C power station. There will only be one entry and exit to the site - in an emergency, the nuclear power station should have two means of evacuation rather than one.	Two emergency evacuation routes from the Sizewell C power station will be provided as follows: - the new access road from the north of the site and leading onto the B1122 via the new main site access roundabout; - the existing private access road to the south of the site passing Sizewell B and A stations and connecting onto Sizewell Gap which leads on to Lover's Lane and the B1122. - Sizewell link road would relieve traffic on the B1122 in the event of an emergency. The emergency evacuation arrangements for nuclear incidents will be established and agreed with the Office for Nuclear Regulation under the Nuclear Site Licence and with the local authorities as part of the multi-agency response plan	4

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	under the Radiation (Emergency Preparedness and Public Information) Regulations 2019.	
Link from B1125 to Sizewell Link Road Link from B1125 to Sizewell link road will only serve to create a rat-run from A12 at Blythburgh, through Westleton and Middleton.	The VISUM strategic traffic model, developed for the assessment of traffic effects of the Sizewell C Project, considers route choice for background traffic cars and LGVs that would have route choice, as well as for Sizewell C traffic which has designated routes for HGVs and buses (note Sizewell C buses and HGVs are assigned a fixed route and would not route via the B1125). Therefore, the traffic modelling has taken account of any reassignment of traffic as a result of the implementation of the Sizewell link road, including on the B1125. The junction modelling included in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and the ES assessment on transport included in Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181] have assessed the effects of the forecast traffic on the B1125 derived from the VISUM strategic modelling and concluded that there would be no significant effects.	5
Sizewell Link Road - Fordley Road Sizewell link road needs to go 'over' the existing Fordley Road to allow rapid access for residents of Middleton, Middleton Moor, Theberton and Westleton to doctor's surgeries, supermarkets and the train station in Saxmundham. The current access/egress proposed to/from the Sizewell link road onto Fordley Road is ill-conceived and impractical.	Fordley Road will not be used by Sizewell C's HGVs. All HGVs travelling to/from the main development site would be required to use B1122 in the early years and the Sizewell link road, once it is operational. The Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608] will manage all freight traffic associated with the Sizewell C Project through a package of measures. The compliance of the HGV routing for HGVs to/from the main development site is proposed to be monitored through GPS tracking. HGVs are classified as a goods vehicle with a gross vehicle weight of greater than 3.5	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Fordley Road is a single track road with no passing places and totally unsuitable for HGVs. Under SZC Co.'s proposals, Fordley Road will simply become a highly dangerous 'rat run' for construction traffic with absolutely no benefit to local users.	tonnes and less than 44 tonnes. Typically, a HGV would be classified as being 7.5 tonnes - 44 tonnes; therefore the proposed HGV classification and associated management measures will include smaller goods vehicles than would normally be the case. A number of junctions are proposed along the Sizewell link road to enable both access to the new road as well as access across it for journeys towards Saxmundham. All junctions have been designed in accordance with the Design Manual for Roads and Bridges with ghost right turn islands for turning traffic to wait.	
Environmental Impacts The environmental impact of Sizewell link road needs to be fully assessed. Concern over impacts on wildlife, pollution, traffic, severance, noise and waste, heritage, landscape and visual effects. The road will cut through and split communities and farmland leaving 'islands' of unproductive land. There will be loss of amenity as the footpaths become unusable. Furthermore, the Sizewell link road will result in the direct loss of a veteran oak tree. There is no legacy of benefit to the local community. There is a lack of detail around mitigation and compensation for these impacts.	An assessment of the environmental impacts of the Sizewell link road has been undertaken and is reported in Volume 6 of the ES (Doc Ref. 6.7) [APP-444 to APP-477]. The assessment considers the potential construction and operational impacts of the development. The route and design have sought to minimise the impact on the surrounding environment, including impacts on landscape, heritage and ecological features, noise and emissions impacts on residential properties, and pedestrian amenity. Where potential for significant effects has been identified, mitigation measures are proposed, including the implementation of measures set out within the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] to control construction impacts, such as the risk of pollution, and other measures such as the provision of landscaping, planting and buffer zones to protect receptors and screen the development.	43

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	It is also proposed to develop a lighting strategy that seeks to minimise the effects of light spill on the surrounding environment whilst meeting necessary safety standards. Full details can be found in Volume 6, Chapters 4 to 12 of the ES (Doc Ref. 6.7) [APP-451 to APP-477]. In addition, the Volume 1, Chapter 6 of the ES Addendum (Doc Ref. 6.14) [AS-185] identifies the likely significant effects of the accepted changes (April 2021), which should be read in conjunction with Volume 6 of ES (Doc Ref. 6.7) [APP-444 to APP-477] that accompanied the Application. The mitigation measures identified within the ES and ES Addendum are all summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and section 106 Agreement.	
Lack of detail on planting and bunding around the Sizewell link road Planting and bunding scheme details on Sizewell link road are very limited with a high level description provided only. Further information on design is required.	Volume 6, Chapter 2 of the ES (Doc Ref. 6.7) [APP-446], as updated by Volume 1, Chapter 6 of the ES Addendum (Doc Ref. 6.14) [AS-185], describe the proposed landscaping along the Sizewell link road. This is also shown on Figures 6.2.2-6.2.8 of that chapter (refer to Volume 2, Chapter 6 Figures of the ES Addendum (Doc Ref. 6.14) [AS-198]). The DCO Plans for approval SZC-SZ0701-XX-000-DRW-100147, SZC-SZ0701-XX-000-DRW-100170, SZC-SZ0701-XX-000-DRW-100171, SZC-SZ0701-XX-000-DRW-100172, SZC-SZ0701-XX-000-DRW-100173 (included within [AS-138])	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	also show the proposed landscaping associated with the Sizewell link road.	
General opposition to the Sizewell link road General statement of opposition to the construction of Sizewell link road.	The comments are noted	6

4.14 Associated Developments – Yoxford roundabout

a) Overview

4.14.2 A total of 15 Interested Parties raised matters regarding the Yoxford roundabout.

4.14.3 **Table 4.13** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.13: Associated Developments – Yoxford roundabout

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Size of Yoxford Roundabout Clarification requested on the design of Yoxford roundabout. Suggestion that the roundabout is oversized. Central overrunnable / demountable islands with demountable signs and bollards to be used for the delivery	The Yoxford roundabout has been designed in accordance with the Design Manual for Roads and Bridges and the design has been tested and worked up in discussion with the highway authority and the police. The largest abnormal loads for Sizewell C are proposed to be delivered via the beach landing facility. However, the Yoxford roundabout and main	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
of Abnormal Indivisible Loads (AILs) should be removed. AILs should be re-routed for delivery via the beach landing facility. Alternatively, overrunable / demountable areas should be removed at end of the construction period.	development site roundabout also need to be designed to cater for road borne abnormal loads.	
Environmental Impacts Concern that works at the Yoxford roundabout will result in a significant detriment to local residents in terms of noise, light pollution, air pollution, traffic and congestion. Concern that no provision for a pedestrian crossing has been made. As a result, increased traffic will compromise the safety of local residents and fragment the village further.	An assessment of the environmental impacts of the Yoxford roundabout has been undertaken and is reported in Volume 7 of the ES (Doc Ref. 6.8) [APP-478 to APP-508]. The assessment considers the likely effects from the construction and operation of the development. Where potential significant effects have been identified, mitigation measures are proposed. This includes the implementation of a Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] to control construction impacts, such as the risk of pollution, as well as other measures, such as the provision of landscaping, buffer zones and sustainable drainage systems to protect receptors and reduce the risk of flooding. It is also proposed to develop a lighting strategy which seeks to minimise the effects of light spill on the surrounding environment whilst meeting necessary safety standards. A VISSIM micro-simulation model has been developed of the Yoxford area to assess the transport effects of Sizewell C traffic and has concluded that the roundabout would operate within capacity for all scenarios. The existing footway on the Stasis House side of the roundabout is to be upgraded.	14

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The proposed minor reduction to site boundary of the Yoxford roundabout is described Volume 1, Chapter 7 of the ES Addendum (Doc Ref. 6.14) [AS-181].	

4.15 Associated Developments – Freight Management Facility

a) Overview

4.15.2 A total of 20 Interested Parties raised matters regarding the freight management facility.

4.15.3 **Table 4.14** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.14: Associated Developments – Freight Management Facility

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Location of the proposed freight management facility is unsuitable Concern the location of the freight management facility is unsuitable, as there will be a considerable risk of accidents on the A1156 and the old A45 junction over the period of operation of the site. Concerns that development of this site will also facilitate the development of the greenfield strip of land	The freight management facility has two functions. The primary day to day function of the freight management facility is to both control the release of deliveries onto the local highway network and the subsequent arrival at the main development site, and to provide welfare facilities for drivers and a space where paperwork, vehicles, and goods can be checked prior to delivery to site. The secondary, and far less frequent function of the freight management facility, is to enable HGVs to be held in the event of an incident on the highway network, which forms part of the management	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
between Ipswich and Felixstowe running along the path of the A14. More appropriate sites are available on A12 northbound.	measures included in the Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) [APP-607]. SZC Co. has needed to balance the requirements of the primary function of the freight management facility and the less frequent secondary function, when selecting a preferred location. Given the primary day to day function of the freight management facility, it has been located at the start of the local highway network and to the south of Martlesham and Woodbridge. Further information is provided within the Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] and Volume 8, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.9) [APP-514]. The junction of A1152 with Felixstowe Road has been assessed in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and is referred to as Junction 41. The junction is forecast to operate well within capacity. The Delivery Management System (DMS) will require HGVs delivering to the main development site to book a delivery slot. The DMS booking system will enable the flow of HGV deliveries to the freight management facility and main development site to be controlled and spread over the course of the day.	
Environmental Impacts Concerns over the impacts of the freight management facility at Seven Hills, specifically with regards to the use of a greenfield site, traffic impacts on already	The purpose of the freight management facility includes the need to reduce the prospect of congestion caused by HGV traffic, including at the A12/A14 junction through the management and controlled release of HGVs to the main development site, with a potential need to limit movements during peak or sensitive hours on the network. Further	15

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
congested roads, increased delays, air, noise and light pollution at the Seven Hills junction. Concern over access to the site from the A1156, whether changes will be made to the junction with the A1156 adjacent to the Seven Hills Crematorium and the use of the existing old Felixstowe Road by HGVs. Concerns the proposed development will lead to an unacceptably high risk of accidents at the junction as HGVs manoeuvre. Mitigation is required by provision of a redesigned layout, ideally with signalisation, at the Crematorium junction. Concerns the development will also obstruct passage to the nationally strategically important container port at Felixstowe.	information can be found in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017]. An assessment of likely environmental effects of the freight management facility during construction and operation is presented within Volume 8 of the ES (Doc Ref. 6.9) [APP-509 to APP-537]. The proposals include the use of landscape bunds, perimeter planting, shorter lamp columns and a best practice approach to lighting to minimise light spill. Structures and buildings have been designed to create an unimposing appearance that harmonises with the surroundings and with the buildings screened as far as possible in line with the Associated Developments Design Principles document (Doc Ref. 8.3) [APP-589]. Further information can also be found in Volume 8, Chapter 6 (Landscape and Visual Amenity) of the ES (Doc Ref. 6.9) [APP-520 to APP-522]. Construction activities would be managed in accordance with the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. With these measures in place, no likely significant environmental effects have been identified. The Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] summarises the development of a VISSIM micro-simulation model of the A12 corridor in order to provide a more detailed assessment of the A12 corridor and the junctions between Seven Hills and Melton. The model includes the Seven Hill junction, which is proposed to be partially signalised as part of the committed Adastral Park development. Based on the results of the micro-simulation VISSIM model, it is not considered that any additional highway	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	improvements are required at the Seven Hills junction beyond the consented scheme. In addition, the junction of A1152 with Felixstowe Road has been assessed in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and is referred to as Junction 41. The junction is forecast to operate well within capacity and, as such, no highway improvements are proposed at this junction.	
Reinstatement Query regarding what guarantees will be in place that the freight management facility site will be reinstated as agricultural land when it is no longer needed?	Requirement 24 of Schedule 2 of the Draft DCO (Doc Ref. 3.1(B) [AS-143]) requires that the freight management facility must be demolished 12 months after the construction of Sizewell C is complete. Part 2 of that requirement states that the land must be restored to a condition suitable for agricultural use.	1

4.16 Associated Developments – Rail

a) Overview

4.16.2 A total of 10 Interested Parties raised matters regarding the rail proposals.

4.16.3 **Table 4.15** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.15: Associated Developments – Rail

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Need case and alternatives for the green rail route and rail improvements What is the need case for the green rail route and rail improvements? There is lack of information on the proposed sources of building materials and, therefore, the ability to transport materials by rail. Concerns that rail transport will have limited benefits and that it will not solve the transport issues. Have alternative designs been considered to reduce the effects of the rail proposals, such as tunnelling the line under the B1122/ Abbey Lane?	Planning policy requires SZC Co. to optimise the use of sustainable modes of transport including rail and marine. This has been reinforced by consistent feedback from stakeholders that transport options which reduce HGV movements should be fully investigated. As a consequence, SZC Co. has developed a rail strategy as part of its overall freight management strategy and developed its rail proposals through close engagement with Network Rail and several stages of consultation. In its January 2021 submission to the Planning Inspectorate, SZC Co. made changes to enhance the rail strategy (referred to as 'accepted changes (April 2021)') and, at the same time, provided an update to its Freight Management Strategy (Doc Ref. 8.18) [AS-280] which includes information on the origin of construction materials. SZC Co.'s logistics and delivery team is clear that there is a strong market for the movement of bulk construction materials by rail and sea and that the updated Freight Management Strategy is deliverable subject to the necessary consents being achieved, including agreement with Network Rail, which is currently the subject of close joint working. Information on alternatives considered for the green rail route and rail improvements is presented within Volume 9, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.10) [APP-544] and Appendix A (Site Selection Report) of the Planning Statement (Doc Ref. 8.4) [APP-591].	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Suggestion for rail improvements The current proposals prevent the provision of a regular hourly passenger train timetable due to the proposal to run one of the freight trains during daytime. Suggestion that some relatively minor changes to the signalling at Saxmundham, the introduction of an intermediate signalling block section near Wickham Market, for which passive provision was made at the time of resignalling in 2012, and line speed improvements for freight trains, where feasible, would enable the timetable to accommodate the proposed one daytime freight train movement without severely impacting on the passenger train timetable. The rail line is inadequate for construction loads in its current state and is single track all the way to Ipswich and Lowestoft. Night-time trains could be avoided by incorporating a length of dual track in the Campsea Ashe area, effectively doubling line capacity during the day. Further extension of continuous rail from Bealings to Saxmundham would reduce noise impact and maintenance of many life expired timber sleepers.	Further joint working with Network Rail has focussed on a number of issues, including the impact on train paths and the timetable. It is not anticipated that there would be any impact on the passenger timetable from the provision of up to 4 trains per day to Sizewell C, running over night and utilising an existing freight path during the day. Network Rail has confirmed the feasibility of this programme and SZC Co. is working towards a Statement of Common Ground with Network Rail to this effect. SZC Co. plan to operate trains in line with the existing loading parameters for the East Suffolk Line and has tested line capacity taking account of a range of factors (including permitted speed, train length, trailing weight and route availability). The key constraint to operating daytime freight trains is the speed differential between the freight trains (20mph) and passenger trains (50mph). Freight trains would either delay the passenger train behind, or delay a passenger train in the opposite direction if they ran during the day. While a passing loop near Wickham Market was considered, the freight train speed would also need to be increased, and the work necessary to increase the freight train speed was not considered feasible. To ensure a deliverable solution, which would also not impact on the existing passenger services, operating freight trains overnight, when no passenger trains are running, is the only feasible solution.	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Disruption during removal All disturbance effects to local residents from the construction of the green rail route will be repeated 12 years later during its removal, resulting in a high level of impact and disturbance over a short period of time.	The proposed development offers the benefits of alleviating the level of HGV movements otherwise required to supply the main development site with construction material. In doing so, it responds positively to national policy objectives. Whilst there are anticipated to be temporary significant effects associated with noise during the delivery of freight materials to the main development site and upon amenity and recreation resources, other effects associated with the construction, operation and removal and reinstatement phases are predicted not to be significant. Environmental effects and mitigation proposed for the construction and removal and reinstatement phases of the green rail route are presented within Volume 9 of the ES (Doc Ref. 6.10) [APP-538 to APP-571]. The green rail route is proposed to minimise disruption, and reduce HGV numbers, during construction of Sizewell C. Once deliveries of freight to the main development site are no longer required, the green rail route would no longer be required and it would be removed to return the land back to the landowners. Retaining the line indefinitely would not be justified and would permanently sever the land it runs through to the landowners' detriment. However, the upgrades to the existing Saxmundham to Leiston branch line, and additional mitigation measures proposed to the East Suffolk line in agreement with Network Rail, would provide a permanent legacy benefit to the existing rail network.	1
Impact on Port of Felixstowe	Further joint working with Network Rail has focussed on a number of issues, including the impact on train paths and the	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
The rail proposals will have potential negative effects on the available freight capacity from the Port of Felixstowe to the west of the Westerfield junction, especially in the medium term. Lack of rail capacity in short and medium term is critical to the continued viability of the Port of Felixstowe. The wider impacts on the rail network, specifically connections to Felixstowe, have not been assessed.	timetable. This includes the provision of up to 4 trains per day to Sizewell C, running over night and utilising an existing freight path during the day, in order to minimise disruption on both the local road network, by reducing the reliance on HGVs for freight delivery, and the existing rail network by operating outside of peak hours and on an available freight path during the day. That capacity is available without impacting operations at Felixstowe. Network Rail has confirmed the availability of this capacity and SZC Co. is working towards a Statement of Common Ground with Network Rail to this effect.	

4.17 Air Quality

a) Overview

4.17.2 A total of 281 Interested Parties raised matters regarding air quality.

4.17.3 **Table 4.16** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.16: Air Quality

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Dust and air pollution from construction (general) Concerns that the Sizewell C Project will increase dust and air pollution during construction. Concerns that dust and contaminants would be blown off the construction site, including the borrow pits and stockpiles, on to the road network and into people's properties. Suggestion that no mitigation has been identified to address this issue and this will impact on agricultural land adjacent to the construction. Concerns that dust management for spoil heaps and stockpiles is inadequate.	SZC Co. recognises the concern about the impact on air quality from the Sizewell C Project, including dust and emissions impacts during the construction phase. Volume 2, Chapter 12 (Air Quality) of the ES (Doc Ref. 6.3) [APP-212] and Volumes 3 to 9, Chapter 5 of the ES (Doc Ref. 6.4 to 6.10) [APP-357, APP-387, APP-418, APP-454, APP-487, APP-517, and APP-548] include the assessment of air quality impacts arising from the construction of the Sizewell C Project. The air quality, and associated impact assessments, consider the impact on residential receptors, as well as ecological receptors, including surrounding habitats (e.g. Volume 2, Chapter 14 (Terrestrial Ecology and Ornithology) of the ES (Doc Ref. 6.3(A)) [AS-033]), and users of amenity and recreation resources (e.g. Volume 2, Chapter 15 (Amenity and recreation) of the ES (Doc Ref. 6.3) [APP-267]).	191

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Air quality impacts arising from the construction and removal and reinstatement phases (where applicable) would be managed through a range of control measures detailed in the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273], which will include measures as per the IAQM Guidance based on treating the construction site as a 'high risk' site. These measures will be incorporated into construction working practices to reduce the likelihood of significant adverse dust impacts. In addition, an outline Dust Management Plan (oDMP) is included within Volume 2, Appendix 12A of the ES (Doc Ref. 6.3) [APP-213], which sets out the approach to dust mitigation and monitoring that the contractors would be required to implement.	
Air pollution from traffic Concerns about the Project on the grounds that increased traffic during construction may create pollution and reduce air quality. There are also concerns there will also be an increase in air pollution from the traffic using the new road infrastructure. Concerns were raised that people with asthma will be especially vulnerable (e.g. due to an increase in ozone pollution). Concerns that SZC Co.'s proposals do not address emissions of either freight vehicles, or local supplementary supplier traffic.	SZC Co. recognises the concern about the impact on air quality from the Sizewell C Project, including from vehicle emissions, particularly during the construction phase of the Sizewell C Project. This is one of the drivers for the change request, submitted in January 2021, through which SZC Co. is intending to reduce the use of road Heavy Goods Vehicles (HGVs) to bring construction materials to site, by increasing the number of rail and marine deliveries. Through the accepted changes (April 2021), the emissions of air pollutants such as nitrogen oxides, particulates and carbon dioxide from HGVs will correspondingly be reduced, although it should be noted that no significant effects on air quality from Sizewell C Project traffic were identified in the original assessment.	124

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Volume 2, Chapter 12 (Air Quality) of the ES (Doc Ref. 6.3) [APP-212] sets out the assessment of air quality impacts arising from the construction and operation of the main development site, including the associated traffic movements on the wider traffic network. This has been updated with additional information as presented in Volume 1, Chapter 2 of the ES Addendum (Doc Ref 6.14) [AS-181] and associated appendices provided in Volume 3 of the ES Addendum (Doc Ref 6.14) [AS-205]. The air quality impact assessment considers the impact on residential receptors as well as ecological receptors, including surrounding habitats (e.g. refer to Volume 2, Chapter 14 of the ES (Terrestrial Ecology and Ornithology)) (Doc Ref 6.3(A)) [AS-033], and users of public rights of way (e.g. refer to Volume 2, Chapter 15 of the ES (Amenity and Recreation)) (Doc Ref 6.3) [APP-267]. In addition, the air quality impact assessment considers potential effects on any Air Quality Management Areas (AQMAS) in the area and no significant effects were identified. Air quality effects from vehicles, construction activities and operational point sources have been assessed. For the road traffic emissions, a number of conservative assessment scenarios have been modelled and the modelling results have been calibrated against current baseline conditions taken from ongoing air quality monitoring data gathered in the area. SZC Co. has engaged with the local planning authorities and their advisers to agree the assessment scenarios to be considered and the data to be used. Ozone is called a secondary pollutant as it is not directly	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	emitted from engines or combustion sources and thus is not considered within the assessment. Locally, nitrogen oxides, such as those emitted from vehicles, react with background ozone to reduce concentrations In the ES, no significant effects were predicted to arise from vehicle emissions as a result of SZC Co. traffic, following Application of the planned mitigation measures, and air quality effects remain not significant as a result of the proposed change in freight management strategy. The proposed mitigation measures are set out in the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273], the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608] and the Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) [APP-607]. The CTMP (Doc Ref. 8.7) [APP-608] specifies the construction traffic routes to be used by HGVs, as well as delivery hours and emergency procedures in the event that the designated routes are temporarily unavailable. In addition, SZC Co. is working with the local planning authorities to agree set commitments for the use of cleaner vehicle engines (that meet the Euro-VI standards) within the construction HGV fleet. This commitment is included within the CoCP (Doc Ref. 8.11(A)) [AS-273] and will further reduce air quality impacts from the conservative assessment presented in the ES and ES Addendum.	
Breaching air quality standards and limits	The scope of the air quality assessment presented in the ES considers the impacts of the construction, operation, and	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Concern that air quality standards and limits will be breached as a result of the increased air pollution from the Sizewell C Project.	restoration and reinstatement, where relevant, of the proposed development. The scope of the assessment was established through a formal EIA scoping process undertaken with the Planning Inspectorate and ongoing consultation and engagement with statutory consultees, as summarised in Volume 1, Appendix 6H of the ES (Doc Ref. 6.2) [APP-171]. The evaluation of the significance of air quality effects arising from traffic and point source emissions has been based on professional judgement and the criteria outlined in the Environmental Protection UK and IAQM publications, and Environment Agency guidance respectively, which collectively provide a framework for undertaking an air quality impact assessment for a development, and allows for a number of aspects to be taken into account including: - the magnitude of the change caused by the proposed development; - the absolute predicted environmental concentration in relation to the air quality objectives; - the likely duration of effects; and - the level of uncertainty associated with effects (i.e. the extent to which worst case assumptions have been utilised). Volume 2, Chapter 12 (Air Quality) of the ES (Doc Ref. 6.3) [APP-212] presents the assessment of air quality impacts arising from the construction and operation of the main development site, including the associated traffic movements on the wider traffic network. This has been updated with	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	additional information as presented in Volume 1, Chapter 2 of the ES Addendum (Doc Ref 6.14) [AS-181]. In the ES, no significant effects were predicted to arise from vehicle emissions as a result of SZC Co. traffic, following Application of the planned mitigation measures, and air quality effects remain not significant as a result of the proposed change in freight management strategy. In addition, SZC Co. is working with the local planning authorities to agree set commitments to the use of cleaner vehicle engines (that meet the Euro-VI standards) within the construction HGV fleet. This commitment is included within the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] and will further reduce air quality impacts from the conservative assessment presented in the ES and ES Addendum. Similarly, no air quality standards for the protection of human health are predicted to be breached as a result of point source emissions associated with the proposed development.	
Shadow Habitats Regulations Assessment (HRA) Concerns that the air quality work that underpins the conclusions in the Shadow HRA is incomplete. This is based on for example: (a) only a limited number of receptor locations have been used in modelling and no	A full ecological assessment of the Sizewell C proposals is provided in the relevant chapters of the ES (Doc Ref. Book 6) on a site-by-site basis updated as relevant within the ecological assessments within the ES Addendum (Doc Ref. 6.14). The potential for impacts on European sites is assessed in detail in the Shadow HRA (sHRA) report (Doc Ref. 5.10) [APP-145 to APP-152] and updated in the sHRA Addendum (Doc Ref. 5.10Ad) [AS-173 to AS-178]. No assessment of ammonia concentrations from road vehicles has been included, as these are not expected to have resulted	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
justification for the selection of the locations is provided; (b) no assessment of ammonia deposition has been provided; (c) predicted exceedance of critical loads and levels for nitrogen oxides concentration, nutrient nitrogen and acid deposition are assumed to be only relevant to “proportions of the site immediately adjacent the road” rather than quantified or modelled geographical extents being provided; (d) save for two brief references, there is no evidence that other plans or Projects to identify cumulative effects have been considered.	in significant contributions at the habitat sites. In addition, ammonia emissions are not identified as pollutants requiring assessment by the new guidance on assessing impacts from road traffic emissions (LA105) published by Highways England, road traffic ammonia emissions are not included in the Defra toolkit nor was it identified as being appropriate to consider in the EIA Scoping Report [APP-168] or Scoping Opinion [APP-169]. There are no ammonia emissions from the point sources associated with the proposed development. Impacts from road transport emissions on sensitive ecological receptors were assessed at 5m intervals for the first five points along a transect, 10m from the next eight and 25m thereafter along a 200m transect from the road to assess the impacts on the receptors within 200m of the road. The worst point was reported in the ES, and for receptors considered the worst point was the site immediately adjacent to the road. With respect to cumulative effects, traffic-related NOx emissions and nitrogen and acid deposition associated with the Sizewell C proposals in-combination with background pollution and the forecast traffic from other Projects and plans was assessed. The results are presented in Volume 2, Appendix 12B of the ES (Doc Ref. 6.3) [APP-213]. A number of scenarios have been assessed for emissions from the proposed emergency diesel generators using conservative assumptions and long-term effects are insignificant. While short term effects may exceed critical levels in some scenarios, this only occurs at limited locations within the ecological receptors and the effects are not	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	considered to be significant as summarised in the supporting HRA assessment reports. The potential for other point source emissions to result in in-combination effects has been considered in light of the critical load/level screening criterion. There are no other significant point sources, not already operating, that would affect the same parts of the protected sites and, therefore, the requirement for 'in combination' assessment has been met.	
Robustness of the air quality assessment Concerns over how emissions have been modelled and whether the assessment sufficiently models all sources of emissions (e.g. PM_{2.5} and ozone). Concern that seasonal, meteorological and climate change impacts on air pollution have not been considered.	The scope of the air quality assessment presented in the ES considers the impacts of the construction, operation, and restoration and reinstatement where relevant, of the proposed development. The scope of the assessment was established through a formal EIA scoping process undertaken with the Planning Inspectorate and ongoing consultation and engagement with statutory consultees, as summarised in Volume 1, Appendix 6H of the ES (Doc Ref. 6.2) [APP-171]. Where new information, tools and guidance have been published since the submission of the Application which enable a more accurate prediction of future air quality backgrounds (such as new versions of the Defra Background Concentration Maps using 2018 as the reference year to Project future background concentrations, an Emissions Factors Toolkit and NO_x to NO₂ conversion tool), the air quality modelling was updated and included in Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181].	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Ozone is called a secondary pollutant as it is not directly emitted from engines or combustion sources and thus is not an emission that is to be considered within the assessment. Emissions of PM_{2.5} from transport have been included within the transport emissions assessment model to quantify PM_{2.5} concentration at sensitive receptors. PM_{2.5} emissions were calculated using Defra's Emissions Factors Toolkit based on traffic data provided for the Project. The air quality assessment methods consider the full range meteorological conditions that are likely to occur at the site. Projected climate change in the UK is not likely to introduce large enough changes to the occurrence or absence of combinations of meteorological conditions to alter the impacts predicted within the air quality assessment. This is the case for both short and long-term assessment criteria used in the assessment.	
Air quality monitoring and mitigation Concerns over lack of monitoring and mitigation proposed for impacts on air quality. Suggestion that further air quality monitoring should be undertaken during the works in the vicinity of the construction site, and routes for vehicles to and from the site. Suggestion that an action plan is required in case of exceedances of air pollutant concentrations. Suggestion that electric buses should be included as a mitigation measure.	SZC Co. understands there are concerns about the emissions associated with Sizewell C traffic, both local to the associated developments and along the main traffic routes. Air quality modelling has been undertaken for the early year and peak year traffic assessment scenarios for all key road links on the network affected by the Sizewell C Project. The assessment of traffic emissions is presented in the air quality chapters of each of the proposed development site volumes of the ES (Book 6), and has been updated in the ES Addendum (Doc Ref. 6.14) submitted alongside the change Application. No significant air quality effects are predicted as a result of the	4

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	increased traffic associated with Sizewell C. However, proposals for the use of electric vehicles have been considered by SZC Co., including electric buses and the integration of Electric Vehicle (EV) charging in the park and rides. Further information, including in relation to mitigation measures, is contained in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017]. SZC Co. will continue to support air quality monitoring efforts carried out by East Suffolk Council around the main traffic routes to demonstrate continued compliance with air quality objectives. Dust monitoring will also be undertaken around the construction sites to supplement the baseline dust monitoring that has been undertaken. The scope of this monitoring will be agreed through the Code of Construction Practice (CoCP) (Doc Ref. 8.10(A)) [AS-273]. Further engagement with East Suffolk Council is ongoing to agree monitoring commitments.	

4.18 Amenity and Recreation

a) Overview

4.18.2 A total of 157 Interested Parties raised matters regarding amenity and recreation.

4.18.3 **Table 4.17** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.17: Amenity and Recreation

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Impacts on Public Rights of Way Concern over impacts on public rights of way, severance of footpaths, cycling paths and bridleways, with increased risk of road accidents as a result. Specific concerns raised on impacts on Sandlings Walk, access to the beach, footpaths severed by two-village bypass and the green rail route. Proposals for new public rights of way are inappropriate, with no evidence of a suitable degree of engagement around the detail of these. New routes that have been suggested are taking footpaths from rural country lanes to running adjacent to roads with noise and air pollution. No legacy benefit to the community.	SZC Co. has sought to minimise the impacts of the Sizewell C Project on public rights of way (PROW). Impacts on PROW are assessed in detail in Volume 2, Chapter 15 (Doc Ref. 6.3) [APP-267] and Volumes 3-9, Chapter 8 of the ES (Doc Ref. 6.4 to 6.10) [APP-366, APP-397, APP-429, APP-464, APP-497, APP-526, APP-558], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188]. A range of mitigation proposals are set out in the ES to minimise effects on PROW users, such as minimising physical disruption, closures and diversions, as far as possible. The long-distance walking routes along the coast (the Suffolk Coast Path, and the future route of the England Coast Path) would remain open during construction and operation of Sizewell C, except in rare circumstances where it is considered unsafe to do so. An inland diversion would be provided for periods of temporary closure to ensure that people can continue to walk the Suffolk Coast Path, Sandlings Walk and the England Coast Path at all times, albeit along a longer inland route. The period of these closures and diversions would be minimised as far as possible. The following enhancements to the PROW and wider access network are also included within the proposals: enhanced north-south recreational routes through the creation of a 4.5km off-road multi-user bridleway for equestrians, cyclists and pedestrians. This includes off-road routes where existing rights of way and the Sustrans	100

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	cycle route currently run along roads, and the creation of new routes where none exist at present; • a new off-road bridleway from Valley Road, connecting to the new off-road bridleway described above; • a new formalised permissive footpath from Kenton Hills car park, connecting to the extensive permissive footpath network in the woodland and to the Sandlings Walk and the Coast Path; • the provision of additional spaces at Kenton Hills car park, surface improvements, selective vegetation removal to create a more open environment and improvements to signage; • a permanent new footpath north of Leiston connecting two existing PROW and Abbey Lane; and • the creation of a naturalistic coastal grassland/dune setting to the Coast Path on and east of the new sea defences as part of the accessible 'coastal margin' which will be designated under the Marine and Coastal Access Act 2009. The DCO changes includes a link from Aldhurst Farm to Kenton Hills car park via a crossing over Lover's Lane. This will substantially improve the west to east connectivity and the surrounding PROW network. The link will be provided for pedestrians during construction and it will be upgraded to a Bridleway following completion of construction. The Rights of Way and Access Strategy which describes the above proposals and temporary diversions during construction is set out within Volume 2, Appendix 15I of the ES (Doc Ref	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	6.3) [APP-270], with detailed Rights of Way Plans included within Book 2 (Doc Ref. 2.4(B) [AS-113] and [AS-114]). The Rights of Way and Access Strategy has been informed by observation and questionnaire surveys of existing users of recreational resources within the vicinity of the main development site, and by consultation with stakeholders, including Suffolk County Council, East Suffolk Council, Natural England, the Suffolk Local Access Forum, the Ramblers Association and the Suffolk Coast and Heaths AONB Partnership. Road safety audits have been completed for the two village bypass and Sizewell link road, and other highways within the scheme to minimise the risk of accidents on PROW. In line with the recommendations of the road safety audits, adequate warning will be provided for vehicles that pedestrians may be crossing the carriageway and adequate visibility will be provided to allow pedestrians to safely judge gaps in traffic prior to crossing.	
General amenity of the area will be diminished General amenity of the area will be disrupted and enjoyment of wildlife / landscapes lost. Sizewell C Project will destroy the peaceful nature and tranquillity of the area. The perception of the area as a desirable place to live and visit would be greatly diminished.	SZC Co. has undertaken a full assessment of the environmental aspects – including noise, transport, socio-economics, visual amenity and air quality – as part of Volumes 2-9 of the ES (Doc Ref. 6.3-6.10) [APP-178 to APP-571], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188]. Impacts specifically on amenity and recreation, including tranquillity, are assessed in detail in Volume 2, Chapter 15 (Doc Ref. 6.3) [APP-267] and Volumes 3-9, Chapter 8 of the ES (Doc Ref. 6.3 to 6.10) [APP-366, APP-397, APP-429, APP-464, APP-497, APP-526,	86

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	APP-558], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188]. Each assessment considers the likelihood of significant adverse effects, and where appropriate, measures to reduce or avoid them. This includes physical design measures embedded into the design, and management plans that will be enacted during the construction of the Sizewell C Project. In order to aid local residents in understanding the potential effects on their communities, SZC Co. has also developed a Community Impact Report (Doc Ref. 5.13) [APP-156] which summarises at a local ward level the effects of the Sizewell C Project on local communities. SZC Co. also recognises that there will be residual, intangible effects on communities which may result in a perception of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected.	
Assessment of recreational effects insufficient and lack of detail on mitigation Assessment of recreational effects not supported by best available scientific evidence and there are issues with SZC Co's approach: (a) out-of-date data from 2014/2015 has been used to establish the baseline position on visitor pressure;	Whilst information from 2014/15 visitor surveys has been used to inform the Amenity and Recreation assessment within the ES, further visitor surveys from 2016-2019 have also been used to inform the assessment. The visitor survey data used to inform the ES is included within Volume 2, Appendices 15A-15D of the ES (Doc Ref. 6.3) [APP-268 to APP-270]. The assessment of cumulative effects with other plans and Projects is presented within Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578].	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
(b) no consideration of other plans and Projects to identify cumulative effects; (c) reliance on a Rights of Way and Access Strategy to mitigate potential significant effects, yet the strategy has no specific details on the affected sites or any proposed measures; (d) draft Section 106 Heads of Terms refer to a contingency fund for European sites to mitigate effects arising from recreational displacement and there is also reference to 'resilience funds' for RSPB Minsmere and the National Trust Dunwich Heath and Beech. The need for these funds undermines the conclusion that the proposed development will not adversely affect the integrity of any European sites. SZC Co. appears to agree that there is uncertainty. Also, no clarity as to precisely which avoidance/mitigation measures these funds would be used for, the mechanism for remedial work, if required, or how this would be agreed with the relevant authorities.	The Rights of Way and Access Strategy included within Volume 2, Appendix 15I of the ES (Doc Ref 6.3) [APP-270] sets out the framework within which detailed design for public rights of way would be developed and submitted to the highway authority for approval pursuant to the Draft DCO (Doc Ref. 3.1(B) [AS-143]), including the temporary and permanent changes to the rights of way alignments at the main development site. The Rights of Way Plans included within Book 2 (Doc Ref. 2.4(B) [AS-113] and [AS-114]) set out all accepted changes (April 2021) to rights of way alignments and where new rights of way are to be established for approval. Disturbance due to an increase in recreational pressure is a potential effect pathway that has been assessed within the Shadow HRA report (Doc Ref. 5.10) [APP-145 to APP-152] and the Shadow HRA Addendum (Doc Ref. 5.10Ad) [AS-173 to AS-178]. As the Shadow HRA report notes, SZC Co. is committed to the principles outlined within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). A payment to accord with the RAMS calculated for campus and caravan park workers, as determined by East Suffolk Council, is to be included in the Section 106 contribution. A bespoke Monitoring and Mitigation Plan has been prepared specifically for Minsmere to Walberswick and Sandlings (North) European sites to address the measures which may be required at these two European sites at which the potential for substantive displacement was predicted; this plan will be	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	submitted at Deadline 2 of the Examination. These measures are being deployed to ensure that there is no adverse effect on the integrity of these European sites. The monitoring and mitigation at these sites would be funded through financial contributions and through the Minsmere and Sandlings (north) contingency fund in the Section 106 Agreement. Further monitoring would be undertaken at the Sandlings SPA (Central and South) and the Alde-Ore Estuary SPA to detect any recreational displacement and any required mitigation would be provided through the Environment Fund. Further detail on this will be provided within a second monitoring and mitigation plan for recreational displacement.	

4.19 Climate Change

a) Overview

4.19.2 A total of 246 Interested Parties raised matters regarding climate change.

4.19.3 **Table 4.18** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.18: Climate Change

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Sizewell C does not provide carbon benefits quickly enough Benefits of Sizewell C to climate change will come too late in comparison with other technologies. Sizewell C will not contribute positively to the UK's climate change obligations until 2040, due to the long construction period and because CO₂ emissions involved in building Sizewell C will take 6 years to offset.	Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342] stated that the Sizewell C Project would take 6 years to offset its construction emissions. This estimate was based on a comparison of Sizewell C output with long-term forecasts for the grid average carbon emissions (the grid average comparison approach). The approach used in the ES is consistent with the approach taken in a number of other Environmental Statements for nationally significant infrastructure projects (NSIPs) to contextualise potential offsets. Following the receipt of comments on the assessment, SZC Co. has considered the issue further and concluded that within the context of Sizewell C - and any other new low carbon generation project - the grid average comparison approach used in the ES is overly conservative and has significant limitations as a means of assessing the carbon savings that new low carbon generators can provide. Some of the issues that give rise to this conclusion are explained further below. However, this does not affect the overall conclusion of the assessment presented within Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342] namely that the Sizewell C Project will provide a significant contribution to reducing the greenhouse gas (GHG) emissions in the long term. In the short-term the GHG emissions associated with the construction of Sizewell C will not affect the ability of the	189

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Government to meet its relevant carbon budgets. These conclusions remain robust. <i>The grid average comparison approach</i> Under the grid average comparison approach, new generation projects are compared with a future projection for the electricity grid. The new project is assumed to displace carbon to an amount equal to the carbon intensity of the forecast grid. In turn, the projected grid intensity would be derived from a long-term forecast for the electricity sector (which would incorporate assumptions about changes in demand and rates of new build technologies and other key variables). To illustrate the grid average comparison approach: If the future grid was assumed to be 20% fossil fuelled, then 20% of the additional output from a new low carbon generator would be assumed to displace fossil fuels. A consequence of this approach is that the lower the carbon intensity of the hypothetical future grid, the lower the carbon saving that any new low carbon project is forecast to have. For example, if the future grid was assumed to be only 10% fossil fuelled (rather than 20% as above), then only 10% of the additional output from a new low carbon generator would be assumed to displace fossil fuels. The grid average comparison approach implicitly assumes that the forecast grid carbon intensity would be achieved	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	without the specific project in question. For example, if Sizewell C was being compared to a grid that was forecast to have decarbonised to a point where only 10% of the power was from fossil fuelled sources (for reference, the UK grid is currently around 40-50% fossil fuelled), then it is assumed that this level of decarbonisation would happen without Sizewell C. I.e. Sizewell C would not help the grid reach the level of decarbonisation where only 10% of the grid is fossil fuelled. It is important to note that this is not a Sizewell C (or new nuclear) specific issue. Any new low carbon generation project which was compared to a future grid projection would also be assumed to not be contributing to the level of decarbonisation achieved in the projection. <i>UK power market forecasts are for a low carbon system. Under the grid average approach, this results in low implied carbon savings from new projects.</i> Forecasts for the future UK grid are typically developed through a modelling exercise during which the party undertaking the modelling will set out assumptions and constraints on key parameters which influence the modelling outputs (outputs include generation technology capacities, power demand and the average carbon intensity of the electricity grid). These modelling exercises typically reflect the UK's decarbonisation requirements and objectives (including carbon budgets which require falling levels of UK carbon	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	emissions and the 2050 net zero obligation). For example, the model will be set up so that the output is consistent with net zero in 2050 (in the most recent BEIS Energy and Emissions Projections there are two illustrative scenarios which specifically achieve net zero (Ref. 7)). More generally, as the modelling exercises that provide forecasts for the future electricity grid tend to take account of the UK's decarbonisation objectives, it follows that as a result, prevailing electricity forecasts show very low levels of future carbon intensity. Consequently, the grid average comparison, when applied with prevailing forecasts for an electricity system which is mostly decarbonised, implies that any (and all) new low carbon generation projects (nuclear, wind, solar etc) would provide minimal carbon emissions savings. On this basis, new projects appear to take a long time to displace their construction emissions. This can be seen in the Sizewell C calculation in Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) APP-342 and has been highlighted in the relevant representations, but a similar effect would apply if the new project in question was for any other low carbon technology. <i>Power sector forecasts show a large amount of new build low carbon capacity</i> In order to achieve the low grid average carbon intensities which are implied in the electricity sector forecasts used in the	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	ES calculation (and other forecasts for the UK electricity sector), large increases in low carbon generation output will be required relative to today's levels: • Low carbon generation output would need to roughly double between today and the early 2030s; and • increase 3-4 times compared to today's outputs by 2050 depending on which forecast is considered. In other words, achieving the low future levels of grid carbon intensity assumed in forecasts for the electricity grid would require a significant build of new low carbon projects from today and continuing through to 2050. Importantly, this means continuing to build a large number of low carbon projects after the electricity grid has reached a very low (or even zero) carbon intensity in order to meet the continually increasing demand for low carbon electricity. This increasing demand for low carbon electricity occurs because other sectors within the economy (for example transport, heating, and industry) are anticipated to achieve decarbonisation by electrification – i.e. the energy sources of these sectors will switch from hydrocarbons to low carbon electricity. This is considered extensively in the CCC net zero report and technical appendices and can be seen in the BEIS Energy and Emissions Projections (Ref. 7).	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	<i>Carbon savings calculated using the grid average comparison approach in the context of the forecasts described above</i> If enough low carbon generation is built to achieve the level of carbon intensity assumed in the Government's forecasts, then the new capacity would serve to avoid carbon emissions by: a) reducing the amount of fossil fuelled generation required in the electricity sector to the extent reflected in the model, in effect, this is displacing carbon emissions in electricity production. Within the model, new low carbon generation will be mostly or entirely displacing fossil fuelled power generation; and b) meeting increasing demand for low carbon electricity from e.g. heating, transport and industry, in effect new low carbon generation is displacing carbon emissions from other sectors. In other words, the projected new capacity in power market models are effectively modelled to achieve carbon 'savings' via either (or both) effects (a) and (b) above. As the grid average comparison assumes that the projected future mix would occur without Sizewell C (or any other new low carbon project) being constructed and becoming operational, the consequence is that an appropriate proportion of the benefits of (a) or (b) is not ascribed to the new project being assessed. Instead, the only benefit implied by the grid average calculation is to remove a proportion of the residual grid emissions in the modelled outcome.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	This approach does not reflect the following important factors: - the large amount of new build capacity that is required to achieve the future forecast (many times the output that Sizewell C would generate); - the fact that most of this forecast capacity is hypothetical (i.e. not yet operating or committed to be built); and - the fact that a large amount of new build will be required to come online throughout the period to 2050 (including after Sizewell C comes online) in order for the future forecast to be achieved Sizewell C and other new build low carbon projects will contribute to achieving the large amount of low carbon generation required to decarbonise the electricity grid and other sectors embedded in power sector forecasts. Having regard to the factors listed above, decarbonisation of the grid (and the resultant carbon savings) can only occur if significant numbers of new low carbon generating stations are authorised and constructed. Therefore, the actual carbon savings delivered from the new low carbon projects are much greater than would be implied through comparison against grid average, as the electricity generated would be consumed instead of fossil fuelled power generation (for example a gas plant) and/ or provide low carbon electricity to replace fossil fuels in other sectors (e.g. through the electrification of motor vehicles). Government policy to achieve net zero requires the	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	decarbonisation of these other sectors and cannot be achieved without projects like Sizewell C. To provide some context of how much need there is for new low carbon generation and how much Sizewell C will contribute to meeting that need, using the BEIS UEP net zero 'low demand' scenario, Sizewell C will provide 7% of the total projected 2035 low carbon power and 4% of the total 2050 total; while in the 'high demand' scenario the equivalent numbers are 6% (in 2035) and 4% (in 2050).	
Using grid average comparison understates carbon emissions reductions The method used to calculate CO₂ emissions displaced drastically understates the actual emissions reductions.	Refer to response above.	2
The Project is not low carbon The Project is not low carbon because of the CO₂ emissions during construction and operation (from maintenance vehicles etc). The emissions from mining uranium, dealing with waste products and decommissioning the power station are not outweighed by the energy produced. Stated CO₂ savings have not accounted for the cost of the geological waste disposal facility and so they are overly optimistic.	Sizewell C Project will provide a significant contribution to reducing the greenhouse gas (GHG) emissions of the energy sector in the long term. In the short-term, the GHG emissions associated with the construction of Sizewell C will not affect the ability of the Government to meet its relevant carbon budgets. The GHG emissions presented within Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342] use emission factors that cover many upstream and downstream activities from the construction and operational phases. Emissions factors used to calculate embodied carbon for materials have been taken from the Bath University Inventory of Carbon and Energy	64

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	(ICE). The factors account for cradle to gate emissions, i.e. from extraction of the raw materials through to the processing of a material into its useable form at the factory gate. This is in line with EU wide standards EN 15978 and EN 15084 on sustainability assessment of construction works. An emissions factor for uranium has been sourced from the Ecolnvent database using a Simapro Lifecycle Assessment (reference source Simapro: IPCC 2013 GWP 100a V1.03.) Activities accounted for within this cradle-to-grave emissions factor include the input of UF6 (included extraction); electricity, diesel, and natural gas used for operation; also taken into account is the material for replacement of centrifuge; water use, lubricant oil, and wastewater treatment; concrete assumed to be used for conditioning of contaminated scrap from decommissioning; transport requirements of operation materials, industrial wastes, and contaminated waste from decommissioning (25% of the reinforced concrete and the great part of metals). It was not possible to fully quantify the emissions involved with the geological disposal facility and decommissioning at this stage, as there are too many uncertainties. This approach was established through the EIA scoping process. Furthermore, it is noted that the delivery of the geological disposal facility is not dependent on the delivery of Sizewell C. In other words, the emissions associated with the geological disposal facility would occur regardless of whether the Sizewell C Project comes forward.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Further information on the assessment of GHG emissions is provided within Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342] .	
Calculation of CO₂ emissions Concern that the assessment of carbon impacts is insufficient and that no independent verification has been undertaken. The embedded carbon calculations should account for carbon emissions from the extraction and processing of raw materials, transportation, etc across the whole life cycle of the Project. The method used for calculating CO₂ emissions displaced from the operation of Sizewell C is flawed and a better method would be to price carbon and include it in life-cycle costs. Furthermore, the UK is expecting to run on zero carbon electricity much sooner. This should have been reflected within the average grid intensity calculations used to assess Sizewell C CO₂ emissions. The existing method is unrealistic and misleading for assessing emission impacts. Suggestion that carbon footprint studies for the construction of the Sizewell B dry fuel store should be used as a basis for	The greenhouse gas (GHG) emissions assessment for the Sizewell C Project, presented within Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342], is governed by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ('the EIA Regulations'). The scope and methodology for the GHG assessment was established through the process of EIA Scoping and follows IEMA guidance on the assessment of GHG emissions in EIAs (Ref. 4). The requirements, approach and purpose of assessing GHGs for an EIA are different than those for assessing organisational corporate GHG accounting where a Life Cycle Assessment (LCA) might be undertaken. An EIA is undertaken to ascertain the likely significant effects of a particular Project/ development in accordance with the requirements of the EIA Regulations and relevant guidance, whilst corporate GHG accounting is used to understand both direct emissions from an organisation and emissions along the value chain for other reasons, such as participation in carbon markets, to meet corporate responsibilities, and identifying ways to reduce costs.	22

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
considering the construction impact of Sizewell C.	Whilst carbon pricing can be a useful exercise for companies to help identify carbon emission 'hotspots', encourage innovation and reduce costs, it is not appropriate for an EIA or understanding the significance of emissions, as per the assessment guidance for EIAs (Ref. 4). The scopes and boundaries for these different approaches are designed to reflect their objectives and requirements. However, SZC Co. recognises that the method used for calculating CO₂ emissions displaced was overly conservative, as explained under responses above. For full transparency, SZC Co. is also commissioning an independently verified LCA as part of its Environmental Product Declaration, which will be made publicly available. The GHG emissions presented within Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342] considered the following emission sources within the assessment: • Direct GHG emissions arising from the construction and operation of the Sizewell C Project at the main development site and associated development sites. • Removal and reinstatement of the temporary associated developments and the temporary construction area on the main development site, once construction of the Sizewell C Project is completed. • Indirect emissions embedded within construction materials arising from the energy used in their production. • Emissions arising from the transportation of materials, waste and construction workers.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Emissions associated with fuel used by the back-up generators in the event of power outages and for any annual testing. Emissions factors used to calculate indirect emissions from embedded carbon have been taken from the Bath University Inventory of Carbon and Energy (ICE). The factors account for cradle to gate emissions, i.e. from extraction of the raw materials through to the processing of a material into its useable form at the factory gate. This is in line with EU wide standards EN 15978 and EN 15084 on sustainability assessment of construction works. The Environmental Statement for the Sizewell B dry fuel store Project was completed pursuant to an earlier version of the EIA Regulations which did not require the submission of a GHG assessment with the planning Application. The GHG impact assessment for the Sizewell C Project is based on Project-specific information and the scale of works is not comparable to those for Sizewell B dry fuel store.	
Loss of carbon stores with site clearance The Project will add to the impacts of climate change due to the loss of habitats, including woodland and hedgerows, and the subsequent loss of carbon stores. The habitats lost are irreplaceable.	The impact on carbon stocks has been addressed within Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342]. Construction of the Sizewell C Project will require the removal of existing deciduous and coniferous woodland, wetlands and agricultural land, resulting in the removal of existing carbon sinks on-site. However, enhancement is proposed to existing habitats and new habitats will be created during construction and in the final removal and reinstatement phases (e.g. refer to the Outline Landscape and Ecology Management Plan	3

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	(Doc Ref. 8.2(A)) and the Updated Biodiversity Net Gain Reports (Doc Ref. 9.7- 9.9) and (Doc Ref. 6.3 14E (A)); resulting in an overall carbon sink net gain of 1,429 tCO ₂ e.	

4.20 Ecology and Biodiversity

a) Overview

4.20.2 A total of 652 Interested Parties raised matters regarding ecology and biodiversity.

4.20.3 **Table 4.19** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.19: Ecology and Biodiversity

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Insufficient ecology surveys Ecology surveys are of lamentable depth or quality, inadequate, incomplete or done to mislead. Specific concerns regarding the northern park and ride and Yoxford roundabout sites, where further surveys are required to ascertain the presence or absence of protected species. In addition, the surveys have not identified habitats in	SZC Co. has provided additional ecology survey information as part of its November, December and January submissions - refer to AS-021 , AS-022 , AS-036 , AS-037 , AS-207 , AS-208 , AS-209 . An updated ecology survey report for the northern park and ride site is also included within AS-036 . Further surveys are being undertaken in 2021 across all relevant sites for great crested newts, bat roosts in trees to inform the approach to licensing and mitigation development. Further	11

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
nearby gardens, ponds and woods, as SZC Co. have failed to request access to these areas.	surveys are being undertaken for wintering and breeding birds including at the northern park and ride site. Survey coverage across the sites is sufficient to establish the baseline for the ecology assessments and a high degree of coverage was obtained across the Project. No access to gardens was sought where sufficient survey coverage could be achieved without such access.	
Loss of natural capital and impact to habitats and wildlife in general during an ecological emergency / crisis Sizewell C Project will drastically reduce natural capital in the local area and impact heavily on local habitats and wildlife, including (but not limited to) fen meadow, coastal habitat (vegetated shingle), birds, bats, badgers, reptiles, water voles, invertebrates, and other protected species, through loss of land or disturbance of habitats/species. The wildlife corridors for birds and animals would be cut in half and birds and animals displaced for years. Coronation Wood will be needlessly felled. Increased traffic is likely to lead to a large increase in wildlife road mortality. In particular, hedgehogs, owls, badgers, deer and otters are predicted to suffer increased collisions. The habitats lost and impacted as	An assessment of effects on terrestrial ecology and ornithology is presented within Volume 2, Chapter 14 (Doc Ref. 6.3(A)) [AS-033] and Volumes 3-9, Chapter 7 of the ES (Doc Ref. 6.4 to 6.10) [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523, APP-555] with additional information submitted to the Examining Authority as summarised within the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188]. Whilst SZC Co. recognises that there will be impacts on terrestrial ecology and ornithology, the Project has sought to minimise effects, where possible, and embed mitigation and enhancements within design. In advance of the works, SZC Co. has already established a 67ha habitat creation area at Aldhurst Farm (which will also provide new recreational opportunities) and undertaken habitat improvement works for marsh harriers and reptiles within the wider EDF Energy Estate. Early planting on Pillbox Field has been undertaken which included the planting of over 2,400 new trees. The remaining tree planting proposed on Pillbox Field will add a further 3,700 trees to compensate for the loss of Coronation Wood.	370

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
a result of the Sizewell C Project are impossible to recreate or compensate for. Once a habitat is destroyed, it can take decades for it to recover its natural biodiversity.	During construction, works will be carefully managed to minimise impacts on ecology. Species-specific mitigation plans and method statements have been developed for all protected species found to be using the site. Following completion of construction works, the temporary construction area at the main development site would be restored to a new landscape founded on the concept of establishing the Suffolk Coast and Heaths AONB landscape in microcosm, by creating a mosaic of some of its most valued habitats. Once fully established, this habitat 'mosaic' would have a higher biodiversity value than the existing habitats, specifically as extensive arable areas would be replaced with habitat improvement areas. Further details are set out in the Main Development Site Design and Access Statement (Doc Ref 8.1) [APP-586] and the Outline Landscape and Ecology Management Plans for the main development site (Doc Ref 8.2(A)), two village bypass (Doc Ref 8.3) [AS-262] and [AS-263] and the Sizewell link road (Doc Ref 8.3) [AS-264] and [AS-265]. Once the habitats are established, the Biodiversity Net Gain Reports (refer to the updated reports included within (Doc Ref. 9.7- 9.9) and (Doc Ref. 6.3 14E (A)) demonstrate that a net gain of over 10% across the development would be achieved. The Fen Meadow Strategy was originally included as Appendix 2.9.D of Volume 3 of the ES Addendum (Doc Ref. 6.14) [AS-209] and updated for Deadline 2 to define SZC Co's commitment to provide appropriate compensation measures to mitigate the loss of fen meadow habitat through the creation of compensatory fen meadow habitats, and the provision of a	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	contingency fund. SZC Co. is proposing to deliver substantially larger areas of compensatory habitat at a series of off-site locations and has undertaken an extensive series of studies to define these. In the event that all of the three offsite areas for fen meadow habitats proposed by SZC Co. are successfully established, the Sizewell C Project would provide at least 4.5ha of new fen meadow habitat compared to 0.46ha of fen meadow habitat lost. SZC Co. also intends to bring the growing EDF Energy estate into the management of an independent environment trust which will focus on biodiversity and the stewardship of the natural habitat. The trust has the opportunity to extend beyond the estate, which will provide a positive legacy for Suffolk. SZC Co. is engaging with relevant agencies to develop the approach and discussions are underway to ensure it operates in a way that is complementary to other measures.	
Impacts on bird populations Sizewell C Project will disrupt feeding bird colonies and their breeding territories.	An assessment of effects on birds is presented within Volume 2, Chapter 14 (Doc Ref. 6.3(A)) [AS-033] and Volumes 3-9, Chapter 7 of the ES (Doc Ref. 6.4 to 6.10) [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523, APP-555] and the Shadow Habitats Regulations Assessment (HRA) (Doc Ref. 5.10) [APP-145 to APP-152]. Additional information for the assessment is also provided within the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188] and the Shadow HRA Addendum (Doc Ref. 5.10Ad) [AS-174 to AS-178]. Effects on a range of bird species have been considered, including: bittern, avocet, redshank, shoveler, gadwall, teal, white-fronted goose, marsh harrier, hen harrier, nightjar, woodlark, red-	11

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	throated diver, little tern, common tern, sandwich tern, lesser black-backed gull, kittiwake, stone-curlew, barn owl, hobby, peregrine, black redstart, cetti's warbler and others. Volume 2, Chapter 14 of the ES (Doc Ref. 6.3(A)) [AS-033] and Volume 1 of Shadow HRA (Doc Ref. 5.10) [APP-145] provide the full list of mitigation to be implemented to avoid significant effects on birds. With these measures in place, the effects on all bird species will be not significant, with the exception of a possible significant effect on marsh harrier during construction. Compensatory habitats for marsh harrier have been established to the north of the temporary construction area to compensate for the possible impact of loss of foraging on the Sizewell Marshes SSSI.	
Impact on Sizewell Marshes SSSI Sizewell C Project will impact heavily on the habitats and wildlife within the Sizewell Marshes Site of Special Scientific Interest (SSSI). The complexity of the SSSI habitats cannot be recreated artificially. The proposed SSSI crossing will be detrimental to birds, fish, insects and otters. Particular concern about the loss of rare invertebrates as Sizewell Marshes SSSI is cited by Natural England as being 'of exceptional interest for their invertebrate fauna'. Aldhurst farm will in no way compensate for the loss of the SSSI	An assessment of effects on the Sizewell Marshes SSSI is presented within Volume 2, Chapter 14 of the ES (Doc Ref. 6.3(A)) [AS-033], with updated SSSI land take calculations provided within SZC Co.'s letter to the Examining Authority submitted on 16 November 2020 [AS-006] and Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]. SZC Co. recognises that the Project will result in land take from the SSSI (2.94ha of temporary and 6.6ha of permanent land take). Land take within the SSSI was also recognised within the Government's National Policy Statement EN-6 when identifying Sizewell as a potentially suitable location for a new nuclear power station.	119

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
- the same species would not thrive there due to high nutrient levels in water. The large-scale interventions (i.e. cut-off wall, Sizewell Drain realignment and SSSI crossing) would cause significant interruption to the hydrological dynamics of the system, bringing fundamental change to critical water flow and, therefore, quality, impacting on fen meadow habitats and threatening the status of the SSSI. Detailed technical assessments to develop a Water Level Management Plan for the SSSI have not been carried out.	In advance of the works, SZC Co. established a 67ha habitat creation area at Aldhurst Farm which provides replacement habitats for reedbeds and ditches. The Fen Meadow Strategy was included as Appendix 2.9.D of Volume 3 of the ES Addendum (Doc Ref. 6.14) [AS-209] and updated for Deadline 2 to define SZC Co.'s commitment to provide appropriate compensation measures to mitigate the loss of fen meadow habitat through the creation of compensatory fen meadow habitats, and the provision of a contingency fund. SZC Co. is proposing to deliver substantially larger areas of compensatory habitat at a number of off-site locations and has undertaken an extensive series of studies to define these. In the event that all of the three offsite areas for fen meadow habitats proposed by SZC Co. are successfully established, the Sizewell C Project would provide at least 4.5ha of new fen meadow habitat compared to 0.46ha of fen meadow habitat lost. Replacement wet woodland habitat would be provided within the main development site to the west of the Grove, which would establish over the long-term and a Wet Woodland Strategy (Doc Ref. 9.8) has been developed to establish additional areas alongside the fen meadow habitats. Furthermore, the accepted changes (April 2021) to the design of the SSSI crossing replace the previously proposed culvert with embankments with a single-span bridge with embankments. The bridge structure would provide greater connectivity for species, reduce the potential for habitat fragmentation (specifically for water vole, otter, fish and	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	invertebrates) and also reduce land take within the SSSI by 0.08ha. Detailed groundwater modelling has been undertaken to understand the potential effects of the Sizewell C Project on groundwater levels and quality within the Sizewell Marshes SSSI. The assessment is reported within Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) [APP-297]. The assessment demonstrates that significant effects on groundwater would be avoided through measures embedded within the Project proposals, such as the construction of a cut off wall, which will prevent major changes in water levels off-site. The modelling indicates that the construction phase may cause a typical drawdown of water levels of less than 10cm adjacent to the site boundaries and the drawdown would rapidly diminish with distance from the site. This would not result in a significant effect on the habitats within the Sizewell Marshes SSSI. A Water Monitoring and Response Strategy has been prepared (an updated version was issued in January 2021 and included within Volume 3, Appendix 2.14.A of the ES Addendum (Doc Ref. 6.14) [AS-236]). This strategy sets out the principles of the proposed monitoring and mitigation approach to protect designated sites in the vicinity. The update provides clarity over the respective remits of the DCO and associated mitigation, and the subsequent permits and consents regime, which includes for a framework of 'trigger' and 'action' levels within water level and quality management measures, where required.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Impact on Minsmere RSPB reserve (Minsmere-Walberswick SPA/ SAC and Ramsar site) Concerns over impacts on the Minsmere RSPB reserve and associated wetlands from noise, light and air pollution during construction and due to changes to hydrology. Minsmere reserve is dependent on having a low level of development and a low footfall on the surrounding land. Concern over impacts on wildlife at Minsmere reserve, specifically marsh harriers. Such an impact cannot be compensated. It is important that all nature reserves are protected and that includes the surrounding peripheral land too. The Project will also result in loss of revenue for this charity.	An assessment of effects on the Minsmere RSPB Reserve (Minsmere-Walberswick SPA/SAC and Ramsar site) is presented within Volume 2, Chapter 14 of the ES (Doc Ref. 6.3(A)) [AS-033] and the Shadow Habitats Regulations Assessment (HRA) (Doc Ref. 5.10) [APP-145 to APP-152], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181] and the Shadow HRA Addendum (Doc Ref. 5.10Ad) [AS-174 to AS-178] respectively. Impacts on the ecological receptors within Minsmere will be limited in part by the distance of the proposed development to most of the reserve, but also specific measures have been embedded within the proposals to address possible impacts, including: • Maintenance of surface water levels during construction through use of control structures on the Leiston drain. • The use of a 5m noise barrier along the northern edge of the construction area to minimise noise to the north of the site and to screen the construction site from long-range views from Minsmere to the north. • The creation of habitats for hunting marsh harriers, to support the Minsmere population during construction. • Monitoring of any increase in visitor numbers to the outer part of the Minsmere reserve in response to 'recreational displacement' from Sizewell and measures to mitigate possible increases through implementing the Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North) European Site (due to be submitted at Deadline 2) for recreational displacement for the Minsmere European Sites.	384

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	With these measures in place, no significant effects on the ecological features of Minsmere RSPB Reserve will occur. In addition, the Minsmere Reserve would be able to benefit from mitigation delivered through various funds under the Section 106 Agreement, as well as its own separate Resilience Fund.	
Impacts on Suffolk Sandlings Walk and Sandlings SPA/ Leiston-Aldeburgh SSSI Concerns over the ecological impact on the Suffolk Sandlings Walk and Sandlings SPA, which have rare habitat suitable for a number of threatened species of birds and reptiles.	An assessment of effects on the Sandlings SPA, including the SSSIs that fall within this designation, such as the Leiston-Aldeburgh SSSI, is presented within Volume 2, Chapter 14 of the ES (Doc Ref. 6.3(A)) [AS-033] and the Shadow Habitats Regulations Assessment (HRA) (Doc Ref. 5.10) [APP-145 to APP-152], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181] and the Shadow HRA Addendum (Doc Ref. 5.10Ad) [AS-174 to AS-178] respectively. The approximate distance of the site to Sandlings SPA is 700m. There will be no direct habitat loss from this receptor, however, potential impacts from disturbance, changes arising from emissions to air and increased recreational pressure have been considered. Due to the distance and intervening land use, no significant effects due to noise, lighting and visual effects would occur. Air quality modelling also shows that no significant effects on the habitats within the designated site would occur during construction or operation. It is proposed that existing arrangements to manage recreational access at Aldringham Walks and North Warren are enhanced to minimise the potential for any increase in recreational disturbance pressure at the Sandlings SPA. This will form part of the Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North)	26

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	European Site (due to be submitted at Deadline 2) for recreational displacement for the Minsmere European Sites which will be extended to cover the Sandlings SPA (North). Such measures may also serve to reduce existing levels of recreational disturbance. Overall, the effects on Sandlings SPA would be not significant.	
Impact on natterjack toad Concern over the impacts of the main development site on the population of natterjack toads.	An assessment of effects on the natterjack toad is presented within Volume 2, Chapter 14 of the ES (Doc Ref. 6.3(A)) [AS-033]. An updated Natterjack Toad Draft Licence Method Statement was also issued in January 2021 (refer to Volume 3, Appendix 2.9.C of the ES Addendum (Doc Ref. 6.14) [AS-209]). This includes further details of mitigation commitments, including proposals for translocation, provision of a new breeding pond, hibernation features and enhancements for terrestrial habitats. With these measures in place, significant effects on the natterjack toad population would be avoided.	2
Impacts on Fungi Concern over impacts on rare species of fungi. Fungal surveys have not been undertaken to inform the EIA. At least three rare species are known to occur within the local area (<i>Mycenastrum corium</i> , <i>Dendrothele naviculoefibulata</i> , <i>Geastrum minimum</i>).	Fungi surveys were not proposed in SZC Co.'s EIA Scoping Report [APP-168] and were not suggested in the Planning Inspectorate EIA Scoping Opinion received [APP-169]. Records for all species, including fungi, were sourced from Suffolk Biodiversity Records but no relevant records of notable species, other than <i>Battarea phalloides</i> , present at Yoxford within a Roadside Nature Reserve, were identified. SZC Co. would welcome any precise details of known locations for rare fungi to determine whether mitigation is necessary and/or appropriate.	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Impact of northern park and ride on great crested newts The assumption presented in the ES that great crested newt meta-population is spread across 6 ponds is not supported by evidence and is based on aquatic data for one pond, which is over 5 years old. Assumptions about the A12 representing a fundamental barrier to the movements of newts are incorrect.	Additional surveys were undertaken at Pond 78 during 2020 and findings are reported in the Northern Park and Ride Ecology Survey Report 2020 (Doc Ref. 6.13) [AS-036]. The pond was considered to have poor suitability to support great crested newts however the results of the eDNA survey confirmed the presence of great crested newts. The assessment presented in Volume 1, Chapter 3 of the ES Addendum (Doc Ref. 6.14) [AS-195] confirms that this information does not change the findings of the assessment presented within Volume 3, Chapter 7 of the ES (Doc Ref.6.4) [APP-363] and effects on great crested newt would remain not significant. Further surveys will be undertaken in April 2021 of all ponds where great crested newts have been recorded, to inform the approach to licensing and any further adjustments to the mitigation proposals.	1
Impact of northern park and ride on Little Nursery Wood Lack of clarity in relation to the condition and value of habitats both within and adjacent to the site, including Little Nursery Wood. The ecology assessment refers to 20 metre buffer between the northern park and ride and Little Nursery Wood, yet no details are provided regarding the composition or design of this zone. Furthermore, to protect roosting bats, the ES advises that lighting along Little Nursery	Little Nursery Wood would be retained in its entirety, with a buffer distance of 20m between the woodland and the proposed development. Within this buffer no construction works would take place other than the erection of ecological fencing. There would be no direct loss of woodland habitat, and its associated species, and the buffer distance would assist in minimising impacts associated with the proposed development (such as noise, lighting and human disturbance). There is an error on the illustrative lighting plan (Figure 2.5) (Doc Ref. 6.4) [APP-352], the colours of the lines are being shown in the wrong order sequentially. The purple line should in fact be light blue (0.1 lux), the light blue should be red (1	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Wood will not exceed 0.1 lux. However, the Illustrative Lighting Plan (Figure 2.5) shows greater light levels (potentially 7.5 lux).	lux), and so on until the dark blue (10 lux). The proposed lighting and CCTV plans are correct (specifically SZC-SZ0204-FP-000-DRW-100004 Rev 02 updated in January 2021 (Doc Ref. 2.6(A) [AS-123]). Therefore, the outer contour is indeed 0.1 lux and thus would not impact on Little Nursery Wood.	
Impact of two village bypass on Pond Wood and Foxburrow Wood Concern over the impact of two village bypass on Pond Wood and Foxburrow Wood. The deep cutting of the proposed two village bypass will generate a high risk to the hydrology of the area, as opposed to the impact if an eastern alignment had been selected. In addition, SZC Co. has not identified notable and veteran trees and historic double hedgerows which will be lost. Pond Wood is not identified properly as ancient woodland. This habitat is irreplaceable. Ancient Woodland is scarce in England and should be better protected with buffer zones in line with Natural England's guidance maintained.	Volume 5, Chapter 7 of the ES (Doc Ref. 6.6) [APP-425] presents an assessment of likely effects on terrestrial ecology and ornithology arising from the construction and operation of the proposed two village bypass. At the time of writing the assessment, Pond Wood was not designated as Ancient Woodland by Natural England and the entirety of Palant's Grove was designated as Ancient Woodland. SZC Co. recognises the importance of Ancient Woodland and has designed the proposed two village bypass to avoid any direct loss from Foxburrow Wood (and the proposals also avoid Pond Wood). In addition, a buffer distance of 15m from earthworks would be applied to prevent impacts to the trees on the edge of the woodland, although some limited footpath works would however be required at the edge of this zone. This remains the case with the Change Application, as reported in Volume 1, Chapter 5 of the ES Addendum (Doc Ref. 6.14) [AS-184] and which also acknowledges the relevant changes in the designation of the ancient woodlands. No hydrological impacts are considered likely in respect of Foxburrow Wood. The veteran tree status was only recently recorded on the Woodland Trust's inventory but the status on that inventory is acknowledged.	10

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The alternative alignment would result in the fragmentation of two areas of ancient woodland, through the removal of a connecting area of woodland, albeit that area of woodland itself is now not considered ancient.	
Mitigation and compensation for impacts to wildlife Concerns that the ecological mitigation proposed is not adequate or consistent and habitats of equivalent value cannot be created quickly enough. Furthermore, SZC Co. have not looked after the habitat created at Aldhurst Farm, how can SZC Co. be trusted to successfully manage new habitats provided? Research into habitat translocation shows that it seldom succeeds in mitigating the impact of development.	SZC Co. has already established a 67ha habitat creation area at Aldhurst Farm (which will also provide new recreational opportunities) and undertaken habitat improvement works for marsh harriers and reptiles within the wider EDF Energy Estate. Early planting on Pillbox Field has been undertaken which included the planting of over 2,400 new trees. The remaining tree planting proposed on Pillbox Field will add a further 3,700 trees. The creation of further new habitats requires the powers within the development consent order to: (i) acquire the land to deliver the Fen Meadow Strategy [AS-209], and (ii) undertake the excavations for the new wetlands in the marsh harrier habitat improvement area. During construction, works will be carefully managed to minimise impacts on ecology. Species-specific mitigation plans and method statements have been developed for all protected species found to be using the site. The habitats proposed on existing arable land within the temporary construction area, as set out in the outline Landscape and Ecology Management Plan (oLEMP) (Doc Ref. 8.2(A)), can only be established once construction works have finished and the temporary construction area has been removed. This habitat 'mosaic'	81

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	would have a higher biodiversity value than the existing habitats, specifically as extensive arable areas would be replaced with habitat improvement areas. Furthermore, the framework for the establishment and long-term management of new habitats adjacent to two-village bypass oLEMP [AS-263] and Sizewell link road is set out within the two-village bypass and Sizewell link road oLEMP [AS-264] submitted to the Examining Authority in January 2021. The Biodiversity Net Gain Reports (refer to updated reports provided within (Doc Ref. 9.7- 9.9) and (Doc Ref. 6.3 14E (A)) demonstrate that a net gain of over 10% across the development would be achieved once the habitats are established. SZC Co. also intends to bring the growing EDF Energy estate into the management of an independent environment trust which will focus on biodiversity and the stewardship of the natural habitat. The trust has the opportunity to extend beyond the estate, which will provide a positive legacy for Suffolk. SZC Co. is engaging with relevant agencies to develop the approach and confirm its relationship with the DCO, if granted.	
Biodiversity net gain SZC Co.'s promise of biodiversity net gain is questioned. There are issues with SZC Co.'s biodiversity net gain calculations due to misclassifications, numerical errors and unjustified discounting of impacts.	Following discussions with stakeholders, SZC Co. has updated the Biodiversity Net Gain reports in light of design changes and to address stakeholder feedback (refer to updated reports provided within (Doc Ref. 9.7- 9.9) and (Doc Ref. 6.3 14E (A))). However, the overall conclusion is that the Sizewell C Project would achieve a net gain of over 19% across the development (compared to an 18% increase predicted under the previous	5

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	design iterations). The minor increase compared to the previous reports is due to additional habitat creation under this design iteration (primarily additional wetland habitat in the main development site and woodland and SuDS (Sustainable Drainage Systems) areas in Sizewell link road.	
Fen Meadow Mitigation Further information is required on mitigation for fen meadow habitat.	A Fen Meadow Strategy was issued to the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.9.D of the ES Addendum (Doc Ref. 6.14) [AS-209]) and updated for Deadline 2. The Strategy has been developed to deliver at least 4.5ha of fen meadow habitat and to achieve the compensation ratio requested by Natural England, this being a 9 times multiplier on habitat loss. In order to achieve this ratio, a third site (Pakenham) has been added to the previous proposals which were based on two sites (Benhall and Halesworth). The use of three sites greatly reduces the risks associated with delivery. The Fen Meadow Strategy has been subject to extensive consultation. It provides a commitment to produce a series of reports in 2021, which would lead to a Fen Meadow Plan that would need to be approved by Natural England. The Strategy would be secured by DCO requirement and includes a contingency strategy if the quantum of fen meadow delivered falls short of 4.5ha after 10 years of on-site works.	3
Compensatory measures for marsh harriers Impacts on marsh harriers (amongst other species) threaten the integrity of the	The feasibility and design report for compensatory marsh harrier areas is provided within Volume 2, Appendix 14C5 of the ES (Doc Ref. 6.3) [APP-259]. An area of 48.7ha within the EDF Energy estate has been identified for the proposed	29

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Minsmere-Walberswick Special Protection Area. SZC Co.'s compensatory measures for marsh harriers have not been finalised and are uncertain. Specifically: (a) a feasibility and design report for the compensation areas is not provided, therefore, it is not possible to assess assumptions and calculations to ensure these are robust; (b) there is doubt over the adequacy of compensatory measures - SZC Co. proposes to replace wetlands with 48.7 hectares of terrestrial habitat, which is less than half the size of habitat to be lost; (c) no information is provided regarding scope, timings or methodology for monitoring surveys; and (d) it is unclear whether the methodology for quantifying marsh harrier foraging behaviour to inform compensatory measures is based on precedent. If not, there is uncertainty over the likelihood of success.	compensatory habitat. The grassland habitats within this area have already been established by the Applicant and the hedgerow features were planted in 2020 in accordance with the marsh harrier habitat plans included in the Marsh Harrier habitat report appended to the ES (Volume 2, Appendix 14C5 of the ES (Doc Ref. 6.3) [APP-259]). Natural scrub colonisation has also commenced within the grassland areas. The January 2021 changes introduced a new wetland area in the marsh harrier habitat area and this aligns with stakeholder comments to provide an element of wetland in the proposals. It is important to note that the existing foraging habitat is not physically lost (through land take) but is assumed on a precautionary basis in the Shadow HRA (Doc Ref. 5.10) [APP-152] that it would not be available to foraging marsh harriers through a 'barrier effect' arising from the temporary construction area. The approach to monitoring surveys would be the same as those used for the baseline surveys (refer to Doc Ref. 6.13(A) [AS-036]). The commitment to monitoring is included within the Terrestrial Ecology Monitoring and Mitigation Plan (Doc Ref. 9.4) which has been developed in consultation with Natural England and other ecology stakeholders. The approach is defined within the relevant section of the Shadow HRA and in the feasibility and design report for compensatory marsh harrier areas (as provided within Volume 2, Appendix 14C5 of the ES (Doc Ref. 6.3) [APP-259]). The method for quantifying marsh harrier foraging activity is bespoke. The survey method itself is a vantage point type survey and these surveys are	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	being widely used and included in certain industry guidance (e.g. for impact assessments of onshore wind farms – SNH 2017 (Ref. 6)). Furthermore, the details of the methods and the ways in which the resultant data are treated and analysed to provide an estimate of the intensity of flight activity have been developed through an extensive programme of stakeholder consultation since 2012. In relation to informing compensatory habitat measures, the marsh harrier flight activity survey methodology is suited to this purpose given the above points.	

4.21 Geology and Land Quality

a) Overview

4.21.2 A total of 4 Interested Parties raised matters regarding geology and land quality.

4.21.3 **Table 4.20** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.20: Geology and Land Quality

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Land contamination	Sizewell C will not contaminate the surrounding land. Volume 2, Chapter 18 of the ES (Doc Ref. 6.3) [APP-280], as updated	3

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
The land will be contaminated for hundreds of years as a result of the Sizewell C Project.	by Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181], and Volumes 3 to 9, Chapter 11 of the ES (Doc Ref. 6.4 to 6.10) [APP-374, APP-405, APP-438, APP-473, APP-505, APP-534 and APP-566] present the assessment of likely effects on geology and land quality, including an assessment of contamination pathways, associated with the construction and operation of the Sizewell C Project. Measures to avoid, manage and mitigate potential pollution from the construction and operation of the Sizewell C Project and address any impacts are set out within these chapters as well as in the Code of Construction Practice (Doc. Ref 8.11(A)) [AS-273]. With mitigation measures in place, no likely significant effects have been identified.	
Geology of the main development site The suitability of the geology of the main development site is questionable for a new nuclear power station. This site is located on a marshland over sand/clays and saturated chalk, essentially on an ancient riverbed. This proposed area is highly vulnerable to land slippage and the cutting off from the higher mainland further inland with sea level rise. The local area had an earthquake and a small tsunami wave in 1930s. Whilst Sizewell A and B and are on more stable geology that extends back towards Norwich, the new Sizewell C site is planned at a potential	Available British Geological Survey (BGS) records indicate that superficial deposits comprising marine beach deposits (sands and gravels) and tidal flat deposits (clay and silt) are present underlying the eastern area of the site within the main platform and temporary construction area. Alluvium, peat and Head Deposits are present underlying the southern part of the main platform and eastern part of the temporary construction area. The Lowestoft Formation (diamicton and sand and gravel) is present within the Land East of Eastlands Industrial Estate and central and eastern areas of the temporary construction area. According to the BGS website, bedrock geology beneath the site comprises sand of the Crag Group, described as ' <i>shallow-water marine and estuarine sands, gravels, silts and clays</i> '.	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
geological edge. Possibly a fault line could be expected at a far deeper level.	Underlying the Crag Group is the London clay formation and the Chalk Group. There are no underlying fault lines. The Envirocheck reports as provided in Volume 2, Appendix 18A of the ES (Doc Ref. 6.3) [APP-281 to APP-291], indicate that there are no ground dissolution stability hazards at the site. Collapsible ground stability hazards, shrinking or swelling clay ground stability hazards and landslides range from no hazard to low risk. The assessment of ground stability, as presented in Volume 2, Chapter 18 of the ES (Doc Ref. 6.3) [APP-280], noted the proposed earthworks may affect ground stability, with additional mitigation to be developed through ground investigation and risk assessment, the effect would be not significant. Where required, ground improvement works would be undertaken as part of the engineering design.	

4.22 Health and Wellbeing

a) Overview

4.22.2 A total of 308 Interested Parties raised matters regarding health and wellbeing.

4.22.3 **Table 4.21** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.21: Health and Wellbeing

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Impact on local communities, quality of life and health and wellbeing The Sizewell C Project will have an impact on local communities, specifically Leiston-cum-Sizewell, Eastbridge, Theberton and other settlements along the B1122 and A12 (and other neighbouring Parishes). The Project will impact on the quality of life and health and mental wellbeing of people living and working in the area. Disruption to the life of local residents will be caused over a long period of time, causing lasting damage to the community due to traffic, noise, pollution and increased disturbance. People who are vulnerable will be particularly susceptible. The Application has underestimated this impact, specifically impacts on vulnerable groups have not been considered, and no clear mitigation has been set out. No assessment of impacts on people with certain health conditions (such as asthma or COPD) has been undertaken.	SZC Co. considers the mental and physical health and wellbeing of local communities and the workforce to be paramount. A full assessment of the likely effects of the Sizewell C Project on residual healthcare service demand and the effects of environmental change to the area on health indicators and perceptions of wellbeing is included in Volume 2, Chapter 28 (Health and Wellbeing) of the ES (Doc Ref. 6.3) [APP-346], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181]. Mitigation applied to minimise impacts associated with air quality, noise and vibration, traffic and transport and radiological effects will also reduce any adverse effects on health and wellbeing. For the construction phase, monitoring of environmental health determinants (air quality, noise transport etc) will be provided and set at environmental thresholds that are protective of the environment and health, thereby facilitating intervention before these thresholds are exceeded. Mitigation and monitoring measures during construction are described in full in the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273]. SZC Co. would also provide a Community Fund to ensure that residual in-combination effects of the Sizewell C Project may be addressed and to enable communities to maximise the opportunities offered by the Sizewell C Project. The Community Fund would be administered on behalf of the community and would fund local schemes, measures, and	274

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Projects which promote the economic, social, or environmental wellbeing of the communities affected by the Sizewell C Project, enhancing their quality of life.	
Negative effects on mental health The Project will have negative effects on the mental health of local residents and visitors to the area, as the opportunities for quiet enjoyment and relaxation in the nature will be greatly diminished with the construction works and the influx of thousands of workers.	An assessment of effects on mental health and wellbeing is provided within Volume 2, Chapter 28 (Health and Wellbeing) of the ES (Doc Ref. 6.3) [APP-346], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181]. Measures identified to reduce impacts associated with air quality, noise and vibration, traffic and transport will also reduce any adverse effects on health and wellbeing. Furthermore, the provision of employment and associated income generation is considered to have a beneficial effect on the local community. An assessment of effects on the recreational use of the local area due to the construction and operation of the main development site, two village bypass and Sizewell link road has also been provided within Volume 2, Chapter 15 (Doc Ref. 6.3) [APP-267] and Volumes 5 and 6, Chapter 8 (Amenity and Recreation) (Doc Ref. 6.6 and 6.7) [APP-429 and APP-464]. During construction, SZC Co. recognises that there are likely to be significant adverse effects on the users of recreational resources due to views of the development, impacts on tranquillity, and pressure from additional visitors. A number of enhancements are therefore proposed to the PROW and wider access network, including new off-road public rights of way routes, permanent improvements to the Kenton Hills car park, provision of public access to specific	30

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	areas within Aldhurst Farm habitat creation area for informal recreational use and new off-site sports facilities at Leiston. In addition, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected.	
Impacts of increased traffic on emergency services and visiting health professionals With the increase in traffic and diversions, emergency services may have problems to reach their destination in a timely manner. Furthermore, increased traffic and diversions will make it difficult for health professionals to get to housebound patients in the time required. With an aging patient demographic, more patients will need to be seen at home, and more will become housebound due to increased traffic or by choice. Concern that by wasting additional time travelling, there will be a surge in deaths.	SZC Co. provided an assessment of the impact of journey delays for emergency services within Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]. The assessment concluded that journey times during peak construction on the A12 northbound would be predicted to increase by up to 62 seconds between 08:00-09:00 and for all other hours the increase would be less than 36 seconds. In the southbound direction, the model predicts a journey time increase of 0-28 seconds. Over the 14 km route, this is considered to be imperceptible to drivers and even combined impacts from multiple trips throughout the day would not affect the scheduling or delivery of community health services or materially impact on ambulance conveyance and emergency response.	54
Ability to exercise There will be a negative impact on the ability of the local residents to exercise freely.	SZC Co. will provide measures throughout the construction and operation of the Sizewell C Project to keep recreational routes open, provide alternative routes and diversions, provide additional and improved recreational resources, and minimise effects due to changes in noise, air quality, views, and traffic. Specifically, the Rights of Way and Access Strategy , provided within Volume 2, Appendix 15I of the ES (Doc Ref	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	6.3) [APP-270], describes the proposals and temporary diversions during construction to minimise effects on public rights of way (PROW) users, so that the local community can continue using the PROW network throughout the construction and operation of Sizewell C. The following enhancements to the PROW and wider access network are included within the Project: - enhanced north-south recreational routes through the creation of a 4.5km off-road multi-user bridleway for equestrians, cyclists and pedestrians. This includes off-road routes where existing rights of way and the Sustrans cycle route currently run along roads, and the creation of new routes where none exist at present; - a new off-road bridleway from Valley Road, connecting to the new off-road bridleway described above; - a new formalised permissive footpath from Kenton Hills car park, connecting to the extensive permissive footpath network in the woodland and to the Sandlings Walk and the Coast Path; - the provision of additional spaces at Kenton Hills car park, surface improvements, selective vegetation removal to create a more open environment and improvements to signage; - a permanent new footpath north of Leiston connecting two existing PROW and Abbey Lane; and - the creation of a naturalistic coastal grassland/dune setting to the Coast Path on and east of the new sea defences as part of the accessible 'coastal margin' which	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	will be designated under the Marine and Coastal Access Act 2009. SZC Co. will also provide public access to specific areas within Aldhurst Farm habitat creation area for informal recreational use and upgraded sports facilities at the Alde Valley School in Leiston.	
Concerns over health and safety management at the Sizewell C construction site Concerns over poor health and safety management at the Sizewell C construction site. Example given in one representation: "the Chinese only recently wanted to compromise health and safety at Hinkley Point C by wanting to use a crane above the workers carrying a vast concrete floor slab."	Health and safety on the Sizewell C construction site will be strictly managed and regulated. SZC Co. will seek certification against the ISO 45001 Health and Safety management standard and will need to satisfy the requirements of the Office for Nuclear Regulation under the Nuclear Site Licence with regards to the recording and investigation of incidents, safety documentation and emergency arrangements on site.	2

4.23 Historic Environment

a) Overview

4.23.2 A total of 66 Interested Parties raised matters regarding historic environment.

4.23.3 **Table 4.22** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.22: Historic Environment

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
General impact of the Sizewell C Project on cultural heritage, including listed buildings and historic landscape character The proposed development will impact on the cultural heritage of the area, including listed buildings and the historic landscape character. There will be a loss of artistic associations with writers, poets (Crabbe), artists (Tuner) and musicians (Britten). The impacts have not been properly assessed and/ or cannot be adequately mitigated.	SZC Co. has undertaken an assessment of the likely historic environment effects of the Sizewell C Project, including on archaeology and designated heritage assets. The scope and methodology of this assessment is presented in Volume 1, Appendix 6L of the ES (Doc Ref. 6.2) [APP-171] and was established through a formal EIA scoping process undertaken with the Planning Inspectorate and through consultation and engagement with statutory consultees during the pre-Application stage. The assessment is presented in Volume 2, Chapter 16 of the ES (Doc Ref. 6.3) [APP-272] and Volumes 3 to 9, Chapter 9 of the ES (Doc Ref. 6.4 to 6.10) [APP-368, APP-399, APP-432, APP-467, APP-499, APP-528 and APP-560], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188, as relevant]. Where possible, impacts are proposed to be avoided or reduced by design or by embedded mitigation measures such as screening by vegetation and earthworks, as well measures included in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] to limit noise disturbance during construction. Where required, additional mitigation will take the form of agreed schemes of archaeological investigation. To support the assessment of likely effects, archaeological evaluation has been carried out including archaeological geophysical survey and trial trenching. This scope of this was agreed with Suffolk County Council Archaeological Service	48

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	(SCCAS) who also monitored the fieldwork. Where archaeology is present, this will be mitigated through an agreed scheme of archaeological investigation (preservation by record) comprising excavation and post-excavation assessment and analysis, followed by public dissemination of the results. The scope would be agreed with SCCAS and they would also monitor this work. Nothing that requires preservation in situ has been identified to date.	
Significant impacts on archaeology Concern over significant effects on archaeology. A substantial quantity of Romano-British artefactual material has been reported within the area, which is of considerable importance and extent, and it is clear that well-preserved archaeological remains are likely to survive within parts of the site. Any archaeological remains within the site would be substantially disturbed.	The assessment presented in Volume 2, Chapter 16 of the ES (Doc Ref. 6.3) [APP-272] and Volumes 3 to 9, Chapter 9 of the ES (Doc Ref. 6.4 to 6.10) [APP-368, APP-399, APP-432, APP-467, APP-499, APP-528 and APP-560], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188, as relevant] consider the potential effects on archaeology as a result of construction and operation of the Sizewell C Project. The assessment included the results of archaeological evaluation has been carried out including archaeological geophysical survey and trial trenching, the scope of which was agreed with Suffolk County Council Archaeological Service (SCCAS) who also monitored the fieldwork. Where archaeology is present, this will be mitigated through an agreed scheme of archaeological investigation (preservation by record) comprising excavation and post-excavation assessment and analysis, followed by public dissemination of the results. The scope would be agreed with SCCAS and they would also monitor this work. Nothing that requires preservation in situ has been identified to date.	3

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Insufficient assessment of effects from traffic on heritage assets The heritage assessment has only assessed the effect of construction traffic on heritage assets near the two village bypass, Yoxford Roundabout, and Sizewell link road during the operational phase. Concerns not addressed include: (a) the need to ensure character of ancient settlements/landscape not eroded by increase in traffic. Noise and visual intrusion can be very harmful in rural settings and 12 years is a long time; (b) even small changes in a sensitive setting can be harmful; (c) noise and visual mitigation measures may be inappropriate for heritage assets (e.g. additional glazing or screen planting); (d) deposits from vehicle exhausts may damage or affect the appearance of heritage assets; (e) given its proximity to Yoxford Roundabout, unassessed effects on Cockfield Hall.	The scope of the assessment of the likely historic environment effects of the Sizewell C Project, including on designated heritage assets, as presented in Volume 1, Appendix 6L of the ES (Doc Ref. 6.2) [APP-171], was established through a formal EIA scoping process undertaken with the Planning Inspectorate and through consultation and engagement with statutory consultees during the pre-Application stage. This approach includes an assessment of both direct effects, such as those which result from physical damage or disturbance which give rise to a loss of heritage significance, and indirect effects, defined as those which result in change to heritage significance but do not give rise to physical damage or disturbance to the asset. In this context, these effects would generally arise through changes to the settings of heritage assets such as visibility of the proposed development in views of and from heritage assets, as well as other potential perceptual changes such as increased traffic movements and noise. The historic environment effects of the proposed two village bypass, Sizewell link road, Yoxford roundabout are assessed in Chapter 9 (Historic Environment) of Volumes 5 to 7 of the ES (Doc Ref. 6.6 to 6.8) [APP-432, APP-467 and APP-499] and take account of the Application of mitigation for the construction and operational phases. Volume 7, Chapter 9 of the ES (Doc Ref. 6.8) [APP-499] considers the effects of the proposed Yoxford roundabout works on Cockfield Hall.	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Mitigation includes measures set out in the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273] to limit noise disturbance and dust impacts, retention of existing vegetation, where possible, and planting, such as hedgerows and woodland, as appropriate, to provide visual screening and to help infrastructure integrate into the landscape.	
Impacts on Theberton Hall from Sizewell link road The proposed bridge will prevent access to the Theberton Hall drive after 400 years of use. The local pollution, noise, light and dust caused by the construction of Sizewell link road, and the use of it, will impact on the future use of the Hall as a residential property.	The historic environment effects of the Sizewell link road are assessed in Volume 6, Chapter 9 (Historic Environment) of the ES (Doc Ref. 6.7) [APP-467]. This includes an assessment of the effects on Theberton Hall (LB 1227753) and concludes that minor adverse (not significant) effects are predicted during construction taking account of the mitigation for the proposed link road, which would reduce to no effect during operation once planting has matured. The assessment predicted there would be no effect on the gates, gateway, walling and well head 30m west of Theberton Hall (LB 1227753) during construction and operation, whilst taking account of mitigation for the Sizewell link road. Mitigation includes standard Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273] measures to limit noise disturbance, retention of existing vegetation where possible and woodland planting to the west of the route in the vicinity of Dovehouse Farmhouse, to compensate for the loss of woodland in the belt west of Theberton Hall, and to infill field corners severed by the proposed route. Further planting is proposed east of the route in this vicinity to minimise visibility from the Theberton Hall estate, and to help integrate the	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	proposed Pretty Road overbridge into the surrounding landscape. There is no change to the historic environment assessment of Theberton Hall as a result of the Additional Information submitted in January 2021 or accepted changes (April 2021). In the assessment of noise and vibration effects, Volume 6, Chapter 4 of the ES (Doc Ref. 6.7) [APP-451], as updated by the ES Addendum (Doc Ref. 6.14) [AS-185] reported minor adverse residual effects from the main construction phase once mitigation is taken into account, which will be secured through the CoCP. The use of the Sizewell link road is predicted to lead to up to major adverse effects during the peak of the construction programme, when there will be additional HGV traffic on the road associated with Sizewell C, reducing to a minor adverse effect once the power station is complete and operational. A Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES (Doc Ref. 6.3) [APP-210]) has been included within the Application. This requires further consideration of road traffic noise impacts and offers a grant in respect of sound insulation for qualifying properties. In addition, further detailed design work will be undertaken to refine the design of the road, and this will include consideration of measures to reduce noise. Effects on air quality in the vicinity of Theberton Hall during both construction and operation of the Sizewell link road were found to be negligible, as set out in Volume 6, Chapter 5 of	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	the ES (Doc Ref. 6.7) [APP-454], as updated by the ES Addendum (Doc Ref. 6.14) [AS-185]. In addition, Volume 6, Appendix 6B of the ES (Doc Ref. 6.7) [APP-458] considered the visual effects of the lighting elements of the proposed development on the visual receptor groups once the link road is operational. It concluded that night-time effects would be of low magnitude, which would result in slight adverse effects that are considered to be not significant. Whilst loss of property value is not a material planning consideration, SZC Co. has produced a Property Price Support Scheme (PPSS) to assist those who wish to move as a result of the development. The PPSS is applicable to certain homes, close to a relevant development site, where certain criteria are met.	
Impacts on Farnham Hall from the Two Village Bypass Farnham Hall represents a long-standing house and manorial farming estate of historic heritage value. SZC Co. have failed to recognise the significance of the built and natural setting of the Farnham Hall complex, which would be much better protected from serious harm by moving an alignment further to the east. SZC Co. has misrepresented the number of residential dwellings in the Farnham Hall area and its Application	The historic environment effects of the two village bypass are assessed in Volume 5, Chapter 9 (Historic Environment) of the ES (Doc Ref. 6.6) [APP-432]. This includes an assessment of the effects on Farnham Manor (LB II 1230210) and concludes that minor adverse (not significant) effects are predicted, whilst taking account of the mitigation for the construction and operational phases of the bypass. Mitigation includes measures set out within the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273] to limit noise disturbance, retention of existing vegetation, where possible, and woodland planting along the western side of the cutting as the route passes Farnham Hall to provide	12

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
documents do not take proper account of its heritage legacy.	visual screening during the construction phase. The woodland planting along the western side of the cutting would remain as mitigation during the operational phase and a footbridge would be provided across the route to maintain connectivity with Foxburrow Wood. There is no change to the historic environment assessment of Farnham Manor as a result of the Additional Information submitted in January 2021 or accepted changes (April 2021).	
Compensation for impacts on heritage assets A historic environment fund should be established and secured through the Section 106 Agreement from which sums can be drawn down for compensatory measures relating to specific heritage assets, or groups of assets, at a later date. A compensation fund would be most appropriate, since implementing mitigation measures for each potentially affected heritage asset would be impracticable.	The scale of impacts assessed for the Sizewell C Project are not such as to warrant a compensatory fund. However, a Heritage Fund is established through the draft Section 106 Agreement [PDB-004] to provide enhancements to the Leiston Abbey sites, as well as a monitoring contribution to Suffolk County Council for the archaeological mitigation.	2

4.24 Landscape and Visual Impact Assessment

a) Overview

4.24.2 A total of 513 Interested Parties raised matters regarding landscape and visual impact assessment.

4.24.3 **Table 4.23** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.23: Landscape and Visual Impact Assessment

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast The Sizewell C Project will have a significant effect on the Suffolk Coast and Heaths AONB and Heritage Coast which should be protected, particularly preserving lowland heath which is recognised nationally. The proposed development would devastate the beautiful area and there will be no recovery. Harm will be caused to the special qualities of the AONB with a significant effect on the integrity of the entire designation, rather than just over localised sections of the AONB and Heritage Coast, as claimed by SZC Co.	The Government's Overarching NPS for Energy (NPS EN-1) states that there is an urgent need for new electricity generating stations, including nuclear power. Sizewell is identified in the NPS for Nuclear Power Generation (NPS EN-6) as one of eight potentially suitable sites for deployment of new nuclear power stations. Annex C to NPS EN-6 confirms that that the inclusion of Sizewell C in the NPS reflects the in-principle acceptability of its location, and together with Chapter 3.10 (Nuclear Impact: Landscape and Visual Impacts) of NPS EN-6, it recognises the potential acceptability of significant environmental effects in this regard in view of the national need for nuclear power generation and the scarcity of alternative sites. The AONB natural beauty and special qualities document has been produced in agreement with Suffolk Coast & Heaths AONB Partnership, Suffolk County Council and East Suffolk Council and has been used to inform the assessment of the	372

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
On completion of construction, how will the surrounding AONB be restored and who will pay for the restoration? 12 years of devastation cannot be restored to the AONB as easily as SZC Co. imply.	effects of the Project on the AONB. An assessment of effects on the AONB is provided in Volume 2, Chapter 13 of the ES (Doc Ref 6.3) [APP-216], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181], and the significance of effects is identified. SZC Co.'s assessment has concluded that local effects on the AONB will not result in any widespread effect on the AONB. It is noted that NPS EN-6 recognises '<i>the potential for long-term effects on visual amenity</i>' (para 3.10.3) and that '<i>the scope for visual mitigation will be quite limited</i>' (para 3.10.8). SZC Co. has deployed extensive mitigation as part of the embedded design for the construction and operational phases to reduce adverse effects. SZC Co. does not agree that during construction the effect on the designated area in its entirety, would be significant. SZC Co. notes that nuclear infrastructure has been a feature of the AONB since its designation, with Sizewell A being in place before the AONB itself was designated. As such energy infrastructure has, and will continue to be, a feature of this part of the AONB; the AONB would not be '<i>overwhelmed</i>' by it. SZC Co. recognises that the Project will affect the performance of the immediate AONB during construction as recorded in the ES (Doc Ref 6.3 and 6.14) [APP-218 and AS-181], but reasonable mitigation measures have been put in place to minimise effects. In addition, SZC Co. notes that the AONB is '<i>supported</i>' by wider expanses of non-designated open countryside which forms a recognised setting to the AONB and is not impacted during construction.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Sizewell C will deliver wider environment improvements to the AONB and its setting through the Section 106 Agreement to be agreed as part of the Application.	
Light Pollution The Sizewell C Project will increase light pollution to local communities and habitat areas during construction and operation. Not enough consideration has been given to light pollution. Concern over impacts on 'dark skies', specifically damage caused to the business of campsites which have an accredited Dark Sky status.	Volume 2, Chapter 13 (Landscape and Visual) of the ES (Doc Ref. 6.3) [APP-216], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181], presents an assessment of the likely landscape and visual effects, including the impact of light pollution arising from the construction and operation of Sizewell C. Further details are provided within the Night-time Appraisal presented within Volume 2, Appendix 13B of the ES (Doc Ref. 6.3) [APP-218 and APP-219] which also includes night-time visualisations. The assessment includes consideration of the accommodation campus, development and activity along the coastline and the effects of the proposed development at night. Specific consideration to impacts on 'dark skies' status has been given. SZC Co. recognises that some significant effects from light pollution would arise. These will be minimised as far as possible through the Lighting Management Plan (LMP) (Doc Ref. 6.3) [APP-182], which has been prepared for the main development site, for both the construction and operational phases. The LMP sets out measures, which when implemented, would minimise light spill from the development during construction and operation. These include (but are not limited to) adopting the lowest safe lighting levels possible for the area to be lit, limiting the hours of lighting, using the lowest possible mounting for the luminaires and using directional lighting and louvres, where required.	211

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Specific measures have been specified to minimise light spill in proximity to bat roosts and commuting routes/ flightpaths.	
General landscape and visual impacts The proposed buildings and stockpiles would be higher than anything for many miles and will dominate the landscape. The peripheral bunding suggested as mitigation is inadequate. The buildings would be a concrete eyesore. The character and appearance of the rural landscape would be irreversibly changed to one with an intrusive industrial element. The cumulative landscape and visual impacts with the Greater Gabbard and Galloper sub stations have not been fully considered. Cumulative visual effect with Sizewell A and B will be apparent for two centuries. The overhead transmission lines should be moved underground.	SZC Co. has given careful consideration to the location of the Sizewell C site within the AONB and Heritage Coast and has sought to minimise and mitigate landscape and visual effects and effects on the natural beauty and special qualities of the AONB through an iterative design process. SZC Co. has provided embedded mitigation as set out in Volume 2, Chapter 13 of the ES (Doc Ref. 6.3) [APP-216] and the Design and Access Statement (Doc Ref. 8.1) [APP-585 to APP-587], to reduce adverse effects and ensure that the 'behaviour' of the power station in the landscape is aligned with that of the existing Sizewell A and B station buildings and support the integration of the power station into the coastal landscape. SZC Co. do not consider that the addition of Sizewell C represents the industrialisation of the local landscape of the AONB. Design mitigation measures include: • Careful design of the proposed turbine halls including alignment of principal structures on the same axis and building envelope. • Careful design of proposed sea defences as naturalistic dune features similar to those on the coast in the immediate area. • Removal of substantial elements of the beach landing facility during the operational phase when the facility is not in use.	134

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The proposals include provision of screening of a substantial amount of lower level development on the main nuclear island, thereby reducing visual effects; and the proposals are sympathetic to the character of the coastline, combined with a focus on the design and appearance of turbine halls as the primary structures that respond to the existing Sizewell A and B stations along a common alignment. The significance of effects is recorded in Volume 2, Chapter 13 of the ES (Doc Ref. 6.3) [APP-216], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181]. SZC Co. consider the effects to have been controlled to the extent that is reasonably practicable and aligned with NPS EN1 and EN6. SZC Co. acknowledge that the present context of Sizewell B will alter with the proposed development and as a result it will be viewed in a different context, especially from the north. While Sizewell B's appearance in views along the coast will alter, it will remain visible, sitting in a sequence of three periods of nuclear power generation. The design principles described in the Design and Access Statement (Doc Ref. 8.1) [APP-585 to APP-587] identify the importance of securing the alignment of each power station's major structures on a common axis to allow each to be read as separate objects without distorting their legibility through changes in orientation. This design discipline will be apparent in views along the coast from the north. Volume 2, Chapter 13 (Landscape and visual) of the ES (Doc Ref. 6.3) [APP-216], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181], assesses the landscape and visual impact	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	of the Sizewell C Project during construction and operation in detail. The assessment considers the effects of the Sizewell C Project within the context of the Greater Gabbard and Galloper sub-stations and the Sizewell A and B stations, which form part of the existing baseline. Further information on the overhead lines is provided in Section 4.8 of this report.	
Absence of visualisations There is an absence of visualisations of the construction site and the final configuration of the Sizewell C power station.	Visualisations of the final configuration of Sizewell C and the construction parameters are provided within Volume 2, Figures 13.9.01 - 13.10.07 of the ES (Doc Ref. 6.3) [APP-221 to APP-223]. The approach to the production of construction and operational visualisations presented in the LVIA was agreed with statutory consultees, including East Suffolk Council, Suffolk County Council and the Suffolk Coast & Heaths AONB Partnership. Additional photomontages of the accommodation campus and the Land East of Eastlands Industrial Estate (LEEIE) were submitted to the Examining Authority in January 2021 and are provided within [AS-050] .	5
Removal of Goose Hill Concern over the removal of almost all of 'Goose Hill' woodland area to the north of the main development site. This is designated as 'mixed woodland / trees to be removed' in the Application. The visual impact of the loss of this woodland on the Sandlings Walk National Trail and views towards the site from the Suffolk Coast Path will be substantial.	Prior to submission of the Application, SZC Co. minimised the amount of development at Goose Hill through re-siting the training centre within the main development site. However, SZC Co. does not consider there is the potential to remove the proposed outage car park from Goose Hill. Locating the outage car park close to the site is extremely important for a number of reasons: • For out of hours emergency response, it is essential for the emergency control team to be able to get to the site as	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	quickly as possible – waiting in a park and ride would cause delay. • The station operates 24hrs a day (with a blend of fixed and flexible start/end times), so running a bus service to and from the site would require the running of buses through the day/night, which could be disruptive to both local residents and the operation of the station. • Outages typically run on an hour by hour timescale and so having a workforce that could be delayed from reaching site through waiting for buses could significantly impact a return to service timescale and prolong outages, resulting in higher costs to the consumer. • It is not possible for Sizewell C and B stations (3 units) to coordinate or confidently always separate their planned outages. Even if they were scheduled from the beginning, there would only be a matter of a few months between each. An outage could over-run; or there may be a forced/un-planned outage – these are unpredictable by their very nature and therefore cannot be anticipated when they will arise, resulting in potentially concurrent outages. Delaying a maintenance and refuelling outage in order to avoid a clash would present a risk to the operation of the power station. • There is comprehensive landscape mitigation proposed within and around the operational/ outage car park. This includes substantial areas of new woodland planting along the southern boundary with the SSSI and also to the immediate west.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	- Retained woodland on the northern and eastern boundaries of Goose Hill will help to mitigate the effects of lighting on the surrounding landscape and receptors in views towards the car park from the coast and from the Sandlings Walk National Trail this (in common with all proposed woodland) will be managed and maintained to retain its screening function. - In addition, the car park incorporates several linear bands of tree planting, providing additional 'layers' of screening to break up the expanse of hard surfacing and also to intercept light spill.	
Visual impact of the Green Rail Route The spoil from the excavation will be banked up around the site to create bunding, but the depth of the cutting for the track will be such that it will block views from adjacent properties.	As described in Volume 9, Chapters 2 (Description of Development) and 6 (Landscape and Visual) of the ES (Doc Ref. 6.10) [APP-541 and APP-551], an approximately 2m high grassed visual and noise screening bund is proposed along the northern edge of the proposed rail extension route, which widens towards the eastern end of the proposed rail extension route and a second bund is also proposed (also approximately 2m high) to the south of the rail extension at the eastern end of the proposed rail extension route, west of the B1122 (Abbey Road). These bunds will help to reduce the potential impacts on landscape and visual receptors by providing further screening of the rail extension route. Due to the undulating topography that the proposed rail extension route crosses, the relationship between the profile of the route and the surrounding landform will vary along its length, resulting in some sections being in cutting and others being on embankment. The proposed bunds therefore provide a	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	consistent approach to screening along the proposed rail extension route. A further benefit of utilising the excavated material closer to the location it is excavated from is the reduction in the amount of vehicle movements that would be required to remove the material to elsewhere within the Project boundary and return it to the proposed rail extension route to reinstate the current uses at the end of the main development site construction period. In addition, the landscape strategy will retain existing woodland, scrub and hedgerows within the site and adjacent to the site boundaries, where practicable.	

4.25 Major Accidents and Disasters

a) Overview

4.25.2 A total of 152 Interested Parties raised matters regarding major accidents and disasters.

4.25.3 **Table 4.24** provides a summary of the key issues raised, alongside a response from SZC Co.

4.25.4 In addition to the relevant representations received from Interested Parties on matters regarding major accidents and disasters, submissions were also received from Austria, Estonia, Germany, Ireland, Norway and Sweden pursuant to Regulation 32 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Key matters raised in these submissions are covered by the responses provided within **Table 4.24** and within **Appendix A, Section A.4** of this report.

- 4.25.5 It is noted that under Article 37 of the Euratom Treaty, the UK Government (on behalf of operators) submits information to the European Commission on plans to dispose of radioactive waste. This includes an assessment of the impacts to member states from both planned routine discharges and in the event of an accident and allows the Commission to make a determination as to whether implementation of a plan is liable to result in radioactive contamination of a member state. In August 2020, a General Data Set was submitted by UK Government to the European Commission in relation to the construction, operation and decommissioning of Sizewell C. This has been sent to representatives of the European Union's member states. Copies of Chapters 2, 6 and 7 of the Article 37 submission, including a description of the UK EPR™, assessment of severe accidents and a description of emergency plans, have been provided in **Appendix B** of this report for information.

Table 4.24: Major Accidents and Disasters

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Risk of explosion/ a major accident Concerns regarding the safety and security of nuclear power. Concern that nuclear power is dangerous and there is a risk of an explosion/accident devastating the local and wider areas, with references to Fukushima and Chernobyl. Other EPR™ plants (Flamanville and Olkiluoto) have been reported to have technical problems. Globally there have been several nuclear power plant accidents since 1950s. An accident at Sizewell would impact on local, regional and	The UK nuclear industry has maintained an exemplary safety record since the Windscale reactor accident in 1957 and the introduction of specific nuclear safety regulations and regulator. Whilst there are similarities in the accidents to the reactors at Chernobyl (1986) and Fukushima (2011), the consequences of the radiological releases from Fukushima were significantly lower at levels unlikely to cause any health detriment to the public. This is a testament to the lessons learnt and improvement in design between first generation reactor design and the current reactor technology. Using one of most modern reactor designs, SZC Co. has continued to improve the safety design to practically eliminate accidents with the likelihood of a severe release of radioactivity. As part of the defence in depth (DiD) approach to safety, SZC Co. will	116

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
national food supply chains due to the abundant farmlands within the area. The risk of accidents is increased due to the lack of niche skills and equipment required for nuclear technology over time as it becomes an outdated technology. Sizewell C also poses a risk to Sizewell B operation and its workers.	include emergency arrangements focused on all aspects of public protection to respond proportionately to all accidents including events not considered in the design of the reactor. The Design Acceptance Confirmation (DAC) granted by the Office for Nuclear Regulation and a Statement of Design Acceptability (SoDA) issued by the Environment Agency in December 2012 confirmed that any risks to the public and the environment from the UK EPR™ reactors can be eliminated or mitigated by design sufficiently to be considered as acceptable. The safety and security of nuclear installations in the UK is assured by a system of strict regulatory control based on a licensing process by which SZC Co. is required to seek a license from the Office for Nuclear Regulation (ONR). In June 2020, Sizewell C applied for a Nuclear Site License and its Application is currently being assessed by the ONR. Construction of Sizewell C cannot commence should a license not be granted. Under the Nuclear Site License, Sizewell C will need to demonstrate via its Safety Case that the design, construction, commissioning, operation and decommissioning of Sizewell C can be undertaken in a safe and secure manner, and any risks to the workers, public and environment are suitably and sufficiently controlled. The Nuclear Site License will also require Sizewell C to demonstrate that it has suitable and sufficient organisation in place throughout the lifecycle of the station, including suitably qualified and experienced personnel.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	As set out within Volume 2, Chapter 27 (Major Accidents and Disasters) of the ES (Doc Ref. 6.3) [APP-344], the National Policy Statement for Nuclear Power Generation (EN-6) identifies that " <i>Certain matters are for consideration of the Nuclear Regulators and the Planning Inspectorate should not duplicate the consideration of these matters itself. Such matters include the Generic Design Assessment (GDA) and the site licensing and environmental permitting processes (including in respect of the management and disposal of radioactive waste, the permitting of cooling water discharges, etc)</i> ". On this basis the Major Accidents and Disasters assessment presented in the ES (Doc Ref. 6.3) [APP-344] has not duplicated the assessment of safety and security arrangements subject to the Generic Design Assessment, nuclear site licensing and environmental permitting regimes. The Major Accidents and Disasters assessment has assumed that these consenting regimes will be properly applied and enforced by the relevant regulator outside of the DCO process. Therefore, where relevant, the Major Accidents and Disasters assessment has assumed compliance with nuclear site licensing and environmental permitting regimes to form part of mitigation within the ES.	
Threat of terrorism and a general risk to security Concern over terrorists (including military action or radical groups) targeting the site.	The vulnerability of the Sizewell C Project to such events is considered within the Major Accidents and Disasters assessment presented in Volume 2, Chapter 27 of the ES (Doc Ref. 6.3) [APP-344] and the supporting Appendix 27A (Doc Ref.6.3) [APP-345].	35

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Throughout the design, construction, commissioning, operation and decommissioning of Sizewell C, SZC Co. will be required to demonstrate to the ONR that it has adequate security arrangements to prevent the theft or sabotage of nuclear or other radioactive materials and the sabotage of nuclear facilities, taking into account the full spectrum of protective measures, including physical protection, personnel security, cyber security and information assurance. These arrangements will be independently approved by the ONR's Civil Nuclear Security and Safeguards (CNSS) division who are responsible for approving security arrangements within the civil nuclear industry and enforcing compliance. A periodic and systematic review and reassessment of the Safety Case would be undertaken in line with the requirements of the Nuclear Site Licence.	
Natural disasters The site of the Sizewell C power station is susceptible to extreme weather events. Nuclear reactors will not be safe in the event of a catastrophic natural event.	The safety and security of nuclear installations in the UK is assured by a system of strict regulatory control based on a licensing process by which SZC Co. is required to seek a license from the ONR. In June 2020 Sizewell C applied for a Nuclear Site License and its Application is currently being assessed by the ONR. Construction of Sizewell C cannot commence should a license not be granted. Under the Nuclear Site License Sizewell C will need to demonstrate via its Safety Case that the design, construction, commissioning, operation and decommissioning of Sizewell C can be undertaken in a safe and secure manner, and any	8

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	risks to the workers, public and environment are suitably and sufficiently controlled. This includes due consideration of any potential internal and external hazards, including natural disasters, such as extreme weather events.	
Emergency Evacuation Emergency evacuation has not been assessed. In addition, there is insufficient information on emergency plans, necessary upgrades to emergency services and infrastructure to facilitate evacuations. Should Sizewell B experience a serious incident during construction how would the construction workers and local residents be safely and quickly evacuated? If an accident occurs, the local roads are not adequate to facilitate a mass evacuation on to the A12, which is already congested.	A summary of arrangements for emergency preparedness is presented within the Major Accidents and Disasters assessment in Volume 2, Chapter 27 of the ES (Doc Ref. 6.3) [APP-344]. In addition to the nuclear safety regulations, Nuclear Site Licence Condition 11, the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR) set out specific requirements for emergency preparedness and response in relation to premises, which work with ionising radiation. These regulations require SZC Co. to: • identify all events that have the potential to cause a radiation emergency; • evaluate the possible on and off-site consequences for these events; • provide Suffolk County Council with a recommended distance for a Detailed Emergency Planning Zone; • implement an effective and proportionate emergency response (operators (on site) Emergency Plan). Suffolk County Council are required to: • implement an effective and proportionate off-site emergency response plan (Off-Site Emergency Plan);	22

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	- to review, consult and make the emergency plan available; - provide information prior to and during a radiation emergency; - recover costs from SZC Co. for the preparation of the emergency plans. The operator emergency plan and offsite emergency plan must be integrated to enable coordination of activities during response. Sizewell C operator's emergency plan will also be integrated and coordinated with Sizewell B's equivalent emergency arrangements and SZC Co. is closely liaising with Sizewell B with regards to any updates required to the existing Sizewell B emergency arrangements during the construction and operation of Sizewell C. The emergency plans include pre-assessed arrangements for the safe evacuation of site in the unlikely event this should be required. The local impact of a site evacuation during an emergency will be similar or less than the end of day traffic leaving the site. The emergency plan will include the need to maximise occupancy to minimise vehicles leaving site and additional traffic controls and marshalling by police. Before nuclear fuel is brought to site, ONR would provide independent oversight to both the Nuclear Site Licence emergency requirements and duties in REPIR to approve the adequacy of the emergency arrangements, this approval	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	includes consideration of the resources required to put the plans into effect.	

4.26 Marine and Coastal

a) Overview

4.26.2 A total of 563 Interested Parties raised matters regarding marine and coastal environment.

4.26.3 **Table 4.25** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.25: Marine and Coastal

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Impacts on coastal morphology and erosion The Sizewell C Project will alter the coastal morphology and damage the coastline, which is already unstable, including the destruction of Shingle Beaches County Wildlife Site. Specific concerns about impacts on the coastline of Minsmere and Thorpeness. There is already evidence of coastal erosion at Thorpeness and the	The potential for the sea defence to cause or exacerbate erosion to the south (or north) of Sizewell has been assessed within Volume 2, Chapter 20 of the ES (Doc Ref. 6.3) [APP-311], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181]. The proposed soft coastal defence feature will ensure the hard sea defence will remain a terrestrial feature and therefore not affect erosion. In fact, by releasing sediment to the system, the soft coastal defence will act to reduce erosion locally, particularly to the south as that is the main direction of sediment transport.	228

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
shingle beach at Dunwich marshes has been breached in recent years. Concerns that the assessment is insufficient and that the cost of continuing erosion has not been fully reflected within the submission. The coastal zone of influence in the Application does not reflect the Scoping Report Opinion from the Secretary of State. There is no plan for monitoring erosion and the proposed coastal defences are inadequate. Suggestion that an Independent Monitoring Authority should be set up and given responsibility for the ongoing monitoring of impacts on the coast. Funds need to be made available and maintained in escrow indefinitely for coastal defence works, including for Aldeburgh to at least Shingle Street. Further details should be provided on how this kind of monitoring would be legally enforced and mitigation funded.	SZC Co. issued a Coastal Processes Monitoring and Mitigation Plan (CPMMP) to stakeholders and the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.15.A of the ES Addendum (Doc Ref. 6.14) [AS-237]). Implementation of the CPMMP will be a requirement of the DCO and a condition of the Deemed Marine Licence. The approach to mitigation for the Shingle Beaches CWS is fully explained in the ES (refer to Volume 2, Chapter 14) (Doc Ref. 6.3(A)) [AS-033], the oLEMP (refer to Doc Ref. 8.2(A)) and the relevant monitoring of the re-establishment is covered in the Terrestrial Ecology Monitoring and Mitigation Plan (Doc Ref. 9.4) which has been shared with Natural England and other ecology stakeholders.	
Lack of clarity and concern over the adequacy and buildability of coastal defences There is insufficient information on the design of the coastal sea defences. No	Although the detailed design of the sea defences is still being refined, the parameters and criteria that it needs to meet are defined as part of the Safety Case assessment to support the Nuclear Site Licence, and thus in close consultation with both the Environment Agency and the ONR. Specifically, the basis of	98

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
complete design of the hard coastal defence feature is available. The proposed sea defences for the Project have also been described as 'unbuildable' and 'do not meet any form of design standard'. The defences fail to meet design standards or requirements of ONR/EA FCERM advice. The suggestion that SZC Co. would build an even higher hard coastal defence feature is nonsensical because it is not only the over-topping that is the major concern but flooding underneath and round the back of the defence feature. Concern regarding SZC Co.'s claim about the exposure of the hard coastal defence feature from 2053 for 160+ years due to coastal processes, if not in perpetuity.	design is to limit overtopping rates up to 2140 to acceptable levels for the 1 in 10,000 year event with allowance for reasonably foreseeable climate change. The design approach allows for future raising of the sea defence to meet credible maximum climate change, in the event that sea level rise with climate change is greater than expected. The assessment is made on those parameters and criteria and the detailed design is not necessary for the Application for development consent. The potential for extreme conditions to result in flooding of the main platform from breach of defences elsewhere along the coastline, with inundation from the rear of the main platform, is understood. The proposed elevation of the main platform at 7.3m above ordnance datum (AOD) has been set in the context of the Safety Case assessment and in support of the Nuclear Site Licence, in close consultation with the ONR. The purpose of the soft coastal defence feature is specifically to provide an erodible beach that will be recharged when required to maintain sediment transport along the site frontage and ensure that the hard coastal defence feature is not exposed. The reference to exposure dates refers to an unmitigated scenario but the Coastal Processes Monitoring and Mitigation Plan (CPMMP) issued to the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.15.A of the ES Addendum (Doc Ref. 6.14) [AS-237]) will ensure that the soft and hard defences have no significant effect on coastal processes. Further engineering information on the HCDF including drawings and plans, as well as modelling for the SCDF, will be provided to	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	stakeholders and the Examining Authority through the examination.	
Coastal erosion and flooding of Sizewell C The Sizewell C Project site will be susceptible to flooding and coastal erosion due to climate change and the resulting sea level rise, increased tidal surges and storms. The site could become an island with three nuclear power plants in the next 30 years, posing safety concerns for power generation and the safe storage of radioactive waste. The contingency allowed within the design for climate change resilience is not sufficient. Defending the enlarged nuclear site against coastal erosion would cause even greater degradation to the local environment. The assessments completed are inadequate. The Application fails to take account of the latest 2019 Intergovernmental Panel on Climate Change Projections on predicted sea level rise and in particular the likelihood and magnitude for tidal surges along the coast during the operational lifespan of the reactor. Instead, the UK CCRA 2018	It should be noted that the flood defence features are not intended to keep the site completely dry, rather that under some extreme circumstances the site might flood but then drain rapidly. The suggestion that the site would become an island probably originates in a study that looks at the proposed Sizewell C site that: (a) uses very extreme (not plausible) sea-level rise and storm effects; and (b) takes no account of the Sizewell C infrastructure or flood defence features. The suggestion of an island forming is based on incomplete evidence and is not correct. The Main Development Site Flood Risk Assessment (FRA) (Doc Ref. 5.2(A)) [AS-018], as updated by the Main Development Site Flood Risk Assessment Addendum (Doc Ref. 5.2(A)Ad) [AS-157], uses the UKCP18 data specifically for the east coast of England, which are considered appropriate for the assessment of Sizewell C. Generalised assessments of global change are not appropriate. Following the 2011 earthquake off the Pacific coast of Tōhoku, and the tsunami that affected the Fukushima Daiich power station, risk of tsunami to all UK nuclear powers station underwent considerable review. The assessment of tsunami risk is taken very seriously by SZC Co. and the ONR and a complete assessment has been made for Sizewell C as part of the Nuclear Site Licence application.	429

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
estimates have been used. Assessments on tsunami and Coralline Crag risk are incomplete.	Volume 2, Chapter 20 of the ES (Doc Ref. 6.3) [APP-311] , as updated by the ES Addendum (Doc Ref. 6.14) [AS-181] , provides an assessment of effects on coastal geomorphology. The soft coastal defence feature to be provided as part of the Sizewell C Project will release sediment to the system and act to reduce or reverse erosion locally, particularly to the south as that is the main direction of sediment transport. There would be no effect on the Coralline Crag outcrop.	
Removal of Acoustic Fish Deterrent (AFD) The proposed development is likely to damage fish stocks through entrainment and raised sea temperature at outfalls. Furthermore, the assessment is based on out of date sea temperature data. The omission of the Acoustic Fish Deterrent (AFD) as the third fish deterrent system for the cooling tunnels from the Application is concerning. Without an AFD, fish are at risk of being sucked into the cooling water tunnels in vast quantities. This is both dangerous and environmentally catastrophic. Not using rigorous fish deterrents and the AFD is a direct threat to the Renaissance of the East Anglia Fisheries (REAF). At the same time as trying to nurture and grow a	The assessment of effects on marine ecology and fisheries finds that effects would be 'not significant' during both the construction and operational phases, as set out in Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035] and Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]. These assessments show that neither the plume nor impingement and entrainment would have a significant effect on fish populations. There is no danger whatsoever to the station from fish ingress as the filtration systems are designed to withstand extreme levels of ingress. The assessments presented in Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035], performed by the Centre for Ecology, Fisheries and Aquaculture Science (the Government's own fisheries advisers and world experts on fish stock assessments), demonstrate that the potential impacts of Sizewell C on fish stocks and the fishing industry are negligible. Mitigation measures to help achieve this outcome include Low Velocity Side Entry intake heads to minimise the number of fish entrapped in the cooling system and a Fish Recovery and	23

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
fishing industry in the local area, the power plant will be suctioning in millions of fish to die in the cooling tunnels over its lifetime. The most common fish in the area are herring and sprat of 88 known species and there is also Dover Sole, sand gobies and Flounder present, which can also be deterred by an AFD. Comparisons of fish kill by the Project with the impacts of fishing are misleading. The removal of the AFD from the Application shows that SZC Co. are trying to cut their costs and are not willing to address this hugely threatening environmental issue that will seriously affect the UK's fishing potential post-Brexit.	Return (FRR) system, comprising one FRR tunnel per EPR™ unit, to recover entrapped fish and return as many to sea as possible unharmed. Details of project alternatives that were considered and do not form part of this Application, such as Acoustic Fish Deterrents (AFDs) and other forms of biota exclusion technology, are set out in Volume 2, Chapter 6 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.3) [APP-190]. The Sizewell C intake locations are more than 3km offshore and not conducive to installation of large, complicated electrical systems, such as acoustic fish deterrents. Installation and extremely regular maintenance would require diver intervention in very turbid, fast flowing tidal waters, which presents an extremely high safety risk. Given that there is no assessed significant effect of Sizewell C on fish stocks, such a high risk is not acceptable.	
Impacts on marine ecology / marine environment in general Concern that the marine environment is already suffering from pollution and there will be additional adverse impacts on marine life from the proposed development. Major impacts on the marine environment will occur from the discharge of cooling water due to heat, chlorination for biofouling control, trade and sanitary effluents, and radioactive materials. Effluents will be	An assessment of the likely effects of the cooling water discharge on the marine environment is provided within Volume 2, Chapter 21 (Marine Water Quality and Sediments) of the ES (Doc Ref. 6.3(A)) [AS-034] and Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035] and demonstrates that local water quality is not significantly affected. The heat and chemical loadings in the discharge are diluted very rapidly as the discharge moves away from the outfall. As the discharge is thermally buoyant it rises to the surface rapidly and thus away from crustaceans such as crabs and lobsters that live on the seabed. The discharge will need to comply with the stringent assessment process performed by the Environment	146

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
discharged at concentrations exceeding environmental quality standards or reference values and will rely on dilution. The proposals will also impact on the seabed. The Application does not reflect the evidence from Cefas scientific reports. Intake and discharge proposals contravene Habitat Regulations. How will impacts on specific species such as harbour porpoise be mitigated?	Agency in order for it to be approved for a Water Discharge Activity permit; part of that assessment process will be to confirm that the discharges do not contravene the Habitats Regulations The assessments presented within Volume 2, Chapter 21 (Marine Water Quality and Sediments) of the ES (Doc Ref. 6.3(A)) [AS-034] and Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035] were prepared by the Centre for Ecology, Fisheries and Aquaculture Science (Cefas). Mitigation for marine mammals, such as harbour porpoise, is described in detail within Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035].	
Impacts on fisheries resource and livelihoods Moribound biota would be discharged via the fish recovery and return system. This would mostly comprise fish such as herrings and sprats, possibly affecting fishermen's livelihoods. The Project will kill tonnes of fish every day for decades, deeply damaging fish stocks. Crabs, lobster, shell-fish and fish are caught and sold locally. This resource would be contaminated by human sewage, toxic chemicals and radionuclides, which could be exacerbated by bio-accumulation and	An assessment of the likely effects of dead and moribund fish being discharged from the cooling water system Fish Recovery and Return (FRR) system is provided within Volume 2, Chapter 21 (Marine Water Quality and Sediments) of the ES (Doc Ref. 6.3(A)) [AS-034]. The discharge would not affect local water quality significantly nor cause a nuisance. Pelagic fish, such as herring and sprat, tend not to survive impingement on the power station drum screen filters due to damage to their delicate scales. However, many, more robust fish species do survive. Return of the dead fish to the local marine environment is preferable to their removal to waste as it provides food for other marine species (i.e. the FRR returns the biomass to the same ecological system).	7

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
bio-magnification. SZC Co.'s assessment is based on designated areas for shellfish further away but does not consider impact on the local resource.	An assessment of the likely effects of removing fish and crustaceans by the cooling water system is provided within Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035] and demonstrates that there would not be a significant impact on fish stocks or, therefore, local fishermen's livelihoods. Further evidence in support of this is provided in the updated ES Addendum (Doc Ref. 6.14) [AS-181]. An assessment of the likely effects of the cooling water discharge on marine fish and crustaceans is provided within Volume 2, Chapter 21 (Marine Water Quality and Sediments) of the ES (Doc Ref. 6.3(A)) [AS-034] and demonstrates that local water quality is not significantly affected. The heat and chemical loadings in the discharge are diluted very rapidly as the discharge moves away from the outfall. As the discharge is thermally buoyant it rises to the surface rapidly and thus away from crustaceans such as crabs and lobsters that live on the seabed. The discharge will need to comply with the stringent assessment process performed by the Environment Agency in order for it to be approved for a Water Discharge Activity permit.	
Impact on water quality at beaches Water quality at beaches such as Dunwich, Sizewell, Thorpeness and Aldeburgh, will be affected. Whilst these are not blue flag beaches, people swim there regularly. SZC Co.'s assessment considers impacts on designated bathing waters at Southwold	An assessment of the likely effects of the cooling water discharge is provided within Volume 2, Chapter 21 (Marine Water Quality and Sediments) of the ES (Doc Ref. 6.3(A)) [AS-034]. The cooling water is discharged 3km offshore and is dispersed by tidal currents that run predominantly north-south along the coast. The heat and chemical loadings are diluted very	3

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
and Felixstowe but does not consider the impact on the water quality of the local beaches.	rapidly as the discharge moves away from the outfall and would not have an impact on local beaches.	
Impact of beach landing facility There is a lack of information about the impact of the beach landing facility. Concern that the beach landing facility will disrupt marine wildlife and reduce recreational and tourism value.	An assessment of the likely effects of the beach landing facility on marine ecology is provided within Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181] for the accepted changes (April 2021). The effects on marine ecology would be not significant due to the localised nature of the effects and mitigation, such as soft start piling techniques, described within the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. Volume 2, Chapter 15 (Amenity and Recreation) of the ES (Doc Ref. 6.3) [APP-267], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181] for the accepted changes (April 2021), considers the likely effects of the beach landing facility on on-shore and off-shore recreational activities. There would be no significant effects on offshore recreational activities. Significant effects are predicted on the users of the Suffolk Coast Path during construction, however, these would be significant as a result of the overall views of construction activities, noise and temporary diversion required due to the works on the main development site.	35

4.27 Materials and Waste

a) Overview

4.27.2 A total of 30 Interested Parties raised matters regarding materials and waste.

4.27.3 **Table 4.26** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.26: Materials and Waste

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Management of materials Management and impacts of spoil heaps/borrow pits and building detritus have not been sufficiently assessed or described, including landscape, fugitive dust and runoff impacts within the AONB. Excavation and disposal of materials will also impact on landfills.	Zones for borrow pits and stockpiles on the temporary construction area within main development site have been identified on the Construction Parameter Plans (Doc Ref. 2.5(B)) [AS-287] and are shown within the illustrative construction masterplans (Volume 2, Figures 2.2.33 -2.2.38 of the ES Addendum (Doc Ref. 6.14) [AS-191]). A detailed assessment of the temporary construction area on landscape and visual receptors is presented within Volume 2, Chapter 13 of the ES (Doc Rec. 6.3) [APP-216], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181]. Specific measures for the management of these areas and for pollution prevention are set out within the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273], including measures to minimise dust (refer to the Outline Dust Management Plan), surface water runoff and groundwater pollution. Measures included within the CoCP have been informed by the Borrow Pit Risk Assessment (Volume 2, Appendix 18E of the ES (Doc Ref. 6.3) [APP-296]), which considers the potential for the	25

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	contamination of groundwater, surface water and land from these areas. In line with the Materials Management Strategy, provided at Volume 2, Appendix 3B of the ES (Doc Ref. 6.3) [APP-185], as updated by Volume 3, Appendix 2.2.C of the ES Addendum (Doc Ref. 6.14) [AS-202], Material Management Plans and Soil Management Plans would be prepared by the contractor, so that site-won materials could be re-used on site. A neutral cut and fill balance is targeted for the Sizewell C Project, with any surplus excavated material to be retained on-site for re-use in landscaping. This will significantly minimise the amount of material classified as waste during the earthworks phase of construction. For any material that cannot be retained on-site, an assessment of effects on local landfill capacity is presented within Volume 2, Chapter 8 (Conventional Waste and Material Resources) of the ES (Doc Ref. 6.3) [APP-193], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181]. The assessment demonstrates that there is sufficient landfill capacity within the region to accommodate the potential waste arisings from the Sizewell C Project.	
Resource use The Project is not a good use of scarce national resources. Will SZC Co. use 15,000 tonnes of granite from Pembrokeshire in Wales to construct the coastal defences like Hinkley Point C? Surely this is not cost effective and not carbon neutral.	The Sizewell C Project will require a significant amount of materials. An assessment of material quantities required is presented within Volume 2, Chapter 8 (Conventional Waste and Material Resources) of the ES (Doc Ref. 6.3) [APP-193], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181]. An update on the Materials Management Strategy (Doc Ref.	5

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	6.3) [APP-185] was also provided within Volume 3, Appendix 2.2.C of the ES Addendum (Doc Ref. 6.14) [AS-202]. The sources for the procurement of materials will be confirmed by the contractors, if DCO is granted, although potential sources are described in the updated Freight Management Strategy (Doc. Ref 8.18) [AS-280]. Locally sourced materials and suppliers would be identified and used, where practicable. The design of the coastal defence is site-specific and, therefore, the amount of materials and its source will not likely be the same as for Hinkley Point C.	

4.28 Noise and Vibration

a) Overview

4.28.2 A total of 294 Interested Parties raised matters regarding noise and vibration.

4.28.3 **Table 4.27** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.27: Noise and Vibration

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Noise impacts (general)	An assessment of noise impacts from the Sizewell C Project is presented within Volume 2, Chapter 11 of the ES (Doc Ref.	253

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
The proposed development will increase noise pollution to local communities during construction and operation. The local area has quiet villages which would be adversely affected by the noise from HGVs and increased traffic. Not enough consideration has been given to noise pollution. Fair compensation should be offered by default to those significantly affected, including the provision of additional sound insulation to the house and other occupied areas within a residential envelope, rather than being deferred to agreement with East Suffolk Council.	6.3) [APP-202] and Volumes 3 to 9, Chapter 4 of the ES (Doc Ref. 6.4 to 6.10) [APP-354, APP-384, APP-415, APP-451, APP-484, APP-515] and [APP-545], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188]. For those properties where there is the potential for residual noise impacts, the Noise Mitigation Scheme (Volume 2, Appendix 11H) of the ES (Doc Ref 6.3) [APP-210] will provide noise insulation and/or ventilation, subject to meeting eligibility criteria. The Noise Mitigation Scheme applies to noise from all aspects of the Sizewell C Project. Volume 9, Chapter 4 of the ES (Doc Ref. 6.10) [APP-545] sets out the assessment of likely noise and vibration effects associated with movement of freight via rail during the construction of the Sizewell C Project. An update to this assessment was provided within Volume 1, Chapter 9 of the ES Addendum (Doc Ref. 6.14) [AS-188] to account for Additional Information obtained since the submission of the Application. This Additional Information has increased SZC Co.'s understanding of how much noise and vibration the trains used to transport construction materials for the Sizewell C Project ('construction trains') are likely to generate, how that noise and vibration spreads away from railway, and how the railway noise and vibration interacts with buildings along the railway line. Part of the design development of the rail proposals are works to mitigate noise to local residents. The draft Rail Noise Mitigation Strategy (Volume 3, Appendix 9.3.E) of the ES Addendum (Doc Ref 6.14) [AS-258] proposes a range of	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	physical and operational mitigation measures to reduce noise and vibration impacts on local residents, informed by the additional surveys and updated assessment. These proposed mitigation measures will be developed through further engagement with Network Rail and freight operating companies.	
Vibration impacts (general) Concern over damage to properties due to vibration impacts from increased traffic.	The ES considered the likely vibration effects associated with the construction and operation of the Sizewell C Project , in accordance with the methodology presented in Volume 1, Appendix 6G of the ES (Doc Ref. 6.2) [APP-171]. The assessment is presented in Volume 2, Chapter 11, and Volumes 3 to 9, Chapter 4 of the ES (Doc Ref. 6.3 to 6.10) [APP-202, APP-354, APP-384, APP-415, APP-451, APP-484, APP-515 and APP-545]. HGVs to and from the main development site would be required to route via the A12 and B1122 / Sizewell link road. Measures are proposed to address identified impacts in a proportionate way in the Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES (Doc Ref 6.3) [APP-210]), which provides a mechanism through which affected properties can obtain improvements to their glazing to better keep out sound, subject to certain qualifying criteria. Within the Section106 Agreement, there is also a maintenance fund for the B1122 prior to the Sizewell link road being operational, to keep the road in a good condition to minimise potential vibration effects.	7

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Noise and vibration impacts from the green rail route and use of the East Suffolk line at night The rail proposals will greatly impact on nearby residents during construction and operation. Noise impacts from the rail movements will be extremely disruptive and will damage rail-side properties due to vibration. Heavy loads on trains will risk structural damage to properties from vibration. Increased noise will cause sleep deprivation. Properties will be affected by the dual menace of noise from the trains and from increased traffic on roads. Dissatisfaction that a comprehensive rail use plan has yet to be provided. No mitigation measures or compensation have been suggested or offered by SZC Co. to affected properties.	Volume 9, Chapter 4 of the ES (Doc Ref. 6.10) [APP-545] sets out the assessment of likely noise and vibration effects associated with movement of freight via rail during the construction of the Sizewell C Project. An update to this assessment was provided within Volume 1, Chapter 9 of the ES Addendum (Doc Ref. 6.14) [AS-188] to account for Additional Information obtained since the submission of the Application. This Additional Information has increased SZC Co.'s understanding of how much noise and vibration the trains used to transport construction materials for the Sizewell C Project ('construction trains') are likely to generate, how that noise and vibration spreads away from railway, and how the railway noise and vibration interacts with buildings along the railway line. Part of the design development of the rail proposals are works to mitigate noise to local residents. The draft Rail Noise Mitigation Strategy (Volume 3, Appendix 9.3.E of the ES Addendum (Doc Ref 6.14) [AS-258]) proposes a range of physical and operational mitigation measures to reduce noise and vibration impacts on local residents, informed by the additional surveys and updated assessment. These proposed mitigation measures, which will be developed through further engagement with Network Rail and freight operating companies, include: • Installation of a crossover north of Saxmundham station and upgrades to the signalling system to permit trains to join or leave the Saxmundham to Leiston branch line	43

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	without stopping, known as the 'change arrangements at Saxmundham'. - The Saxmundham to Leiston branch line will be upgraded with a refurbished trackbed, concrete or steel sleepers, and welded rails to provide a consistent rail cross-section consistent gauge, and smooth running surface. - The proposed rail extension route will be constructed using the same approach as the upgraded Saxmundham to Leiston branch line. - Under ballast mats will be installed where the Saxmundham to Leiston branch line or proposed rail extension route pass within 15 metres of a residential receptor, and will be installed for a minimum of 10 metres either side of the property. An alternative design may be substituted, if its effectiveness is equal and approved. - Night-time speed limits of 10 mph will apply at three locations along the East Suffolk line: Woodbridge/Melton, Campsea Ashe, and Saxmundham. - Speed on the Saxmundham to Leiston branch line will be limited to 10mph during the early years. - Pending the results of further assessment of the upgraded and mitigated Saxmundham to Leiston branch line during the early years operation, the speed limit on Saxmundham to Leiston branch line may be increased to 20mph. This further assessment work is described later in this section.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	- The speed limit on the proposed rail extension route will match that applied to the Saxmundham to Leiston branch line. This enables constant train speeds to be maintained, thereby avoiding accelerating locomotive noise close to the north-western corner of Leiston. - Class 66 locomotives will be used in preference to Class 68 locomotives, where there is equivalent choice. - Night-time construction trains will not travel into or out of Leiston, instead being held on the Saxmundham to Leiston branch line to the west of the Saxmundham Road level crossing, at defined locations. - Construction trains stabled overnight on the branch line will not be permitted to keep their engines idling. In terms of the potential for structural damage as a result of rail movements, the vibration assessment criteria have been aligned with thresholds that relate to human perception of vibration, i.e. the thresholds at which vibration will be perceptible to people living nearby. Damage to buildings will generally only occur at much higher levels of vibration than would ordinarily be tolerated by anyone living nearby. Vibration effects from rail movements, so far as they are likely, relate to impacts on people not buildings; structural damage is not likely as a result of railway vibration. For those properties where there is the potential for residual noise impacts, the Noise Mitigation Scheme (Volume 2, Appendix 11H) of the ES (Doc Ref 6.3) [APP-210] will provide	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	noise insulation and/or ventilation, subject to meeting eligibility criteria.	
Proximity of two village bypass The two village bypass will be close to residential properties and will cause noise pollution during operation. Many residents moved to this area for the peace and quiet.	The site predominantly comprises rural fields, woodland and farms, except where it connects to the A12 at each end of the site. The villages of Stratford St Andrew and Farnham are located to the north west of the site, and there are also isolated farmsteads which are adjacent to the site. The sound environment is generally dominated by traffic close to the A12 but away from these areas, there is quite a high proportion of natural sounds as well as agricultural noises and occasional aircraft. The existing daytime noise levels close to the A12 are fairly high, however, noise levels reduce overnight. The assessment of road traffic noise from the use of the two village bypass, including mitigation to reduce road traffic noise, was set out in Volume 5, Chapter 4 of the ES (Doc Ref 6.6) [APP-415], and was updated in Volume 1, Chapter 5 of the ES Addendum (Doc Ref 6.14) [AS-184]. In addition, the tranquillity of those areas away from the current A12 alignment, which may be quieter, are considered in the Amenity and Recreation chapter of the ES (Volume 5, Chapter 8) (Doc Ref 6.6) [APP-429]. The outcomes of the assessment of tranquillity set out in the ES was not altered as a result of the changes to the Project, as described in Volume 1, Chapter 5 of the ES Addendum (Doc Ref 6.14) [AS-184]. Mitigation measures, which minimise the noise impact of the proposed development, include:	1

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	- The proposed alignment of the two village bypass would offer road users a more direct route than travelling through Stratford St Andrew and Farnham. This would reduce traffic flows, during both the peak construction of the Sizewell C Project and upon completion of the power station through the villages, and reduce associated traffic noise. - The site boundary has been designed to maximise the separation distance of construction works and the proposed development from noise sensitive receptors where reasonably practicable. - The proposed route of the two village bypass would be in an approximately 4.5m deep cutting, which would help to reduce the noise impact on Farnham Hall and its nearby neighbouring properties, compared to being at grade. - During construction, appropriate good practice, as outlined in BS 5228-1, will be followed, and will be controlled through the Code of Construction Practice (Doc Ref 8.11(A)) [AS-273]. Mitigation for the control of noise and vibration during construction will include, but not be restricted to the following measures: - selection of quiet plant and techniques in accordance with good practice in BS5228 for all construction, demolition and earth moving activities; - switching off equipment when not required;	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	○ use of reversing alarms that ensure proper warning whilst minimising noise impacts off-site; and ○ provision of training and instruction to construction site staff on methods and techniques of working to minimise off-site noise and vibration impacts. ● SZC Co. will have a system for the receipt and recording of any noise or vibration complaints from occupiers of noise sensitive receptors, and procedures for investigating and acting appropriately as necessary upon those complaints. ● During construction, a Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608] and, a Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] will be implemented to help manage the effects of traffic generated by the Sizewell C Project – (see Volume 2, Chapter 10 (Transport) of the ES (Doc Ref. 6.3) [APP-198] for more detail).	

4.29 Radiological Considerations

a) Overview

4.29.2 A total of 309 Interested Parties raised matters regarding radiological considerations.

4.29.3 **Table 4.28** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.28: Radiological Considerations

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Radioactive waste Sizewell C will produce radioactive waste which will remain dangerous for thousands of years and for which there is no agreed or proven method of disposal. It is morally wrong that future generations will have to deal with it. The legacy of radioactive waste will not be worth the 60-years of power generation. The radioactive waste would be a long term contamination hazard that is an unacceptable legacy for future generations. It will pose unquantified costs for future generations of taxpayers and enormous safety risks, which residents and businesses cannot insure against. The UK's existing stockpile of radioactive waste, the largest in the world, has been poorly managed and its storage methods at Sellafield have been severely criticised by the Government's own national audit office and other independent bodies. Moreover, the site of Sizewell C is not suitable for the storage of radioactive waste, being so close to residences and on a unstable coastline which will be flooded with sea level rise. Suggestions that this had not been assessed properly.	UK Government Policy is for the UK's Higher Activity Radioactive Waste (Intermediate Level Waste and High Level Waste) and Spent Fuel to be disposed of via a UK Geological Disposal Facility. The delivery of this facility is managed by Radioactive Waste Management Limited, a subsidiary of the Nuclear Decommissioning Authority. Geological Disposal Facilities are a tried and tested technology and similar types of facilities are currently in operation in countries around the world. As an example, Finland and Sweden who have been operating repositories since the 1990's for the disposal of Low and Intermediate Level Waste. Spent Fuel Repositories are currently undergoing design and construction in Finland and Sweden, along with several other countries. Low Level Radioactive Waste in the UK is managed via existing permitted disposal facilities. UK Government Policy requires that for New Nuclear Builds Intermediate Level Waste and Spent Fuel is stored on-site until the availability of the Geological Disposal Facility. Under its Nuclear Site License, Sizewell C is required to demonstrate that the on-site facilities for the interim storage of Intermediate Level Waste and Spent Fuel can be designed, constructed, commissioned, operated and decommissioned in a safe manner that ensures any risks to the workers, public and environment is suitably and sufficiently controlled. This	292

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
SZC Co. unfairly compares nuclear energy to other low carbon energy, as no alternative form of energy production would leave the legacy of radioactive waste.	includes due consideration of any potential internal and external hazards, including flooding. In addition, prior to construction commencing Sizewell C is required to obtain the approval of the Secretary of State for a Funded Decommissioning Programme (FDP). The FDP ensures that Sizewell C has taken appropriate steps within the design and construction of a new nuclear build to ensure the plant can be decommissioned and will have secure financing arrangements in place to meet the full costs of decommissioning once the power plant ceases generation. Further information on spent fuel and radioactive waste management is provided within Volume 2, Chapter 7 (Spent Fuel and Radioactive Waste Management) of the ES (Doc Ref. 6.3) [APP-192] .	
Radioactive discharges impacting on human health Concern over the impact of radioactive discharges on human health. SZC Co. state that this will be below background levels of radiation under normal operative situations. However, all nuclear power stations have had problems where more radiation has had to be discharged. There have already been confirmed reports of radiation leaks from the existing Sizewell power station complex. The KIKK study showed a 60% increase in solid cancers and a 117% increase in	Radioactive discharges both airborne and aqueous are regulated In England and Wales under the Environmental Permitting Regulations 2016. This requires Sizewell C to obtain a Radioactive Substances Activity Environmental Permit prior to construction and operation of the plant. The permit places a number of strict conditions that Sizewell C will need to demonstrate compliance against throughout its lifecycle, including limits on the quantity of radioactivity that can be discharged. In May 2020, Sizewell C submitted its Radioactive Substances Activity Environmental Permit Application to the Environment Agency. The Application has been openly consulted on and is currently being determined by the Environment Agency.	25

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
leukaemia among young children living near all 16 large German nuclear power stations. SZC Co. have not stated how these effects would be mitigated. Concern over tritium gas releases which can eventually find their way into the drinking water (recent tests on local water supplies prove this) and thence into the environment including plants, animals and human metabolism, leading to terrible outcomes with unacceptable increases in rates of cancers, mutations and other health problems.	Volume 2, Appendix 25B of the ES (Radioactive Substances Regulations Permit Application: Support Document D1 - Human radiological impact assessment for Sizewell C) (Doc Ref. 6.3) [APP-340] provides a copy of the detailed radiological impact assessment of the proposed radiological discharges from the operation of Sizewell C that was included in the permit Application. This includes an assessment of the impacts both at the predicted discharges (best estimates) and proposed discharge limits, which allows for operational fluctuations. The assessment considers all radionuclides that may be discharged (tritium), their chemical and physical form and all exposure pathways. The assessment is based on internationally accepted science and standards governing the field of radiation protection and has shown that the radiological dose (exposure) to the public is low, and two orders of magnitude less than what the average member of the UK public receives from everyday naturally occurring sources of radioactivity. The level of exposure is broadly equivalent to that which a member of the public would receive from a dental x-ray and less than that of a transatlantic flight. Further information is provided within Volume 2, Chapter 25 (Radiological Considerations) of the ES (Doc Ref. 6.3) [APP-340].	
Permanent storage of radioactive waste	UK Government Policy is for the UK's Higher Activity Radioactive Waste (Intermediate Level Waste and High Level	13

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Lack of information on annual and cumulative radioactivity inventory of buildings associated with radioactive waste (low level radioactive waste facility, spent fuel storage facility and intermediate level waste storage facility) and proposals in the event that off-site geological disposal facility is not available. SZC Co. falsely relies upon an off-site disposal facility coming forward. After nearly 80 years of waste production and accumulation, there exists no proven environmentally sound permanent disposal solution for highly radioactive waste. No verified reliable technology, materials and solution (GDF) exists in the UK yet. It should be the responsibility of the radioactive waste producer to ensure the permanent safe storage of radioactive waste.	Waste) and Spent Fuel to be disposed of via a UK Geological Disposal Facility. The delivery of this facility is managed by Radioactive Waste Management Limited, a subsidiary of the Nuclear Decommissioning Authority. Geological Disposal Facilities are a tried and tested technology and similar types of facilities are currently in operation in countries around the world. As an example Finland and Sweden who have been operating repositories since the 1990's for the disposal of Low and Intermediate Level Waste. Spent Fuel Repositories are currently undergoing design and construction in Finland and Sweden, along with several other countries. UK Government Policy requires that for New Nuclear Builds Intermediate Level Waste and Spent Fuel is stored on-site until the availability of the Geological Disposal Facility. The design of interim stores at Sizewell C is based on a 100 year design life. Given the relatively simple design of these facilities, they would be capable of extension beyond this period, if necessary, subject to any required refurbishment and or replacement of equipment.	

4.30 Socio-economic effects

a) Overview

4.30.2 A total of 646 Interested Parties raised matters regarding socio-economic effects.

4.30.3 **Table 4.29** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.29: Socio-economic effects

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Tourism Concerns over impact on the local tourism industry during construction. The timing of this in the aftermath of the pandemic seems particularly unfortunate. The one industry that could be thriving during this time of the "staycation" is going to be seriously jeopardised. The substantial loss of tranquillity, wildlife habitats and clear views especially around the Minsmere, Eastbridge region and loss of amenity would deter tourists for an extended period, as would the noise generated by multiple transport links, leading to a loss in revenue. A damaged tourism trade would have detrimental impacts on the employment and businesses of generations of Suffolk families. Loss of tourism income is estimated at £40m a year, with 400 jobs being lost. Loss of tourists will mean loss of local jobs while another obstacle to tourism will be the loss of available accommodation as holiday lets are occupied by Sizewell C workers. An independent assessment of effects on tourism is needed,	SZC Co. recognises the importance of the tourist economy within and around the Suffolk Coast, and has undertaken an assessment of the effects of the Sizewell C Project on tourism, in-line with the requirements of National Policy Statement EN-1, as part of Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195]. As part of this, SZC Co. commissioned an ex-ante stated preference survey to identify potential sensitivities to change for existing and potential visitors, in order to identify measures that could effectively be implemented by a Tourism Fund to reduce the risk of stated intentions to change visiting behaviour from manifesting, and then contributing to changes in economic activity. SZC Co. is aware that monitoring through governance, as well as public datasets, has shown no adverse effect on the Somerset tourist economy from the construction activity at Hinkley Point C where a Tourism Fund has been applied. A Tourism Fund to promote the area and support the longevity of the very important and diverse tourist economy of the Suffolk Coast is proposed and will be secured in the Section 106 Agreement. The principles for this are set out in Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] and the Economic Statement (Doc Ref. 8.9) [APP-610], and have since been developed further in	411

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
as the effects have been seriously underplayed. Scepticism over the mitigation that a Tourism Fund could deliver and that it would only be used within the AONB.	collaboration with the local authorities. SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including a Tourism Programme Manager Role) and governance through the draft Section 106 Agreement [PDB-004]. The scale of the Tourism Fund is to be agreed. SZC Co.'s position is that while surveys undertaken by the Applicant and Suffolk Coast Destination Management Organisation provide helpful context for the sensitivities that potential and returning visitors may have to change and, therefore, can inform the types of activities a Tourism Fund should address, ex-ante stated preference perception surveys cannot be used as a means of estimating quantitative changes in visitor behaviour or economic cost (reported changes in propensity to visit and spend are not uniform). Evidence from Hinkley Point C provides strong support for the gap between ex ante survey and reality. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects, such as marketing, promotion, research and supporting local Projects. Separate Resilience Funds will be agreed bilaterally with RSPB Minsmere and National Trust Dunwich Heath. This will ensure that the activities funded through those measures do not overlap but can complement the plans, programmes and Projects supported by the proposed Tourism Fund (and other funds, where applicable).	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The Socio-economic Assessment (Volume 2, Chapter 9 of the ES (Doc Ref. 6.3) [APP-195]) and the Accommodation Strategy (Doc Ref. 8.10) [APP-613] identify that there is unlikely to be a widespread, significant adverse effect on the ability of the Tourist Accommodation Sector to respond to demand, based on affordability, availability, location, occupancy rates and seasonality of accommodation. There may be a beneficial effect, as outside of peak seasons otherwise unoccupied accommodation will be used by construction workers. However, SZC Co. considers (and East Suffolk Council agree) that it is prudent to address the risk of any uncertainties and, therefore, has developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/reconfiguration of existing tourist accommodation sites.	
Local economy and businesses General concern over the damage to the local economy from the Sizewell C Project. Rather than provide jobs and opportunities for people living in the area, it will instead damage the existing thriving local economy and be a burden on the county's infrastructure. The Project will cause damage to or loss of local businesses. There is no evidence that Leiston	SZC Co. has undertaken a robust assessment of the likely impacts to the local and wider economy in terms of employment, supply chain spending, additionality and wages and benefits to employment, skills and education. These assessments are set out in Volume 2, Chapter 9 of the ES (Doc Ref. 6.3) [APP-195], and within the Economic Statement (Doc Ref. 8.9) [APP-610] which also includes appendices that set out measures to enhance benefits to the	257

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
or Saxmundham had any long-term benefits from Sizewell A and B construction, instead it was a boom and bust. Assessments submitted with the Application do not consider the funding of a Leiston economic development/ regeneration programme.	supply chain and labour market (via employment, skills and education interventions). The Sizewell C Project's effects on the local economy will be overwhelmingly positive – supporting long-term, sustainable careers through employment, skills and training initiatives secured in partnership with Suffolk County Council and New Anglia Local Enterprise Partnership (NALEP)'s strategic plans for the regional economy. The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. is working with partners including Suffolk County Council, NALEP and education, training and skills providers to develop a suite of Employment, Skills and Training measures that support local people into work, into higher skilled work, and to develop sustainable careers in construction, energy and other sectors that support the Sizewell C Project and the wider ambitions for growth in the region. By focusing on promoting 'legacy' skills that the Project and the region both need, local people will be supported into sustainable careers that will reduce the risk of 'boom and bust' – such measures were not fully considered and the scope of wider opportunity and regional strategic planning were not so developed for the construction phase of Sizewell B. SZC Co. is working with Suffolk County Council, East Suffolk Council, NALEP, Suffolk Chamber of Commerce to finalise a	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	suite of activities for employment, skills and education, including activities in the supply chain to ensure that the beneficial effects of the Project can be enhanced and any risks of adverse effects can be avoided through the development of measures set out initially in the Employment, Skills and Education Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611]. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial, creating more jobs, higher skilled jobs and promoting competency in the supply chain, it will be important to optimise the benefits locally. Through engagement with local and regional stakeholders in the skills, training and employment sector, SZC Co. has been made aware of concerns that local businesses may experience vacancies being harder to fill. In order to tackle this, SZC Co. is working with local stakeholders to develop a range of precautionary measures that will reduce those risks while enhancing the benefits and focussing them on local people and businesses. A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Project and wider employment market.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Local firms will be supported through local supply chain engagement activities to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. Upskilling will benefit the Project and the wider market – focus will be on 'legacy' roles (as determined by the Council's research base) that the region and the Project both need for the long term. SZC Co. and Suffolk County Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation has been agreed for most of the key measures, including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region, for example providing revenue funding to deliver on existing capital investment in skills centres in the region. SZC Co. has set estimates for local and regional retention of Project value in the Economic Statement (Doc Ref. 8.9) [APP-610] that reflect similar supply chain engagement measures as employed at Hinkley Point C. There is no contractual obligation for either Project to guarantee local procurement as that would be detrimental to the Project's	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	delivery, but there are built-in criteria that prioritise local firms that compete for contracts on the Sizewell C Project, and firms in the region will benefit from the measures set out in the Supply Chain Strategy (Doc Ref. 8.9) [APP-611], as well as the Sizewell C Jobs Service. SZC Co. has committed to measures to support the local and regional supply chain to compete for and win work on the Project (see Supply Chain Strategy (Doc Ref. 8.9) [APP-611]). Some measures are already being enacted including the on-going operation of the Supply Chain Portal by the Suffolk Chamber of Commerce, on SZC Co.'s behalf. SZC Co. is working with the Councils, NALEP and the Chamber of Commerce to finalise governance and monitoring arrangements for the local supply chain engagement strategy that has been agreed between SZC Co. and the Suffolk Chamber of Commerce and is funded by SZC Co. This strategy sets out the 'on the ground' activities for potential local suppliers including 'meet the buyer' events and information sharing. SZC Co., NALEP and the Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. Intelligent Replication will be used which does not necessarily mean local firms being overlooked. Tier 1 contractors will be required to seek local procurement options through their contracts, using the Suffolk Chamber of Commerce supply chain portal. Weighting in assessment criteria will be in favour of Suffolk firms, but contracts could go outside Suffolk if, for example the contract is critical replication, there is a lack of	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	competency or the price is not-competitive. Note that Suffolk Chamber of Commerce has an agreed set of activities to pro-actively raise competencies to help Suffolk firms win contracts. Monitoring would be sophisticated, using a similar method to Hinkley Point C, with lessons learnt, which would give a detailed supply chain map for demand (from the Project) and supply (from local business community), setting out success rates in terms of Pre-Qualification Questionnaires, tenders, contracts won by scale, location etc. The local supply chain engagement strategy would be flexible and responsive to changes in the Project and the economic climate and will be reviewed periodically in-line with plans for workforce development review and where key construction phases arise. The Section 106 Agreement includes a raft of measures to provide resilience and long-term legacy to the areas likely to experience the most change as a result of the Project, such as Leiston. This includes a ring-fenced Community Fund, Housing Fund, Tourism Fund, physical investment in transport infrastructure and public rights of ways and cycleways, as well as employment, skills and training investment set out above that will focus on areas, where social value can be most gained.	
Pressure on existing infrastructure The construction period will put pressure on the existing infrastructure and services within	The Sizewell C Project will require a temporary non-home-based workforce who may seek to access public services. Volume 2, Chapter 9 (Socio-economics) and Chapter 28	236

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
the area, including local health services, emergency, social, and leisure services, and schools. The workers living at the accommodation campus will put pressure on the existing infrastructure and have a negative effect on the local community. The influx of workers will potentially bring COVID-19 to the local area and add further pressure to health services, which has not been considered within the Application. Local workers required for the Project will be unemployed when the Project is completed, thus, creating an extra burden for the already stretched support services. Funding for new facilities should be included within the Section 106 Agreement.	(Health and Wellbeing) of the ES (Doc Ref. 6.3) [APP-195 and APP-346] set out an assessment of the potential net additional demand from the workforce for these services, and identify that there is unlikely to be a substantial demand that would not otherwise be accounted for by general taxation. However, in recognition of the potential demand for some services as a result of workers bringing dependents, the lag time between taxation and central government funding, or related to the specific demographic profile of the workforce, SZC Co. will provide a public services resilience fund and a residual healthcare demand fund as part of the Section 106 Agreement that can be applied, where potential additional demand may arise. SZC Co. also recognises that there could be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected. SZC Co. has developed a balanced accommodation strategy including temporary worker accommodation in the form of a 2,400-bed campus at the main development site. This aims to balance the economic benefit of workers living in communities and accessing amenities and services, without overwhelming local accommodation. The accommodation campus will be designed to include facilities, such as a gym and canteen and bar, to limit the demand for workers to access services outside the campus, and workers using this type of accommodation	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	are more likely to return to their permanent address between working periods. SZC Co. has been working with Suffolk Constabulary in order to understand and model the potential for increased recorded offences and non-crime incidents as a result of the Sizewell C Project and its workforce. Consideration of demographic and population characteristics is an important component of this, but SZC Co.'s position is that focusing on Suffolk-wide rates of selected demographics is unlikely to give a clear indication of the potential scale of mitigation required, particularly as crime and incidents reported at Hinkley Point C show a much lower rate per worker than for the community in general. SZC Co. is working closely with Suffolk Constabulary to arrive at an appropriate mitigation package to reduce the risk of adverse effects. SZC Co. welcome the support from Suffolk Constabulary in providing a modelled approach to the potential effects, leading to demand on resources. SZC Co. has responded to Suffolk Constabulary's initial model with some additional evidence from Hinkley Point C relating to observed rate and type of incidents and crimes related to Hinkley Point C and Hinkley Point C workers compared to the average population of Somerset; and to identify some concerns with the limited demographic modelling Suffolk Constabulary has used. Further engagement will continue, and Sizewell C is in the process of developing a Statement of Common Ground with Suffolk Constabulary and will continue to work on a Strategic Relationship Protocol.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Where mitigation is agreed for police resourcing, it will be proportionate to the scale of change and apply for the length of the construction phase where effects are predicted. SZC Co. has also set out a position with regard to contributions to Community Safety support for East Suffolk Council and Suffolk County Council as part of Section 106 Agreement negotiations. The Community Safety Management Plan (CSMP) (Doc Ref. 8.16) [APP-635] and Socio-economic ES Chapter (Volume 2, Chapter 9 of the ES (Doc Ref. 6.3) [APP-195]) set out the range of embedded measures and complementary measures that will contribute to reducing actual and perceived effects on community safety, across embedded Project measures and as principles for all additional measures including those set out in the Accommodation Strategy (Doc Ref. 8.10) [APP-613] and the Economic Statement (Doc Ref. 8.9) [APP-610] and APP-611]. Further to this, SZC Co. has proposed funding for a package of measures under the Public Services Resilience Fund for East Suffolk Council and Suffolk County Council to develop social care, support for education, community safety and well-being resilience. Through engagement, SZC Co. recognises that the Councils are well-placed to control these funds for multi-agency responses that cross-cut social care, health and community safety activities for, e.g. safeguarding of vulnerable children, sexual health and safety, and crime which may be related to the specific workforce demographic.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Community safety measures to be funded by SZC Co. for East Suffolk Council will include supporting measures and organisations, including multi-agency approaches that are already successful in Leiston, and allow the Council flexibility in using the fund, which may be in collaboration with Parish and Town Councils. To clarify, all of SZC Co.'s proposed measures set out to implement reasonable endeavours to prevent effects from arising wherever practicable. SZC Co. and the Councils have been working to develop an appropriate approach to governance and implementation of the Community Fund, including options for ring-fencing provision for the areas where change is most likely to occur as a result of the Project, independent management of the Fund by Suffolk Community Foundation, and a role for an Oversight Panel including the Councils. The approach will be based on the Hinkley Point C Community Fund which has been implemented successfully in Somerset through various strategic, small and open grants. SZC Co. is proposing specific measures for Leiston including providing community access to new sports facilities (artificial turf pitch and Multi-Use Game Areas) adjacent to Leiston Leisure Centre and specific investment for traffic measures in Leiston.	
Employment generation Although construction jobs will be created, most will not go to local people and many will	The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and	200

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
be low quality jobs in site support. SZC Co. intends to cut costs and minimise risk by redeploying the Hinkley Point C supply chain rather than local businesses. Construction workers are in short supply in the local area and would have to be brought in from elsewhere. In relation to long-term nuclear posts, these are highly specialised and local expertise is not always available. The Project will also attract local workers away from their current employment, leaving local businesses without staff. Unemployment is not an issue in the local area currently. The majority of existing workforce in Suffolk is employed in agriculture or tourism. These jobs would be lost but not re-provided. Currently there has been no reassurance that promised apprenticeships and skills are primarily sourced through Alde Valley Academy and Suffolk College on the Coast which is of great importance. Alde Valley Academy must be the 'go to' place of education to fill these skills and the possible 900 permanent jobs.	provide 900 long-term operational jobs once the power station is built. Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] uses a conservative assessment case for assumptions about Home-Based (HB) and Non-Home Based (NHB) workers - this is to ensure mitigation for the NHB component is sufficiently robust. The scale of HB workforce was based on assumptions by broad contract package which have been borne out at Hinkley Point C, though may represent an underestimate given advances in higher-skilled operative recruitment for mechanical, electrical and heating (MEH) roles, and a more locally focused recruitment pattern for professional and management roles. SZC Co. will seek to maximise the HB recruitment beyond this assessment case. There are no 'targets' for local employment, but the DCO sets out a reasonable expected level which takes into account the measures funded by the Employment, Skills and Education Strategy enhancement measures. There is clearly benefit in promoting local employment for economic and social benefit, but also to reduce scale of NHB workforce meaning fewer accommodation, community safety, public services effects. Intelligent Replication will be used - this does not necessarily mean local firms being overlooked. Tier 1 contractors will be required to seek local procurement options through their contracts, using the Suffolk Chamber of Commerce supply chain portal. Weighting in assessment criteria will be in favour of Suffolk firms, but contracts could go outside Suffolk if e.g.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
There are no positive statements about efforts to secure work for people with disabilities or mental health problems. The proposed increase in jobs is not clear in terms of the percentage of locally sourced workers. The percentages suggested are misleading and actually refer to global statistics, i.e. people already working for companies in the supply chain. After Sizewell C construction finishes, unemployment will rise, as was the case following Sizewell B construction. SZC Co. needs to support communities in this regard through all stages of the Project.	the contract is critical replication, there is a lack of competency or the price is not competitive. Note that Suffolk Chamber of Commerce have an agreed set of activities to pro-actively raise competencies to help Suffolk firms win contracts. Through engagement will local and regional stakeholders in the skills, training and employment sector, SZC Co. has been made aware of concerns that local businesses may experience vacancies being harder to fill. In order to tackle this, SZC Co. are working with local stakeholders to develop a range of precautionary measures that will reduce those risks while enhancing the benefits and focussing them on local people and businesses. A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Project and wider employment market. Local firms will be supported through local supply chain engagement activities to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Replication of some parts of the supply chain developed for the first of a kind new fleet of UK nuclear new builds (at Hinkley Point C) is important to enable efficiencies but there will be substantial opportunities for Suffolk-based firms to benefit from contracts over the lifetime of the Sizewell C Project, as has been identified in the Economic Statement (Doc Ref. 8.9) [APP-610] and within the Supply Chain Strategy, provided in Appendix B of the Economic Statement (Doc Ref. 8.9) [APP-611]. Work has been underway to provide information and support to local companies with an interest in bidding for contracts on the Sizewell C Project through the Supply Chain Portal (run by the Suffolk Chamber of Commerce, funded by SZC Co.). SZC Co. has worked with partners including Suffolk County Council, NALEP and education, training and skills providers to develop an Employment, Skills and Education Strategy. This Strategy, provided within Appendix A to the Economic Statement (Doc Ref. 8.9) [APP-611], includes a suite of measures, supported by financial commitments, that will work with local and regional policy aspirations and mechanisms for upskilling and qualification, and with partner organisations such as schools, further education and higher education institutions to support the workforce needed for the Sizewell C Project and the wider Energy Coast, and develop sustainable careers with transferrable skills for local residents. Jobs will be created for local people in a range of skill types and through a number of skill and training opportunities, such as apprenticeships. These will not be limited to 'low skill, low	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	pay' jobs, Sizewell C aims to invest in education and training initiatives to dovetail with the region's wider aspirations for legacy skills in engineering and construction, including Project management. The operational phase of the Project will also generate substantial local employment, as well as supply chain effects, for 60 years. Combined, these measures ensure a commitment to sustainable employment initiatives that will support the local economy and labour market beyond the construction phase. The construction phase of Sizewell C will be up to 12 years long – during that time the UK's economy is likely to pass through at least one economic cycle, resulting in differing levels of unemployment and economic activity. As such, the programme of measures is flexible to respond to a dynamic labour market, as set out in the Economic Statement (Doc Ref. 8.9) [APP-610]. Even at 'high' points in the economic cycle, Sizewell C's labour market will have a substantial amount of labour market slack, offering opportunities for people to enter the labour market from worklessness as well as from training/education.	
Pressure on local housing Excessive pressure will be put on local housing, especially the private-rental sector. Holiday lettings and local rental market taken up by construction workers will force prices up for local people. It would make properties even less affordable for young people than	SZC Co. is aware of the potential effects from workers accessing rented accommodation in the local area that is an important resource for local residents. An assessment of the likely effects is set out in Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195]. SZC Co. has developed an Accommodation Strategy (Doc Ref. 8.10)	114

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
they are now. Construction would also have a negative impact on house purchase prices.	[APP-613] and will provide a Housing Fund to avoid potential adverse effects on the housing market. SZC Co. has developed proposals for a Housing Fund, including measures to boost supply of housing stock in order to reduce or avoid effects on the housing market, particularly for those at most risk of housing need or vulnerability within the private rented sector. Additionally, SZC Co. proposes a 'resilience' element to the Housing Fund to allow East Suffolk Council's statutory housing services to respond to increased Applications for support, should this arise, and prevent these issues from occurring. SZC Co. and East Suffolk Council agree that the Housing Fund should be robust and flexible to meet the needs of a potentially changing housing market, and spent within the first seven years of construction in order to address peak effects. SZC Co. proposed a structure, governance/ monitoring framework and implementation plan within the Accommodation Strategy (Doc Ref. 8.10) [APP-613] and subsequent submissions on the Housing Fund, including a response to East Suffolk Council's proposed scale and mix of measures (set out in the Accommodation Strategy). Further work is required to agree an appropriate scale for the Housing Fund based on an agreed indicative mix of measures, and to finalise the approach to administration / implementation of the Fund. The Socio-economic assessment (Volume 2, Chapter 9 of the ES (Doc Ref. 6.3) [APP-195]) and the Accommodation	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Strategy (Doc Ref. 8.10) [APP-613] identify that there is unlikely to be a widespread, significant adverse effect on the ability of the Tourist Accommodation Sector to respond to demand, based on affordability, availability, location, occupancy rates and seasonality of accommodation. There may be a beneficial effect, as outside of peak seasons otherwise unoccupied accommodation will be used by construction workers. However, SZC Co. considers (and East Suffolk Council agree) that it is prudent to address the risk of any uncertainties and therefore have developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/reconfiguration of existing tourist accommodation sites. SZC Co. will also run an Accommodation Management System which will interact with prospective landlords and provide information about the Project, its workers and broker information about safety, compliance and tenancy services. In order to provide additional assistance, SZC Co. developed a Property Price Support Scheme to provide assistance to homeowners, within agreed criteria, who sell their properties and can demonstrate a loss arising directly from the Sizewell C Project. SZC Co. have committed to periodically reviewing the Property Price Support Scheme to ensure that it continues to be appropriate.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Impacts on farming businesses and fishing industry The Sizewell C Project threatens the jobs of local farm workers due to impacts on the continued viability of farming businesses, including through severing farmland. The increased traffic will adversely affect the ability to carry on normal farming operations and the diesel fumes will be detrimental to crops growing on the route. The 12 year construction period will cause lasting damage to the land and farming businesses in the area. Furthermore, local farms will lose seasonal workers to Sizewell C. In addition, not enough consideration has been given to how the fishing industry in this area will be affected.	Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] provides an assessment of likely effects on agricultural economy locally and regionally. Overall, the Sizewell C Project (including main development site and associated developments) would permanently remove around 125.26ha of known agricultural land. This represents approximately 0.04% of the total c. 330,000ha of agricultural land across Suffolk as a whole. As a proportion of the total employment in the agricultural sector in Suffolk, this would equate to an average loss of around 4 jobs in this sector based on average jobs per hectare in the sector in Suffolk. Given the very low proportion of jobs to be lost directly, this effect is considered to be not significant. Direct impacts on individual farming businesses affected by the Sizewell C Project are considered within Volume 2, Chapter 17 (Doc Ref. 6.3) [APP-277] and Volumes 3-9, Chapter 10 (Soils and Agriculture) of the ES (Doc Ref. 6.4 to 6.10) [APP-371, APP-402, APP-435, APP-470, APP-502, APP-531, APP-563], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188]. SZC Co. has engaged in negotiations with all directly affected landowners to secure the land required for the Project by private treaty and continues to work with the businesses via Dalcour Maclaren (their appointed agents) to help mitigate impacts on farming. Section 4.26 of this report provides further information on impacts on the fishing industry.	54

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Anti-social behaviour and security The Sizewell C Project will cause unsociable behaviour from the housing of over 2,000 predominantly male workers in one campus and approximately 7,000 workers at peak. The construction of Sizewell B caused Leiston to become like the wild west with drunkenness and fights in town and led to a huge increase in drug dependency locally, still affecting people today. This will have a huge effect on the local community and their security, in particular elderly residents in the area who will not be able to adjust to the changes that the scheme will bring. A disproportionate spike in male population will mean an increase in sex work trade, crime, sexually transmitted disease and pregnancies. No assessment of this has been presented. Further detail on mitigation is required. For example, what are the details of the 'Sizewell C Worker Code of Conduct' and how will it be enforced? What is the evidence from Hinkley Point C, including statistics? What additional contribution is SZC Co. making to the cost of scaling up of local policing? Will workers need to complete a disclosure and barring service (DBS) check?	SZC Co. notes the concern raised by local communities and service providers over the potential effect of workers on crime and anti-social behaviour. A full assessment of these potential effects is set out in Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195], with additional information provided in the ES Addendum (Doc Ref. 6.14) [AS-181]. In order to avoid effects before they arise, SZC Co. has been working with Suffolk Constabulary and other community safety stakeholders to understand concerns about effects on crime and community cohesion, perceptions of safety, mental wellbeing and safeguarding issues. This process has led to the development of a Community Safety Management Plan (Doc Ref. 8.16) [APP-635], which sets out the potential effects and measures to mitigate them, including Section 106 Agreement funding for the emergency services and local authorities All workers will be required to complete security vetting. This is likely to comprise a mixture of a bespoke process agreed with the ONS and Baseline Personnel Security Standard (BPSS) (all of which include Disclose and Barring Service (DBS) checks or equivalent) for the enabling works and early civils phase, moving for BPSS for the whole site from the mechanical, electrical and heating (MEH) phase. They will also have to provide a valid drug and alcohol test and sign the Worker Code of Conduct. This is in line with what has been agreed with the ONR at Hinkley Point C.	75

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The Sizewell C Project will adopt the same vetting aftercare arrangements as Hinkley Point C which are deemed best practice by ONR and have subsequently been rolled out to Sellafield. During security clearance / vetting and aftercare; the personnel security panel (formed of personnel security, occupational health, HR, the site security manager and supported by a security enquiries team) will review cases and delivers aftercare arrangements. On an ongoing basis, SZC Co. will undertake random and for cause drug and alcohol testing, reinforce the Worker Code of Conduct through ongoing training and enforce the Worker Code of Conduct, breach of which may lead to dismissal from the Project. The accommodation campus and northern park and ride site will have a 24-hour on-site security presence, as well as security fencing separating the developments from neighbouring properties. SZC Co. is acutely aware of the Public Sector Duty to consider differential and disproportionate effects of the Project on people with protected characteristics, as required by the Equality Act (2010). To that end, SZC Co. has completed an equality impact assessment, as reported in the Equality Statement (Doc Ref. 5.14) [APP-158], demonstrating consideration of those effects on sensitive receptors, and summarising the approach to engagement undertaken, to aid the Public Sector in understanding effects.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	SZC Co. recognises that some communities will experience more substantial change than others with a combination of environmental effects, physical change to infrastructure, Non-Home Based workers living in communities and transport/traffic changes. For each potential effect, mitigation has been developed sensitively and through consultation in order to reduce or avoid significant effects. In each case these will be monitored and reviewed over time to ensure they are effective. However, SZC Co. acknowledges that these changes may result in intangible effects on quality of life for some residents in some communities, and has developed a Community Fund to help to improve quality of life where the Project's effects may contribute to real and perceived changes. SZC Co. and the Councils have been working to develop an appropriate approach to governance and implementation of the Community Fund, including options for ring-fencing provision for the areas where change is most likely to occur as a result of the Project, independent management of the Fund by Suffolk Community Foundation, and a role for an Oversight Panel including the Councils. The approach will be based on the Hinkley Point C Community Fund which has been implemented successfully in Somerset through various strategic, small and open grants.	
Local industries need support Sustainable local industries will need support from the Sizewell C Project to continue to	SZC Co. recognises the potential for the infrastructure and workforce associated with Sizewell C to lead to changes in the local economy in terms of labour supply, economic opportunity	1

SIZEWELL C PROJECT –
RELEVANT REPRESENTATIONS REPORT

NOT PROTECTIVELY MARKED

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
operate, including the tourism industry and farming businesses.	within the supply chain, and environmental and land changes to specific businesses and sectors. SZC Co. will be providing a significant investment into transport infrastructure to ensure that accessibility issues related to the Sizewell C Project on local and strategic road networks are minimised wherever possible, in order to minimise the effects on businesses. Where land is required for the Sizewell C Project, compensation for businesses in those landholdings (e.g. farming businesses) will be negotiated with those interests. In addition, a Tourism Fund to promote the area and support the longevity of the very important and diverse tourist economy of the Suffolk Coast is proposed and will be secured in the Section 106 Agreement. Also refer to responses above for further information on the Tourism Fund.	
Housing Fund The Housing Fund is inappropriate, as no further housing is required. There has already been a huge reduction in agricultural land due to development in this area. Also Sizewell, Leiston and the surrounding villages / towns do not have the work, infrastructure, shops and facilities to accommodate any further increase in residents.	SZC Co. has developed proposals for a Housing Fund including measures to boost supply of housing stock in order to reduce or avoid effects on the housing market, particularly for those at most risk of housing need or vulnerability within the private rented sector. Additionally, SZC Co. proposes a 'resilience' element to the Housing Fund to allow East Suffolk Council's statutory housing services to respond to increased applications for support should this arise, and prevent these issues from occurring. SZC Co. and East Suffolk Council agree that the Housing Fund should be robust and flexible to meet the needs of a potentially changing housing market, and spent within the first	2

NOT PROTECTIVELY MARKED

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	seven years of construction in order to address peak effects. The Housing Fund will focus on improving the capacity and quality of existing accommodation and the DCO does not include a commitment to build new houses. Any new homes built where an element might be supplemented by the Housing Fund would in any case require their own planning consent and infrastructure contributions. Local residents, landlords and other accommodation providers will be able to access grants, loans and other support to improve existing homes and bring more supply to the market, people will be supported to move from unsuitable housing, empty homes will be revitalised and brought to the market, and part of the Housing Fund will be reserved for providing additional resilience to the Council's housing services – providing new temporary and emergency accommodation and supporting existing staff and services to respond to any additional housing need and prevent homelessness. SZC Co. proposed a structure, governance/monitoring framework and implementation plan within the Accommodation Strategy (Doc Ref. 8.10) [APP-613] and subsequent submissions on the Housing Fund, including a response to East Suffolk Council's proposed scale and mix of measures (set out in the Accommodation Strategy). Further work is required to agree an appropriate scale for the Housing Fund based on an agreed indicative mix of measures, and to finalise the approach to administration / implementation of the Fund.	

4.31 Soils and Agriculture

a) Overview

4.31.2 A total of 16 Interested Parties raised matters regarding soils and agriculture.

4.31.3 **Table 4.30** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.30: Soils and Agriculture

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Loss of high quality arable land Concerns over removal of significant areas of high quality productive arable and vegetable land from production. Furthermore, the new road infrastructure will sever existing agriculture land.	SZC Co. has sought to reduce land take where possible as part of the design development process and worked closely with landowners to minimise disruption to existing accesses and provide revised access arrangements, where necessary. In addition, once temporary development is no longer required including the park and ride sites, freight management facility and the rail extension route, the land will be returned to agricultural use. This will be managed in accordance with the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273], and the Outline Soil Management Plan (refer to Volume 2, Appendix 17C of the ES (Doc Ref. 6.3) [APP-278]). SZC Co. has worked with councils in Suffolk and other stakeholders to develop a package of measures as set out in the Community Impact Report (Doc Ref. 5.13) [APP-156] to ensure	16

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	opportunities are maximised locally – for people and businesses. SZC Co. will provide compensation to any agricultural land holdings that are displaced or substantially changed, as set out in Volume 2, Chapter 17 of the ES (Soils and Agriculture) (Doc Ref. 6.3) [APP-277] and Volumes 3-9, Chapter 10 of the ES (Soils and Agriculture) (Doc Ref. 6.4 to 6.10) [APP-371 , APP-402 , APP-435 , APP-470 , APP-502 , APP-531 , APP-563].	

4.32 Transport

a) Overview

4.32.2 A total of 621 Interested Parties raised matters regarding transport.

4.32.3 **Table 4.31** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.31: Transport

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Transport impacts and mitigation (general) Concerns over HGV and traffic numbers causing significant disruption and increased	SZC Co. is aware that the transport of construction workers and freight during the construction phase is of concern to local	589

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
pressure to the existing road network across Suffolk. Increased traffic will cause untold damage on local communities along the A12 and A14 which are already unfit for their present purpose. East Suffolk's already challenged road network is unable to accommodate the increase in traffic; the Orwell Bridge and the A12 north are already at capacity at peak times. The impact on the local road system will cause further congestion, delays, accidents and damage to the existing road infrastructure. Concerns over rat-runs across the area due to construction traffic and impact on public transport due to the influx of workers. Westleton and other areas are already a rat run used by Sizewell workers and speeding through the villages is common. What mitigation and compensation will be offered to address the above transport impacts? The A12 and connecting roads should be upgraded to accommodate the proposed increase in traffic. SZC Co. should agree to the improvements to junctions and stretches of road identified by Suffolk County Council in	residents both around the construction site and along the main transport corridors to the site. SZC Co. has taken steps to ensure that construction traffic impacts are mitigated and the proposals included in the Application included the following mitigation, relevant to transport: • accommodation campus at the main development site for up to 2,400 workers to reduce construction workforce trips on the highway network; • 400 space caravan park at the Land East of Eastlands Industrial Estate (LEEIE) for 600 workers (based on 1.5 people per caravan), who will be bussed to site in order to reduce the construction workforce trips on the highway network; • the proposed new north-south (off-road) bridleway, cycleway and footway parallel to Lover's Lane, B1122 and Eastbridge Road to provide a route for non-motorised users while the Sizewell C Project is constructed; • a park and ride facility at the LEEIE in the early years to bus workers to the main development site; • northern park and ride facility at Darsham and southern park and ride facility at Wickham Market to intercept construction workforce trips and bus construction workers between the park and ride facilities and the main development site; • direct bus services to bus workers to the main development site, to reduce construction workforce trips on the highway network; • beach landing facility to enable the delivery of Abnormal Indivisible Loads (AILs) by sea during construction and operation;	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
its Cabinet paper response of 22nd September 2020.	- Saxmundham to Leiston branch line upgrades, rail extension into the LEEIE, and green rail route to enable the transportation of construction material by rail and thereby reduce the number of HGVs on the road; - freight management facility at Seven Hills to manage the flow and route of HGVs on the highway network to the main development site; and - package of highway improvement works, including the two village bypass, Sizewell link road, Yoxford roundabout and other highway improvement schemes, to mitigate the transport effects of the residual Sizewell C Project related traffic. The highway works also include improvements to walk and cycle infrastructure and public rights of way (PRoW) diversions where necessary in order to maintain PRoW connectivity. - Additional transport mitigation is also proposed to be funded by SZC Co. via obligations in the S106 Agreement and implemented by Suffolk County Council. The construction programme has sought to deliver mitigation early on in the process, whilst allowing the Sizewell C Project to be delivered in a timely manner. The construction of the off-site associated developments would be undertaken early in the construction programme. The construction period of each associated development would vary, however, each is assumed to take no longer than 24 months. An indicative phasing schedule for the Sizewell C Project as a whole is provided in the Implementation	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Plan, Appendix 8.4I of the Planning Statement (Doc Ref. 8.4) [APP-599]. In addition, best practice measures set out in the following documents would be adopted: Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608], the Construction Workforce Travel Plan (CWTP) (Doc Ref. 8.8) [APP-609], Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) [APP-607] and a Worker Code of Conduct (refer to the Hinkley Point C Worker of Conduct as an example (Doc Ref. 8.16) [APP-636]) to govern worker behaviour and manage freight traffic. The management plans will be monitored by SZC Co. and monitoring results reported to the Transport Review Group (TRG) for review on a quarterly basis throughout the construction phase. Since the Application was submitted, SZC Co. has submitted a number of changes to the DCO (referred to as 'accepted changes (April 2021)') to address concerns raised by stakeholders, including but not limited to changes to increase the number of rail and marine movements. With these changes, there is the potential for the proportion of freight by HGV during the construction phase to be reduced to 40%.	
Early years HGV traffic and timing of transport infrastructure construction Concern over the impact of early years construction traffic. The HGV numbers for early years were not presented in any of the consultations and there is uncertainty around the HGV numbers presented. The early years	The level of HGVs forecast to be generated to/ from the main development site in the early years is summarised in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and was included in the public consultations. It is forecast that up to 600 two-way HGVs would be generated to/from the main development site during the early years prior to the two-village bypass and Sizewell link road being operational. HGVs to/from the main	101

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
traffic would have significant effects on local communities along the B1122, Sizewell Gap Road and others. No acceptable solution for the early years traffic before completion of the new infrastructure has been offered. Any delay in the construction of the new infrastructure would lead to increased traffic on existing local roads for longer periods of time. Suggestion that the new infrastructure should be built ahead of the start of construction at the main development site.	development site during the early years will be required to adhere to the proposed HGV routes via the A12 and B1122 and compliance with the HGV routes will be monitored via GPS technology through the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608]. Two new roads (two village bypass and Sizewell link road) are proposed, which will enable HGVs and other Sizewell C traffic to bypass local communities. As set out in the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], it is only once the two village bypass and Sizewell link road are operational that that level of HGVs to/from the main development site could increase to up to 1,000 two-way HGVs on the busiest day (reduced to 700 with the accepted changes (April 2021)). Since the Application was submitted, a VISSIM micro-simulation model has been built of the A12 corridor between Seven Hills and A1152 at Melton as set out in Chapter 9 of the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266]. The VISSIM modelling study forecasts that the impact of Sizewell C traffic on A12 average journey times would be no more than 18 seconds in the early years during the AM and PM network peak periods. This increase in journey time over a 14km route during the early years is not considered to be significant and would not materially impact communities and local businesses.	
Impact on road-side properties Concern that the increased traffic will damage rural road-side properties, which are already	The effects of noise and vibration from HGVs, and other traffic, serving the Project were set out in the Application. The noise and vibration effects of construction traffic on existing roads can be	12

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
shaken when traffic passes, due to vibration and exhaust emissions from traffic. Access in and out of properties with large vehicles, e.g. horse trailers, will become even more dangerous.	found in Volume 2, Chapter 11 of the ES (Doc Ref 6.3) [APP-202]. The noise and vibration effects of traffic, including construction traffic, on new or altered roads can be found in the following locations: - For the two village bypass: Volume 5, Chapter 4 of the ES (Doc Ref 6.6) [APP-415]. - For the Sizewell link road: Volume 6, Chapter 4 of the ES (Doc Ref 6.7) [APP-451]. - For the Yoxford roundabout and other highways improvements: Volume 7, Chapter 4 of the ES (Doc Ref 6.8) [APP-484]. The assessments have been updated in light of Additional Information and the accepted changes (April 2021) to the Application. The updated assessments can be found in Volume 1, Chapters 2, 5, 6 and 7 of the ES Addendum (Doc Ref 6.14) [AS-181], AS-184, AS-185 and AS-186. The assessments follow the appropriate guidance in LA111 'Noise and vibration', which is the relevant part of the UK assessment method for considering the effects of highways noise and vibration. It forms part of the 'Design Manual for Roads and Bridges'. Measures are proposed to address identified impacts in a proportionate way in the Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES (Doc Ref 6.3) [APP-210]), which provides a mechanism through which affected properties can obtain improvements to their glazing to better keep out sound, subject to certain qualifying criteria.	

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Within the Section 106 Agreement, there is also a maintenance fund for the B1122 prior to the Sizewell link road being operational, to keep the road in a good condition to minimise potential vibration effects.	
Severance impacts from new roads and railway line (general) New roads and railway link would sever communities, damage the rural footpath system and divide farmland. The new roads will increase traffic due to induced demand, therefore, the area will be left with a legacy of increased traffic and severance. For example, the parish of Theberton and Eastbridge will be cut in half by the closure of Moat Road and Pretty Road due to Sizewell link road. SZC Co. should make the bridge over Pretty Road usable by road traffic to allow local people easier access in and out of the two villages.	The highway improvements proposed in the Application largely constitute upgrading or replacing existing infrastructure. For example, the two village bypass moves traffic off the existing A12 onto a new highway scheme – it would not be possible, without significant property demolition, to upgrade the existing A12 through Farnham and Stratford St Andrew. Similarly, the Sizewell link road effectively replaces the existing B1122, which many consultees felt could not accommodate the additional traffic during Sizewell C construction. Online improvement of the existing B1122 would have been impractical and have a very significant impact on Middleton Moor and Theberton. The proposed road schemes enable Sizewell C traffic to bypass existing communities and thereby reduce severance effects through the villages. Where appropriate, public rights of way that cross the new highway infrastructure or the main development site (e.g. Bridleway 19) have been accommodated through temporary or permanent diversions so that pedestrian access to the countryside would be maintained. Treatment of public rights of way, National Trails and other publicly accessible land and routes within the main development site and green rail route site are described in the Rights of Way and Access Strategy (refer to Volume 2, Appendix 15I of the ES (Doc Ref. 6.3) [APP-270]). Temporary and	68

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	permanent closures, diversions and creation of new PRoW for all sites are set out in the detailed Access and Rights of Way Plans (Doc Ref. 2.4(B)) [AS-113 to AS-114] and in Schedule 10, 11 and 13 of the draft DCO (Doc Ref. 3.1(B)) [AS-143]. Vehicular access is provided onto the Sizewell link road and across the road via at-grade junctions. Moat Road and Pretty Road are proposed to have junctions onto the southern side of the Sizewell link road, with connections onto the B1122 via junctions at either end of Theberton.	
Cumulative transport impacts Concern over cumulative traffic and transport impacts with other energy Projects, including Scottish Power and National Grid schemes, Sizewell B relocated facilities, and with other proposed housing developments near the A12. SZC Co. have not assessed these Projects cumulatively. Furthermore, the effects of Sizewell C construction with other Projects requiring building or haulage services have not been considered. An example is the proposed use of the Bentwaters Airfield site for storage or transfer of materials. This will require large HGVs to use the narrow lanes such as those from the A12 to Bentwaters via Campsea Ashe or via Eyke and Woodbridge.	Within the 2023, 2028 and 2034 'Reference Case' models (i.e. future year traffic models without Sizewell C), background traffic growth that takes account of committed development has been included. The committed development schemes and background traffic growth for the traffic modelling has been discussed and agreed with Suffolk County Council and East Suffolk Council. All future year reference case scenarios have also been modelled including traffic flows generated by an outage at Sizewell B. This is highly robust, given that a planned outage only occurs for 8% of the time. The Sizewell B relocated facilities construction traffic has been assessed in the early years (2023) scenario. In addition, a cumulative assessment of Sizewell C with East Anglia 1 North (EA1N) and East Anglia 2 (EA2) has been undertaken (refer to the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] for further information). An updated Freight Management Strategy (Doc Ref. 8.18) [AS-280] was included in the January	32

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	2021 submission and sets out the likely sources of construction materials.	
Management of construction traffic (including HGVs) Concern over the robustness of construction traffic management plan, traffic incident management plan, including plans for dealing with A12 and Orwell Bridge closures, construction worker travel plan, protocols for the Transport Review Group and the proposed car share scheme. Concerns regarding the remit of the Transport Review Group and Section 106 provisions, including potential lack of any safeguarding of recognised 'limits' and the developer having 50% of the vote, raising 'conflict of interest issues'. Speed limits should be introduced within villages and there should be a zero-tolerance policy from SZC Co. to fly-parking in the village. The Delivery Management System will monitor the route of HGVs travelling to the site but the proposal fails to indicate similar strict controls for vehicles leaving it. Route adherence should also be checked for LGV	The environmental transport effects of the Sizewell C total traffic and increase in HGVs on the highway network have been assessed within Volume 2, Chapter 10 (Transport) of the ES (Doc Ref. 6.3) [APP-198] and the ES Addendum (Doc Ref. 6.14) [AS-181]. The assessment shows that any significant effects would be mitigated through the implementation of the highway works, improvements to be funded through the Section 106 Agreement and the management of traffic through the implementation of the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608], the Construction Worker Travel Plan (CWTP) (Doc Ref. 8.8) [APP-609] and the Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) [APP-607]. The Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608] proposes for all HGVs both to and from the main development site to be tracked via GPS to monitor compliance with the proposed HGV routes. For the purposes of the Project, any delivery vehicle in excess of 3.5 tonnes and below 44 tonnes will be defined as a HGV and will be required to adhere to designated HGV routes to and from the main development site. Typically, a HGV would be classified as being 7.5 tonnes - 44 tonnes and, therefore, the proposed HGV classification and associated management measures will include smaller goods vehicles than would normally be the case. LGVs to and from the main	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
traffic. ANPR cameras should be installed to back up contractual controls.	development site are proposed to be booked into the Delivery Management System. The management plans will be monitored by SZC Co. and monitoring results reported to the Transport Review Group (TRG) on a quarterly basis throughout the construction phase. The TRG is proposed to be governed in a similar way to the TRG at Hinkley Point C, which has been successful. A fly parking team is to be employed by SZC Co. to monitor and manage any occurrences of fly parking. Construction workers will be required to swipe onto Sizewell C park and ride and direct buses and the data will be helpful to plan bus services, as well as monitor occurrences of fly parking (e.g. workers driving closer to the main development site and boarding a bus that they are not allocated to use). Occurrences of fly parking and action taken will be reported to the TRG as part of the quarterly monitoring reports. In the event of an incident, vehicles will comply with the processes set out in the Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) [APP-607].	
Comments/ clarification requests on the Transport Assessment Comments/ queries on the robustness of the Transport Assessment (TA), traffic analysis and modelling. Concern that the transport impacts have been understated.	Extensive pre-Application scoping and discussions have been undertaken with Suffolk County Council and East Suffolk Council since 2012 on the Transport Assessment (Doc Ref. 8.5(A)) [AS-017], alongside the SZC Co. consultations that have been carried out with the local community and stakeholders. The assessment has been based on the information and advice that has been made available through these discussions on the approach, methodology and scope of the study area. SZC Co. has actively sought to obtain	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	views from a wide range of prescribed and non-prescribed consultees on matters including transport. The strategic highway assignment modelling provides an assessment covering the highway network, which has been accepted by Suffolk County Council and extends to Lowestoft to the north, Ipswich to the south and the A140 to the west, including the A12, A14 and key routes envisaged to be used by Sizewell C traffic. Since the submission of the Application, SZC Co. has continued to liaise with the local authorities and Highways England with regards to the evidence base for the trip generation assumptions as well as make refinements to the traffic models based on comments received from technical audits undertaken by Suffolk County Council and East Suffolk Council. Refinements have been made to the transport models (VISUM strategic model and junction models) and an A12 micro-simulation model of the A12 corridor between Seven Hills and Melton has been developed, in consultation with the transport stakeholders. The updated traffic modelling is summarised in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266].	

4.33 Water Resources, Flood Risk and Drainage

a) Overview

4.33.2 A total of 273 Interested Parties raised matters regarding water resources, flood risk and drainage.

4.33.3 **Table 4.32** provides a summary of the key issues raised, alongside a response from SZC Co.

Table 4.32: Water Resources, Flood Risk and Drainage

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
Hydrology and Water Supply The Sizewell C Project will impact on the inland hydrology due to requirements for water supply. There is insufficient fresh and potable water in the local area for this Project, with Suffolk being one of the driest counties in England. SZC Co. have no plausible solution for water supply; there is a lack of information on how the water supply needs are proposed to be met. If abstracted, local groundwater supplies will be significantly affected due to substantial volumes of water that would need to be extracted. Concerns that this has been insufficiently assessed and will leave residents, businesses and farmland with scarce water supply.	Sizewell C's demand for potable water is estimated to be around 4MI/day at peak during construction, and 2MI/day during the operational phase when both units are in normal operation, and 2.8MI/day when one unit is in normal operation and one unit is in outage. Essex and Suffolk Water (ESW) has confirmed that they would be able to meet this demand in full from its Barsham Water Treatment Works (WTW), subject to ongoing environmental and feasibility studies. The Sizewell C scheme would likely involve bringing forward ESW's planned upgrade of Barsham WTW, installation of 30km new or replacement water mains between Shadingfield and Sizewell, and construction of a new pumping station at Holton. The scheme would likely connect into Saxmundham Water Tower and would be designed to increase the capacity and resilience of the local distribution network as well as meeting Sizewell C's demand. Further information can be found in Volume 1, Chapter 2, Section 2.2 a) iii 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3,	187

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021.	
Flood Risk How will risks around flooding be managed? Concerns over impact on flooding from new road infrastructure and main development site. The coastal defences on the main development site will cause coastal flooding in other areas along the coastline, such as Aldeburgh. The loss of flood storage on the development site will result in widespread risk of flooding, as well as an unacceptable risk to groundwater levels and surrounding habitats and ecology. It is unclear whether the proposals pass the NPS EN-1 Exception Test. An independent review of the flood risk assessment should be undertaken.	The flood risk to and from the development has been assessed in relation to all forms of flooding and the proposed development has been designed to be safe and operable under foreseeable conditions, also taking account of climate change and rising sea levels. Flood risk assessments have been prepared for the main development site and each of the associated developments (Doc Ref. 5.2 to 5.9) [APP-093 to APP-144]. Measures to mitigate flood risk from the main development site and from new road infrastructure have been incorporated that include the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes, whilst recognising the need to protect habitats and groundwater by managing potential pollutant loading such as sediment and hydrocarbons. These approaches are described in the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. In response to further engagement with the key stakeholders following the Application, SZC Co. has revised the design of some aspects of the scheme to provide further mitigation against potential flood risk and environmental impacts, and to increase the resilience of the site to future climate change.	103

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	These are detailed in Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181] and assessed in the Main Development Site Flood Risk Assessment Addendum (Doc Ref. 5.2(A)Ad), and include: - increasing the height of the hard coastal sea defence; - change to the design for the SSSI crossing; and - flood mitigation area to the north of the main development site. Volume 2, Chapter 19 (Groundwater and surface water) of the ES (Doc Ref. 6.3) [APP-297] provides full details on the assessment of effects on groundwater levels, potential contamination of water bodies and flood risk, and demonstrates that the Sizewell C Project is appropriate in this regard. The relevant statutory bodies are assessing the suitability of the flood risk assessments undertaken and submitted in support of the Application.	
Impacts on habitats through changes in water levels Construction will have a negative impact due to changes in water levels which will disrupt habitats. Abstraction of water and the loss of flood storage areas will affect the groundwater levels and surrounding habitats and ecology.	Detailed groundwater modelling has been undertaken to understand the likely effects of the Sizewell C Project on groundwater levels and quality within the Sizewell Marshes SSSI. The assessment is reported within Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) [APP-297]. The assessment demonstrates that significant effects on groundwater would be avoided through measures embedded within the Project proposals, such as the construction of a cut off wall, which will prevent major changes in water levels off-site. The modelling indicates that the construction phase may cause a typical peak drawdown of water levels of less than 10cm adjacent to the site	36

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	boundaries and the drawdown would rapidly diminish with distance from the site. This would not result in a significant effect on the habitats within the Sizewell Marshes SSSI. A Water Monitoring and Response Strategy has been prepared (an updated version was issued in January 2021 and included within Volume 3, Appendix 2.14.A of the ES Addendum (Doc Ref. 6.14) [AS-236]). This strategy sets out the principles of the proposed monitoring and mitigation approach in order to protect designated sites in the vicinity.	
Detailed hydrological impact assessment and drainage strategy Detailed hydrological impact assessment and detailed mitigation plans are required. Concerns over lack of detail provided on the drainage strategy and its impacts across the Project, including what this means for local farming businesses.	Detailed groundwater modelling has been undertaken to understand the likely effects of the Sizewell C Project on groundwater levels and quality within the Sizewell Marshes SSSI. The assessment is reported within Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) [APP-297]. The assessment demonstrates that significant effects on groundwater would be avoided through measures embedded within the Project proposals, such as the construction of a cut off wall, which will prevent major changes in water levels off-site. The modelling indicates that the construction phase may cause a typical drawdown of water levels of less than 10cm adjacent to the site boundaries and the drawdown would rapidly diminish with distance from the site. A Water Monitoring and Response Strategy has been prepared (an updated version was issued in January 2021 and included within Volume 3, Appendix 2.14.A of the ES Addendum (Doc Ref. 6.14) [AS-236]). This strategy sets out the principles of the proposed monitoring and mitigation approach in order to protect designated sites in the vicinity.	18

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	The Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] demonstrate the measures that shall be employed to mitigate flood risk from the development. These include the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes, whilst recognising the need to protect habitats and groundwater by managing potential pollutant loading such as sediment and hydrocarbons. Further detail on the drainage design in specific areas of the main development site and the associated development sites shall be provided as the designs develop pursuant to the requirements of the draft DCO.	
Impact on Minsmere sluice and flooding of grazing land Concerns over potential damage to Minsmere Sluice and associated drains, which could lead to damage to grazing land needed to feed livestock. Changes to inland water levels will potentially threaten plants and wildlife. Insufficient assessment of impacts on Minsmere Sluice.	SZC Co. recognises concerns of stakeholders regarding the long-term viability of Minsmere Sluice. Minsmere Sluice is an Environment Agency owned and maintained structure that controls drainage from the Minsmere New River, Leiston Drain and Scott's Hall Drain. It provides controls and limits the ingress of salt water and is tide locked when water levels in the North Sea are high. At low tide drainage of the upstream fluvial system via Minsmere Sluice is via gravity. We note that the Shoreline Management Plan (SMP) policy for the wider coast (MIN12.3 and MIN12.4) in the vicinity of Minsmere Sluice is managed realignment, whereas the position for Minsmere Sluice is for it to be maintained.	72

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	SZC Co. has carried out a number of assessments which conclude there is no significant effect on the function of the Minsmere Sluice whether in extreme conditions (e.g. flood) or normal operating conditions.	
Contamination of waterways Concern that the Sizewell C Project and infrastructure will pose a risk of contamination to waterways and groundwater.	SZC Co. have carried out a number of assessments in relation to groundwater, surface water, drainage and borrow pit infill. We recognise the potential for the main development and associated development sites to impact on the hydrological and hydrogeological regimes, through the introduction of buildings, hardstanding, drainage infrastructure, materials handling and infill, often within floodplains, in proximity to watercourses and adjacent to sensitive ecological receptor sites. Impacts could include the effects on water quantity, flow, location and quality, and over time. Volume 2, Chapter 19 (Groundwater and surface water) of the ES (Doc Ref. 6.3) [APP-297] and Volumes 3-9, Chapter 12 (Doc Ref. 6.4 to 6.10) [APP-376, APP-407, APP-441, APP-476, APP-507, APP-536 and APP-570], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-188], provide full details on the assessment of effects on groundwater levels, potential contamination of water bodies and flood risk, and demonstrate that the Sizewell C Project is appropriate in this regard. We propose the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes, whilst recognising the need to protect habitats and	16

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	groundwater by managing potential pollutant loading such as sediment and hydrocarbons. These approaches are described in the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] .	
Sewage disposal Sewage disposal during construction and operation is unclear. Concerns that the existing sewage infrastructure would not be able to cope with the additional load from the accommodation campus.	Both during construction and operation, sewage would be treated in an on-site sewage treatment plant and the treated effluent would be discharged to the sea via the marine outfall. Discharges will be strictly monitored and managed under an Environmental Permit granted by the Environment Agency. The proposed sewage treatment plant located within the construction site will receive and treat all domestic foul water generated by the accommodation campus during the construction period. A foul water pump station will need to be accommodated within the accommodation campus site to convey the foul water to this treatment plant. Existing infrastructure will remain unaffected. Further information is provided within the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] .	4
SSSI crossing hydrological impacts The culvert proposed as part of the SSSI crossing is not satisfactory and will not be successful in protecting Sizewell Belts or Minsmere Levels which rely solely on the quality and depth of the water. Any changes will cause irreparable harm as all habitats in the area are dependent upon these factors.	SZC Co. recognises the concerns raised by the public and the stakeholders on the design of the SSSI crossing. In April 2021, the Examining Authority accepted changes to the design of the SSSI crossing. The revised SSSI crossing design includes for a widened opening over Leiston Drain (approximately 24m at ground level and up to 30m at soffit level) as part of a single span bridge and embankment design. This design would	6

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
There should not be any impediment to the flow of water in this area, which the culvert will inevitably create.	maintain normal hydrological function of the ditch and avoid any significant increase in off-site flooding in storm events. Further details are set out in Volume 1, Chapter 2 of the ES Addendum (Doc Ref 6.14) [AS-181] , Main Development Site Flood Risk Assessment Addendum (Doc Ref. 5.2(A)Ad) [AS-157] and Outline Drainage Strategy (Doc Ref. 6.3) [APP-181] .	
Northern park and ride drainage Concerns about the impact of northern park and ride construction on the existing land drainage systems and future ability to cope with the surface water runoff.	Measures to mitigate flood risk from the northern park and ride have been incorporated that include the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes, whilst recognising the need to protect habitats and groundwater by managing potential pollutant loading such as sediment and hydrocarbons. Further detail regarding drainage proposals can be found in Volume 3, Chapter 12 (Groundwater and Surface Water) of the ES (Doc Ref. 6.4) [APP-376] and the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] .	2
Two village bypass - impacts on existing drainage Concerns that the two village bypass will sever existing drainage infrastructure. There is no information on how existing drainage will be maintained, protected or diverted in SZC Co.'s proposals.	As set out in Volume 5, Chapter 2 (Description of Development) of the ES (Doc Ref. 6.6) [APP-411] , it is proposed that existing local drainage from surrounding fields would be culverted. Field drains located at the western end of the bypass, either side of the proposed River Alde overbridge, would be diverted along the base of the embankment to the River Alde where possible with additional/excess water culverted through the embankments. The design includes for flood relief culverts beneath the embankment which would	2

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	enable direction of field drainage, where appropriate. The swales and infiltration basins would provide an appropriate level of treatment for highway runoff in accordance with design guidance and as agreed with the Drainage Authority.	
Sizewell link road - drainage impacts Any impact on drainage infrastructure including the impact of increased surface run off from the proposed Sizewell link road must be properly addressed. Sufficient detail on this has not been made available.	SZC Co. has carried out a number of assessments in relation to groundwater, surface water, drainage which were reported within the ES (refer to Volume 6, Chapter 12 of the ES (Doc Ref. 6.7) [APP-476]). Since the submission of the Application, SZC Co. has continued to develop the proposed drainage infrastructure required for the effective removal of runoff from the proposed Sizewell link road and its disposal, and the crossing of watercourses along the route of the Sizewell link road. This included a review of new data for the site, including topographic and geotechnical. As part of the January 2021 submission, SZC Co. proposed a number of changes to the site boundary (and Order Limits) of the Sizewell Link Road. This is to accommodate updates to drainage design assumptions, highway design development (following close engagement with Suffolk County Council) and in response to topographic survey information. Further information is provided within Volume 1, Chapter 6 of the ES Addendum (Doc Ref. 6.14) [AS-185]. Measures to mitigate flood risk from new road infrastructure have been incorporated that include the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes, whilst recognising the need to	3

Summary of comments received	SZC Co.'s Response	Number of responses code has been applied to
	protect habitats and groundwater by managing potential pollutant loading such as sediment and hydrocarbons. These approaches are described in the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] .	
Sizewell link road - detention pond near Fordley Road Concerns that SZC Co.'s proposed detention pond close to the junction of Fordley Road and the B1122 is at the top of a hill looking down towards Fordley Road. Please confirm what benefit the location of this detention pond will have to an area renowned for flooding?	The drainage design is being undertaken in line with industry guidance and best practice, and shall be appraised by the Drainage Authority who has responsibility for determining if it is appropriate. As agreed with the Drainage Authority, any infiltration or attenuation basins would be sited outside of areas of potential flooding. The flood risk for Sizewell link road has been assessed in the Sizewell Link Road Flood Risk Assessment (Doc Ref. 5.6) [APP-136], as updated by the Sizewell Link Road Flood Risk Assessment Addendum (Doc Ref. 5.6Ad), which provides fluvial flood extents, and has been used to correctly site the road drainage infrastructure. Measures to mitigate flood risk from new road infrastructure have been incorporated that include the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes. These approaches are described in the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273].	1

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APPENDIX A: SELECTED INDIVIDUAL AND TECHNICAL CONSULTEES RESPONSE TABLES

A.1. Local Authorities

Norfolk County Council (RR-0906)

Table A.1: Norfolk County Council

Matter raised	SZC Co.'s Response
General Project	
Extent of impacts - unlikely for immediate impacts on Norfolk to occur (a) General Comments: As the proposed development is located outside of Norfolk within the neighbouring County of Suffolk, it is unlikely that the proposal will have any immediate impacts on Norfolk in terms of landscape, ecology and archaeological matters. Furthermore, it is not felt that there will be any significant transport impacts on Norfolk arising from either the construction or operation of the new Nuclear Power Plant.	Noted.
Transmission network Clarification requested on impacts on the wider transmission network (c) Transmission network – grid connection comments It is understood that Sizewell C will generate enough electricity for 6 million homes. There are wider grid connection issues in respect of the 400kV network which runs between Norfolk and Suffolk. The Stage 2 Report (Autumn/Winter 2016) indicated that electricity from Sizewell C will be stepped up to 400 kV through on-site transformers and connected via underground cables to a new National Grid 400 kV sub-station. This	A summary of the work required to connect Sizewell C to the National Electricity Transmission System is provided in the Grid Connection Statement (Doc Ref. 7.1) [APP-583]. Paragraph 1.3.13 of that document clarifies the specific works for which SZC Co. is seeking development consent in relation to the grid connection. In response to the specific clarification questions posed: (a) The Grid Connection Statement confirms at paragraph 1.3.14 that reinforcement works to the surrounding National Electricity Transmission System would be carried out by National Grid as appropriate.

Matter raised	SZC Co.'s Response
previous report indicated that no additional overhead line circuits would be required for Sizewell C in the “vicinity” of the site. It is understood that further studies will be completed to confirm the details of the revised overhead line connection. The NTS suggests that apart from the provision of a new National Grid 400 kV substation; and the minor relocation of an existing National Grid Pylon and overhead lines, there is no further impact on the wider transmission networks. It is considered that there needs to be clarification from both EDF Energy and the National Grid as to whether there is likely to be any requirement in the wider area for either: (a) reinforcement of the existing 400 kV network; or (b) new overhead lines (400kV).	(b) Any requirement for new overhead lines would be determined by National Grid and would form part of the reinforcement works referred to above. SZC Co. is not aware of a requirement for new overhead lines arising directly as a result of the proposed development. SZC Co. is continuing engagement with National Grid to inform the need for any works required to the transmission network.
Transmission network - In-combination impact on the transmission network in the wider strategic area Given the amount of electricity coming ashore from offshore wind energy Projects off the Norfolk and Suffolk Coasts, EDF Energy and National Grid will need to address the in-combination impact on the 400 kV transmission network in the wider strategic area i.e. including the potential for reinforcement and new lines in both Norfolk and Suffolk. These cross-boundary electricity transmission issues were raised by the County Council at both the Stage 1 consultation in 2013 and the Stage 2 consultation in January 2017 and at the Section 42 consultations stage (2019). As such the County Council would like to see further evidence and studies setting out the full implications of both the Sizewell C; and the planned / emerging offshore wind energy Projects on the existing 400 kV network across the two Counties. Any	The Grid Connection Statement (Doc Ref. 7.1) [APP-583] explains at paragraph 1.3.8 that it is the responsibility of National Grid to develop and maintain the National Electricity Transmission System. Any studies into the implications of planned / emerging energy Projects on the existing 400 kV network would be carried out by National Grid as part of this responsibility. SZC Co. is continuing engagement with National Grid to inform the need for any works required to the transmission network.

Matter raised	SZC Co.'s Response
such study / evidence will need to take into account the current Offshore Transmission Network Review (OTNR) being led by the Department for Business, Energy and Industrial Strategy.	
Socio-economics	
Employment impacts and mitigation (b) Employment and Training Comments It is understood from the EIA (NTS) that during construction there will be up to 7,900 people employed on-site and that a further 25,000 jobs would be created in the wider supply chain during this phase. When operational it is understood that the Plant would employ a workforce of around 900 staff. While Norfolk County Council welcomes the employment opportunities the Power Station will have within the local/regional area both during construction and once operational, there are significant economic issues, which the proposal will need to address with regard to: (a) The potential impact on the local labour market – will the development lead to shortages of construction and other key skilled workers in other location in East Anglia; (b) What measures will be taken to mitigate any potential impacts; and (c) What support and investment will be given to the training in the local area (e.g. covering the construction sectors). Norfolk County Council would especially welcome measures that will enable permanent, long term job opportunities to be taken up by local people. Norfolk County Council would welcome measures which would encourage/enable people currently excluded from the formal labour market being supported into	To clarify, the EIA (NTS) (Doc Ref. 6.1) [APP-159] does not state "<i>that there would be a further 25,000 jobs created in the wider supply chain during this phase</i>". For reference, a full detailed breakdown of the estimated local and regional employment and supply chain benefits is set out in the Economic Statement (Doc Ref. 8.9) [APP-610]. SZC Co has been working closely with regional stakeholders to design mitigation and enhancement measures to promote local skills, employment, training and education opportunities that the Project will bring through a range of investments and strategies, to be secured through the Section 106 Agreement. This includes support for skills development in the supply chain, local supply chain engagement, funding for outreach activities and regional skills and capabilities. Importantly, these measures will build on the existing infrastructure of skills, employment, education and training and enhance existing programmes that are designed to benefit both the needs of the Sizewell C Project, but also the skills legacy demand of the wider region. The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, as set out in the Employment, Skills and Education Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611],

Matter raised	SZC Co.'s Response
jobs at any level /degree of permanency which could help ease competition for people already active in the relevant local labour market.	there may be some effects on local businesses such as some vacancies being harder to fill. In order to tackle this: • A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Sizewell C Project and wider employment market. • Local firms will be supported through local Supply Chain Strategy to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project opportunities. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. • Upskilling will benefit the Sizewell C Project and the wider market – focus will be on 'legacy' roles (as determined by Suffolk County Council's research base) that the region and the Project both need for the long term. SZC Co., Suffolk County Council and East Suffolk Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation has been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region - for example providing revenue

Matter raised	SZC Co.'s Response
	funding to deliver on existing capital investment in skills centres in the region.
Employment, Skills and Education Strategy The County Council recognises that EDF Energy are: (1) Working with the Suffolk Chamber of Commerce on Supply Chain matters; and (2) Developing an Employment, Skills and Education Strategy which will form part of the DCO Application. The Environmental Statement Non-Technical Summary (ES NTS) makes specific reference to EDF Energy preparing an Employment, Skills and Education Strategy, which is welcomed.	Noted. The Employment, Skills and Education Strategy is appended to the Economic Statement (Doc Ref. 8.9) [APP-611], and sets out the measures that SZC Co and regional partners will develop through Section 106 and other agreements to enhance benefits and mitigate for any risks in terms of labour market, employment, skills and training.
Supply Chain Strategy The NTS also refers to a Supply Chain Strategy which is again welcomed.	Noted. The Supply Chain Strategy is appended to the Economic Statement (Doc Ref. 8.9) [APP-611], and sets out SZC Co's intentions to actively engage with and monitor the success of the local supply chain, supporting local and regional firms to win work on the Project and retain the value of those contracts locally.
Consideration of supply chain issues, cumulative impacts and impacts on employment in other sectors While welcoming the above commitments by EDF Energy, it is felt that given the proposal's proximity to Norfolk and the likelihood of additional major construction Projects in both Norfolk and Suffolk arising from the offshore wind energy sector (i.e. associated with the Norfolk Vanguard (approved DCO July 2020); Hornsea Project Three Project (Secretary of State is minded to approve DCO July 2020); Norfolk Boreas	SZC Co.'s assessment of cumulative effects is based on a long-list and short-list of other Projects within the planning system and within the Zone of Influence for socio-economic effects. Volume 10, Chapter 1 of the ES (Doc Ref. 6.11) [APP-572] sets out the selection criteria for inclusion of Projects, including the consultation process to agree these. Nonetheless, SZC Co. recognises that the region is preparing for a large number of Projects both in planning and further in the future, and has had regard to that demand when considering enhancement and

Matter raised	SZC Co.'s Response
(Examination extended to 12 October 2020); and East Anglia Offshore Wind One (North) and Two (Examination to begin shortly) - there is a need for any accompanying Strategies having regard to: (a) Wider consideration of supply chain issues to include working with neighbouring authorities particularly Norfolk County Council; (b) Ensuring that any Education, Skills and Employment Strategy addresses/considers the wider cumulative impacts arising from other planned NSIPs in the area (i.e. covering the above offshore wind energy Projects); and ensures appropriate collaboration with neighbouring authorities (e.g. Norfolk County Council) and the Local Enterprise Partnership in any potential initiatives arising from the above Strategies; and (c) There needs to be clear evidence provided through the above Strategies that the significant construction workforce needed will not adversely affect the delivery of other key sectors such as local house building and other employment sectors.	mitigation proposals related to the labour market and supply chain. SZC Co. is keen to work within Suffolk County Council's principle of promoting legacy skills that benefit both the Sizewell C Project and the region in the future - SZC Co. is working with Suffolk County Council, NALEP and Suffolk Chamber of Commerce to develop a forward-looking plan for skills and employment which would include Workforce Delivery Strategies for each phase with enough lead-in time to be effective in bringing labour to the market, and would provide ASEC and Outreach Funds and other measures scoped with Suffolk County Council's need and aspiration for legacy skills in mind. SZC Co, Suffolk County Council, East Suffolk Council and NALEP continue to engage on technical issues through monthly Economic Development meetings and weekly skills, employment and education meetings, which will include technical consideration of the Council's wider skills demand research.
Additional Planning Requirements in the Development Consent Order (DCO) The delivery for the above Strategies by the applicant should be set out as a Planning Requirement in the Development Consent Order (DCO); or agreed separately through a S106 legal agreement. Norfolk County Council would expect to be consulted on any emerging Strategies along with Suffolk County Council and the Local Enterprise Partnership. The above Authorities along with the LEP would need to be satisfied with the Strategies' content before the Requirement	SZC Co. recognises the importance of securing deliverable supply chain, employment, skills and training measures within a Section 106 Agreement, both to ensure the Sizewell C Project can be delivered, and to ensure any potential risks of adverse effects are mitigated. Through engagement with local stakeholders including County and District Councils and NALEP, SZC Co. is developing the Employment, Skills and Education Strategy into a suite of measures to be secured in the Section 106 Agreement, with accompanying monitoring and governance measures to ensure that they are implemented effectively

Matter raised	SZC Co.'s Response
could be discharged (or S106 fulfilled). It is suggested that Suffolk County Council ought to be the discharging authority on such a Planning Requirement/s; or signatory on any S106 along with the applicant. Such Requirements have been used in in other DCO proposals (e.g. Norfolk Vanguard) – see below: <i>Skills and employment strategy 33-</i> <i>(1) No stage of the onshore transmission works must commence until a skills and employment strategy (which accords with the outline skills and employment strategy) has been submitted to and approved in writing by Norfolk County Council.</i> <i>(2) Prior to submission of the skills and employment plan for approval in accordance with Requirement 33(1), the undertaker shall consult North Norfolk District Council, Broadland District Council, Breckland District Council, Norfolk County Council and the New Anglia Local Enterprise Partnership on the content of the strategy.</i> <i>(3) The skills and employment strategy must be implemented as approved.</i>	and with enough oversight and lead-in time to produce required results. SZC Co, as part of this, will commit to providing regularly reviewed Workforce Delivery Strategies and Annual Implementation Plans to deliver workforce requirements and focus the direction of measures such as the Outreach Fund and ASEC Fund, with the support of local stakeholders under working groups whose remit will also be secured by the Section 106 Agreement.

Babergh and Mid-Suffolk District Councils (RR-0125)

Table A.2: Babergh and Mid-Suffolk District Councils

Matter raised	SZC Co.'s Response
General Project This significant Project has the potential to create significant impacts across Suffolk including highway impacts, environmental impacts, impacts to employment and skills and delivery of other construction Projects including housebuilding and as such we reserve the right to be an interested party.	SZC Co. is proposing to mitigate all significant adverse effects related to the Sizewell C Project. In order to understand the extent of the effects Project-wide and cumulatively with other Projects, an Environmental Impact Assessment has been undertaken and physical mitigation and implementation measures, as well as financial mitigation, identified. These include (but are not limited to) a Housing Fund, a Public Services Contingency Fund and implementation strategies like an Accommodation Strategy (Doc Ref. 8.10) [APP-613] and a Community Safety Management Plan (Doc Ref. 8.16) [APP-635]. SZC Co. also recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected. Further information can be found in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195]. In addition, SZC Co. has set out a number of strategies to enhance the economic benefits of the Sizewell C Project – further information can be found in Appendix A, the Employment, Skills and Education Strategy; and Appendix B, the Supply Chain Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611].

A.2. Parish Councils

Leiston-cum-Sizewell Town Council (RR-0679)

Table A.3: Leiston-cum-Sizewell Town Council

Matter raised	SZC Co.'s Response
General Project	
Further information regarding how monitoring will be undertaken and secured 6. Monitoring and accountability - Leiston Town Council would like to see clear transparent mechanisms in place early in the Project to ensure all predicted impact effects are independently monitored, reported upon and that action is taken where necessary. They would also support East Suffolk Council in their comments regarding the assessments of some of the impacts contained in the DCO. - Leiston Town Council will be expecting to have elected representation on the Main Development Site Forum, when it is set up for construction, to ensure rapid visibility of emerging issues etc. The Town Clerk would also wish to be a key member of this forum.	SZC Co. has committed to monitoring across the Project both during construction and operation, where necessary. The monitoring proposals are set out in the DCO Application (May 2020) and further detail is provided in the January 2021 submission. The monitoring is proposed to ensure effects from the Project are appropriately managed and controlled in accordance with the Application and include for example, monitoring of workforce, traffic, noise, air quality, ecological, groundwater, coastal and marine impacts. Monitoring proposals are identified in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1). The monitoring proposals for each topic area would be secured through Requirements, Deemed Marine Licence Conditions or Section 106 Obligations. SZC Co. is progressing discussions on the monitoring and reporting arrangements with East Suffolk Council and Suffolk County Council, alongside the Section 106 Agreement.
Request for mitigation/financial contributions 14. This Project is on an enormous scale and will have a massive impact on this small town. The DCO identifies many of the adverse impacts on Leiston and some potential benefits to the local economy and jobs. There are extra sports facilities in the town and, all being well, substantial improvements in the	A Community Fund will be implemented via the Section 106 Agreement which will help mitigate and compensate for intangible, residual or in-combination effects through schemes, measures and Projects which promote the economic, social or environmental well-being of communities and enhance the quality of life. SZC Co. will ensure that the affected communities have the opportunity to access

Matter raised	SZC Co.'s Response
town centre but LTC are still clear that the damaging impacts of this Project will need further mitigation so that the impacts do not outweigh the benefits. These will be explored during the examination process.	this Fund. Details of the Community Fund are included in the draft Section 106 Agreement [PDB-004] , on which stakeholders have the opportunity to comment.
General EIA	
Impact with other energy Projects and impact from traffic Leiston-cum-Sizewell Town Council has engaged with SZC Co. throughout the consultation process but still has concerns about the impacts of the Project on Leiston cum Sizewell. The majority of the points East Suffolk Council and Suffolk County Council have raised regarding the wider Project are supported as are all representations from Natural England, Minsmere Levels Stakeholder Group, the RSPB and other environmental bodies. We will therefore focus on the immediate environment and the local effects on Leiston. It is believed that the Initial Assessment of the Principal Issues must acknowledge the very real concerns raised regarding the cumulative impact of this Project alongside the other energy NSIP's coming forward on this coast. An early overview from the Inspectorate to the Secretary of State would be very important on this subject.	Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578] presents the assessment of cumulative effects with other plans and Projects. The short-list for the cumulative assessment includes but is not limited to the following schemes: • East Anglia One North, • East Anglia Two, • East Anglia Three wind farms, • Thanet Extension wind farm, • Hornsea wind farms (Two and Three); • Dogger Bank Zone windfarms, • Greater Gabbard and Galloper wind farm extensions, • Nautilus Interconnector, and • Eurolink Interconnector. The cumulative assessment assumes that the schemes will take place as per the descriptions made publicly available at the time of writing the ES, unless otherwise specified in the technical chapter. Any short listed scheme for which an Application has not yet been submitted would also need to consider the Sizewell C Project as part of its own environmental impact assessment.
Health and wellbeing	
Concerns regarding support of emergency services and availability to local residents	SZC Co. has undertaken a detailed assessment of the likely socio-economic effects of the Sizewell C Project in terms of housing and

Matter raised	SZC Co.'s Response
12. Safety Issues [Part 2] Leiston Town Council have raised concerns throughout the consultation over Emergency Services support, so as not to have deficiencies of cover and availability during construction. There is no mention of how this will be mitigated against yet. We appreciate discussions are ongoing but would like to see any agreements as they come forward.	public and emergency services, leisure/sport activity and economic development, and community cohesion. This is included within Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195]. As a result of this assessment, a range of mitigation measures have been developed, as summarised in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195], to avoid or reduce significant effects – this includes a Housing Fund, a Public Services Fund and implementation strategies like an Accommodation Strategy (Doc Ref. 8.10) [APP-613] and a Community Safety Management Plan (Doc Ref. 8.16) [APP-635].
Socio-economics	
Impacts of construction workers on infrastructure and impacts on residents 2. Socio – economic - Well over 80% of the construction work and workforce will be based in the parish of Leiston-cum Sizewell. - Personnel movement into and out of the town to access services, leisure and businesses will put a lot of pressure on the amenity of local residents – particularly with housing, access to footpaths and social cohesion - it will also make huge changes to the current socio-economic activity. The effect on residents needs to be acknowledged and mitigated for.	SZC Co. has undertaken a ward-level assessment of the likely demographic and population change as a result of the temporary, non-home-based construction workforce, and the knock-on implications for housing and public services, and community cohesion as a result. This is included within Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195]. As a result of this assessment, a range of mitigation measures have been developed, as summarised in Volume 2, Chapter 9 of the ES (Socio-economics), to avoid or reduce significant effects – this includes a Housing Fund, a Public Services Resilience Fund and implementation strategies like an Accommodation Strategy (Doc Ref. 8.10) [APP-613] and a Community Safety Management Plan (Doc Ref. 8.16) [APP-635]. SZC Co. also recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local

Matter raised	SZC Co.'s Response
	communities which seek to improve quality of life for those most affected.
Welcomes support to increase education and skills 3. Education and Skills: The effort being put in by EDF to support Education and skills is welcomed and Leiston Town Council would like to see further specific references and efforts put into ensuring that apprenticeships and skills are primarily sourced through Alde Valley Academy and Suffolk College on the Coast.	SZC Co. welcomes the recognition that the Sizewell C Project will provide lasting community benefits in terms of employment, skills, training, education and supply chain benefits. SZC Co. has worked closely with stakeholders to ensure that the economic benefits can be enhanced in-line with the aspirations for sustainable sectoral growth across the region – plans to implement these enhancements are set out in Appendix A, the Employment, Skills and Education Strategy; and Appendix B, the Supply Chain Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-610 and APP-611], which quantifies the overall economic benefits. SZC Co. and local and regional stakeholders are designing measures that focus on the ability of local resources and providers of skills, training and education to access funds and support to enable them to create pathways for local people into the labour market and employment both at Sizewell C and other major infrastructure Projects locally.
Request for further mitigation for cultural and recreational activity impacts on residents and infrastructure. 4. Legacy benefits The provision of sports facilities is welcome. Sport is not the only cultural or recreational activity in the town however and further mitigation in this area is requested. Especially as, during construction, the provided sports facilities, which are there for SZC workforce, would not be as readily accessible as maybe wished by residents. Leiston Town Council has a positive and wide ranging	SZC Co. welcomes the recognition that the proposed sports facilities provided for shared use between the Sizewell C workforce and community will promote social and community wellbeing. As statutory provision, sports facilities will also help to mitigate the potential for adverse effects on temporary demand for formal recreation. Other cultural and recreational facilities can also provide substantial benefit to communities, and financial support for these may be sought through Applications to a Community Fund, where investment in a Project can demonstrate meaningful positive effects on community

Matter raised	SZC Co.'s Response
mitigation proposal to offset this for both residents and workers families which would need SZC Co. support. It will be important to ensure robust community cohesion during the inevitable upheaval this Project brings and it is intended to provide an oasis for families where this can be achieved at the Waterloo Centre. • Cycleways and cycle paths. By supporting Leiston Town Council in establishing a wider cycling network to enhance and merge with the proposed routes in the DCO, SZC Co. would be helping improve the travel plan, local amenity and, more importantly, future legacy benefits from the Project.	cohesion, wellbeing and wider community benefits in an area likely to experience change as a result of the Sizewell C Project. SZC Co. will also provide a Public Service Resilience Fund with the aim of supporting the Councils' existing structure of community safety and support services for vulnerable members of communities, and those accessing social care and public health services, where there may be an enhanced risk as a result of the Project. SZC Co. is in discussion with Leiston Town Council to develop transport proposals in the town, to complement proposed footpath and cycleway improvements.
Funding / Financial Contributions / Amenity mitigation 9. Labour Market: East Suffolk Council are working with SZC Co. on the concerns we have for the potential “leaching” of local workforce from local jobs to meet the rather high estimate of HB workers they suggest will come from local communities. Robust training and skills programmes have to be put in place to help counter this. Current proposals for employment Projects through Inspire and ACT do not necessarily mean impacts in Leiston will be addressed but we would like see how the detail can address this.	The assessment presented within Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195] uses a conservative assessment case for assumptions about Home-Based (HB) and Non-Home Based (NHB) workers - this is to ensure mitigation for the NHB component, e.g. with regard to demand for accommodation and other services, is sufficiently robust. SZC Co. will seek to maximise the HB recruitment beyond this assessment. The DCO sets out a reasonable expected level which takes into account the measures funded by the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] enhancement measures. There is clearly benefit in promoting local employment for economic and social benefit, but also to reduce the scale of NHB workforce, meaning fewer accommodation, community safety, public services effects. Bringing people into work from worklessness is an important part of the drive for sustainable employment and upskilling.

Matter raised	SZC Co.'s Response
	The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, as set out in the Employment, Skills and Education Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611], there may be some effects on local businesses such as some vacancies being harder to fill. In order to tackle this: • A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Sizewell C Project and wider employment market. • Local firms will be supported through local Supply Chain Strategy to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project opportunities. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. • Upskilling will benefit the Sizewell C Project and the wider market – focus will be on 'legacy' roles (as determined by Suffolk County Council's research base) that the region and the Project both need for the long term. SZC Co., Suffolk County Council and East Suffolk Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the

Matter raised	SZC Co.'s Response
	measures set out in the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation have been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region - for example providing revenue funding to deliver on existing capital investment in skills centres in the region.
Request for mitigation/financial contributions to maintain attractiveness of Leiston to visitors during construction of the Project 13. Tourism. Leiston Town Council will support all efforts to adequately mitigate tourism. The requested public realm improvements in Leiston will help ensure that access remains desirable to the attractions in the town but there is concern about the wider, overall, effect that this Project will have on this area.	SZC Co. and local tourism stakeholders recognise that there is a need to provide pre-emptive support for the tourist sector to promote and market the region, and provide a clear strategy including investment in physical infrastructure and support for tourist accommodation providers in order to reduce risks identified through quantitative research, set out in the Economic Statement (Doc Ref. 8.9) [APP-610] and Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195]. SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. An Accommodation Strategy (Doc Ref. 8.10) [APP-613] has been developed to minimise harm to the sector during the peak seasons, when tourist and worker demand for accommodation may overlap. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects such as marketing, promotion, research and supporting local Projects.

Matter raised	SZC Co.'s Response
	SZC Co. agrees that it is prudent to address the risk of any uncertainties and therefore has developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/ reconfiguration of existing tourist accommodation sites.
Transport	
Impacts on amenity within Leiston, public transport and non-motorised users 1. Transport - The effects that increased traffic will have on the town centre, residential areas and the main entrances into Leiston. The effect on King George Avenue (and the Town Centre) is not clearly identified in the DCO. - The reliance on the Sizewell Gap Road to access the site in the first two years is a major concern (residents' amenity and Sizewell B workers use of the road and small cycleway). How will this be mitigated? - Ensuring that cycle routes are safe and that improvements to the cycle network outside the DCO are supported to ensure they tie in with the proposed routes seamlessly and enhance the travel plan. - Control of vehicular traffic and LGVs destined for the LEEIE (Land East of Eastland's Industrial Estate) in the early years and before the major transport network infrastructure improvements are completed. With concerns of rat running in inappropriate locations Leiston Town	SZC Co. is liaising with Leiston Town Council to agree a transport improvement scheme for Leiston, to be funded via the Section 106 Agreement. As part of the development of the transport scheme, the traffic flow outputs from the models are being reviewed in consultation with the town council. As part of the Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609], no worker living in Leiston will be allocated a parking permit for the main development site and will instead be required to walk, cycle or get a bus to the site. This will act to reduce the level of traffic within the town. More detailed work is currently being undertaken by SZC Co. on the Implementation Plan and the phasing of the associated development sites and other highway improvements, including the improvements along Lover's Lane. SZC Co. continue to liaise with the local authorities to agree a package of cycle improvements to be funded through the Section 106 Agreement, which will provide legacy benefits to the area. All HGVs will be managed through the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], including those to/from the LEEIE. The bus-based strategy for construction workers will be managed through the Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] and the monitoring reports will be reviewed on a quarterly basis by the Transport Review Group (TRG). The direct bus strategy will be

Matter raised	SZC Co.'s Response
Council would like to see a clear transport plan for this phase. Buses. Leiston Town Council will continue to work with SZC Co. to plan work bus routes for local workers and also develop shuttle bus plans for leisure and sport for workers from the Campus. Leiston Town Council will be encouraging electric or hydrogen technology for all buses.	reviewed on a quarterly basis through the TRG to ensure that the services respond to the workforce profile and distribution.
Transport Review Group (TRG) 5. Transport Review Group. LTC, although being an active and important member of their own local transport and traffic group, would seek to have a non-voting place on the TRG to be able to observe and ensure important local concerns are considered appropriately. The local (transport) group would like to work with SZC Co. to get the best bus routes for workers to and from site and also for a small recreational shuttle bus services from the accommodation.	A similar approach to the TRG is proposed to be taken as at Hinkley Point C. It is proposed that the TRG is limited to East Suffolk Council, as the local planning authority, and Suffolk County Council and Highways England as the local and strategic highway authorities, respectively. The parish / town councils will be able to raise issues to the Transport Co-ordinator and all concerns will be included in the quarterly monitoring reports to be reviewed by the TRG. The monitoring reports and minutes of the TRG meetings will be made publicly available by SZC Co.
Construction traffic impacts during early years 7. Associated infrastructure It is absolutely imperative that the most important associated infrastructure is completed and in place before construction begins. This section of the East Suffolk coastal strip gets a lot of traffic which has to use very limited routes to access the main artery (A12). Any disruption to junctions on the A12 will be a major issue during the construction of the roundabouts but, if they are not completed before construction traffic starts, this will be	SZC Co. recognises the importance of minimising traffic delay during the construction of the Project, including during the Early Years when the associated developments are being constructed. More detailed work is currently being undertaken by SZC Co. on the Implementation Plan and the phasing of the associated development sites. This will include the phasing of any improvements along the A12 corridor. HGV movements to/from the main development site will be required to route via the A12 and B1122/Sizewell link road and compliance with the HGV routes will be monitored through the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608]. Likewise, all Sizewell C buses will be on fixed routes with regular drivers. A signage

Matter raised	SZC Co.'s Response
exacerbated and the situation untenable. These routes are vital links to essential services such as the hospital etc. Leiston Town Council would request that they be involved in planning road signage from the A12 through to the site entrances as these need to be clear and need to have local input to incorporate and complement existing routing.	strategy will be agreed with the local authorities as one of the measures within the CTMP.
Funding / Financial Contributions / Amenity mitigation 10. LEEIE. - Leiston Town Council intend to stop vehicular traffic along the east end of Valley Road locally known as Kemps Hill. This is to make the route safe and desirable for residents, cyclists and, in particular, workers staying at the caravan park to get to and from town. It will also tie into the DCO cycle routes. Financial help from SZC Co. will be sought for this (Transport review Orders, bollards and bank tidying). - Access to and from the LEEIE will be carefully monitored and, currently, Leiston Town Council is working with SZC Co. to ensure road layouts and public realm improvements in the town centre make transit through the town undesirable for this site and other Sizewell C traffic. Signage and transport plans need to be robust however to ensure the park and ride at this location (LEEIE) is accessed from the Lover's Lane end of King George Avenue (and not through town).	SZC Co. continues to work with Leiston Town Council and other stakeholders to agree a transport improvement scheme for Leiston, to be funded via the Section 106 Agreement.
Concerns regarding congestion and road safety at recycling site on Lover's Lane	The access to the Leiston Household Waste and Recycling Centre is to be upgraded by SZC Co. to provide a right turn facility for vehicles to wait when turning into the site.

Matter raised	SZC Co.'s Response
11. Household Waste and Recycling site, Lover's Lane: Leiston Town Council would wish to ensure that all parties find a satisfactory solution to ensure vehicles accessing this site off Lover's Lane queue off the carriageway. Currently, with the Covid appointment system, there is a permanent queue at the entrance which obstructs Lover's Lane quite considerably. This will not be acceptable when construction starts.	
Concerns regarding safety at Lover's Lane / Kenton Hills, and impacts on the beach. 12. Safety issues - Leiston Town Council are keen to explore potential safety issues with SZC Co. for cyclists (and pedestrians) using the proposed DCO routes. There will be a desire to cross Lover's Lane near the bend by Kenton Hills where no provision exists in the Application. This has to be addressed. - There is also a real safety issue with cyclists using the (very welcome) cycle track along the east of Lover's Lane going South where the cycle lane stops and cyclists have to cross Sizewell Gap Road by a fast blind bend to get access to the existing cycle way on the south side of gap road. This needs to be examined. - When beach works start it is Leiston Town Council's desire that a boardwalk or similar sturdy provision is provided for the more unsteady walkers over the shingle when the path is pushed out onto the shingle due to works.	The Rights of Way Access Strategy included within Volume 2, Appendix 15I of the ES (Doc Ref 6.3) [APP-270] sets out the framework within which detailed design for public rights of way would be developed and submitted to the highway authority for approval pursuant to the Draft DCO (Doc Ref. 3.1(B) [AS-143]), including the temporary and permanent changes to the rights of way alignments at the main development site. The Rights of Way Plans included within Book 2 (Doc Ref. 2.4(B) [AS-113] and [AS-114]) set out all accepted changes (April 2021) to rights of way alignments and where new rights of way are to be established for approval. The change Application includes a pedestrian link between Aldhurst Farm and Kenton Hills during construction to stop any informal crossing of Lovers lane and to provide beneficial links into the Kenton Hills permissive footpath network. This link will be upgraded to a Bridleway upon completion of construction. Sizewell C HGV movements will be managed through the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608]. HGV deliveries will be booked via the Delivery Management System in order to spread deliveries over the course of the day and manage the flow of HGVs on the highway network and at the site itself. HGV movements to the main development site will be required to route via the A12 and B1122 or Sizewell link road and compliance with the HGV routes will be monitored through the CTMP.

Matter raised	SZC Co.'s Response
	In addition, HGV drivers will be required to adhere to HGV driver rules. These mitigation measures will act to reduce the effect on the public rights of way crossings.
Water Resources, Drainage and Flood Risk	
Requests further detail on the sources of potable water 8. Potable Water: SZC Co. will be well aware of our concern regarding provision of potable water (from Stage 1 consultation onward). There still seems to be very little information on this though so a clear strategy (and confirmatory statements from Essex and Suffolk Water) will be sought at the examination.	Sizewell C's demand for potable water is estimated to be around 4Ml/day at peak during construction, and 2Ml/day during the operational phase when both units are in normal operation, and 2.8Ml/day when one unit is in normal operation and one unit is in outage. Essex and Suffolk Water (ESW) has confirmed that they would be able to meet this demand in full from its Barsham Water Treatment Works (WTW), subject to ongoing environmental and feasibility studies. The Sizewell C scheme would likely involve bringing forward ESW's planned upgrade of Barsham WTW, installation of 30km new or replacement water mains between Shadingfield and Sizewell, and construction of a new pumping station at Holton. The scheme would likely connect into Saxmundham Water Tower and would be designed to increase the capacity and resilience of the local distribution network as well as meeting Sizewell C's demand. Further information can be found in Volume 1, Chapter 2, Section 2.2 a) iii) 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3, Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021.
Concerns regarding increase in flood risk at Valley Road 10. LEEIE. Flooding: Leiston Town Council will be carefully watching the work being done by Suffolk County Council, East Suffolk Council and SZC Co. to alleviate concerns of residents that the intended activity at the LEEIE will increase the flood	Noted. An assessment of flood risk at LEEIE is presented within the Flood Risk Assessment (Doc Ref. 5.2(A)) [AS-018] and Flood Risk Assessment Addendum (Doc Ref. 5.2(A) Ad) [AS-157] .

Matter raised	SZC Co.'s Response
risk in Valley Road (which is hugely vulnerable to 1 in 100 year events as it is).	

Theberton and Eastbridge Parish Council (RR-1214)

Table A.4: Theberton and Eastbridge Parish Council

Matter raised	SZC Co.'s Response
General Project	
Introduction <i>Theberton</i> Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C (SZC) twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village. Within the village of Theberton there is St Peters Church, a Grade I listed thatched roof church with an unusual round tower, a Grade II listed public house, a village hall, two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside. The successful village hall offers many activities and classes to the community, surrounding areas and hosts Duke of Edinburgh Award Scheme events. Eastbridge Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or	Noted.

Matter raised	SZC Co.'s Response
speed limits. It borders an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is the location for RSPB Minsmere. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the dark skies, the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via the National Trust's Dunwich Coastguard Cottages. The villages have a mix of properties owned and rented into both the tourist and private rental sector. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasant, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors benefit from the close proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.	
Planning Process 1. Representation Summary The Parish Council (TEPC) is concerned that EDF's Sizewell C (SZC) Development Consent Order Application (DCO) is premature, lacks sufficient rigour and, in keeping with our previously stated requests for information during four stages of consultation, still fails to provide sufficient evidence, justifications and/or mitigations/compensation for the impacts of the development.	The 2017 Ministerial Statement indicated that the Government considers that neither NPS EN-1 nor NPS EN-6 "has effect" for the Sizewell C DCO Application and that if the decision on the Application were made today, it would be made pursuant to section 105 of the Planning Act. However, EN-1 and EN-6 incorporate information, assessments and statements, including concerning the need for nuclear power, which continue to be important and relevant to the Sizewell C Project. Section 3 of the Planning Statement (Doc Ref. 8.4) [APP-590] explains there has been no relevant change of

Matter raised	SZC Co.'s Response
In short, • Compliance with Planning Act 2008 (as amended) and EN-1 and EN-6 • Site suitability and size • Plans, mitigations, and compensation insufficiently developed for assessment • Transport and Freight strategy • Suitability and justification of worker accommodation strategy • Widespread environmental and landscape impacts • Narrow and unrealistic assessment of coastal and marine impacts • Lack of specific blight and impact mitigations for residents in proximity to SZC construction site and transport routes • Need for independent assessment and compensation mechanisms for resident impacts that take account of individual circumstances • Lack of cumulative impact assessments • Reports relied upon but not evidenced in the DCO submission	circumstances which would suggest that anything less than significant weight should be given to the policy in EN-1 and EN-6. Indeed, the need for new nuclear power is now even greater than when NPS EN-1 and NPS EN-6 were designated. Any change in circumstances would be a matter for the Government to consider in its review of the NPS. The Government confirmed in the NPS EN-6 that the Sizewell C site is a potentially suitable location for new nuclear power station. We recognise that the coastline adjacent to the proposed development is part of a changing coastline and our assessments have investigated the potential impact of the proposed power station. We have also had to assess the impacts of a potentially changing shoreline on the safety of the power station. We have a long history of coastal studies in this area as part of the ongoing shoreline management group of the adjacent power station (Sizewell B) and have a good understanding of the local system. Using our own studies and the opinions of independent experts, our assessments show that the construction and operation of the proposed power station will not have a significant impact on coastal process to the north or south of the site. SZC Co. has taken steps to identify all likely significant effects on the environment during the Sizewell C Project's construction and operational phases. An extensive and detailed evaluation of the environmental effects of the Sizewell C Project has been undertaken in accordance with the provisions of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Marine Works (Environmental Impact Assessment) Regulations 2007. The ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are summarised in the

Matter raised	SZC Co.'s Response
	Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and the Section 106 Agreement. A Community Fund is proposed under the Section 106 Agreement for any intangible effects on local communities. SZC Co. is continuing engagement with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation to develop Statements of Common Ground and to agree the mitigation required for the Sizewell C Project. The accepted changes (April 2021) introduce further environmental improvements. These included measures to further reduce the number of HGV movements during construction through the introduction of additional rail movements and the provision of a temporary beach landing facility. The location and alternatives considered for the accommodation campus are set out in the Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591] and the Accommodation Strategy (Doc Ref. 8.10) [APP-613]. Cumulative effects assessment is presented in Volume 10 of the ES (Doc Ref. 6.11) [APP-572 to APP-582]. Reports referenced within the ES have been submitted to the Examining Authority (refer to (Doc Ref. 6.12) [AS-020]).
General 7. Endorsements. We endorse the Relevant Representations of,	Noted.

Matter raised	SZC Co.'s Response
- Theberton and Eastbridge Action Group on Sizewell (Stop Sizewell C) - Minsmere Levels Stakeholders Group - B1122 Action Group - Royal Society for the Protection of Birds - Suffolk Wildlife Trust	
General EIA	
Concerns over environmental impacts from main development site 3. Main Development Site The construction site comes within 250m of the village of Eastbridge and will significantly impact the community. Areas of concern include, - The platform size at 32 hectares is too small for two nuclear reactors and is well below the EN-6 suggested size leading to unacceptable compromises within the AONB - Significant losses of mature woodland will ensue and will take many decades to re-instate reducing biodiversity - Risks to the coastal frontage and wider communities from incomplete design of sea defences, restricted zone of influence, compared to Secretary of State Scoping Opinions, and unexplained about-face assessment of coastal geomorphology influences - Inadequate inland hydrological assessments of the effect of Water Management Zones, the SSSI crossing, realignment of the Sizewell Drain, changes to the flow characteristics of ground and surface water through the Causeway/Culvert	Noted. 1) The Government confirmed in the NPS EN-6 that the Sizewell C site is a potentially suitable location for new nuclear power station. Annex C to NPS EN-6 confirms that the inclusion of Sizewell C in the NPS reflects the in-principle acceptability of its location, and together with Chapter 3.10 (Nuclear Impact: Landscape and Visual Impacts) of NPS EN-6, it recognises the potential acceptability of significant environmental impacts on the AONB in view of the national need for nuclear power generation and the scarcity of alternative sites. Further information is provided within the Planning Statement (Doc Ref. 8.4) [APP-590]. 2) In advance of the works, SZC Co. has already undertaken early planting, established a 67ha habitat creation area at Aldhurst Farm (which will also provide new recreational opportunities) and undertaken habitat improvement works for marsh harriers and reptiles within the wider EDF Energy Estate. Early planting on Pillbox Field has been undertaken which included the planting of over 2,400 new trees. Following construction, the Sizewell C Project will deliver an increase in biodiversity net gain through the extensive habitat improvement proposals (e.g. refer to the Updated Biodiversity Net Gain Reports (Doc Ref. 9.7- 9.9) and (Doc Ref. 6.3 14E (A)).

Matter raised	SZC Co.'s Response
crossing and the onward impacts into Minsmere valley and the Minsmere sluice • Lack of a coherent, evidenced and impact assessed plan for water supply during site development and operation. • Opaque carbon Life Cycle Assessment scoping out decommissioning and long term spent fuel management with unsupportable claims of CO₂ emissions savings • Operational waste heat vented to the environment not assessed against Paris climate agreement, 2050 net zero commitments or UK Committee for Climate Change reports • Significant increases in light, dust and noise pollution for the Parish but particularly for Eastbridge but not adequately recognized for their severity • Reports referenced but not provided for assessment and examination	3) We recognise that the coastline adjacent to the proposed development is part of a changing coastline and our assessments have investigated the potential impact of the proposed power station and associated coastal infrastructure. We have also had to assess the impacts of a potentially changing shoreline on the safety of the power station. We have a long history of undertaking coastal studies in this area as part of the ongoing shoreline management group of the adjacent power station (Sizewell B), and have a good understanding of the local system. Further studies (including monitoring and modelling), together with independent expert review have informed our assessments and demonstrate that the construction and operation of the proposed power station will not have a significant impact on coastal process to the north or south of the site. The parameters of the sea defence are set out within the Application, the detailed design will be subject to further approval. 4) Detailed hydrological modelling has been undertaken to understand the potential effects of the Sizewell C Project on groundwater and surface water receptors. The assessment is reported within Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) [APP-297]. The assessment demonstrates that significant effects on groundwater and surface water levels and quality would be avoided through measures embedded within the Project proposals, such as the construction of a cut off wall, which will prevent major changes in water levels off-site. A Water Monitoring and Response Strategy has been prepared (an updated version was issued in January 2021 and included within Volume 3, Appendix 2.14.A of the ES Addendum (Doc Ref. 6.14) [AS-236]). This strategy sets out the principles of the proposed monitoring and mitigation approach to protect the designated sites in vicinity.

Matter raised	SZC Co.'s Response
	5) SZC Co. has continued to develop its water supply strategy by engaging with stakeholders including the Environment Agency, Essex & Suffolk Water and Anglian Water to discuss and assess potential sources for water supply. An update on the water supply strategy for the Sizewell C Project was submitted to the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.2.D of the ES Addendum (Doc Ref. 6.14) [AS-202]). An updated assessment of the water supply strategy is provided within Chapters 2 and 10 of the ES Addendum (Doc Ref. 6.14) [AS-181] and [AS-189]. 6) Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342] includes the output of a greenhouse gas assessment that provides a high-level view of the carbon emissions attributed to the Sizewell C Project during its construction and operational phases. The scope of this assessment was established through the process of EIA Scoping with the Planning Inspectorate. 7) An assessment of the thermal plume associated with the Sizewell C outfall is provided within Volume 2, Chapter 22 of the ES (Doc Ref. 6.3) [AS-035]. The assessment demonstrates that no significant effects on the marine environment are likely. An assessment of effects on the UK carbon budgets is provided within Volume 2, Chapter 26 of the ES (Doc Ref. 6.3) [APP-342]. 8) SZC Co. has taken steps to identify all likely significant effects on the environment during the Sizewell C Project's construction and operational phases. The ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be

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	provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and the Section 106 Agreement. A Community Fund is proposed under the Section 106 Agreement for any intangible effects on local communities. 9) Reports referenced within the ES have been submitted to the Examining Authority (refer to (Doc Ref. 6.12) [AS-020]).
Associated Development – Sizewell link road	
Development and design of Sizewell link road proposals 2. Transport and Freight Strategy. Issues for TEPC over the early years and for the whole of development period include, • B1122 mitigations, crossing, speed limits, visibility improvements previously suggested now form no part of the proposal • Pretty Road and Moat Road will be closed to traffic, severing community access • Insufficient monitoring for listed buildings along and close to the B1122 • No proposals for noise mitigation for Theberton houses • Reductions expected in traffic levels from the combined road and rail integrated strategy have not been realized and levels now exceed those originally proposed for the road-led strategy	The proposed development would help to reduce the amount of traffic on the B1122 through Middleton Moor and Theberton during the peak construction phase of the Sizewell C Project. For details regarding the proposed Sizewell link road refer to Volume 6 of the ES (Doc Ref. 6.7) [APP-444 to APP-477]. SZC Co. has worked closely with landowners to minimise disruption to existing accesses and provide revised access arrangements, where necessary. Please also see Volume 6, Chapter 10 (Soils and agriculture) of the ES (Doc Ref. 6.7) [APP-470] for further details about impact on soils and agriculture and Volume 6, Chapter 8 (Amenity and recreation) of the ES (Doc Ref. 6.7) [APP-464] for details regarding amenity and recreation impacts. SZC Co. has worked with councils in Suffolk and other stakeholders to develop a package of measures as set out in the Community Impact Report (Doc Ref. 5.13) [APP-156] to ensure opportunities are maximised locally – for people and businesses. A transport strategy will be put in place to minimise disturbance as far as practicable and funding is earmarked for public realm, pedestrian and cycle improvement Projects in Leiston to increase its attractiveness and use by pedestrians and cyclists. The route and design of the Sizewell link road have sought to minimise impacts on the local area as much as possible, including the impact of

Matter raised	SZC Co.'s Response
	noise and vibration to residential properties during both construction and operation. During construction, a number of mitigation measures to control noise and vibration impacts would be adopted in accordance with standard good practice, as set out in the Code of Construction Practice (Doc ref. 8.11(A)) [AS-273]. A full assessment of the noise and vibration impacts can be found in Volume 6, Chapter 4 of the ES (Doc Ref. 6.7) [APP-451]. No significant effects from vibration is expected and so no damage to nearby dwellings is expected.
Ecology and Biodiversity	
Ecological impacts 5. Environment and Biodiversity. SZC site sits between multiple international, national and local designated sites including offshore designations. The construction site severs Suffolk Coast and Heaths AONB for 10-12 years. Our concerns are as follows, • The potential effects of the hydrological disturbance referred to earlier has not been properly assessed with regards to the marsh, ditch systems and the various fauna and flora assemblages that make this area one of the most biodiverse in the country • Impacts on protected bird, insect, reptile and mammal species cannot be properly assessed as a significant number of assessments are out of date • EDF admit that impacts on the protected Marsh Harrier cannot be fully mitigated or compensated for	The impact on the AONB has been minimised as far as possible by setting the construction area as sensitively as possible within the retained landscape, using natural screening of the landform and retained woodland and hedges supplemented by a high quality approach to boundary treatments. In the longer-term, the impacts would be minimised by the measures defined in the operational masterplan and the Outline Landscape and Ecology Management Plan (oLEMP) (Doc Ref. 8.2(A)) which will establish extensive areas of acid grassland, characteristic of the Suffolk Sandlings, across former arable areas of the EDF Energy estate. Impacts on Sizewell Marshes SSSI have been minimised as far as practicable. Permanent and temporary land-take from the designation has been kept to an absolute minimum and indirect effects would be minimised through a raft of measures embedded in the proposals. These include measures such as the proposed sheet pile wall that would run along the western and northern sides of the platform, the cut-

Matter raised	SZC Co.'s Response
- Some site designations, including the AONB and SSSI are potentially at risk because of this proposed development - There are unsubstantiated claims for embedded mitigations for pollution and runoff from site roads, spoil heaps and borrow pits	off wall and site drainage strategy that are all designed to minimise hydrological impacts both on the SSSI and Minsmere South Levels. The borrow pits are designed to retain a 2m unsaturated zone at their base that will act to protect groundwater and surface water quality. An assessment of hydrological impacts is presented within Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) [APP-297]. Mitigation measures for pollution and runoff from site roads, spoil heaps and borrow pits are set out in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. Unavoidable land-take will be compensated for through habitat creation. This includes the 67 ha Aldhurst Farm habitat creation scheme that has been under conservation management since 2016 and has supported breeding marsh harriers for the past two years. Further habitat creation schemes are proposed for fen meadow and wet woodland. In addition, an area of 48.7ha within the EDF Energy estate has been allocated for compensatory habitat for marsh harriers. The grassland habitats within this area have already been established and the hedgerow features were planted in 2020 as per the marsh harrier habitat plans included in Marsh Harrier habitat report appended to the ES (Volume 2, Appendix 14C5 of the ES (Doc Ref. 6.3) [APP-259]. In the January 2021 change Application, SZC Co committed to establishing a new wetland in this area, as initially proposed by stakeholders, which will be constructed in the first winter of construction and will further enhance the site for marsh harriers during construction. An extensive series of baseline ecology surveys were undertaken on the main development site in 2020 including updated bird, insect, reptile and mammal surveys and survey reports have all been submitted to the

Matter raised	SZC Co.'s Response
	Planning Inspectorate (in submissions in November, December 2020 and January 2021). The updated information was considered in the ES Addendum submitted in January 2021. No changes to the significance of effects predicted in the assessments provided in the ES were identified.
Socio-economics	
Impacts from construction workers 4. Accommodation Impacts from the 2,400-worker campus are expected both from traffic and simple impact of numbers compared to the parish and Leiston populations. Furthermore, - Noise and light pollution will impact the local communities surrounding the site - Alternative sites suggested by EDF and by external reports but justifications for selecting the single Eastbridge Lane site are poorly evidenced - Suggestions that a site which could leave a long-term legacy for affordable housing has been rejected without valid justification - No additional planning for accommodation has been made since the maximum workforce rose from 5,400 to 7,900 relying entirely on scant available rental accommodation in the area impacting a vibrant tourism sector and the social housing sector	The Accommodation Strategy (Doc Ref. 8.10) [APP-613] has been carefully designed through engagement with East Suffolk Council in order to promote a balanced approach between limiting effects on local housing markets and transport networks, ensuring an efficient delivery of the Sizewell C Project with worker accommodation close to the site that is attractive to the workforce, while still integrating some of the workforce in local communities to promote economic benefits e.g. of off-peak tourist accommodation use. An assessment of effects associated with noise and light pollution from the main development site as a whole is presented within Volume 2, Chapters 11 and 13 of the ES respectively (Doc Ref. 6.3) [APP-202] and APP-216]. SZC Co. has developed its proposals for a single, on-site accommodation campus for Sizewell C and considered alternatives, including alternative locations, throughout four stages of consultation. A range of factors have led to the finalization of a strategy for the on-site accommodation campus. Specifically, it would allow SZC Co. to: - reduce the number of journeys on local roads; - balance the economic benefits of workers integrating within housing markets and communities, without overwhelming local communities with new residents; - allow flexible working patterns and out of hours working that would be necessary to maintain construction productivity and progress.

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	The accommodation campus has also been located outside the boundary of the Suffolk Coast and Heaths AONB. Further details of the site selection process are set out in the Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591] and the Accommodation Strategy (Doc Ref. 8.10) [APP-613]. The site selection process for the accommodation campus was driven by balancing the potential adverse effects with the beneficial effects for delivering the Project safely and effectively. As such, selecting a site that has already been allocated for housing (including affordable housing) has not been a key component of the process – it would effectively intervene in the ability of the market and planning system to deliver planned homes, would require the identification of a site beyond planning periods, and would be likely to limit the search to sites that are inevitably embedded within or immediately adjacent to existing communities. SZC Co.'s Accommodation Strategy is based on an 'assessment case' whereby c.5,900 workers would be Non-Home Based (NHB) and seeking local accommodation. A full assessment on the housing market and tourist accommodation sector has been undertaken, resulting in a range of embedded and additional mitigation measures that seek to reduce pressure on the housing market by providing Project accommodation, an Accommodation Management System, and a Housing Fund to boost supply in private and tourist sectors and provide resilience to East Suffolk Council's statutory housing service. SZC Co. and East Suffolk Council agree on the principle of the mitigation package and are negotiating on details of the mix of measures that may be appropriate to avoid effects, which will in turn inform the scale of the Housing Fund.

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Impacts from construction workers and traffic 6. Socio-Economic Impacts Theberton and Eastbridge are small communities. The two villages are significantly dependent upon tourism. Residents also work at SZB, so we are aware of the value of the operating nuclear power station. However, a Project the size of SZC brings a new level of concern, • EDF's Projections show a significant number of visitors will be deterred from visiting the area whilst the construction is ongoing • Impacts to the two pubs in the district will not be easily mitigated and suggestions that advertising will help are not substantiated • Issues for residents in engaging local trades services are likely to be impacted due to displacement of existing trades to SZC jobs with no replacements available • As a result of worker displacement, local businesses may fail, or engagements will be made less available or delayed potentially causing damage or safety issues in the home and at business premises • Details of mitigation funds and eligibility to access such funds is inadequate • Pressure on local housing in the private rented sector due to EDF seeking increases in houses of multiple occupancy will cause existing renters in the vulnerable and social housing sectors to be disadvantaged and priced out of the market • Holiday rentals are expected by EDF to provide some of the required accommodation as there will be a reduction in	The Community Safety Management Plan (Doc Ref. 8.16) and Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] set out the range of measures that will contribute to reducing actual and perceived effects on community safety - including those set out in the Accommodation Strategy (Doc Ref. 8.10) [APP-613] and Economic Statement (Doc Ref. 8.9) [APP-610]. Further to this, SZC Co. has proposed funding for a package of measures under the Public Services Resilience Fund for East Suffolk Council and Suffolk County Council for social care, education, community safety and well-being resilience. Through engagement, SZC Co. recognises that the Councils are well-placed to control these funds for multi-agency responses that cross-cut social care, health and community safety activities, e.g. safeguarding of vulnerable children, sexual health and safety, and prevention of crime, which may be related to the specific workforce demographic. To clarify, all of SZC Co.'s proposed measures are set out to implement reasonable endeavours to prevent effects from arising wherever practicable The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, as set out in the Employment, Skills and Education Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611], there may be some effects on local businesses such as some vacancies being harder to fill. In order to tackle this:

Matter raised	SZC Co.'s Response
visitors to the area but lower rates available from SZC workers may make providers from the holiday rental sector unviable • The proposed Sizewell Link Road will divide farms and fields making some family farms no longer viable • Delays to emergency service responses will increase due to traffic on A12 and B1122	• A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Sizewell C Project and wider employment market. • Local firms will be supported through local Supply Chain Strategy to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project opportunities. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. • Upskilling will benefit the Sizewell C Project and the wider market – focus will be on 'legacy' roles (as determined by SCC's research base) that the region and the Project both need for the long term. SZC Co., Suffolk County Council and East Suffolk Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation have been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region - for example providing revenue funding to deliver on existing capital investment in skills centres in the region. SZC Co.'s Accommodation Strategy is based on an 'assessment case' whereby c.5,900 workers would be NHB and seeking local

Matter raised	SZC Co.'s Response
	accommodation. A full assessment on the housing market and tourist accommodation sector has been undertaken, resulting in a balanced strategy with a range of embedded and additional mitigation measures that seek to reduce pressure on the housing market by providing Project accommodation, an Accommodation Management System, and a Housing Fund to boost supply in private and tourist sectors and provide resilience to East Suffolk Council's statutory housing service. SZC Co. and regional stakeholders agree that a Tourism Fund is an appropriate way to ensure potential changes in visitor activity does not result in economic consequences. SZC Co. has shared with ESC and SCC a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] and the Accommodation Strategy (Doc Ref. 8.10) [APP-613] identify that there is unlikely to be a widespread, significant effect on the ability of the Tourist Accommodation Sector to respond to demand, based on affordability, availability, location, occupancy rates and seasonality of accommodation. However, SZC Co. consider that it is prudent to address the risk of any uncertainties and therefore has developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/ reconfiguration of existing tourist accommodation sites. SZC Co. and the Councils have been working to develop an appropriate approach to governance and implementation of a Community Fund, including options for ring-fencing provision for the areas where change

Matter raised	SZC Co.'s Response
	is most likely to occur as a result of the Project, independent management of the Fund by Suffolk Community Foundation, and a role for an Oversight Panel including the Councils. The approach will be based on the Hinkley Point C Community Fund which has been implemented successfully in Somerset through various strategic, small and open grants.
Transport	
Transport Assessment 2. [Part 2] Transport and Freight Strategy. Issues for TEPC over the early years and for the whole of development period include, • Cumulative impacts of the other seven or eight energy Projects is not assessed • Insufficient controls for cars and LGV travelling to and accessing the construction site • Eastbridge single roads, particularly from Westleton through Minsmere (RSPB private road), will become a rat-run for workers and should be controlled • Speed limits should be introduced in Eastbridge • EDF need to monitor and prevent fly-parking	The base year modelling includes all types of traffic currently on the highway network. Traffic from committed developments is then added to the traffic model, this includes the other major energy infrastructure Projects within the Zone of Influence of the Sizewell C Project. Sizewell C traffic, which is made up of heavy goods vehicles, light goods vehicles, buses and cars, is then added into the traffic model so that a comprehensive picture of the cumulative transport impact is presented. The more detailed modelling of the individual junctions presented in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] includes the effects of on-street parking, where appropriate. Traffic is to be managed through the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608], Construction Worker Travel Plan (CWTP) (Doc Ref. 8.8) [APP-609] and Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) [APP-607]. Within the CTMP, HGVs are classified as a goods vehicle with a gross vehicle weight of greater than 3.5 tonnes and less than 44 tonnes. Typically an HGV would be classified as being 7.5 tonnes - 44 tonnes and therefore the proposed classification and corresponding management measures will include smaller goods vehicles than would normally be the case. All HGV deliveries to the main development site

Matter raised	SZC Co.'s Response
	will be required to route via the proposed HGV routes, and compliance with the HGV routes will be via GPS technology. Management measures for LGVs are set out in the CTMP and will include LGV movements to and from the main development site being booked into the Delivery Management System (DMS). The CWTP sets out measures to manage worker travel during the construction phase. The key elements of the transport strategy for construction workers are the provision of an accommodation campus at the main development site to enable workers to walk to work as well as park and ride facilities, which will consolidate car-based journeys for the construction workers onto buses. Along with direct bus services from key locations, this bus-based approach will allow the majority of the workforce to travel to and from the construction site by bus. A fly parking team is to be employed by to monitor and manage any occurrences of fly parking. Construction workers will be required to swipe onto Sizewell C park and ride and direct buses and the data will be helpful to plan bus services, as well as monitor occurrences of fly parking (e.g. workers driving closer to the main development site and boarding a bus that they are not allocated to use). Occurrences of fly parking and action taken will be reported to the TRG as part of the quarterly monitoring reports. A transport contingency fund is proposed to be included in the S106 Agreement, which could be used by the Transport Review Group to mitigate potential unmitigated significant adverse transport effect, should they arise.

Marlesford Parish Council (RR-0758)

Table A.5: Marlesford Parish Council

Matter raised	SZC Co.'s Response
Freight Management Strategy	
Freight Management Strategy <i>A12, Freight Strategy and Traffic Numbers continued</i> 22. MPC will want an explanation of why a predominantly road led strategy has been preferred over marine or rail led.	The Sizewell C Transport Strategy is explained in the updated Freight Management Strategy (Doc Ref. 8.18) [AS-280] submitted in January 2021 alongside the accepted changes (April 2021) to the Application which included an enhancement of the rail strategy and the addition of a new temporary beach landing facility. The updated Strategy explains that the consequence of the changes would be that the majority of construction materials (60%) could be moved by sustainable means. It would not be appropriate, therefore, to suggest that Sizewell C has a road-led strategy. SZC Co. recognises, however, that there would remain a significant volume of HGV movements for materials that cannot practically be transported by other means. In recognition of that fact, however, substantial transport mitigation works are proposed in addition to the investment in rail and marine transport - particularly the two bypasses, two park and ride sites and the freight management facility at Seven Hills. This is considered to be a comprehensive transport strategy which optimises sustainable transport whilst mitigating the effects of residual road based transport.
General Project	
Insufficient detail 3. At Stage 4 consultation MPC withheld its support for SZC on the grounds that insufficient information had been provided on the proposals. MPC's position has now shifted to one of opposing the EDF proposals for Sizewell C in their current form. MPC feels that key areas such as freight strategy, various aspects of ecology and general impacts on the	Following receipt of the Relevant Representations, further engagement with stakeholders and further development of detail of the proposals following the submission of the Application, SZC Co has reviewed and challenged the freight management strategy further. SZC Co has also undertaken further technical environmental assessment work, such as ecological baseline surveys or development of landscape and ecological proposals. This additional

Matter raised	SZC Co.'s Response
communities and landscape of East Suffolk have been dealt with in insufficient detail and despite engagement in the consultation process we feel that the concerns of this, and neighbouring parishes have not been addressed by EDF.	work was submitted to the Examining Authority in January 2021, and included the accepted changes (April 2021) to the Application including additional marine infrastructure and rail use to further reduced HGVs on the roads, and also Additional Information on specific issues.
General 4. MPC and neighbouring parishes of Wickham Market, Hacheston, Campsea Ashe, Pettistree, Little Glemham and Parham have identified areas of common interest and many of the issues set out below are shared concerns with our neighbours. We have confined our comments to the four topic areas below which we believe will have greatest impact on our community. We will leave others who may be more directly affected or have greater specialist knowledge to comment on other issues, amongst which we would expect to see concerns about EDF's ability to deliver the whole Project, the impact of SZC on the Suffolk Coasts and Heath AONB, its impact on coastal processes in the Sizewell area, concerns about potable water supplies and impacts on tourism and the local economy.	Noted. Responses to specific comments raised have been provided within this response.
Concluding statement 24. This community will suffer heavily as a result of the direct impact of the SP&R, increased HGV, LGV and bus use of the A12 through Marlesford, and will be affected by the expected congestion in Wickham Market. This is a high price to pay over the anticipated 12 - 15 year build period and, EDF should be held responsible for the considerable costs involved in making life bearable for the residents of Marlesford and Little Glemham and providing legacy benefits in the event that the two villages are not bypassed.	SZC Co. recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected. Further information can be found in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195] . SZC Co. is also continuing to engage with Suffolk County Council with regards to mitigation requirements for transport effects in Little Glemham and Marlesford.

Matter raised	SZC Co.'s Response
25. We expect the establishment of a forum through which community concerns can be voiced during the construction and operation phases.	
General EIA	
Southern Park and Ride <i>Southern Park and Ride - Hacheston continued</i> 11. EDF claims that in general, noise from the construction, operation and removal phases will have negligible impacts on the identified receptors (see DCO Application Documents, Book 6 Environmental Statement, 6.5, Volume 4 Southern Park and Ride, Chapter 4 Noise and Vibration) - we will challenge this. We do not believe all receptors have been considered. 12. As part of EDF's noise and air quality mitigation we will press for EDF's contractors to use electric buses.	No significant noise or air quality effects are predicted at receptors close to the southern park and ride during construction, operation or the removal and reinstatement phase of the development. As set out in Volume 4, Chapters 4 and 5 of the ES (Doc Ref. 6.5) [APP-384] and [APP-387] , a number of mitigation measures are proposed to minimise the effects from the proposals, including the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273] which sets out noise and air quality control measures during construction of the development. The accepted changes (April 2021) propose an extension of the proposed landscape bunding on the site to provide further screening.
Monitoring <i>A12, Freight Strategy and Traffic Numbers continued</i> 20. MPC will argue for A12 baseline studies of noise, air quality and vibration before construction. Monitoring should continue during construction and for an agreed period after the construction phase ends. 23. The list of issues outlined above is not exhaustive and we will seek full and appropriate mitigation of these and other issues for the benefit of local residents.	Noted. The Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273] sets out a series of mitigation and management measures for the proposed development, including monitoring, where necessary. Discussions are ongoing with East Suffolk Council and Suffolk County Council on monitoring requirements, including traffic related monitoring.
Associated Development – Southern park and ride	

Matter raised	SZC Co.'s Response
Southern Park and Ride Design <i>Southern Park and Ride - Hacheston continued</i> 8. Important aspects of the site are shown on plans as “Not for Approval” including detail on buildings, signage, drainage and lighting (see DCO Application Documents, Book 2 Plans, 2.7 Southern Park and Ride Plans). MPC will want positive assurances that these areas will be properly conditioned and discharge monitored. 10. The construction start date for the SP&R is scheduled for Year 2 of the Project. We believe it should be started in Year 1 to ensure the earliest and maximum capture of A12 SZC traffic.	The details on the plans 'not for approval' are subject to change as the detailed design progresses but provide an accurate portrayal of how each individual associated development site will come forward. This provides flexibility if the designs change, even if only to a small degree. There are further controls in place in the Associated Development Design Principles (Doc Ref. 8.3) [APP-589] and 'for approval' parameter plans and works plans, all of which provide a set of clear parameters within which the associated development must come forward, as secured through the draft DCO. The construction of the southern park and ride will take approximately 12 to 18 months. Therefore, it is not possible for the southern park and ride to start operating sooner.
Associated Development – Two village bypass	
Traffic Two Village Bypass 5. MPC does not support the proposals for the Two Village Bypass (TVB). This is on the grounds that the proposals do not allow for a comprehensive long-term strategic bypassing solution for the A12 at Marlesford and Little Glemham which would provide the only conceivable long term solution to the growing traffic problems faced by these communities. 6. It is accepted by the highways' authority that the alignment of the TVB and particularly its southern junction with the A12, will preclude the eventual delivery of the Four Village bypass of Marlesford, Little Glemham, Stratford St Andrew and Farnham (Suffolk County Council's SEGway). Strategically we believe this is a gross error.	The option of a four village bypass has been considered extensively, both historically and through the DCO submission. Principally, a bypass of the four villages is not justified or proportionate to mitigate the impacts resulting from the construction of Sizewell C. Furthermore, in the decision letter from the Department for Transport (DfT) (9 May 2019) concerning Suffolk County Council's proposals for a four village bypass (Suffolk Energy Gateway proposals), the DfT rejected the four village bypass options and suggested, "<i>There may also be alternative options that you want to consider to improve value for money, such as a smaller two-village bypass</i>". More detail can be found in Volume 5, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.6) [APP-414] and the Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591].

Matter raised	SZC Co.'s Response
Health and wellbeing	
Quality of life Introduction 1. Marlesford Parish Council (MPC) MPC is very worried by the impacts on this village as a result of EDF's proposals for SZC. We believe that quality of life will be impaired over the likely 12 year build period and for many of the older residents, the impacts will be felt for the majority of their remaining lives – that is a sad prospect for those who have long enjoyed the relative tranquillity of this village.	SZC Co. considers the mental and physical health and wellbeing of local communities and the workforce to be paramount. A full assessment of the potential effects of the Sizewell C Project on residual healthcare service demand and the potential for effects of environmental change to the area on health indicators and perceptions of wellbeing is included in Volume 2, Chapter 28 of the ES (Doc Ref. 6.3) [APP-346]. A Community Fund is proposed under the Section 106 Agreement for any intangible effects on local communities.
Landscape and visual	
Landscape impacts of the Southern Park and Ride Southern Park and Ride - Hacheston 7. The elevated position (DCO Application Documents, Book 6, 6.5, Volume 4, Chapter 6, para 6.4.12) of the Southern Park and Ride (SP&R) makes the site an inappropriate one and is the reason that we have opposed its location. The site is located between the two Special Landscape Areas of the Rivers Deben and Ore (Policy AP13 Special Landscape Areas, Suffolk Coastal Local Plan, Saved Policies July 2013). That policy states that "<i>The District Council will ensure that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality</i>", we contend that the development of the SP&R in this location will detract from the quality of the landscape. In the	During construction, operation and the removal and reinstatement phase of each park and ride, the landscape character of the area will change. However, the landscaping strategy for each site has been designed to minimise potential impacts on amenity and recreational, and landscape and visual receptors through the provision of landscape bunds, buffer zones and planting. Landscape mitigation measures embedded within design are described within Volume 4, Chapter 6 (Landscape and Visual) of the ES (Doc Ref. 6.5) [APP-390]. These include creation of landscape bunds, retention of existing vegetation, where possible, and the provision of new planting to provide screening. Lighting columns within the car parking areas and along the access road would be restricted to 6m in height to minimise visibility during day and night-time. Lights with zero-degree tilt would be used to minimise light spill and along the perimeter would be fitted with demountable shield to reduce backward spill of light.

Matter raised	SZC Co.'s Response
event that the site is consented we will require screening commensurate with its sensitive landscape location. 9. There are significant visual impacts that do not appear to have been fully considered. As a minimum, we will be pressing for bunding to be reinstated to what was shown at Stage 4 (see DCO Application Documents, Book 5, 5.1 Consultation Report, Appendices F1-F2, Appendix 1 Stage 4 Consultation Summary Document Pg 19) and we would expect our concerns regarding old and new hedgerows and existing specimen trees to be addressed. 13. Marlesford is a “dark skies” area. We will argue that EDF must mitigate the illumination of the SP&R site to ensure that dark skies are protected.	The detailed design for landscaping will follow the Associated Development Design Principles (Doc Ref. 8.3) [APP-589]. As part of the accepted changes (April 2021), SZC Co. has extended the landscape bund adjacent to the north-western boundary of the site. Once the park and rides are no longer necessary for the construction of the main development site, the land at each site would be reinstated to its former use (be it agricultural use or highway land). Therefore, any potential urbanisation and visual impact would be temporary.
Socio-economics	
Tourism 2. Whilst we acknowledge some benefits to the East Suffolk community from Sizewell C (SZC), for example, employment opportunities, opportunities for local businesses and the inflow of substantial business rates, we feel that these benefits do not outweigh the huge burden that this area will have to bear on behalf of the rest of the country. The impact of SZC in the construction phase will be felt in East Suffolk on many fronts, including increases in traffic (particularly HGVs) using the A12, pressure on rented accommodation and adverse effects on tourism.	SZC Co.'s Accommodation Strategy (Doc Ref. 8.10) [APP-613] is based on an 'assessment case' whereby c. 5,900 workers would be Non-Home Based (NHB) and seeking local accommodation. A full assessment on the housing market and tourist accommodation sector has been undertaken, resulting in a balanced strategy with a range of embedded and additional mitigation measures that seek to reduce pressure on the housing market by providing Project accommodation, an Accommodation Management System, and a Housing Fund to boost supply in private and tourist sectors and provide resilience to East Suffolk Council's statutory housing service. SZC Co. and regional stakeholders agree that a Tourism Fund is an appropriate way to ensure potential changes in visitor activity does not result in economic consequences. SZC Co. has shared with East Suffolk Council and Suffolk County Council a proposed approach to the Tourism Fund including its release, scope, implementation

Matter raised	SZC Co.'s Response
	(including Tourism Programme Manager Role), and governanceocio-economic eviuew Group. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. SZC Co. and the Councils have been working to develop an appropriate approach to governance and implementation of a Community Fund, including options for ring-fencing provision for the areas where change is most likely to occur as a result of the Project, independent management of the Fund by Suffolk Community Foundation, and a role for an Oversight Panel including the Councils. The approach will be based on the Hinkley Point C Community Fund which has been implemented successfully in Somerset through various strategic, small and open grants.
Transport	
Wickham Market and Surrounding Area Traffic Issues 14. The inappropriate proposed location of the SP&R will put enormous pressure on already congested local roads. Wickham Market is a service centre for its neighbouring villages. MPC has been working closely with its neighbouring parishes to ensure that traffic issues in and around Wickham Market are addressed by EDF. Dialogue is ongoing with EDF, but we will expect to see commitments to improvements secured early in the Examination process and enshrined in the Decision. 15. We will need to see evidence that EDF is taking seriously the need to direct all traffic via A14/A12 in order to alleviate pressure on the B1078.	The traffic modelling included in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and updated in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] includes background traffic growth, which takes account of committed development, as well as the cumulative effects of other planned schemes. The modelling shows that the Sizewell C traffic would not have a significant adverse effect on the operation of the highway network in the vicinity of Wickham Market. The impact on the B1078 is identified in Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266]. SZC Co.is working with Wickham Market parish council and other stakeholders to agree a transport scheme for Wickham Market to be funded via the Section 106 Agreement. In addition, road safety

Matter raised	SZC Co.'s Response
16. We expect innovative solutions to be applied to tracking of LGVs and private cars using the SP&R to ensure that the A14/A12 objective (above) is met. 17. We consider the cycle and pedestrian access to the SP&R is lacking detail. As a legacy issue we will press for a cycle and pedestrian route from the Marlesford Road/A12 junction to the SP&R.	improvements are proposed to be implemented along the B1078, to be funded via the Section 106 Agreement. SZC Co. traffic is to be managed through the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] and Traffic Incident Management Plan (Doc Ref. 8.6) [APP-607]. Mitigation during construction is also set out within the Code of Construction Practice (Doc Ref. 8.10(A)) [AS-273]. Within the CTMP, HGVs are classified as a goods vehicle with a gross vehicle weight of greater than 3.5 tonnes and less than 44 tonnes. Typically an HGV would be classified as being 7.5 tonnes - 44 tonnes and therefore the proposed classification and corresponding management measures will include smaller goods vehicles than would normally be the case. All HGV deliveries to the main development site will be required to route via the proposed HGV routes, which avoid the B1078. The compliance of the HGV routing is proposed to be monitored through GPS tracking. A signage strategy is proposed to direct Sizewell C traffic along the A14 and A12. All freight movements to and from the main development site (i.e. LGVs, HGVs and abnormal loads) will be required to book in the Delivery Management System (DMS). A transport monitoring report will be submitted to the Transport Review Group on a quarterly basis.
A12, Freight Strategy and Traffic Numbers 18. MPC regards the A12 through Marlesford as wholly inadequate to carry the increased traffic arising from SZC and Scottish Power Renewables construction Projects. We will challenge assumptions made on cumulative impact. 19. The lived experience of Marlesford residents suggests that the junctions of Bell Lane/A12 and Marlesford Road/A12 are	Further information was provided in SZC Co's submission in January 2021 to the Planning Inspectorate on the accepted changes (April 2021) to the Application. A Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and Freight Management Strategy (Doc Ref. 8.18) [AS-280] were included in the submission.

Matter raised	SZC Co.'s Response
dangerous and MPC disagrees with EDF that, "As no capacity problems are foreseen no mitigation is proposed or deemed necessary at the existing junction" (see DCO Application Documents, Book 8, Other Documents, 8.5 Transport Assessment 9.29.1 - 9.29.17). 21. The unimproved A12 through Marlesford creates community severance. This will increase with the SZC and other Projects' traffic. A safe crossing will be required as a legacy benefit.	SZC Co. is liaising with Little Glemham and Marlesford parish councils and other stakeholders to agree appropriate transport mitigation measures, which would be funded via the Section 106 Agreement.

Wickham Market Parish Council (RR-1266)

Table A.6: Wickham Market Parish Council

10	SZC Co.'s Response
Associated Development – Southern Park and Ride	
General concerns 1. Introduction 1.1 Wickham Market is situated to the west of the A12 about fourteen miles south west of the main development site. Located at the junction of the B1078 from Needham Market to the west and B1438 from Woodbridge to the south, the village is a key service centre for many neighbouring villages most notably Pettistree, Hacheston, Marlesford and Campsea Ashe. 1.2 Full information on the Council's stance to the Sizewell C proposals and evidence regarding the WMPC area's demographics, heritage, character and location is available on	Noted.

10	SZC Co.'s Response
the WMPC web site: [Redacted] And the Neighbourhood Plan web site [Redacted] 1.3 WMPC believe that the parish, will suffer significant and negative impacts from the construction phase of the SZC Project. WMPC expect EDF to provide fully funded mitigation measures for the highway network but remain concerned that these will not resolve the issues created.	
Additional car park 2.1.2 Mitigation requested: a) Provision of car parks further south on the A12 to reduce the need for one large SP&R. The existing Martlesham Park and Ride site (A12/A1214) could be used for workers from that area taking some cars off the A12 northwards.	The temporary southern park and ride at Wickham Market is required to support the construction of Sizewell C through the capture of wider workforce traffic from the south and west of the A12. Potential traffic impacts in Wickham Market and on the B1078 are proposed to be mitigated through local measures which are being discussed with Suffolk County Council and the parish council and would be funded via an obligation in the S106 Agreement. SZC Co. has undertaken a robust site selection process to determine the location of the southern park and ride. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] and in Volume 4, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.5) [APP-383]. The Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] sets out the proposed direct bus strategy, which is to be managed via the Transport Review Group (TRG) in line with the workforce profile and distribution. Should there be workers living along the A12 corridor in Ipswich, Woodbridge and Martlesham area, a direct bus service could be provided to reduce the number of car movements on this part of the A12 corridor. The Martlesham park and ride facility could act as a pick up point for a direct bus, but would be subject to agreement with the TRG.
Climate Change	

10	SZC Co.'s Response
GHG 1.4 The claim by EDF of providing zero carbon energy by 2036 is unlikely to be achievable given the entire construction process and the damage to the Suffolk environment.	The UK Government has made it clear in its recent statements that it considers new nuclear to have an important role in the UK's pathway to achieving its net zero carbon emissions. The Energy White Paper stated that nuclear continues to be 'an important source of reliable clean energy' and nuclear power forms one part of the Prime Minister's Ten Point Plan to continued decarbonisation. The Energy White Paper announced a specific aim to bring at least one large-scale nuclear Project to the point of Final Investment Decision by the end of this Parliament (by 2024) as additional nuclear power (beyond Hinkley Point C) will 'be needed in a low-cost 2050 electricity system of very low emissions'. Under the Government's net zero scenarios, the UK electricity demand will increase between around 250TWh and 350TWh between 2030 and 2050. This is equivalent to another nine to twelve low-carbon power stations of Sizewell C's output which would be required to come online after Sizewell C. Demand for electricity will increase substantially throughout the period to 2050 as other sectors such as heating, transport and industry increasingly electrify in order to decarbonise. Moreover, new low carbon generation of all technologies is expected be required on a continual basis up to, and beyond, 2050 in order to meet increasing electricity demand and to replace existing low-carbon generation as it reaches the end of its technical life. In other words, rather than Sizewell C being too late to contribute to decarbonisation, it will come online in a timely fashion to help meet the rising demand for low carbon electricity in the 2030s and 2040s and there will still be a requirement for very large amount of additional low new low carbon generation after Sizewell C for the 2050 net zero target and beyond. Nuclear has a critical and complementary role

10	SZC Co.'s Response
	alongside other low carbon energy provision in a decarbonised power system.
Landscape and Visual	
Visual effects of Southern Park and Ride 2.2 Adverse Landscape and Visual Impacts 2.2.1 WMPC is concerned that: a) the location and size of the SP&R in an elevated prominent location will result in it being visible over a wide area, affecting the setting of the Special Landscape Areas of the River Deben and River Ore; b) insufficient assessment of landscape and visual impacts from a limited set of receptors has resulted in poor design with inadequate mitigation proposals; c) no viewpoints for visual assessment have been selected from Wickham Market despite the Zone of Visual Influence encapsulating extensive parts of the village; d) the proposed site and highway lighting will create adverse impacts on current dark skies viewed from the village and its countryside setting including Hacheston, Marlesford, Loudham and Campsea Ashe; e) the proximity of the development to the Whin Belt woodland and the loss of a section of ancient hedgerow and oak on the southern boundary will result in adverse landscape impacts which have been inadequately assessed.	An assessment of landscape and visual effects of the southern park and ride is presented within Volume 4, Chapter 6 (Landscape and Visual) of the ES (Doc Ref. 6.5) [APP-390]. During construction, operation and the removal and reinstatement phase of each park and ride, the landscape character of the area will change. However, the landscaping strategy for each site has been designed to minimise potential impacts on amenity and recreational, and landscape and visual receptors through the provision of landscape bunds, buffer zones and planting. Landscape mitigation measures embedded within the design of the southern park and ride are described within Volume 4, Chapter 6 (Landscape and Visual) of the ES (Doc Ref. 6.5) [APP-390]. These include creation of landscape bunds, retention of existing vegetation, where possible, and the provision of new planting to provide screening. Lighting columns within the car parking areas and along the access road would be restricted to 6m in height to minimise visibility during day and night-time. Lights with zero-degree tilt would be used to minimise light spill and along the perimeter would be fitted with demountable shield to reduce backward spill of light. The detailed design for landscaping will follow the Associated Development Design Principles (Doc Ref. 8.3) [APP-589]. As part of the accepted changes (April 2021) submitted to the Examining Authority in January 2021, SZC Co. has extended the landscape bund adjacent to the north-western boundary of the site.

10	SZC Co.'s Response
	The ZVI shows that the site is relatively open, and there are views across the site from adjoining roads and footpaths. However, views of the site from within the wider landscape are relatively contained by local variations in landform and woodland and the site is not readily visible from settlements within the study area, including Wickham Market. Once the park and rides are no longer necessary for the construction of the main development site, the land at each site would be reinstated to its former use (be it agricultural use or highway land). Therefore, any potential urbanisation and visual impact would be temporary. Whilst there has been some loss of existing vegetation, a general design approach has been taken, aiming to create an unimposing appearance, with the buildings screened as far as possible. The layout aims to maximise the benefit of existing screening provided by Whin Belt and the other blocks of woodland located to the north, west and east. Where visible the buildings would adopt natural colours to allow their appearance to harmonise with the surroundings.
Mitigation for visual and landscape impacts from Southern Park and Ride 2.2.2 Mitigation requested: a) A scheme of boundary landscape mitigation through hedges with trees be provided on the site boundaries in order to secure a long-term legacy of landscape improvements to remain following removal of the SP&R and the restoration of the land back to agricultural use. b) Temporary bunding provided close to all site boundaries to minimise views.	During construction, operation and the removal and reinstatement phase of each park and ride, the landscape character of the area will change. However, the landscaping strategy for each site has been designed to minimise potential impacts on amenity and recreational, and landscape and visual receptors through the provision of landscape bunds, buffer zones and planting. The detailed design for landscaping will follow the Associated Development Design Principles (Doc Ref. 8.3) [APP-589] and further information can be found regarding planting in the southern park and ride masterplan (Figure 4.2.2 of the ES Addendum (Doc Ref 6.14) [AS-196]). Further information around temporary landscape bunds was provided as part of SZC Co's submission in January 2021 on the accepted

10	SZC Co.'s Response
c) Landscape restoration and aftercare should be secured through planning conditions and legal agreement. d) The associated SP&R buildings, signage, drainage, and lighting have been indicated on a suite of 'indicative' plans titled "Not for Approval" apparently without an assessment of visual impacts arising. These plans need prior assessment to any DCO being granted with ancillary structures conditioned and strictly controlled. Wickham Market Parish Council 21st September 2020 Note: Documents setting out WMPC's specific concerns regarding the adverse impacts from the SP&R and a traffic 'Wickham Market Problem Statement' were issued to EDF at a meeting on 9th December 2019. A joint parish document 'Parish Traffic Mitigation Proposals Working Document' was presented to EDF at a meeting on 13th July 2020, specific comments relating to a WSP document regarding traffic mitigation were tabled on 24th August. WMPC are concerned at the lack of any positive mitigation being offered by EDF in response to these documents, and to discussions which have taken place at a series of five meetings (to date) and the PC responses submitted during the consultation period and pre-DCO submission. WMPC web site: [Redacted]	changes (April 2021) to the DCO. As part of this submission, SZC Co. has extended the landscape bund adjacent to the north-western boundary of the site. Further details regarding the landscape and visual assessment can be found in Volume 4, Chapter 6 of the ES (Doc Ref 6.5) [APP-390]. This included an assessment of the maximum parameters for buildings proposed on site. Requirement 24 of Schedule 2 of the Draft DCO (Doc Ref. 3.1(B)) [AS-143] requires that both the northern and southern park and ride facilities must be demolished 12 months after the construction of Sizewell C is complete. Part 2 of that requirement states that the land must be restored to a condition suitable for agricultural use. Engagement continues with Wickham Market Parish Council as we progress through examination.
Transport	
Traffic 2. Southern Park and Ride Site (SP&R) 2.1 Adverse Traffic Impacts	The traffic modelling included in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and updated in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] includes background traffic growth, which takes account of committed development, as well as the cumulative effects of other planned schemes. The modelling shows that the Sizewell C traffic would not have a significant effect on the

10	SZC Co.'s Response
2.1.1 Additional traffic volumes during construction of Sizewell C are expected to lead to significant negative impacts for local road users and residents as they will: a) involve 700+ daily HGV and 700+ bus and van movements on the A12, and significant extra LGV and private car movements on the B1078, the High Street - and other local roads; b) entail up to 1050 cars travelling through the village additionally each day over the construction period, - these figures could be higher due to the shift patterns for a seven day week / 20-hour working day at the main site; c) result in a significant increase in noise, vibration, air and light pollution affecting properties and residential amenity; d) further exacerbate the increase in traffic evident in recent years, and adverse cumulative traffic impacts expected from planned additional housing in Wickham Market, nearby towns and villages, and the construction of other major energy Projects within the area; e) compromise the safety of cyclists and pedestrians using promoted leisure routes and accessing the SP&R; f) result in any benefits to retail outlets in the village centre (from worker purchases) being outweighed by the detrimental impacts arising from increased traffic, parking, and fly parking on waiting restrictions; and g) affect the slip road from the B1078 Fiveways roundabout to the SP&R access making it inadequate to accommodate vehicles needing to access the site or join the A12 north, with	operation of the highway network in the vicinity of Wickham Market. SZC Co. is working with Wickham Market parish council and other stakeholders to agree a transport scheme for Wickham Market to be funded via the Section 106 Agreement. In addition, road safety improvements are proposed to be implemented along the B1078, to be funded via the Section 106 Agreement. SZC Co. traffic is to be managed through the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] and Traffic Incident Management Plan (Doc Ref. 8.6) [APP-607]. Mitigation during construction is also set out within the Code of Construction Practice (Doc Ref. 8.10(A)) [AS-273]. The impact on the B1078 is identified in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and mitigation proposed at the A140 junction and near Easton and Otley College. Impacts on other roads, for example the B1116 near to the southern park and ride site, are small and do not require mitigation measures. The Fiveways roundabout has been assessed within the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266], which demonstrates that the junction will not exceed operational capacity for all future year scenarios. An assessment of the likely environmental effects arising from construction, operation, removal and reinstatement phases of the proposed southern park and ride at Wickham Market has been undertaken and is reported within Volume 4, Chapters 4 to 12 of the ES (Doc Ref. 6.5) [APP-378 to APP-408]. A large proportion of the effects of the southern park and ride have been assessed to be minor, including effects on heritage assets, soils and land use, as well as effects on the transport network, ecology, groundwater, amenity and noise effects, given the temporary nature of the site's proposed use. There are anticipated moderate effects on the visual amenity of the

10	SZC Co.'s Response
tail backs likely to occur around shift change times and creating detrimental impacts on local traffic movements.	users of footpaths near to the site. This is the only effect that is considered to be significant, and is to be mitigated as far as practical.
Request for further mitigation <i>2.1.2 Mitigation requested: continued</i> b) Use of electronic tracking systems to track cars, LGVs and HGVs to ensure drivers use the preferred routes to the SP&R, i.e. A14 and A12 wherever possible. c) Use of smart cameras and number plate recognition to exclude Sizewell traffic from specific routes when travelling to/from the SP&R. d) EDF to design and fund (capital and revenue costs) a scheme of pedestrian, cycle and public realm improvements at Wickham Market (as stated in their DCO documentation) in accordance with the emerging draft Neighbourhood Plan (NP) Policy Wick10. This policy highlights existing issues of pedestrian safety in the centre of the village which EDF related traffic will exacerbate. e) EDF to design and fund (capital and revenue costs) a scheme of pedestrian, cycle and public realm improvements on the B1078, High Street, gateway entry points and other specific areas on the village road network. All agreed traffic mitigation measures should be carried out prior to the use of the SP&R and the construction of SZC. f) At the time of writing no firm proposals (detail, scope, or specific measures) have been tabled by EDF despite regular meetings since December 2019. No provision for either cycle or footway routes to the SP&R site are indicated on the DCO plans.	SZC Co. is working with Wickham Market Parish Council and other stakeholders to agree a transport scheme for Wickham Market to be funded via the Section 106 Agreement. In addition, road safety improvements are proposed to be implemented along the B1078, to be funded via the Section 106 Agreement. SZC Co. traffic is to be managed through the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608], Construction Worker Travel Plan (CWTP) (Doc Ref. 8.8) [APP-609] and Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) [APP-607]. Within the CTMP, HGVs are classified as a goods vehicle with a gross vehicle weight of greater than 3.5 tonnes and less than 44 tonnes. Typically a HGV would be classified as being 7.5 tonnes - 44 tonnes and therefore the proposed classification and corresponding management measures will include smaller goods vehicles than would normally be the case. All HGV deliveries to the main development site will be required to route via the proposed HGV routes, which avoid the B1078. The compliance of the HGV routing is proposed to be monitored through GPS tracking. A signage strategy is proposed to route Sizewell C traffic along the A14 and A12. All delivery vehicles to the main development site (i.e. LGVs, HGVs and abnormal loads) will be required to book in the Delivery Management System (DMS). A transport monitoring report will be submitted to the Transport Review Group on a quarterly basis.

Farnham with Stratford St Andrew Parish Council (RR-0379)

Table A.7: Farnham with Stratford St Andrew Parish Council

Matter raised	SZC Co.'s Response
Freight Management Strategy	
The parish council is not contesting the case for a new nuclear facility in principle but we do contest EDF's transport proposals and in particular the route alignment for a bypass of Farnham and Stratford St Andrew villages. We strongly feel that further consideration should be given to marine and railway led provision for construction in order to relieve the already busy roads in this part of East Suffolk. The East Suffolk coast has always been a very popular tourist and second home destination and our local economy very much relies on this income. Our roads have become even busier this summer owing to the coronavirus pandemic with people holidaying in this country rather than going abroad. Increases to local traffic caused by the construction of Sizewell C may put people off travelling as well as causing serious delays for local traffic.	SZC Co.'s has continued engagement and Project development to optimise the movement of materials by rail and sea. In January 2021, SZC Co. submitted accepted changes (April 2021) to the Application to allow an increase in rail movements to 4 trains per day and to provide an additional temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport. To reduce the effects of construction traffic on the local road network, the principal mitigation proposed is in the form of associated developments submitted with the Application. SZC Co. have undertaken a robust site selection process for each of the associated developments proposed, including the park and rides, two-village bypass, Sizewell link road, green rail route, East Suffolk line improvements and freight management facility. Need and proposals for highway improvements have been informed by transport modelling. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591]. The permanent associated developments (i.e. two village bypass, Sizewell link road, rail and highway improvements) will leave a lasting beneficial legacy to the local area by reducing traffic travelling through Farnham, Stratford St Andrew and on B1122, improving traffic flows on the A12 and local roads, and providing permanent improvements to rail and highway infrastructure.
Associated Development – Two Village Bypass	

Matter raised	SZC Co.'s Response
The parish council welcomes the proposal to build a bypass around the two villages which is long overdue and absolutely necessary. Our principle objection is to the proposed alignment of the new road which we have highlighted in our previous responses to EDF's public consultations but which have not been addressed. We are wholly dissatisfied with EDF's intransigence in continuing to single-mindedly pursue a bypass route to the west of Foxburrow Wood, to the exclusion of a more easterly alignment which has the support of our residents, this parish council, our County Councillor and others. Natural England have recently removed the Ancient Woodland designation from the narrow band of trees connecting Foxburrow Wood and Palant's Grove, through which we have consistently maintained the bypass can and should be routed. This completely undermines EDF's argument that they must pass to the west of Foxburrow Wood in order to avoid destroying Ancient Woodland, which was one of their principle inputs for route selection and objection to an eastern alignment. In their documentation EDF mentions Farnham Hall as if it is one property. In fact it is ten separate properties. This means that the current road proposal will affect around twenty properties and not eleven. Nineteen residential properties (and three business properties) will see the A12 move closer to them, fourteen of these residences will be adversely affected by the new road's proximity (including Grade II listed Farnham Manor and the five dwellings which fall within its curtilage), five of them will be significantly affected. Conversely, should the	SZC Co. welcomes the positive response for the two village bypass and will continue to work with Suffolk County Council, East Suffolk Council and the Environment Agency on the detailed design of the two village bypass. The proposed route of the two village bypass in the Application would be a viable alternative to using the existing A12 and would include mitigation to reduce the impacts on the residents of the Farnham Hall properties. It is therefore considered to be the most appropriate route. Whilst the alternative alignment suggested by the Parish Council is likely to have fewer impacts on the Farnham Hall properties, it would present a number of disadvantages which would outweigh the benefit to the Farnham Hall properties. In order to pass further to the east, the Parish Council's alternative alignment would be considerably longer, diverting traffic well into the countryside, rather than providing a realistic bypass of the Farnham bend. Whilst Sizewell C construction traffic would be instructed to use the bypass and avoid the two villages, the majority of other vehicles using the A12 may not be inclined to divert onto a bypass which offers no significant benefit in journey time or distance (it would be circa 2.9km in length, approximately 0.5km longer than the proposed two village bypass in the Application). Consequently, it would not be a viable alternative for traffic passing through the two villages and would therefore not provide the significant reduction in traffic flows that would be a legacy benefit for these local community centres. Additionally, Foxburrow Wood and Palant's Grove are both classified as ancient woodland and are County Wildlife Sites (CWSs). The woodland block which connects Foxburrow Wood and Palant's Grove has been downgraded and thus is not classified as ancient woodland. However, it is still part of the CWS and provides ecological benefits in

Matter raised	SZC Co.'s Response
bypass go to the east of Foxburrow Wood then only three properties will be adversely affected (two of which will nonetheless be better off than with EDF's proposal). Of these, only a single dwelling will be significantly affected (a bungalow in isolated countryside that is only occasionally occupied). In addition, an easterly alignment would enable the linking up of a future four village bypass which would greatly benefit Marlesford and Little Glemham. The latest proposal is for an increased speed limit of 60mph rather than 50mph which will cause more noise and pollution and which we object to. We also highlighted constructional and in-life benefits of an easterly route, as well as beneficial implications for vehicular access to properties and preservation of Public Rights of Way. None of these factors have been acknowledged by EDF	connecting the two ancient woodlands it connects. Its removal to run the two village bypass through between Foxburrow Wood and Palant's Grove would result in ecological severance and the irreversible harm to the interconnectivity of these important habitats. The Parish Council's alternative alignment would also be closer to Walk Barn Farm than the proposed DCO alignment is to any property, resulting in significant noise and vibration issues, as well as severance issues with Langham Road. It would also result in agricultural severance of Friday Street Farm at its eastern end, requiring additional land and severing the Farm Shop and Café from the 'pick your own' fields, which is likely to have a negative impact on the commercial success of this local business. Consequently, whilst the alternative alignment put forward by the Parish Council would reduce the potential impacts on the Farnham Hall properties, it would have greater impacts on the wider area involving a long diversion into the countryside and a greater agricultural land-take, the loss of ecological connectivity within a CWS, and severance impacts on Friday Street Farm to the detriment of a local business.. The Site Selection Report provided in Appendix A within the Planning Statement (Doc Ref. 8.4) [APP-591] explains the route selection for the two village bypass. Further information is also provided within Volume 5, Chapter 3 (Alternatives and design evolution) of the ES (Doc Ref. 6.6) [APP-414]. The proposed two village bypass in the Application would also not prejudice the future bypassing of Little Glemham and Marlesford. As detailed in previous studies undertaken (or commissioned) by Suffolk County Council, several options for shorter, staged interventions on this stretch of the A12 have previously been considered and could still come forward following the delivery of the two village bypass.

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	Alternatively, the two village bypass could be adapted in the future to spur off to the south with a bypass of Little Glemham and Marlesford.

Middleton Cum Fordley Parish Council (RR-0795)

Table A.8: Middleton Cum Fordley Parish Council

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Freight Management Strategy	
HGV movements <i>"At least 40% of the construction material will be delivered by sea or rail". This is a strange claim, given that at each stage of public consultation, the number of HGV movements has increased to now almost double the original estimates despite the supposed use of sea and rail. It is strongly believed that much more material could be brought to site by both these means, the dismissing factor in EDF's case undoubtedly being cost.</i>	SZC Co. shares these aspirations and the changes proposed to the Application in January 2021 move the Application on so that the use of sustainable modes (rail and sea) has been optimised. The updated Freight Management Strategy (Doc Ref. 8.18) [AS-280] now estimates that 60% of material can be moved by rail or sea.
Investment in transport infrastructure The A12, not even a trunk road north of Ipswich, offers neither the capacity nor the inherent strength to support the envisaged hyper levels of usage. Yet nowhere can it be seen that any provision is being made by the companies involved or government to invest in the significant improvements (new roads, doubling the East Suffolk Line rail track etc., which should be carried out before the Projects commence) that would be necessary to allow such major concurrent works to	The Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] consider in detail the effects of Sizewell C traffic on top of existing traffic on the A12 and other parts of the highway network. The assessment does not identify the need for significant enhancements but SZC Co. is continuing to discuss these matters closely with Suffolk County Council and Highways England. The Sizewell C Project includes major investment in park and ride facilities, the freight management facility, the two village bypass and the Sizewell link road as well as substantial enhancements to the local rail network to serve

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take place, let alone the life of local people to carry on with any semblance of normality.	the construction site and beach landing facilities. This scale of investment adds up to a very comprehensive response to the concerns raised by stakeholders.
General Project	
Principle of the Project The negative impacts of the proposed Sizewell C development are so severe that adequate redress is not possible. Several measures could be taken to make the scheme less unacceptable, though EDF seem reluctant to do so. Throughout every stage of the Public Consultation process, EDF have signally failed to adequately address, or provide sufficient detail of, the majority of major issues arising from their proposals. This has been highlighted by their September release of a pamphlet entitled “Sizewell C – What it means for you”. Its ‘Key Facts’, listed on page 3, serve to illustrate the yawning gap between their aspirations and reality: • “Sizewell C will be located right next to a stable and secure section of the Suffolk coast”. EDF do not have any facts to substantiate this claim. The East Suffolk coast is eroding - notoriously prone to damaging storms and surges. • “The design of the station is a replica of one EDF are building at Hinkley Point [and one in France and another in Finland]....and will take 9-12 years to build”. In fact, all are behind schedule and over budget – the foreign ones horrendously so. EDF’s specific claim that Hinkley C “is on schedule” is simply risible.	SZC Co. has taken steps to identify all likely significant effects on the environment during the Sizewell C Project’s construction and operational phases. An extensive and detailed evaluation of the environmental effects of the Sizewell C Project has been undertaken in accordance with the provisions of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Marine Works (Environmental Impact Assessment) Regulations 2007. The Environmental Statement (ES) (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and the Section 106 Agreement. A Community Fund is proposed under the Section 106 Agreement for any intangible effects on local communities. SZC Co. is continuing engagement with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation to agree results of the EIA and develop Statements of Common Ground to agree the mitigation required for the Sizewell C Project.

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<i>“They [UK EPRs] are proven to work”. The only ‘working example’ of the basic PR design is in China. Its safety regime and compliance to ONR scrutiny are not known, nor whether it is/was plagued by the complex building delays, structural and valve problems being experienced in France and Finland.</i>	We recognise that the coastline adjacent to the proposed development is part of a changing coastline and our assessments have investigated the potential impact of the proposed power station. We have also had to assess the impacts of a potentially changing shoreline on the safety of the power station. We have a long history of coastal studies in this area as part of the ongoing shoreline management group of the adjacent power station (Sizewell B) and have a good understanding of the local system. Using our own studies and the opinions of independent experts, our assessments show that the construction and operation of the proposed power station will not have a significant impact on coastal process to the north or south of the site. The EPR™ design is now successfully operating at Taishan 1 and 2 in China. The French (Flamanville) and Finnish (Olkiluoto) Projects experienced delays as a result of an incomplete design. Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. We have a very good understanding of Project risks and how to mitigate them. SZC Co. has been able to learn from the experiences of EPR™ construction and this has informed the proposals assessed within the ES.
Need for the Scheme / Cumulatives With the profusion of windfarm Projects and trans-continental power cable feeds destined for the area immediately surrounding the Sizewell site, there is the very real possibility that the Nation’s energy requirements can be met much sooner and far cheaper than the inordinately costly and slow-to-build nuclear plant proposed. However, having said that, all these alternative power Projects represent a threat not only to	The need for a new power station at Sizewell C is firmly established within the Government’s policy on national significant energy infrastructure. The National Policy Statement for Nuclear Power Generation (EN-6) (NPS EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and Wales by 2025. This is further supported by the Government’s Energy White Paper: Powering our Net Zero Future (2020) that identifies an ‘<i>aim to bring at least one further large-scale nuclear Project to the point of FID by the end of this</i>

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each other, but to Sizewell C, in terms of conflicting traffic flows – they will all need to use the same inadequate road systems.	<i>Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals</i>'. The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – was set out in the Planning Statement (Doc Ref. 8.4) [APP-590] that accompanied the Application and remains valid. Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578] presents the assessment of cumulative effects with other plans and Projects. The short-list for the cumulative assessment includes but is not limited to the following schemes: • East Anglia One North, • East Anglia Two, • East Anglia Three wind farms, • Thanet Extension wind farm, • Hornsea wind farms (Two and Three); • Dogger Bank Zone windfarms, • Greater Gabbard and Galloper wind farm extensions, • Nautilus Interconnector, and • Eurolink Interconnector.
General We endorse the Relevant Representation submitted by “Stop Sizewell C”, Theberton and Eastbridge Parish Council and the B1122 Action Group. We wish to state categorically that the consideration of the Sizewell C Application by a digital examination process is totally unacceptable	The Application for development consent is subject to the same process and timescale as other DCO Applications. SZC Co. has understood concerns regarding the timing of the Application in recognition of the ongoing Covid-19 and in this context: • Whilst the Sizewell C Application was ready for submission in February 2020, we took the decision to defer its submission until May 2020 in recognition that the pandemic would impact upon the resources available to all stakeholders.

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	• Nevertheless, we shared the Application material in draft in October 2019 with the Defra family and in its full form on its submission in May, prior to its acceptance. • The period provided for relevant representations then ran until 30 September – again in recognition of the scale of the Application but also the continuing implications of the pandemic. • There was an extended timeframe before the preliminary meetings were held, to ensure stakeholders have sufficient time to prepare for the examination. The Application proposals have therefore already had an unusually long period between submission and examination, substantially so that parties may have sufficient time to study the Application material. However, the UK has an urgent need for new energy infrastructure and the region also has a clear need for the economic benefits that the proposals would bring. It is therefore essential that the planning process continues and is not delayed or put on hold. The Consultation Report (Doc Ref. 5.1) [APP-068 to APP-092] and Consultation Report Addendum (Doc Ref. 5.1Ad) [AS-153 to AS-156] contain details of the consultation materials, consultation activities and how SZC Co. had regard to feedback received.
Climate Change	

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Carbon emissions and ecosystem damage “The carbon emissions during construction will be offset within 6-8 months.” This is totally misleading. In fact, EDF have previously conceded the true figure could be 6 years, meaning it will be well into the 2030s before electricity from Sizewell C can truthfully be considered ‘Low Carbon’. The various pledges that EDF have outlined on page 4 concerning noise, light and dust are inadequately explained and couched by terms such as ‘reduce where possible’, ‘as little as possible’, and ‘minimise’ – hardly likely to provide any comfort to the thousands of local people who will be affected, and for which no amount of mitigation or compensation will suffice. The damage to the fragile Sizewell/ Minsmere ecosystem will be considerable. Reinstating some of the land and providing alternative sites for wildlife will not do. The cumulative effects of pollution, massive works and intense human activity will cause irreparable damage.	Sizewell is identified in the NPS for Nuclear Power Generation (NPS EN-6) as one of eight potentially suitable sites for deployment of new nuclear power stations by 2025. Annex C to NPS EN-6 confirms that the inclusion of Sizewell C in the NPS reflects the in-principle acceptability of its location, and recognises the potential acceptability of significant environmental effects in view of the national need for nuclear power generation and the scarcity of alternative sites. The UK Government has made it clear in its recent statements that it considers new nuclear to have an important role in the UK’s pathway to achieving its net zero carbon emissions. The Energy White Paper stated that nuclear continues to be ‘an important source of reliable clean energy’ and nuclear power forms one part of the Prime Minister’s Ten Point Plan to continued decarbonisation. The Energy White Paper announced a specific aim to bring at least one large-scale nuclear Project to the point of Final Investment Decision by the end of this Parliament (by 2024) as additional nuclear power (beyond Hinkley Point C) will ‘be needed in a low-cost 2050 electricity system of very low emissions’. Under the Government’s net zero scenarios, the UK electricity demand will increase between around 250TWh and 350TWh between 2030 and 2050. This is equivalent to another nine to twelve low-carbon power stations of Sizewell C’s output which would be required to come online after Sizewell C. Demand for electricity will increase substantially throughout the period to 2050 as other sectors such as heating, transport and industry increasingly electrify in order to decarbonise. Moreover, new low carbon generation of all technologies is expected be required on a continual basis up to, and beyond, 2050

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	in order to meet increasing electricity demand and to replace existing low-carbon generation as it reaches the end of its technical life. In other words, rather than Sizewell C being too late to contribute to decarbonisation, it will come online in a timely fashion to help meet the rising demand for low carbon electricity in the 2030s and 2040s and there will still be a requirement for very large amount of additional low new low carbon generation after Sizewell C for the 2050 net zero target and beyond. Nuclear has a critical and complementary role alongside other low carbon energy provision in a decarbonised power system. Further information on the environmental effects and need for the Project can be found within the ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] and the Planning Statement (Doc Ref. 8.4) [APP-590]. The mitigation measures identified within the ES and ES Addendum are summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and the Section 106 Agreement.
Ecology and Biodiversity	
Construction impacts on wildlife <i>“A net increase in land for wildlife will be created”.</i> No mention is made as to how flora and fauna will be re-directed to these new sites, after they have been scared off by the noise, dust and light pollution or totally destroyed by the construction site.	SZC Co. is committed to ensuring that measures to avoid, mitigate and/or compensate for impacts to internationally designated sites (SACs, SPAs, Ramsar sites), nationally designated sites (SSSIs) are agreed and secured through the relevant mechanisms in the Development Consent Order and the Section 106 Agreement. Impacts on ecological receptors are fully assessed within the Shadow Habitats Regulations Assessment (sHRA) Report (Doc Ref. 5.10) [APP-145 to APP-152] and sHRA Addendum (Doc Ref. 5.10Ad) [AS-

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	173 to AS-178] (Europeans sites), and the ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582] and ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260]. Updated Biodiversity Net Gain Assessment Reports (Doc Ref. 9.7-9.9) and (Doc Ref. 6.3 14E (A)) have been submitted to the Examining Authority. The biodiversity net gain of the main development site is delivered across the wider EDF Energy estate, including the Aldhurst farm habitat creation scheme, Studio Field complex, the marsh harrier habitat improvement area in the short term and in the longer term the creation of habitats across the temporary construction area. This represents a large switch from former arable to grassland, heathland, compared to the baseline, and a net increase in scrub and woodland planting, which generates the predicted net gain. Many species of flora and fauna are relatively mobile over short distances with plants able to colonise new habitats by dispersed seed once new habitats are created. In most cases, creation of the basic habitat is a managed intervention and the diversity then increases over time as new species colonise - this has been the experience at Aldhurst Farm and the Studio Field complex, both former intensive arable areas which now support a wide range of wildlife. The construction site will also include a number of boundary treatments to ensure that light spill and noise spill to adjacent areas are minimised. SZC Co. is also committed to establishing an Environmental Trust, which will partner with other organisations, and is likely to include long-term management of the estate but also deliver on other initiatives to enhance habitats in the vicinity, so that we do contribute to 'creating a true legacy landscape' within - and beyond - the site boundary given

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	and to 'make a major contribution to 'bigger, better and more joined up' habitats in the area.'
Marine / Coastal	
Site Location As presently and very sketchily portrayed, EDF's plans for protecting the site from ingress by the sea are woefully inadequate. Years of experienced observation of the coast of East Anglia amply illustrate that the 'double whammy' of: (a) building another nuclear plant, and (b) storing its waste for centuries to come, on a stretch of coastline subject to erosion, the extent of which cannot be foreseen or defended, is of itself indefensible.	The safety and security of nuclear installations in the UK is assured by a system of strict regulatory control based on a licensing process by which SZC Co. is required to seek a license from the Office the Nuclear Regulation (ONR). In June 2020 Sizewell C applied for a Nuclear Site License and its Application is currently being assessed by the ONR. Construction of Sizewell C cannot commence should a license not be granted. Under the Nuclear Site License Sizewell C will need to demonstrate via its Safety Case that the Design, Construction, Commissioning, Operation and Decommissioning of Sizewell C can be undertaken in a safe and secure manor, and any risks to the workers, public and environment is suitably and sufficiently controlled. This includes due consideration of any potential external hazards, including natural disasters, such as extreme weather events and flooding. Sizewell C will be protected from coastal erosion and flooding by its sea defences. The basis of design is to limit overtopping rates up to 2140 to acceptable levels for a 1 in 10,000 year storm event with allowance for reasonably foreseeable climate change. The design allows for future raising of sea defences, in the event that sea level rise with climate change is greater than expected. The potential for extreme conditions to result in flooding of the main platform from breach of defences elsewhere along the coastline, with inundation from the rear of the main platform, is understood. The proposed elevation of the main platform at 7.3m Above Ordnance Datum (AOD) has been set in the context of the Safety Case

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	assessment and in support of the Nuclear Site Licence, in close consultation with the ONR. A soft coastal defence feature will be provided and recharged when required to supply sediment into the system and avoid the exposure of the hard coastal defence feature. Coastal Processes Monitoring and Mitigation Plan (CPMMP) issued to the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.15.A (Doc Ref. 6.14) [AS-237]) will ensure that the soft and hard defences have no significant effect on coastal processes.
Socio-economics	
Employment and workforce “25,000 job opportunities will be created”. It would be more factually correct to say 25,000 activities, where many of these are performed by a single individual and could be very short-term. “At least a third of the workforce will be local”. It is expected that the vast majority of these local jobs will be filled by people ‘poached’ from existing positions in tourism, social care and building trades, rather than providing ‘new’ openings, since current unemployment is low. And with EDF construction workers expected to take up much of the potential accommodation in the area, ‘replacement’ staff for those lost to EDF will be difficult to recruit without the potential of somewhere to live.	It should be noted that neither Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] nor the Economic Statement (Doc Ref. 8.9) [APP-610] state that “25,000 job opportunities will be created”. Sizewell C’s construction phase will support around 2,600 jobs for local residents at the peak of activity in a range of different skills, roles and in both construction and non-construction sectors that would not otherwise arise (without the Sizewell C Project). Replication of some parts of the supply chain developed for the first of a kind new fleet of UK nuclear new builds (at Hinkley Point C) is important to enable efficiencies – but there will be substantial opportunities for Suffolk-based firms to benefit from contracts over the lifetime of the Sizewell C Project, as has been identified in the Economic Statement (Doc Ref. 8.9) [APP-610] and within the Supply Chain Strategy, provided in Appendix B of the Economic Statement (Doc Ref. 8.9) [APP-611]. Work has been underway to provide information and support to local companies with an interest in bidding for contracts on the Sizewell C

Matter raised	SZC Co.'s Response
	Project through the Supply Chain Portal (run by the Suffolk Chamber of Commerce, funded by SZC Co.). SZC Co. has committed to measures to support the local and regional supply chain to compete for and win work on the Sizewell C Project. These are set out in the Supply Chain Strategy appended to the Economic Statement (Doc Ref.8.9) [APP-611]. Some measures are already being enacted including the on-going operation of the Supply Chain Portal and other supply chain engagement activities by the Suffolk Chamber of Commerce on SZC Co.'s behalf. SZC Co. is working with the Councils, NALEP and Chamber of Commerce to finalise governance and monitoring arrangements for the local supply chain engagement activity during the construction phase. As set out in the Supply Chain Strategy, this will include 'on the ground' activities for potential local suppliers including 'meet the buyer' events and information sharing. SZC Co, NALEP and the Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, as set out in the Employment, Skills and Education Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611], there may be some effects on local businesses such as some vacancies being harder to fill. In order to tackle this:

Matter raised	SZC Co.'s Response
	• A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Sizewell C Project and wider employment market. • Local firms will be supported through local Supply Chain Strategy to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project opportunities. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. • Upskilling will benefit the Sizewell C Project and the wider market – focus will be on 'legacy' roles (as determined by Suffolk County Council's research base) that the region and the Project both need for the long term. SZC Co., Suffolk County Council and East Suffolk Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation have been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region - for example providing revenue funding to deliver on existing capital investment in skills centres in the region. • SZC Co. proposes to use part of the Skills or Public Service mitigation funds to provide a contribution to workforce planning at

Matter raised	SZC Co.'s Response
	the outset of the Sizewell C Project to help to improve Suffolk County Council's capacity to retain staff in the social care sector, plan for recruitment and training and provide resilience. Funding would be for the purposes of measures that provide resilience to workforce planning for the social care sector in Suffolk. SZC Co.'s Accommodation Strategy (Doc Ref. 8.10) [APP-613] is based on an 'assessment case' whereby c.5,900 workers would be Non-Home Based (NHB) and seeking local accommodation. A full assessment on the housing market and tourist accommodation sector has been undertaken, resulting in a balanced strategy with a range of embedded and additional mitigation measures that seek to reduce pressure on the housing market by providing Project accommodation, an Accommodation Management System, and a Housing Fund to boost supply in private and tourist sectors and provide resilience to East Suffolk Council's statutory housing service. SZC Co. and East Suffolk Council agree on the principle of the mitigation package and are negotiating on details of the mix of measures that may be appropriate to avoid effects, which will in turn inform the scale of the Housing Fund.
Tourism and Community fund The provision of a Community Fund by EDF (without sufficient explanation of how it would be applied or how much it would be) is most unlikely to address the issues that will be raised. EDF's pledge to support the growth of the local economy is effectively wiped out by the loss of tourism – vital to the region – even EDF admit this could cause a reduction of approaching one third. Their proposed Tourism Fund (as yet unquantified) is unlikely to be sufficient in terms of quantity, or flexibility in its Application, to compensate for the destruction of years of	SZC Co. and regional stakeholders agree that a Tourism Fund is an appropriate way to ensure potential changes in visitor activity does not result in economic consequences. SZC Co. has shared with East Suffolk Council and Suffolk County Council a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. The Community Safety Management Plan (Doc Ref. 8.16) [APP-635] and Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] set out the range of embedded measures and

Matter raised	SZC Co.'s Response
Careful investment in, and development of, East Suffolk's tourist economy. It is earnestly hoped that EDF's pledge to 'require all workers to sign a code of conduct and enforce it' will be rigorously enacted. This was far from the case during the construction of both Sizewell A and B, despite assurances being given at that time. Comparisons with Bridgwater, the nearest town to Hinkley C, are meaningless as it has eight times the population of Leiston, which will simply be overwhelmed by the SZC workforce. There are several extremely important issues not addressed either within the brochure or during any of the stages of prior consultation.	complementary measures that will contribute to reducing actual and perceived effects on community safety, across embedded Project measures and as principles for all additional measures including those set out in the Accommodation Strategy (Doc Ref. 8.10) [APP-613] and Economic Statement (Doc Ref. 8.9) [APP-610]. Further to this, SZC Co. have proposed funding for a package of measures under the Public Services Resilience Fund for East Suffolk Council and Suffolk County Council to develop social care, support for education, community safety and well-being resilience. Through engagement, SZC Co. recognises that the Councils are well-placed to control these funds for multi-agency responses that cross-cut social care, health and community safety activities, e.g. safeguarding of vulnerable children, sexual health and safety, and crime which may be related to the specific workforce demographic. Community safety measures to be funded by SZC Co. for East Suffolk Council will include supporting measures and organisations - including multi-agency approaches - that are already successful in Leiston, and allow the Council flexibility in using the fund, which may be in collaboration with Parish and Town Councils.
Employment, tourism and amenity It is difficult, if not downright impossible, to identify what benefit the local area and population will gain from the construction or operation of Sizewell C. The two previous nuclear plants have left Leiston as one of the poorest towns in East Anglia – there is no certainty that SZC will produce anything other than a short and unsustainable boost to the local economy, largely if not wholly offset by losses in tourism income. There will not be a net gain in employment for local people.	SZC Co. recognise that there is existing deprivation in Leiston and other areas, and has considered this throughout baseline studies for the socio-economic assessment, and in terms of the direction of mitigation which aims to target those most at risk of experiencing adverse effects as a result of the effects of the Project. For example, a Housing Fund targeting measures to protect the lower end of the private rented sector, and community safety measures directed at areas likely to accommodate the greatest change to population and infrastructure are proposed.

Matter raised	SZC Co.'s Response
- There will be a tangible loss of amenities and the quality of life, regardless of EDF's efforts to 'minimise'. - There will be a serious threat to tourism, through traffic delays, loss of availability of accommodation and degradation of attractions such as Minsmere and the Suffolk Coast and Heaths.	SZC Co. is working with regional partners to develop employment, skills and training measures, as set out in the Economic Statement (Doc Ref. 8.9) [APP-610]. This will focus on delivering revenue to support existing capital Projects in the region, and provide outreach and support to areas and communities where the most benefit from social mobility can be gained. Bringing people into work from worklessness is an important part of the drive for sustainable employment and upskilling – SZC Co., East Suffolk Council and Suffolk County Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation have been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region, for example providing revenue funding to deliver on existing capital investment in skills centres in the region. SZC Co. and regional stakeholders agree that a Tourism Fund is an appropriate way to ensure potential changes in visitor activity does not result in economic consequences. SZC Co. has shared with East Suffolk Council and Suffolk County Council a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. SZC Co. and the Councils have been working to develop an appropriate approach to governance and implementation of a Community Fund, including options for ring-fencing provision for the

Matter raised	SZC Co.'s Response
	areas where change is most likely to occur as a result of the Project, independent management of the Fund by Suffolk Community Foundation, and a role for an Oversight Panel including the Councils. The approach will be based on the Hinkley Point C Community Fund which has been implemented successfully in Somerset through various strategic, small and open grants.
Transport	
Operation of the Freight Management Facility Traffic, from the Seven Hills junction with the A14, all the way to the site, regardless of Projected by-passes and a new link road (both of which are seen as hopelessly inadequate, badly sited but nonetheless needed to be in place before work commences), will increase to such a level that the daily lives and livelihood of people along the route will be severely disrupted by delays and excessive pollution – noise, light and airborne matter. Also the ability of the Emergency Services to speedily answer calls will be prejudiced to a life-threatening degree. In the event of road repairs being required, or a traffic accident, the intended roads leading to Sizewell have no viable alternative routes, which would not only hold up work at the site but seriously threaten the life of the local population.	Additional traffic modelling, journey time analysis and supporting trip generation evidence is provided in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] . The Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] summarises the development of a VISSIM micro-simulation model of the A12 corridor in order to provide more detail on the impact of Sizewell C traffic on driver delay. Based on the VISSIM modelling, no material impact on driver delay is predicted and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the A12 corridor between Seven Hills and Melton. In the event of an incident on the highway network, HGVs would be held at the freight management facility, Traffic Incident Management Area at the southern park and ride or main development site. A Traffic Incident Management Plan (Doc Ref. 8.6) [APP-607] has been submitted with the Application.
Water Resources, Drainage and Flood Risk	
Water Supply There is great concern about EDF's ability to secure a sufficient supply of potable water, both during construction and operation. Discussions with the local water provider have been	Sizewell C's demand for potable water is estimated to be around 4MI/day at peak during construction, and 2MI/day during the operational phase when both units are in normal operation, and 2.8MI/day when one unit is in normal operation and one unit is in outage. Essex and Suffolk Water (ESW) has confirmed that they

Matter raised	SZC Co.'s Response
inconclusive, and proposals by EDF to build a reservoir are seen as too little, too late if construction is to start when envisaged. Given the low rainfall in the locality (Projected to become even less in the future) there is little likelihood of a reservoir being able to contribute meaningfully to the huge expected demands.	would be able to meet this demand in full from its Barsham Water Treatment Works (WTW), subject to ongoing environmental and feasibility studies. The Sizewell C scheme would likely involve bringing forward ESW's planned upgrade of Barsham WTW, installation of 30km new or replacement water mains between Shadingfield and Sizewell, and construction of a new pumping station at Holton. The scheme would likely connect into Saxmundham Water Tower and would be designed to increase the capacity and resilience of the local distribution network as well as meeting Sizewell C's demand. Further information can be found in Volume 1, Chapter 2, Section 2.2 a) iii) 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3, Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021.

Kelsale cum Carlton Parish Council (RR-0655)

Table A.9: Kelsale cum Carlton Parish Council

Matter raised	SZC Co.'s Response
Draft Development Consent Order, consultation and process	
Subsequent approvals Relevant Representations of Kelsale-cum-Carlton Parish Council on Sizewell (Please look at a map of the location of our Parish - as it seems I cannot include it here) As a directly impacted Parish we wish to raise concerns about:	The proposed HGV limits have been developed based on feedback from Hinkley Point C. SZC Co. is confident that the limits included in the Application are appropriate for the Project. The HGV limits for the Project are set out within the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608] and would be secured by the Section 106 Agreement. There is no proposal included within the CTMP that would allow these limits to be increased.

Matter raised	SZC Co.'s Response
1. Application The approach to 'subsequent approvals' and how they will be managed. e.g. at Hinkley Point significant changes to HGV volumes being applied for, relatively shortly after DCO given.	It is accepted that changes to the Section 106 Agreement could be made following the grant of any DCO for the Project, but such applications are not currently expected and any such change would need to be the subject of a separate application made to the Secretary of State.
General Project	
Site Location 2. Site selection • We believe this to be 'too big', in the wrong place with the wrong 'materials' delivery strategy, as outlined in our previous responses to Consultations 2,3 & 4,	The Government confirmed in the NPS EN-6 that the Sizewell C site (to the north of Sizewell B) is a potentially suitable location for new nuclear power and there is enough land within the site boundary to safely and securely operate a nuclear power station. SZC Co.'s has continued engagement and Project development to optimise the movement of materials by rail and sea. The accepted changes (April 2021) to the Application increase rail movements to 4 trains per day and to provide an additional temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport.
Impact on local communities and mitigation 3. Local Communities • The development will have significant impacts on Kelsale-cum-Carlton in addition to neighbours in Leiston, Eastbridge & Theberton, Middleton-cum-Fordley and Yoxford - seriously impacting the life, wellbeing and mental health of residents, and all communities adjacent to the A12. At our southern boundary is the Leiston branch line, proposed to be uplifted generating significant noise and pollution nuisance for nearby Parish residents, in addition to many more across open fields.	SZC Co. has taken steps to identify all likely significant effects on the environment during the Sizewell C Project's construction and operational phases. An extensive and detailed evaluation of the environmental effects of the Sizewell C Project has been undertaken in accordance with the provisions of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Marine Works (Environmental Impact Assessment) Regulations 2007. The Environmental Statement (ES) (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260], identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are summarised in the Mitigation Routemap [APP-616]

Matter raised	SZC Co.'s Response
- At our northern boundary, the Parish is proposed as the site for the SLR (Sizewell Link Road) A12 western roundabout. The impact of the SLR's construction and operation being loss of amenity, vibration, light, noise, traffic pollutants, visual, and dirt/dust nuisances on nearby residents, farms and businesses. - In the west the impact of significantly heavier traffic will increase severance in part of our Parish - Rendham Road and significantly increase road noise and pollutants in Curlew Green, Dorley's Corner and the properties at Hedgehog Hall. - To the east, Theberton Bypass, the blocking-up of Pretty Lane and SLR means the Parish is completely encircled by aspects of development. The direct impact is cumulatively reducing the ability of; local businesses, residents, visitors, tourists, carriers and couriers to go about their respective activities without hindrance. Aspects directly impacting these users include; - Any recreational journeys by campus/caravan park residents and weekend trips for workers back home - Up to or over 700 (peak construction) daily additional LGV journeys - Up to or over 600 additional bus journeys - Close to 2,000 (peak construction) daily additional HGV Main Site movements - The level of amenity and enjoyment provided by the Parish's lanes, footpath networks and agricultural landscape by residents of both Kelsale cum Carlton and neighbouring communities (as highlighted and evidenced during the COVID-19 lockdown of Spring & Summer 2020) will be significantly impacted. We need mitigation and compensation as a consequence, but ideally measures to	and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and Section 106 Agreement. A Community Fund is proposed under the Section 106 Agreement for any intangible effects on local communities. SZC Co. is continuing engagement with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation to develop Statements of Common Ground to agree the mitigation required for the Sizewell C Project.

Matter raised	SZC Co.'s Response
ensure Sizewell traffic does not use the Parish as a rat run, self-routing etc.	
General EIA Project	
Cumulative schemes As currently there are up to 8 other potential energy Projects it would result in significant and unacceptable cumulative impacts to the East Suffolk environment and economy.	Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578] presents the assessment of cumulative effects with other plans and Projects. The short-list for the cumulative assessment includes but is not limited to the following schemes: East Anglia One North, East Anglia Two, East Anglia Three wind farms, Thanet Extension wind farm, Hornsea wind farms (Two and Three); Dogger Bank Zone windfarms, Greater Gabbard and Galloper wind farm extensions, Nautilus Interconnector, and Eurolink Interconnector. Any short listed scheme for which an Application has not yet been submitted would also need to consider the Sizewell C Project as part of its own environmental impact assessment.
Associated Development – Sizewell link road	
Sizewell Link Road 4. [Part 1] Transport EDF's transport strategy omits sufficient justification on a number of aspects. - The starting point for the Main Construction Traffic route (Planning Statement Appendix A 7.2.1) remains unjustified and pre-supposes no new/additional haul route from the outset - A SLR appeared for the first time in Consultation 3, with a limited number of alternative routes being dismissed with little analysis or justification demonstrated. This brings	SZC Co. has undertaken a robust site selection process to determine the need and route of the Sizewell link road. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref 8.4) [APP-591] and in the Volume 6, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref 6.7) [APP-450] . The Sizewell link road would be a quicker and safer route than the existing B1122 so would be more attractive than the existing road to drivers, encouraging them to use the Sizewell link road rather than other roads. Similarly, the two village bypass will be quicker and safer than the existing A12 through Farnham and Stratford St Andrew. Volume 6, Chapter 8 (Amenity and Recreation) of the ES (Doc Ref 6.7) [APP-464] assesses potential effects that may result from disturbance of users of nearby public rights of way (PRoW).

Matter raised	SZC Co.'s Response
traffic further north than needed, increasing all forms of pollution unnecessarily. • The EDF SLR selection process remains unclear and unjustified, despite the Peer Review • The Peer Review of the EDF SLR Selection Process lacks; detail, transparent weightings, a sound rationale for decision making and seemingly relies heavily on 1980's reports and analysis. • The SLR is too close in proximity to the existing access road of the B1122 thus still drawing traffic unnecessarily to one area and providing little overall relief. • The SLR will isolate and sever our Parish by impeding access to Public Rights of Way during its construction • The SLR will remove from cultivation prime arable farmland and threaten farm viability.	Temporary and permanent diversions would be provided to all public rights of way impacted by the Sizewell link road. These are shown on Rights of Way Plans (Doc Ref. 2.4(B)) [AS-113 and AS-114]. An assessment of impacts on agricultural land holdings and mitigation proposed is presented within Volume 6, Chapter 10 (Soils and Agriculture) of the ES (Doc Ref. 6.7) [APP-470].
Ecology and Biodiversity	
Impact of Project on ecology Impact on nationally significant natural history in the Parish and surrounding area i.e. Bats, Great Crested Newts and many other flora and fauna assets (Suffolk Biodiversity Information Service)	Volume 2, Chapter 14 (Doc Ref. 6.3) [AS-033], Volumes 3 to 9, Chapter 7 of the ES (Doc Ref. 6.4 to Doc Ref. 6.10) [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523, APP-555] and Volume 1, Chapters 2, 3, 4, 5, 6 and 9 of the ES Addendum (Doc Ref. 6.14) [AS-181 to AS-185, AS-188] consider the potential effects on important ecological features (IEFs). The assessment uses the standard CIEEM approach to defining Important Ecological Features (IEFs) and then assessing each of them in turn to define the potential for significant adverse effects. Where substantive mitigation measures are embedded in the proposals this inevitably means that the effects are greatly reduced or eliminated. Specifically, in relation to Great Crested Newts, mitigation proposals are embedded within the design (such as new breeding ponds) and

Matter raised	SZC Co.'s Response
	relevant works will be undertaken under Natural England Licence. Additional population surveys in 2021 will help inform the final mitigation details and the need for any local translocations. The same is true for bats and further surveys of possible roosts undertaken in early 2021 will inform the need for any bat boxes and licences to close roosts. .
Socio-economics	
Assessment of socio-economic - Negative socio-economic impacts of the development are not adequately addressed by the developer - The detail of the proposed housing and tourism funds is inadequate, our Parish is not specifically named as one which would receive mitigation/compensation. - Tourists come here to enjoy the countryside/wildlife, easy access to beaches and Minsmere. Our responses to consultation 2,3&4 together with a Parish survey in 2019 indicated Parishioners are very concerned about the impact of the development on these issues together with transport. The DCO proposals bring more traffic and concerns. - Main site car parking for 'home based workers' based on a quarter of workers being categorised as local, and defined as up to 90 minutes away may not relate to many Suffolk workers actually benefitting in economic gain but taking environmental and social impacts.	SZC Co. and East Suffolk Council agree that the Housing Fund should be robust and flexible to meet the needs of a potentially changing housing market, and spent within the first seven years of construction in order to address peak effects. SZC Co. proposed a structure, governance/monitoring framework and implementation plan within the Accommodation Strategy (Doc Ref. 8.10) [APP-613] and is working with East Suffolk Council to finalise this and agree the scale and mix of measures in the Housing Fund. SZC Co. has shared with East Suffolk Council and Suffolk County Council a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release.
Economic impacts 7. Economic and social impacts • Impact of local business losing trained staff	SZC Co will seek to maximise Home-Based (HB) recruitment. The DCO sets out a reasonable expected level which takes into account the measures funded by the employment, skills and education

Matter raised	SZC Co.'s Response
	enhancement measures. There is clearly benefit in promoting local employment for economic and social benefit, but also to reduce scale of Non-Home Based (NHB) workforce, meaning fewer accommodation, community safety, public services effects. Bringing people into work from worklessness is an important part of the drive for sustainable employment and upskilling. The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, as set out in the Employment, Skills and Education Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611], there may be some effects on local businesses such as some vacancies being harder to fill. In order to tackle this: • A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Sizewell C Project and wider employment market. • Local firms will be supported through local Supply Chain Strategy to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project opportunities. SZC Co., NALEP and the Suffolk Chamber of

Matter raised	SZC Co.'s Response
	Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. Upskilling will benefit the Sizewell C Project and the wider market – focus will be on ‘legacy’ roles (as determined by Suffolk County Council's research base) that the region and the Project both need for the long term. SZC Co., Suffolk County Council and East Suffolk Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation has been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scale of financial contributions has still to be discussed. The scope for each measure has been based around existing measures in the region - for example providing revenue funding to deliver on existing capital investment in skills centres in the region.
Transport	
Transport Assessment 4. [Part 2] Unacceptable impact when the forecast daily car and LGV traffic carried mainly on feeder network will contribute to “<i>an unacceptable impact on highway safety...</i>”. i.e. unmanaged EDF traffic funnels from 90 minute travel radius onto a progressively limited number of narrower roads & lanes onto A12 and then to site. (NPPF (Ref 3.7) updated 2.19 Promoting Sustainable Transport Chapter Para 109)	Further information was provided in SZC Co's submission in January 2021. A Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] was included in the submission and included a road safety assessment as well as refined traffic modelling. As set out in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266], the traffic modelling includes traffic associated with an outage at Sizewell B even though this is an infrequent event. Seasonality is considered in Section 2 of the Transport Assessment (Doc Ref. 8.5(A)) [AS-017]. Whilst the analysis indicates that traffic flows on the A12 on a Friday afternoon/evening could be higher during August than the rest of the year, transport assessments should represent typical

Matter raised	SZC Co.'s Response
Insufficient consideration has been given to traffic level analysis for both weekends and holiday periods for a tourist destination. 'Good practice' would be to include this analysis, confirmed in DoT correspondence 4.3.2019. The later use of selective historic data to justify the impact assessment is undesirable.	traffic conditions and are not intended to assess the absolute busiest day of year. The inclusion of other atypical traffic elements within the assessment, such as period outage at Sizewell B, provide a robust basis of assessment and, given this, it was not considered appropriate to base the assessment on August traffic flows.
Impact of traffic - There are inadequate mitigations specific to the Parish and its' neighbours. Requirements for "...safe, secure and attractive..." and proposals that "...minimise the scope for conflicts between pedestrians, cyclists and vehicles" and the mitigation of detrimental impacts on the ecology and local communities, appear to have been totally ignored as an expedient measure. NPPF (Ref. 3.7), updated in February 2019 under 'Promoting Sustainable Transport Chapter', Para 110(c). We highlighted 70 impacts in our response to Consultation 4, many were also raised in 3, and 2 and they have not been addressed. - Insufficient consideration has been given as a responsible employer, to safeguard; the public, individual workers, other road users and fellow worksite colleagues when the working day of a 'local' Sizewell C worker could conceivably comprise a 90 minute drive to either of the Sizewell Park and Ride sites (or directly to the Main Site Car Park), a bus ride, security/alcohol and drug testing, a full shift, a return bus ride and another 90 minute drive back home. Particularly as fatigue causes multiple safety issues.	Further information has been provided in SZC Co's submission in January 2021. A Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and Freight Management Strategy (Doc Ref. 8.18) were included in this submission. To clarify, the 90 minute journey time catchment for workers is for home-based workers (those living at their permanent residence) and it includes the total journey time from their residence to work, with transfer onto a park and ride bus. The non-home based worker journey time catchment is 60 minutes, which also includes the park and ride journey. The majority of HGVs to the main development site are envisaged to route via the A12 south but there is expected to be some HGVs arriving from the north. The Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608] manages all freight traffic associated with the Project through a package of measures. The compliance of the HGV routing for HGVs to/from the main development site is proposed to be monitored through GPS tracking. HGVs are classified as a goods vehicle with a gross vehicle weight of greater than 3.5 tonnes and less than 44 tonnes. Typically a HGV would be classified as being 7.5 tonnes - 44 tonnes and therefore the proposed HGV classification and associated management measures will include smaller goods vehicles than would normally be the case. The Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] will manage the construction worker trips by all modes and mode share

Matter raised	SZC Co.'s Response
Sources: *DVLA 'Tiredness Kills' INF159 and ? Various through the BRAKE road safety charity - There is no Freight management facility to the north and it is unclear what would happen in the event of an issue on the A12 north of the site. - Planned road maintenance is referred to, but unplanned road maintenance is not. The A12, a de-trunked road is the one key route for traffic seeking to pass through the majority of Coastal Suffolk, (parts being single carriageway) and the impact on the A12 of HGVs will be higher carriageway 'surface and bed' attrition than other traffic. - The Traffic Management Plan includes HGV's (inward journey only) but excludes LGV, Cars, Motorcycles, Buses thus giving insufficient consideration to the overall impact. - Car sharing plan is unambitious and inadequate causing more traffic issues as described above. The impact of traffic on our Parish could be reduced by contractual obligations routing all Sizewell workers through an agreed route to site. This could also result in a reduction in the amount of land used for car parking.	targets have been set, which will be monitored and reported to the Transport Review Group on a quarterly basis. The vast majority of workers will travel to/from the main development site by sustainable modes.
Traffic impact of Project 5. Landscape & Heritage Unmanaged traffic including 10,000 new daily car movements (at Peak) will seriously impact the Parish which largely consists of single track, unpaved lanes giving access to arable farmlands, and hamlets leading to a Conservation Area via roadside nature reserves (in addition to many listed buildings).	SZC Co. traffic will not be unmanaged and is to be managed through the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] and Traffic Incident Management Plan (Doc Ref. 8.6) [APP-607]. Mitigation during construction is also set out within the Code of Construction Practice (Doc Ref. 8.10(A)) [AS-273]. There are not proposed to be 10,000 new daily car movements at peak in the parish. Car parking at the main development site is limited to 1,000 car parking spaces. A key parking control measure is that only workers living inside the area bounded by the A12, River Blyth, and River

Matter raised	SZC Co.'s Response
	Deben (except those living in the Leiston area or within 800m of the main development site) will be issued a parking permit for the main development site on-site parking. Workers without a parking permit for the main development site (including those living in the Leiston area) will need to use one of the park and ride sites, a direct bus service, or walk or cycle to the main development site.
Water Resources, Flood Risk and Drainage	
Water supply 6. Environment • Unsustainable impact on water supplies in the driest part of the country.	Sizewell C's demand for potable water is estimated to be around 4Ml/day at peak during construction, and 2Ml/day during the operational phase when both units are in normal operation, and 2.8Ml/day when one unit is in normal operation and one unit is in outage. Essex and Suffolk Water (ESW) has confirmed that they would be able to meet this demand in full from its Barsham Water Treatment Works (WTW), subject to ongoing environmental and feasibility studies. The Sizewell C scheme would likely involve bringing forward ESW's planned upgrade of Barsham WTW, installation of 30km new or replacement water mains between Shadingfield and Sizewell, and construction of a new pumping station at Holton. The scheme would likely connect into Saxmundham Water Tower and would be designed to increase the capacity and resilience of the local distribution network as well as meeting Sizewell C's demand. Further information can be found in Volume 1, Chapter 2, Section 2.2 a) iii) 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3, Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021.

Yoxford Parish Council (RR-1277)

Table A.10: Yoxford Parish Council

Matter raised	SZC Co.'s Response
Draft Development Consent Order, consultation and process	
Mitigation securing General 1. There is insufficient consequence to the applicant of failing to achieve their proposed mitigations in a complete and timely way or even at all. Similarly, there is no consequence to the applicant if dubious forecasts and estimates turn out to be incorrect. 2. The combined impacts of this Application and several other local energy Projects need to be considered	1. SZC Co. has taken steps to identify the likely significant effects on the environment during the Sizewell C Project's construction and operational phases. All necessary mitigation is then secured to ensure that it will provide effective and reliable mitigation on which the Project can rely on. This also includes all necessary monitoring during the construction and operation phases. Securing mechanisms for mitigation are summarised within the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1). SZC Co. is committed to complying with mitigation requirements. This is secured through the draft DCO itself and the section 106 Agreement. A breach of the DCO would be a criminal offence. The section 106 will set up various review groups with the local authorities and relevant stakeholders to ensure that there is visibility on the delivery of mitigation and that enforcement bodies have the information that they need to carry out their function. Monitoring and funding commitments are made through the DCO and the section 106 Agreement. 2. Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578] presents the assessment of cumulative effects with other plans and Projects. The short-list for the cumulative assessment includes but is not limited to the following schemes: • East Anglia One North, • East Anglia Two, • East Anglia Three wind farms, • Thanet Extension wind farm,

Matter raised	SZC Co.'s Response
	• Hornsea wind farms (Two and Three); • Dogger Bank Zone windfarms, • Greater Gabbard and Galloper wind farm extensions, • Nautilus Interconnector, and • Eurolink Interconnector. The cumulative assessment assumes that the schemes will take place as per the descriptions made publicly available at the time of writing the ES, unless otherwise specified in the technical chapter. Any short listed scheme for which an Application has not yet been submitted would also need to consider the Sizewell C Project as part of its own environmental impact assessment.
Freight Management Strategy	
Freight Management Strategy 2. A marine led strategy was dismissed too readily and should be reconsidered. 3. Insufficient use is being made of rail as an alternative form of transport.	The accepted changes (April 2021) to the Application allow an increase in rail movements to 4 trains per day and provide an additional temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport. The accepted changes include the addition of a new temporary beach landing facility (BLF) capable of handling substantial volumes of bulk materials. SZC Co. re-visited the decision not to progress with a full scale jetty but remains convinced that the environmental effects of constructing a full jetty would not be acceptable. The BLF, however, achieves the majority of the material transport that the jetty would have provided with substantially less impact and enables Sizewell C to operate a fully integrated transport strategy with a substantial role being played by marine transport.
General EIA	

Matter raised	SZC Co.'s Response
Environment [Part 4] 5. The approach of separately assessing the environmental impacts of parts of the development means consequential impacts have not been assessed. For example, increased air pollution due to increased traffic volumes on stretches of roads where no mitigation is taking place.	Volume 10 of the ES (Doc Ref. 6.11) [APP-572 to APP-582] considers the following types of cumulative effects: 1) 'Inter-relationships' that occur when the individual environmental effects of the proposed development combine together with one another, with the potential to result in significant effects on a single resource or receptor (e.g. air quality and transport impacts occurring on the same receptor). Inter-relationship effects during the construction and operation of the Sizewell C Project are considered within Volume 10, Chapter 2 of the ES (Doc Ref. 6.11) [APP-575]. 2) 'Project-wide effects' that occur when impacts of the main development site and associated developments combine. A number of the assessments presented within Volume 2 of the ES (Doc Ref. 6.3) already included an assessment of the Project-wide environmental effects (e.g. with regards to transport, socio-economics, waste and materials, marine, climate change, major accidents and disasters, and health and wellbeing effects). A consideration of other potential Project-wide effects during the construction and operation of the Sizewell C Project are considered within Volume 10, Chapter 3 of the ES (Doc Ref. 6.11) [APP-577]. 3) 'Cumulative effects with other plans, Projects and programmes' that arise as a result of the proposed development in combination with other Projects and/or development plans within the Zone of Influence (Zol) of the proposed development. Cumulative effects with other Projects are considered within Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578].
Associated Development – Northern Park and Ride	
Operation of the Northern park and Ride Environment [Part 5]	The impact of lighting at the northern park and ride site has been assessed as part of Volume 3, Chapter 6 (Landscape and Visual) of

Matter raised	SZC Co.'s Response
6. The noise and light pollution from the northern park and ride will adversely impact some Yoxford residents with no mitigation.	the ES (Doc Ref. 6.4) [APP-360] and suitable mitigation has been proposed. The Associated Development Design Principles (Doc Ref. 8.3) [APP-589] provide details regarding the height and lighting levels in order to minimise light spill. Lighting within the car parking areas would be restricted to 6m in height to minimise visibility during day and night time. Lighting columns around the proposed roundabout and along the proposed access road between the roundabout and Willow Marsh Lane would be 8m in height to reduce the number of columns necessary to produce a lighting scheme that meets highway authority requirements. The lighting columns would utilise LED base lights with zero-degree tilt to minimise light spill and along the perimeter would be fitted with demountable shields to reduce backward spill of light into properties and adjacent habitats. The assessment of construction and operational noise and vibration was set out in Volume 3, Chapter 4 of the ES (Doc Ref 6.4) [APP-354]. The operation of the northern park and ride is not expected to lead to any significant adverse noise or vibration effects. Once mitigation is taken into account, no significant adverse effects are expected during the construction works. Noise and vibration arising from construction will be managed through the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. Should there be any properties that are subject to high levels of noise from the construction works, enhancements to their sound insulation will be available under the Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES (Doc Ref 6.3) [APP-210]), or in extreme circumstances, occupants may be temporarily relocated, both subject to meeting eligibility criteria.
Ecology and Biodiversity	
Impacts on RSPB Minmere, AONB and Minmere Nature Reserve, and impacts on tourism	2. Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] identifies the potential effects on tourism. It concludes that

Matter raised	SZC Co.'s Response
Environment [Part 2] 2. The noise, dust and light pollution during construction will significantly impact RSPB Minsmere's role as a key tourist destination. 3. The proximity and scale of the finished construction will devastate the character of the local area and be a blight on the AONB and the Minsmere Nature Reserve, its wildlife, environment and associated tourism forever.	while actual changes are not likely to be significant, there is recognition that at certain times and in certain locations perceptions of change may arise that could materialise. Mitigation measures to reduce impacts from construction noise, dust and light are set out within the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-2731]. A Tourism Fund is also proposed to enable early investment in measures to deter the development of adverse perceptions of local impact and, thereby, help to sustain the tourist industry locally. Further information can be found in Volume 2, Chapter 9 of the ES (Doc Ref. 6.3) [APP-195]. 3. The Government's Overarching NPS for Energy (NPS EN-1) states that there is an urgent need for new electricity generating stations, including nuclear power. Sizewell is identified in the NPS for Nuclear Power Generation (NPS EN-6) as one of eight potentially suitable sites for deployment of new nuclear power stations by 2025. Annex C to NPS EN-6 confirms that the inclusion of Sizewell C in the NPS reflects the in-principle acceptability of its location, and together with Chapter 3.10 (Nuclear Impact: Landscape and Visual Impacts) of NPS EN-6, it recognises the potential acceptability of significant environmental effects in this regard in view of the national need for nuclear power generation and the scarcity of alternative sites. The ES acknowledges that there would be some significant adverse effects on landscape character of the AONB arising as a result of the development although the effects have been minimised as far as possible. A natural Environment Fund is proposed which would enable the enhancement of the landscape and ecology of the AONB and its setting. The Sizewell C Project is therefore considered appropriate in this regard, and in the context of NPS EN-1 and NPS EN-6.

Matter raised	SZC Co.'s Response
Landscape and Visual	
Pylons Environment [Part 3] 4. The visual impact of 65m high transmission towers for power export connection is not acceptable. Power export connection can be achieved with cables in surface troughs and/or gas insulated lines.	The potential for undergrounding the cables has been considered. There are, however, a number of significant safety and programme risks associated with the construction and operation of an underground cable option. Further details, and the consequent need for overhead pylons, are set out in the Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591].
Socio-economics	
Economy, social impacts and accommodation 1. EDF have recently described how re-contracting Hinkley Point C workers will reduce costs for Sizewell C construction. This will mean fewer jobs for local people and a reduced economic benefit for the local area. It will also lead to more incoming people requiring accommodation locally. 2. The proposed campus will not provide enough accommodation. 3. The accommodation need will distort the private rental sector of the local housing market making it harder for local people to secure housing. That will have a knock-on increase on demand for social housing from local people. 4. The housing need will encourage the repurposing of current tourist accommodation for Sizewell C workers reducing the number of tourist beds in the area. Fewer tourists will negatively impact tourist focussed businesses not involved in accommodation.	1. Sizewell C's construction phase will support around 2,600 jobs for local residents at the peak of activity in a range of different skills, roles and in both construction and non-construction sectors that would not otherwise arise (without the Sizewell C Project). Replication of some parts of the supply chain developed for the first of a kind new fleet of UK nuclear new builds (at Hinkley Point C) is important to enable efficiencies – but there will be substantial opportunities for Suffolk-based firms to benefit from contracts over the lifetime of the Sizewell C Project, as has been identified in the Economic Statement (Doc Ref. 8.9) [APP-610] and within the Supply Chain Strategy, provided in Appendix B of the Economic Statement (Doc Ref. 8.9) [APP-611]. Local firms will be supported through local supply chain engagement activities to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain.

Matter raised	SZC Co.'s Response
	SZC Co. has developed a Housing Fund including measures to boost supply of housing stock in order to reduce or avoid effects on the housing market, particularly for those at most risk of housing need or vulnerability within the private rented sector. Additionally, SZC Co. proposes a 'resilience' element to the Housing Fund to allow East Suffolk Council's statutory housing services to respond to increased Applications for support should this arise, and prevent these issues from occurring. SZC Co. and East Suffolk Council (the statutory provider of housing services) agree that the Housing Fund should be robust and flexible to meet the needs of a potentially changing housing market, and spent within the first seven years of construction in order to address peak effects. Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] and the Accommodation Strategy (Doc Ref. 8.10) [APP-613] submitted with the DCO identify that there is unlikely to be a widespread, significant effect on the ability of the Tourist Accommodation Sector to respond to demand, based on affordability, availability, location, occupancy rates and seasonality of accommodation. However, SZC Co. consider that it is prudent to address the risk of any uncertainties and therefore have developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/ reconfiguration of existing tourist accommodation sites.
Transport	

Matter raised	SZC Co.'s Response
Impact on Yoxford 1. The proposed development is too dependent on roads for transport. There will be significant adverse impact to local communities and businesses from noise and increased journey times. The increased road traffic and congestion will deter visitors and significantly impact tourism and associated local jobs. It is not reasonable for tourism to bear this cost. The problem could be mitigated by a marine led transport strategy and/or increased use of rail. 4. We have repeatedly asked for transparency on traffic modelling assumptions and remain concerned that they underestimate the traffic volumes during construction. The estimated versus actual traffic at Hinkley Point illustrate the issue. We are concerned about traffic all year round but are especially concerned about the traffic during the peak holiday season which we do not believe has been modelled fully. 5. There is an environmental impact to road building so the proposed A12 link road must use a route that has legacy value. The proposed route does not and there is a significant risk it will need to be removed after construction compounding the environmental damage. A better route should be used. 6. The relief road and other road improvements need to be brought forward in the plan. It is not acceptable to have 2 to 3 years of very significant unmitigated traffic impact whilst this work is completed. 7. There is no mitigation of the community severance caused by increased traffic on the A12 and A1120 in Yoxford.	Further information has been provided in SZC Co.'s submission in January 2021. The updated Freight Management Strategy (Doc Ref. 8.18) [AS-280] has been included in this submission. The accepted changes (April 2021) to the DCO provide enhanced rail and marine proposals, which would enable HGV movements to be further reduced to 500 two-way HGVs to the main development site on a typical day and up to 700 two-way HGVs on the busiest day during peak construction. Additional traffic modelling, journey time analysis and supporting trip generation evidence is provided in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266]. The permanent associated developments (i.e. two village bypass, Sizewell link road, rail and highway improvements) will leave a lasting beneficial legacy to the local area by reducing traffic travelling through Farnham, Stratford St Andrew and on B1122, improving traffic flows on the A12 and local roads, and providing permanent improvements to rail and highway infrastructure. An indicative phasing schedule for the Sizewell C Project as a whole is provided in the Implementation Plan (refer to Appendix 8.4I of the Planning Statement) (Doc Ref. 8.4) [APP-599]. The construction of the associated developments to reduce the impact of construction traffic would be undertaken early in the programme (within approximately the first two years of the construction period) and be in place prior to the peak of construction on the main development site.
Water Resources, Drainage and Flood Risk	

Matter raised	SZC Co.'s Response
Environment [Part 1] 1. There is insufficient mitigation of the risks from climate change, rising sea levels and flooding.	The flood risk to and from the development has been assessed in relation to all forms of flooding and the proposed development designed to be safe and operable under foreseeable conditions, also taking account of climate change and rising sea levels. Measures to mitigate flood risk from the main development site and from new road infrastructure have been incorporated that include the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes, whilst recognising the need to protect habitats and groundwater by managing potential pollutant loading such as sediment and hydrocarbons. These approaches are described in the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. Flood risk assessments also have been prepared for the main development site and each of the associated developments (Doc Ref. 5.2 to 5.9) [APP-093 to APP-144]. In response to further engagement with the key stakeholders following the Application, SZC Co. has revised the design of some aspects of the scheme to provide further mitigation against potential flood risk and environmental impacts, and to increase the resilience of the site to future climate change. These are detailed in Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181] and assessed in the Main Development Site Flood Risk Assessment Addendum (Doc Ref. 8.5Ad) [AS-157], and include: • increasing the height of the hard coastal sea defence; • change to a bridge design for the SSSI crossing; and • flood mitigation areas to the north of the main development site.

Matter raised	SZC Co.'s Response
	The relevant statutory bodies are assessing the suitability of the flood risk assessments undertaken and submitted in support of the DCO Application.

Campsea Ashe Parish Council (RR-0170)

Table A.11: Campsea Ashe Parish Council

Matter raised	SZC Co.'s Response
General Project	
Principle of the Project 1. [Part 1] Introduction Campsea Ashe Parish Council (CAPC) acknowledges some benefits to the East Suffolk community from Sizewell C (SZC), such as employment opportunities, opportunities for local businesses and the inflow of substantial business rates. However, CAPC feels, that these benefits do not outweigh the huge burden that this area will have to bear over the 12 years of construction on behalf of the rest of the country. The impact of SZC in the construction phase will be felt in East Suffolk on many fronts, including increases in traffic (particularly HGVs) using the A12 and smaller inappropriate country lanes, pressures on rented accommodation and adverse effects on tourism and the AONB. We believe that this part of Suffolk will pay a heavy price for its role in supporting energy supply to the rest of the country and	SZC Co. is seeking to mitigate all significant adverse effects related to the Sizewell C Project. In order to understand the extent of the effects, an Environmental Impact Assessment has been undertaken and physical mitigation and implementation measures, as well as financial mitigation identified. The proposed mitigation is summarised within the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1). In addition, SZC Co. has set out a number of strategies to enhance the economic benefits of the Sizewell C Project, as set out in Appendix A, the Employment, Skills and Education Strategy; and Appendix B, the Supply Chain Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611]. A range of mitigation measures have been developed, summarised in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195], to avoid or reduce significant effects – this includes a Housing Fund, a Public Services Contingency Fund and

Matter raised	SZC Co.'s Response
CAPC also believes, that the likely compensation and mitigation, if the SZC Project goes ahead, will be inadequate. Campsea Ashe will over the potentially 12-year build period be negatively affected by the current proposals and has seen no feasible mitigation measures to minimise the impact to a level acceptable to our and the neighbouring communities. Regrettably, we have not had relevant responses to our repeatedly expressed concerns about the potential impact of their proposal during any of the consultation stages.	implementation strategies like an Accommodation Strategy (Doc Ref. 8.10) [APP-613] and a Community Safety Management Plan (Doc Ref. 8.16) [APP-635]. Mitigation measures for transport effects are set out within Volume 2, Chapter 10 (Transport) of the ES (Doc Ref. 6.3) [APP-198]. SZC Co. also recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected. Further information can be found in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195].
Concluding statement 5 Conclusion CAPC is very concerned by the impacts on our village as a result of EDF Energy / SZC Co.'s proposals for SZC. We believe that quality of life will be majorly impaired over the likely 12-year build period to a level, that makes this Project questionable for many residents. Impacts are not just immediate, but also include our wider recreational space, the AONB of Suffolk Coast & Heath. The cumulative effects of the SZC Project running alongside the proposals from Scottish Power Renewables, as well as the future growth in housing and business along the A12 have not been adequately addressed. This underlines the very important need for full mitigation of the impacts that will be felt by local residents - without it, the quality of life of our residents as well as the attractiveness of Coastal Suffolk as a recreational AONB will be dealt a severe and irrevocable blow. We agree with other PC's, that wherever possible the	The Government's Overarching NPS for Energy (NPS EN-1) states that there is an urgent need for new electricity generating stations, including nuclear power. Sizewell is identified in the NPS for Nuclear Power Generation (NPS EN-6) as one of eight potentially suitable sites for deployment of new nuclear power stations. Annex C to NPS EN-6 confirms that that the inclusion of Sizewell C in the NPS reflects the in-principle acceptability of its location, and together with Chapter 3.10 (Nuclear Impact: Landscape and Visual Impacts) of NPS EN-6, it recognises the potential acceptability of significant environmental effects in this regard in view of the national need for nuclear power generation and the scarcity of alternative sites. SZC Co. is also seeking to mitigate all significant adverse effects related to the Sizewell C Project. In order to understand the extent of the effects, an Environmental Impact Assessment has been undertaken and physical mitigation and implementation measures, as well as financial mitigation identified. The proposed mitigation is summarised within the Mitigation Routemap [APP-616] and

Matter raised	SZC Co.'s Response
mitigation measures that are put in place should seek to provide legacy benefits for this and other communities and should endure well beyond the completion of the SZC construction phase.	Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1). Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578] presents the assessment of cumulative effects with other plans and Projects, including but not limited to the Scottish Power Renewables schemes and new major housing developments. SZC Co. recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected. Further information can be found in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195].
General EIA	
Cumulative schemes 1. [Part 2] We will leave others to comment on other issues, amongst which we would expect to see concerns about EDF's ability to deliver the whole Project, the impact of SZC on the Suffolk Coasts and Heath AONB, its impact on coastal processes in the Sizewell area, concerns about wider environmental issues and impacts on tourism and the local economy. Campsea Ashe PC is concerned that the cumulative effect of the various other energy Projects proposed for this region have not been addressed adequately and will further add traffic pressures and create irrevocable negative changes and impacts on the rural and coastal nature of the county.	Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578] presents the assessment of cumulative effects with other plans and Projects. The short-list for the cumulative assessment includes but is not limited to the following schemes: • East Anglia One North, East Anglia Two, East Anglia Three wind farms, • Thanet Extension wind farm, • Hornsea wind farms (Two and Three); • Dogger Bank Zone windfarms, • Greater Gabbard and Galloper wind farm extensions, • Nautilus Interconnector, and • Eurolink Interconnector.

Matter raised	SZC Co.'s Response
	The cumulative assessment assumes that the schemes will take place as per the descriptions made publicly available at the time of writing the ES, unless otherwise specified in the technical chapter. Any short listed scheme for which an Application has not yet been submitted would also need to consider the Sizewell C Project as part of its own environmental impact assessment.
Associated Development – Southern Park and Ride	
Alternatives 3.1 CAPC maintains that a P&R facility south of Woodbridge would reduce a large proportion of the traffic impact in the Woodbridge, Wickham Market and surrounding villages area and hence it should be the preferred option, especially as mitigation measure to avoid rat-runs on unsuitable minor roads are not addressed. Insufficient detail was given by EDF during consultation. We are particularly concerned that for the SP&R there are very significant gaps in DCO details on ecology, landscape and visual impact, drainage, noise and air quality, particularly the problem of dust during construction.	SZC Co. has undertaken a robust site selection process to determine the location of the southern park and ride. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] and in Volume 4, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.5) [APP-383]. An assessment of the likely environmental effects arising from construction, operation, removal and reinstatement phases of the proposed southern park and ride at Wickham Market has been undertaken and is reported within Volume 4, Chapters 4 to 12 of the ES (Doc Ref. 6.5) [APP-378 to APP-408]. The design of the proposed development has evolved to include a number of primary mitigation measures including the retention of existing hedgerows and woodland where possible, infilling of hedgerows where required, soft landscaping within the car park, provision of landscape bunds which would also provide acoustic screening. Measures set out in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] would reduce impacts arising from construction activity, including measures to reduce potential noise impacts and dust. The lighting and drainage plans are not for approval at this stage. However, they provide an indication of the likely drainage and lighting that will come forward, and a firm basis for environmental assessment. The final drainage details for the site are secured by Requirement 5 of

Matter raised	SZC Co.'s Response
	the Draft DCO (Doc Ref. 3.1(B)) [AS-143] which requires the final surface and foul water drainage design to be submitted to and approved by East Suffolk Council, following consultation with the Environment Agency, the relevant Statutory Nature Conservation Body, the relevant Internal Drainage Board, the Lead Local Flood Authority and the drainage authority. The lighting design is controlled by the Associated Development Design Principles (Doc Ref. 8.3) [APP-589] which detail the requirements for lighting proposals, in accordance with the latest Institution of Lighting Professionals Guidance Note. The Associated Development Design Principles include limits on light spill beyond the site boundaries, light spill onto adjacent habitats, design and height of the lighting columns, as well as additional requirements for sustainable drainage systems. Updated ecology survey information was also submitted to the Examining Authority in December 2020 (refer to Doc Ref. 6.13(A) [AS-036]).
Climate Change	
Carbon usage 4.2 We also want to register our concern that some of EDF Energy / SZC Co.'s statements about SZC's contribution to achieving Net Zero by 2050 are misleading and it is our understanding that SZC cannot make a positive contribution towards achieving Net Zero until at least 2050 owing to the carbon usage during construction and in transport. We also believe that the carbon impacts of decommissioning have not been fully accounted for.	The UK Government has made it clear in its recent statements that it considers new nuclear to have an important role in the UK's pathway to achieving its net zero carbon emissions. The Energy White Paper stated that nuclear continues to be 'an important source of reliable clean energy' and nuclear power forms one part of the Prime Minister's Ten Point Plan to continued decarbonisation. The Energy White Paper announced a specific aim to bring at least one large-scale nuclear Project to the point of Final Investment Decision by the end of this Parliament (by 2024) as additional nuclear power (beyond Hinkley Point C) will 'be needed in a low-cost 2050 electricity system of very low emissions'.

Matter raised	SZC Co.'s Response
	Under the Government's net zero scenarios, the UK electricity demand will increase between around 250TWh and 350TWh between 2030 and 2050. This is equivalent to another nine to twelve low-carbon power stations of Sizewell C's output which would be required to come online after Sizewell C. Demand for electricity will increase substantially throughout the period to 2050 as other sectors such as heating, transport and industry increasingly electrify in order to decarbonise. Moreover, new low carbon generation of all technologies is expected be required on a continual basis up to, and beyond, 2050 in order to meet increasing electricity demand and to replace existing low-carbon generation as it reaches the end of its technical life. In other words, rather than Sizewell C being too late to contribute to decarbonisation, it will come online in a timely fashion to help meet the rising demand for low carbon electricity in the 2030s and 2040s and there will still be a requirement for very large amount of additional low new low carbon generation after Sizewell C for the 2050 net zero target and beyond. Nuclear has a critical and complementary role alongside other low carbon energy provision in a decarbonised power system.
Landscape and Visual	
Southern Park and Ride 3.2 The Southern Park and Ride (SP&R) is sited on high ground between the two Special Landscape Areas of the valleys of the Rivers Ore and Deben. The SP&R will have an intrusive visual impact in a sensitive landscape area affecting several villages. The measures proposed to mitigate the visual, noise and lighting impacts are wholly inadequate.	During construction, operation and the removal and reinstatement phase of each park and ride, the landscape character of the area will change. However, the landscaping strategy for each site has been designed to minimise potential impacts on amenity and recreational, and landscape and visual receptors through the provision of landscape bunds, buffer zones and planting. The detailed design for landscaping will follow the Associated Development Design Principles (Doc Ref. 8.3) [APP-589].

Matter raised	SZC Co.'s Response
	Once the park and rides are no longer necessary for the construction of the main development site, the land at each site would be reinstated to its former use (be it agricultural use or highway land). Therefore, any potential urbanisation and visual impact would be temporary. An assessment of landscape and visual effects is presented within Volume 4, Chapter 6 (Landscape and Visual) of the ES (Doc Ref. 6.5) [APP-390].
Southern Park and Ride 3.3 Line of sight towards Campsea Ashe, and with it inherent noise & light pollution will impact a major part of Campsea Ashe, something that again has not been addressed adequately by EDF.	The impact of lighting at the southern park and ride site has been assessed as part of Volume 4, Chapter 6 (Landscape and Visual) of the ES (Doc Ref. 6.5) [APP-390]. Noise and vibration effects are assessed within Volume 4, Chapter 4 (Noise and Vibration) of the ES (Doc Ref. 6.5) [APP-384]. The design of the proposed development has evolved to include a number of primary mitigation measures including the retention of existing hedgerows and woodland where possible, infilling of hedgerows where required, soft landscaping within the car park, provision of landscape bunds which would also provide acoustic screening. In addition, lighting within the car parking areas would be restricted to 6m in height to minimise visibility during day and night time. Lighting columns along the proposed access road would be 8m in height to reduce the number of columns necessary to produce a lighting scheme that meets highway authority requirements. The lighting columns would utilise LED base lights with zero-degree tilt to minimise light spill and along the perimeter would be fitted with demountable shields to reduce backward spill of light into properties and adjacent habitats. The lighting design is controlled by the Associated Development Design Principles (Doc Ref. 8.3) [APP-589] which detail the requirements for lighting proposals, in accordance with the latest Institution of Lighting Professionals Guidance Note.

Matter raised	SZC Co.'s Response
	Measures set out in the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] would also reduce impacts arising from construction activity, including measures to reduce potential noise impacts and dust.
Noise and Vibration	
2.5 Campsea Ashe has preferred a marine & rail led strategy in Stage 3&4 consultations as the Ipswich-Lowestoft line would have improvements allowing day time trains. The integrated approach with up to five night time freight trains presents additional concerns for Campsea Ashe as it is located along the railway line. Any night freight movement will affect over half of the population through noise and vibration. With no serious mitigation proposals offered, Campsea Ashe can not agree to such proposal.	Further information was provided in SZC Co.'s submission in January 2021 to the Planning Inspectorate on the accepted changes (April 2021) to the DCO Application. The draft Rail Noise Mitigation Strategy (Volume 3 Appendix 9.3.E of the ES Addendum (Doc Ref 6.14) [AS-258]) set out the physical and operational measures that will be implemented to control railway noise and vibration. The proposed measures include a night-time 10mph speed limit through Campsea Ashe to limit both railway noise and vibration. For the worst-affected properties, enhancements to their sound insulation will be available under the Noise Mitigation Scheme (Volume 2 Appendix 11H of the ES (Doc Ref 6.3) [APP-210]), subject to meeting eligibility criteria.
Socio-economics	
Community fund 4.1 We support the principle of a Community Impacts Fund. This is welcomed, but it is unclear what the size of the fund will be, how grants will be awarded and which communities will be able to benefit. It must be ensured, that the fund is properly applied to those communities most disadvantaged by EDF's proposals.	SZC Co., East Suffolk Council and Suffolk County Council have been working to develop an appropriate approach to governance and implementation of the Community Fund, including options for ring-fencing provision for the areas where change is most likely to occur as a result of the Project, independent management of the Fund by Suffolk Community Foundation, and a role for an Oversight Panel including the Councils. The approach will be based on the Hinkley Point C Community Fund which has been implemented successfully in Somerset through various strategic, small and open grants. Further information will be provided through the Section 106 Agreement, as it progress over the course of the examination.

Matter raised	SZC Co.'s Response
Transport	
Construction traffic impacts 2.1 Campsea Ashe is gravely concerned that traffic issues arising from the anticipated volume of cars, LGV's & HGV's will overwhelm the A12 in the Woodbridge area and again in the Hacheston/Marlesford area, resulting in increased rat-running on an inadequate and at times already dangerously stretched rural network of roads and lanes, especially the A1152 / Woods Lane towards Tunstall and the B1078 from Hacheston through Campsea Ashe to Tunstall/Snape. The capacity issue in Melton had already been subject to a negative appraisal by SCC Highways in 2017.	As set out in the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], HGV deliveries to the main development site will be required to route via the proposed HGV routes, which (from the south) would be A12 and B1122 or Sizewell link road once it is operational. The compliance of the HGV routing is proposed to be monitored through GPS tracking. HGVs are classified as a goods vehicle with a gross vehicle weight of greater than 3.5 tonnes and less than 44 tonnes. Typically a HGV would be classified as being 7.5 tonnes - 44 tonnes and therefore the proposed HGV classification and associated management measures will include smaller goods vehicles than would normally be the case. A bus based transport strategy for construction workers is proposed, which will further reduce the number of cars travelling between the A12 corridor and the main development site.
Construction traffic impacts 2.2 The B1078 through Campsea Ashe and eastwards to Tunstall/Snape has several pinch points in and around Campsea Ashe, creating hazardous conditions even for cars passing. The anticipated increase of traffic, not just at times of A12 congestion, will make this road even more hazardous and subject Campsea Ashe residents not just to intolerable high levels of pollution.	As set out in the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], HGV deliveries to the main development site will be required to route via the proposed HGV routes, which (from the south) would be A12 and B1122 or Sizewell link road once it is operational. The compliance of the HGV routing is proposed to be monitored through GPS tracking. HGVs are classified as a goods vehicle with a gross vehicle weight of greater than 3.5 tonnes and less than 44 tonnes. Typically a HGV would be classified as being 7.5 tonnes - 44 tonnes and therefore the proposed HGV classification and associated management measures will include smaller goods vehicles than would normally be the case. A bus based transport strategy for construction workers is proposed, which will further reduce the number of cars travelling between the A12 corridor and the main development site. Road safety improvements are proposed to be implemented along the B1078 at the A140 junction and near Easton and Otley College, to be

Matter raised	SZC Co.'s Response
	funded via the Section 106 Agreement. Further information is provided in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] , with supporting traffic modelling.
Construction traffic impacts 2.3 There is no detail about potential supply chains and there is a significant threat of Debach and Bentwaters Industrial Parks becoming an active part in the works for the Energy Projects (Sizewell & Scottish Renewables). This will again put pressure on an already inadequate road infrastructure, affecting not only Campsea Ashe, Tunstall and Snape as vehicles leave/access the A12 using the B1078 and other minor roads.	Further information was provided in SZC Co's submission in January 2021 to the Planning Inspectorate on the accepted changes (April 2021) to the DCO Application. A Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and an updated Freight Management Strategy (Doc Ref. 8.18) [AS-280] was included in the submission, which included details of the likely sources of materials.
Construction traffic impacts 2.4 The high level of agricultural traffic will add to traffic levels in peak agricultural periods, especially affecting the Debach/Bentwaters (B1078) areas.	As set out in the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608] , HGV deliveries to the main development site will be required to route via the proposed HGV routes, which (from the south) would be A12 and B1122 or Sizewell link road once it is operational. The compliance of the HGV routing is proposed to be monitored through GPS tracking. A bus based transport strategy for construction workers is proposed, which will further reduce the number of cars travelling between the A12 corridor and the main development site. Further information is provided in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] , with supporting traffic modelling.
Southern Park and Ride 3.4 Traffic impact of the SP&R in the Five Ways Roundabout area have not been addressed adequately.	The Fiveways roundabout has been assessed within the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and demonstrates that the junction will not exceed operational capacity for all future year scenarios.

Matter raised	SZC Co.'s Response
Southern Park and Ride 3.5 No adequate cycling & pedestrian provisions have been considered. [in relation to the southern park and ride]	SZC Co. continues to work with Wickham Market parish council and other stakeholders to agree a transport scheme for Wickham Market to be funded via the Section 106 Agreement.
Two village bypass 3.6 The TVB creates additional problems for the parishes of Marlesford, Glenham and Campsea Ashe. EDF's modelling shows that there will be 2,000 additional HGV and bus movements through the A12 at Marlesford on a daily basis (1 additional HGV/bus every 40 seconds!) creating hazardous condition for the villagers trying to cross / turn on-off the A12.	The new bypass has been designed to current Design Manual for Roads and Bridges standards. New roads of this type have a significantly lower accident rate than the existing roads. The design has already been subject to a Stage 1 Road Safety Audit. Stage 2 would take place after detailed design is completed, stage 3 one month after the scheme had opened to traffic and stage 4 after 12 months of use. The new road will be significantly safer, particularly at the Friday Street junction, than the existing roads.

Levington & Stratton Hall Parish Council (RR-0686)

Table A.12: Levington & Stratton Hall Parish Council

Matter raised	SZC Co.'s Response
Draft Development Consent Order, consultation and process	
Consenting strategy Return to Original Use including Felixstowe Road 3. 6.9 Volume 8 – Chapter 2 – 2.6.3 The intention to return the site to agricultural use AND reinstating the Felixstowe Road should be a legally binding	Schedule 2 of the Draft DCO (Doc Ref. 3.1(B)) [AS-143] includes Requirement 24 (Associated Development Sites: Removal and Reinstatement). This provides a legally binding commitment to ensure that the temporary associated development sites are removed and reinstated following completion of the Sizewell C construction works.

Matter raised	SZC Co.'s Response
commitment so avoiding a predatory planning authority or developers industrialising the countryside.	
Freight Management Strategy	
Impact of freight The Parish Council has participated in all four stages of public consultation over eight years. This Application concentrates on the site for the proposed Freight Management Facility [FMF] in the context of the overall Freight Management Strategy options [6.1 Environmental Statement – plate 3.3 page 12]. This releases 325 one-way HGV movements on a typical day [13.5 deliveries per hour = 1 every 4 minutes] and 500 on the busiest days [21 deliveries per hour = 1 every 3 minutes] over 24 hours. This will have a significantly detrimental impact on the local roads and the environment around the FMF. It is regrettable that SCDC did not support a web-based Delivery Management System [Volume 9 – 6.9 – Chapter 3 – 3.2.5 and 3.2.6 refers].	The freight management facility at Seven Hills is proposed in addition to an electronic Delivery Management System in order to ensure that there is in place a comprehensive approach to the management of Sizewell - related traffic. The Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] submitted in January 2021 comprehensively assesses the traffic impacts of the construction traffic and of the operation of the freight management facility. These matters are the subject of continuous and detailed engagement with the Highway Authority, Suffolk County Council and with Highways England, to determine whether any additional mitigation measures need to be put in place.
Rail-led The Parish Council supports more emphasis being placed on the rail led option for the delivery of goods to the construction site.	SZC Co. agrees that rail should form a significant part of the overall transport strategy. For this purpose, SZC Co. has been engaging closely with Network Rail for a significant period and has committed to substantial investment in a complete re-building of the Sizewell branch line and the construction of new sidings as well as the green rail route which would take trains directly into the temporary construction area. The accepted changes (April 2021) to the Application upgrade the rail strategy to enable the movement of 4 trains per day. Together with the new temporary beach landing facility, SZC Co. is optimising the use of sustainable transport.
Associated Development – Freight Management Facility	

Matter raised	SZC Co.'s Response
1. Book 6.9 Volume 8 – Local Environment Proposals to mitigate the harmful impact of this site set within the countryside and on a flat topography comprise a 3m high landscape bund [only to the west and partially to the east of the site], a 10m buffer zone and native trees/shrub planting [it is noted that a 1.8m security fence will encircle the site]. This is insufficient mitigation not to cause a nuisance:	An assessment of likely environmental effects of the freight management facility during construction and operation is presented within Volume 8 of the ES (Doc Ref. 6.9) [APP-509 to APP-537]. The proposals include the use of landscape bunds, perimeter planting, shorter lamp columns and a best practice approach to lighting to minimise light spill. Structures and buildings have been designed to create an unimposing appearance that harmonises with the surroundings and with the buildings screened as far as possible in line with the Associated Development Design Principles (Doc Ref. 8.3) [APP-589]. Further information can also be found in Volume 8, Chapter 6 (Landscape and Visual Amenity) of the ES (Doc Ref. 6.9) [APP-520 to APP-522]. Construction activities would be managed in accordance with the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. With these measures in place, no likely significant environmental effects have been identified.
Air Quality	
Air Quality – Particular concern for nearby residents, along with other pollutants [above].	Construction and operational activities with the potential to impact upon local communities have been investigated and assessed as part of Volume 8 of the ES (Doc Ref. 6.9) [APP-509 to APP-537], Potential impacts on air quality are assessed within Volume 8, Chapter 5 (Air Quality) of the ES (Doc Ref. 6.9) [APP-517]. Air quality impacts arising from construction are managed through the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. With mitigation in place, no significant effects are predicted.
Landscape and Visual	
Visual – as almost all the HGVs and buildings will be above the height of the bund there will be a visual impact.	This comment is noted. The proposals include use of landscape bunds, perimeter planting, shorter lamp columns and a best practice approach to lighting to minimise light spill. Structures and buildings

Matter raised	SZC Co.'s Response
Light – the lighting lanterns being 8m high at 4m spacing will clearly tower above the bund. Further mitigation is given to the use of a Central Management System, but it is difficult to assess effectiveness. Further mitigation relies on partial blockage by existing trees [mainly to the south] but this will be ineffective after leaf fall.	have been designed to create an unimposing appearance that harmonises with the surroundings and with the buildings screened as far as possible in line with the Associated Development Design Principles document (Doc Ref. 8.3) [APP-589]. Lighting will utilise LED-based light fittings with zero-degree tilt, and the lighting columns along the access road and security fencing will be fitted with demountable shields to reduce the backward spill of light. Further information can be found in Volume 8, Chapter 6 (Landscape and Visual Amenity) of the ES (Doc Ref. 6.9) [APP-520].
When will planting take place and how long will it be before it matures to be an effective screen?	Further information about planting and growth rates can be found in Volume 8, Chapter 6 (Landscape and Visual Amenity) of the ES (Doc Ref. 6.9) [APP-520].
Noise and vibration	
Noise and Vibration –background noise is mentioned but this is low level and constant. HGVs stopping and starting, cab doors banging, will be jarring.	Potential noise impacts from the construction and operation of the freight management facility are assessed in Volume 8, Chapter 4 of the ES (Doc Ref 6.9) [APP-515]. No significant adverse effects were identified for either construction or operation of the freight management facility. Notwithstanding this, noise arising from construction will be managed through the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273].
Transport	
Traffic Assessment 2. Book 8 [8.5] Junction with A1156 [Section 9.30 – pages 472 to 478] – Junction 41 is described as “a simple priority T-junction” which is the problem. It will become dangerous with slow HGVs crossing the sweeping bend of a 60mph A-road. There is a	The junction of A1152 with Felixstowe Road has been assessed in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] and is referred to as Junction 41. The junction is forecast to operate well within capacity (maximum RFC of 0.48 on an arm over all scenarios). The Delivery Management System (DMS) will require HGVs delivering to the main development site to book a delivery slot. The DMS booking system will enable the flow of HGV deliveries to the

Matter raised	SZC Co.'s Response
'ghost island' providing negligible protection for right turning vehicles.	freight management facility and main development site to be controlled and spread over the course of the day.
Traffic from Port of Felixstowe using A14 Junction – on the busiest day, 75 journeys will originate from here. The junction to the Felixstowe Road is inadequate and positioned on a fast stretch of the A14. There is also concern about pollution and disturbance to residents living alongside this road.	The off-slip from A14 westbound into Felixstowe Road has a deceleration lane, which would be used by any HGVs accessing the freight management facility from Felixstowe Port.

Darsham Parish Council (RR-0267)

Table A.13: Darsham Parish Council

Matter raised	SZC Co.'s Response
Darsham Parish Council Submission to Planning Inspectorate re EDF's DCO for Sizewell C & D. 1. Introduction and scope of submission. While Darsham Parish Council (DPC) shares the wider concerns about the impacts of EDF's proposals on transport, environment and tourism with the majority of local Parish Councils, and supports the views of the Environment Agency and national and local conservation groups, our submission concentrates on the siting and impacts of the Northern Park and Ride (NPR) which is located within the Parish Council boundary. 2. Consultation responses. 3. Traffic flow 4. Congestion 5. Level crossing closures	SZC Co. has undertaken a robust site selection process to determine the location of the northern park and ride. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] and in Volume 3, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.4) [APP-353].

Matter raised	SZC Co.'s Response
6. Dark skies 7. Rat-running 8. Noise and pollution 9. Legacy provisions 10. Geology, drainage and flood risk 11. Traffic constriction 12. Relief road 13. Summary: Taken as a whole, Darsham Parish Council conclude that siting the NPR north of Darsham Station on a single carriageway section of the A12 adjacent to a level crossing is a serious mistake. (The Southern Park and Ride is located off a dual carriageway) Darsham Parish Council (CP & MS) September 2020.	

Hacheston Parish Council (RR-0447)

Table A.14: Hacheston Parish Council

Matter raised	SZC Co.'s Response
Freight Management Strategy	
4.2 Sustainability HPC has consistently advocated the use of sea and rail for the transport of heavy construction materials and we are not convinced that the transport strategy has been exhaustively researched or is accurately presented in the DCO Application. A larger proportion of construction materials can be carried by rail and improvements to the East Suffolk line will remain a valuable legacy for the community for years to come.	SZC Co. agrees with the parish council that optimum use should be made of rail and marine transport. This has enabled SZC Co. to propose changes to the Application in January 2021 to enhance the rail strategy and propose a new temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport.

Matter raised	SZC Co.'s Response
Associated Developments – Southern Park and Ride	
Location of the southern park and ride 1. Introduction Hacheston is a small village 14 miles from the site of Sizewell C. The Southern Park and Ride facility, (SP&R) will be sited within the parish on elevated ground close to the A12. Whilst HPC accepts that park and ride facilities reduce the number of workforce vehicles on local roads, we are opposed to the proposed location. The visual impact of the site and the noise and air pollution will have an adverse impact on the lives of local residents and light pollution is likely to have a serious detrimental impact on the dark skies of the surrounding area. The combined impact of over one thousand vehicles 7 days a week on local roads plus a large increase in HGVs on the A12 will seriously affect the daily lives of Hacheston residents for 12 to 15 years.	The temporary southern park and ride at Wickham Market is required to support the construction of Sizewell C through the capture of wider workforce traffic from the south and west of the A12. A large amount of the impacts of the southern park and ride have been assessed to be minor, including impacts on heritage assets, soils and land use, impacts on the transport network, noise impacts, ecological impacts, groundwater impacts and other impacts on amenity given the temporary nature of the site's proposed use. There would be moderate impacts in terms of landscape on users of footpaths near to the site and their views. This is the only impact that is considered to be significant, and is to be mitigated as far as possible. Potential traffic impacts in Wickham Market are proposed to be mitigated through local measures which have been discussed and agreed in principle with the parish council. Further information can be found within Volume 4, Chapters 4 to 12 of the ES (Doc Ref. 6.5) [APP-378 to APP-408] and Volume 1, Chapter 4 of the ES Addendum (Doc Ref. 6.14) [AS-183].
Location of the southern park and ride 2.1 Location The Southern Park and Ride should be situated further south on the A12 at Martlesham where an under-used P&R exists. On the basis that 1 bus can replace up to 50 private cars, this location could remove hundreds of cars from the busiest section of the A12 around Woodbridge.	SZC Co. has undertaken a robust site selection process to determine the location of the southern park and ride. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] and in Volume 4, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.5) [APP-383].
Landscape and Visual	
Visual and Environmental Impact of the Southern Park and Ride	During construction, operation and the removal and reinstatement phase of each park and ride, the landscape character of the area will

Matter raised	SZC Co.'s Response
2.2 Visual and Environmental Impact The proposed site for the SP&R is inappropriate. It is a rural setting, a special landscape between 2 protected river valleys. The SP&R will be an industrial development of 26.4 hectares of parking, service buildings and dense lighting. The site is elevated and it will be visible from many local properties in the area. We believe that the ecological and environmental mitigation measures proposed are inadequate, for example the bunding around the site has been reduced from that proposed at Stage 4.	change. However, the landscaping strategy for each site has been designed to minimise potential impacts on amenity and recreational, and landscape and visual receptors through the provision of landscape bunds, buffer zones and planting. The detailed design for landscaping will follow the Associated Development Design Principles (Doc Ref. 8.3) [APP-589]. As part of the accepted changes (April 2021), SZC Co. has extended the landscape bund adjacent to the north-western boundary of the site. Once the park and rides are no longer necessary for the construction of the main development site, the land at each site would be reinstated to its former use (be it agricultural use or highway land). Therefore, any potential urbanisation and visual impact would be temporary.
Operation of the Southern Park and Ride - Night-time lighting 2.3 Light Pollution The facility will operate 20 hours in 24 and at night, with lighting columns 6 metres high on site and 10 metres high on the access roads, light spill and loom will considerably detract from the valued dark skies of the area.	The impact of lighting at the southern park and ride site has been assessed as part of Volume 4, Chapter 6 (Landscape and Visual) of the ES (Doc Ref. 6.5) [APP-390] and suitable mitigation has been proposed. Lighting within the car parking areas would be restricted to 6m in height to minimise visibility during day and night time. Lighting columns along the proposed access road would be 8m in height to reduce the number of columns necessary to produce a lighting scheme that meets highway authority requirements. The lighting columns would utilise LED base lights with zero-degree tilt to minimise light spill and along the perimeter would be fitted with demountable shields to reduce backward spill of light into properties and adjacent habitats. The lighting design is controlled by the Associated Development Design Principles (Doc Ref. 8.3) [APP-589] which detail the requirements for lighting proposals, in accordance with the latest Institution of Lighting Professionals Guidance Note.
General impacts	SZC Co. recognises that the scale of Sizewell C has led to concern regarding its impact on people and the environment. Sizewell C is a

Matter raised	SZC Co.'s Response
4 Other areas of concern 4.1 Quality of life HPC is concerned that SZC power station will irreversibly damage the coastline and landscape and have profound impacts on the wildlife, beauty and tranquility of East Suffolk which residents cherish.	major development and comprises a Nationally Significant Infrastructure Project (NSIP). The principle of the need for nuclear power generation in the UK has been established by the Government. Sizewell is identified in the NPS for Nuclear Power Generation (NPS EN-6) as one of eight potentially suitable sites for deployment of new nuclear power stations by 2025. Annex C to NPS EN-6 confirms that that the inclusion of Sizewell C in the NPS reflects the in-principle acceptability of its location, and recognises the potential acceptability of significant environmental effects in view of the national need for nuclear power generation and the scarcity of alternative sites. Further information can be found within the Planning Statement (Doc Ref. 8.4) [APP-590]. The ES (Doc Ref. Book 6) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260], identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are all summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the draft DCO and section 106 Agreement.
Noise and vibration	
Operation of the Southern Park and Ride 2.4 Noise Levels Despite the conclusions reached in the DCO Application, HPC does not accept that noise will have negligible impact on the neighbourhood during the construction of the SP&R.	The assessment presented in Volume 4, Chapter 4 (Noise and Vibration) of the ES (Doc Ref 6.5) [APP-384] remains SZC Co.'s view as to the likely impacts from the construction of the southern park and ride scheme. Notwithstanding these outcomes, noise arising from construction will be managed through the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. Should there be any properties that are subject to sufficiently high levels of noise from the construction

Matter raised	SZC Co.'s Response
	works, enhancements to their sound insulation will be available under the Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES (Doc Ref 6.3) [APP-210]) , or in extreme circumstances, occupants may be temporarily relocated, both subject to meeting eligibility criteria.
Transport	
Concerns regarding the impact traffic will have on the village 2.5 SP&R Traffic The operation of the SP&R site will generate 1,784 vehicle movements in the day in addition to 900 at night. Workforce traffic in the village will have a serious impact on the lives of Hacheston residents.	The temporary southern park and ride at Wickham Market is required to support the construction of Sizewell C through the capture of wider workforce traffic from the south and west of the A12. Hacheston village is link 30 within the transport environmental assessment reported within Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]. It has been screened out of the assessment as there is forecast to only be a 2% increase in daily traffic through the village, which equates to 190 two-way vehicles a day over the course of a 24 hour period. No Sizewell C HGVs or buses would route through the village. The environmental impact of Sizewell C traffic on the village is therefore considered to be not significant.
Transport impacts/congestion on the B1116 3 Traffic Impact 3.1 Re-routing Up to 1000 HGVs a day carrying materials to the construction site will cause serious congestion on the A12. Drivers seeking alternative routes will re-route along unsuitable narrow lanes in the district and will be tempted to speed along the B1116 through the village.	Hacheston village is link 30 within the transport environmental assessment reported within Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]. It has been screened out of the assessment as there is forecast to only be a 2% increase in daily traffic through the village, which equates to 190 two-way vehicles a day over the course of a 24 hour period. The traffic model takes account of re-routing of traffic. No Sizewell C HGVs or buses would route through the village. The environmental impact of Sizewell C traffic on the village is therefore considered to be not significant.
Transport impacts on the Fiveways Roundabout	The Fiveways roundabout has been assessed within the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266], which

Matter raised	SZC Co.'s Response
3.2 Fiveways Roundabout. Fiveways roundabout links the B1078 and B1116 with the A12 and Hacheston residents use it for most of their journeys. All the SP&R traffic including buses and the light goods vehicle associated with the postal consolidation facility will use the roundabout. The junctions and slip roads onto the A12 are inadequate and provision for walkers and cyclists non existent. Without comprehensive mitigation measures the roundabout will be the site of dangerous congestion and delay.	demonstrates that the junction will not exceed operational capacity for all future year scenarios.
Transport impacts/congestion on Wickham Market 3.3 Traffic in Wickham Market Traffic using the B1078 to access the SP&R will cause serious congestion in Wickham Market and no realistic mitigation measures have been proposed. With its shops and medical centre the village is an important service centre for Hacheston residents.	Traffic modelling is reported in the Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and updated in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266]. The modelling shows that the Sizewell C traffic would not have a significant effect on the operation of the highway network in the vicinity of Wickham Market. SZC Co.is working with Wickham Market parish council and other stakeholders to agree a transport scheme for Wickham Market to be funded via the Section 106 Agreement. In addition, road safety improvements are proposed to be implemented along the B1078, to be funded via the Section 106 Agreement. SZC Co. traffic is to be managed through the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608], Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] and Traffic Incident Management Plan (Doc Ref. 8.6) [APP-607]. Mitigation during construction is also set out within the Code of Construction Practice (Doc Ref. 8.10(A)) [AS-273].

Benhall and Sternfield Parish Council (RR-0134)

Table A.15: Benhall and Sternfield Parish Council

Matter raised	SZC Co.'s Response
Associated Development – two village bypass	
Two village bypass. It is noted that the eastern roundabout and approaches are within the parish of Benhall, and the following comments refer to aspects of the proposed bypass within Benhall. The proposed 40 mph speed limit at the eastern roundabout will leave a 600m length of 50 mph limit on the bypassed (old) A12 from the Farnham / Benhall boundary (where the 30 mph limit starts) to the roundabout. Within this short length are the junctions with Benhall Low Street and Park Road, as well as the access to Molletts Farm (holiday complex). Given that the ethos of any bypass is to improve conditions for that which is bypassed, it would seem to be more appropriate to extend the 40 mph limit from the roundabout to the existing 30 mph limit through Farnham.	SZC Co. has discussed this with Suffolk County Council as part of the detailed design of the two village bypass and the County Council accept that existing speed limits will need to be reviewed in the vicinity of the roundabout and amended where appropriate.
Amenity and recreation	
Fen Meadow, Benhall. Whilst we support the proposed Fen Meadow in Benhall and appreciate the environmental and ecological benefits, we are concerned about the impact on Footpath 26. We note that the footpath is to be retained, but seek a commitment from the applicant that the footpath will be maintained in a walkable state, notwithstanding any works required to create the fen meadow, such as raising of the water level, or disruption to the meadow drainage.	The proposed fen meadow site at Benhall will not result in any closures of the existing Rights of Way in the area. Mitigation measures would be in place to ensure that footpath is not adversely affected by the development, line with the requirements set out within the Code of Construction Practice (Doc Ref. 8.10(A)) [AS-273].
Two village bypass Retention of footway at A12/ A1094 eastern roundabout	The design of the proposed roads (including the interactions between rights of way and drainage) has been carefully considered and has

Matter raised	SZC Co.'s Response
The earthworks for the leg of the eastern roundabout onto the A12 north are shown to be immediately adjacent to the footway running alongside the A12. We seek assurance that the footway will be retained, and that the drainage from the footway will not be compromised by the earthworks. (Refer to drawing SZC-SZ0204-XX-000-DRW-100039).	evolved through consultation and environmental assessments. SZC Co. also notes that the footway on the eastern roundabout onto the A12 will be retained as well the drainage being carefully considered. Further information on drainage principles can be found in the Outline Drainage Strategy in Volume 2, Appendix 2A of the ES (Doc Ref. 6.3) [APP-181]. This is secured by a requirement included in Schedule 2 of the Draft DCO (Doc Ref. 3.1(B)) [AS-143].

Melton Parish Council (RR-0780)

Table A.16: Melton Parish Council

Matter raised	SZC Co.'s Response
Freight Management Strategy	
Requests a greater volume of material is transported by rail 4. We welcome the decision to use rail and sea transport to reduce the number of HGV journeys. We urge that more be done to maximise rail freight over road transport, as the levels of proposed HGV movements are still too high for Suffolk's limited road network.	SZC Co. shares these objectives and the revisions to the Application proposed in January 2021 propose the further amendments to the freight management strategy which would ensure that everything practical is done to optimise the use of rail and sea for the movement of goods. As a result, HGV movements can be reduced, although SZC co. has maintained its mitigation strategy for traffic impacts including the provision of extensive infrastructure.
Main Development Site	
New pylons 7. It is inappropriate to install new pylons for SZC in an AONB. This invasive approach was avoided in the 1980s for SZB, as it should be in the 21st century for SZC. We suspect this is a	In addition to the case presented in the DCO submission (May 2020) (refer to the Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591]), the scope for undergrounding the power export connections was reviewed in detail and the results

Matter raised	SZC Co.'s Response
cost saving measure, not an unsolvable technical problem - and it should be reversed.	presented to the Councils in the form of additional technical report, confirming the technical difficulties with undergrounding. SZC Co. considered the potential for gas insulated cables (GIL), which are underground, but this was discounted on the basis that: • The insulating gas (SF₆) has 22,000 times the global warming potential of CO₂. Although sealed, industry experience is that it gets 'lost' at a rate of c. 1% per annum on average. This could present a 10% increase to the lifetime carbon footprint of Sizewell C and is contrary to the UK Government's aim of achieving net zero by 2050. • Construction of GIL would require the operational platform to be extended c. 20m into the Sizewell Marshes SSSI, with consequential further loss of 0.6ha of SSSI habitat. • Deeper excavations for the additional galleries (if underground cables were used) may not be practical given the constraints on the main development site. • The GIL life expectancy is not sufficient to cover the life of the power station – full replacement would be required after c. 40 years. Any faults within the GIL during operation would take on average two weeks to repair (compared with a day for the restringing of the wires on overhead lines). • Experience from Hinkley Point C has indicated that the gallery installation would introduce risk to schedule and cost. The use of pylons continues to be the most appropriate solution. The impact of the pylons is assessed in Volume 2 of the ES (Doc Ref. 6.3) [APP-178 to APP-347] and the Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181], most notably the Landscape and Visual assessment, and remains valid. SZC Co. have considered various alternative pylon schemes through consultation. The four-pylon option proposed represents the most

Matter raised	SZC Co.'s Response
	appropriate approach with regard to visual impact. Whilst the pylons would contribute towards visual effects this must be considered in the context of the visual effects of the main development site as a whole. Considered in this context the pylons are not likely to contribute to any change in the significance of residual visual effects, albeit it is acknowledged that the nature of effects on visual receptors would be different by the introduction of pylons to the effects resulting from the proposed power station structures, and in particular in views from close proximity, including along Sizewell beach, which is within the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast. SZC Co. understand the concerns raised about the visual impact of the overhead lines. Through discussions with stakeholders, tower heights were reduced during the design development process and the Planning Statement (Doc Ref. 8.4) [APP-590] provides full details to demonstrate how the Application accords with policy and other relevant matters. Notwithstanding this, SZC Co. has continued to explore opportunities to reduce the visual impact of the overhead power lines on the main platform. Through detailed discussions with stakeholders and further assessment, SZC Co. now intends to reduce the height of the southernmost pylon from 75mAOD to 59AOD. The necessary amendments were proposed in the DCO Change Submission (Jan 2021). Further information can be found in the Site Selection Report, appended to the Planning Statement (Doc Ref. 8.4) [APP-591] and Volume 2, Chapter 6 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.3) [APP-190].
Associated Development – Southern Park and Ride	
Location of the southern park and ride	The Site Selection Report , appended to the Planning Statement (Doc Ref. 8.4) [APP-591] and Volume 4, Chapter 3 (Alternatives and

Matter raised	SZC Co.'s Response
3. We note the proposal to locate the Southern Park & Ride north east of Wickham Market and insist that the Stage 2 consultation option for it to be located adjacent to the Woods Lane(A1152) roundabout with the A12 remains off the table (supporting evidence paragraph 12).	Design Evolution) of the ES (Doc Ref. 6.5) [APP-383] detail why the Woods Lane site was discounted and SZC Co. are not considering it any further.
Noise and Vibration	
Operation of rail 5. Sizewell night-time goods trains (speed-limited to 10mph) through Melton will cause noise disturbance. Melton homes likely to be adversely impacted should now be identified and appropriate mitigation measures secured as part of any consent.	The draft Rail Noise Mitigation Strategy (Volume 3, Appendix 9.3.E of the ES Addendum (Doc Ref 6.14) [AS-258]) set out the physical and operational measures that will be implemented to control railway noise and vibration. The proposed measures include a night-time 10mph speed limit through Melton to limit both railway noise and vibration. For those properties that are most affected, enhancements to their sound insulation will be available under the Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES (Doc Ref 6.3) [APP-210]), subject to meeting eligibility criteria.
Socio-economics	
Negative impacts to community including jobs 8. We believe the community dis-benefits of SZC outweigh the benefits. This mirrors MPC's view following its community consultation event in March 2019. The community will incur severe dis-benefits to transport, the environment and pollution, tourism, accommodation and community safety. While the economic benefits to the supply chain and jobs are welcome, in the latter case they fall short of expectations. For new jobs, only a small proportion of the higher graded, senior, posts will go to local people.	SZC Co. is seeking to mitigate all significant adverse effects related to the Sizewell C Project. In order to understand the extent of the effects, an Environmental Impact Assessment has been undertaken and physical mitigation and implementation measures, as well as financial mitigation identified. The mitigation measures identified within the ES and ES Addendum are summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the draft DCO and section 106 Agreement. In addition, SZC Co. has set out a number of strategies to enhance the economic benefits of the Sizewell C Project, for example, as set out in

Matter raised	SZC Co.'s Response
	Appendix A, the Employment, Skills and Education Strategy; and Appendix B, the Supply Chain Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611]. A range of mitigation measures have been developed, summarised in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195], to avoid or reduce significant effects – this includes a Tourism Fund, Housing Fund, a Public Services Resilience Fund and implementation strategies like an Accommodation Strategy (Doc Ref. 8.10) [APP-613] and a Community Safety Management Plan (Doc Ref. 8.16) [APP-635].
Negative impacts to community including jobs 9. SZC strategies for delivering benefits and mitigating dis-benefits appear to have good governance arrangements. But there is still much uncertainty. Will all partner organisations sign-up to the strategies? Will SZC put in sufficient investment? There are huge risks to Suffolk's £2bn tourism industry. SZC's large transient workforce will inevitably place strain on existing housing and community infrastructure.	SZC Co and regional stakeholders have been working together to develop the scale and implementation of mitigation for all socio-economic effects identified for the community. These will be secured through the Section 106 Agreement, which will also secure monitoring and governance arrangements to ensure transparent, balanced and effective use of mitigation and direction of strategies throughout the construction phase in order to pre-empt and prevent effects from occurring in the first instance. SZC Co. recognise that in terms of statutory activities like housing and homelessness prevention, social care and public health, education and economic development, local stakeholders and Councils in particular are well-placed to deliver mitigation effectively through existing channels and supporting existing governance structures. As such, SZC Co have sought to provide sufficient flexibility in mitigation to allow those stakeholders to implement mitigation, while maintaining control in order to meet planning and regulatory tests. SZC Co. and regional stakeholders agree that a Tourism Fund is an appropriate way to ensure potential changes in visitor activity does not result in economic consequences. SZC Co. has shared with East

Matter raised	SZC Co.'s Response
	Suffolk Council and Suffolk County Council a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. SZC Co.'s Accommodation Strategy (Doc Ref. 8.10) [APP-613] is based on an 'assessment case' whereby c.5,900 workers would be Non-Home Based (NHB) and seeking local accommodation. A full assessment on the housing market and tourist accommodation sector has been undertaken, resulting in a balanced strategy with a range of embedded and additional mitigation measures that seek to reduce pressure on the housing market by providing Project accommodation, an Accommodation Management System, and a Housing Fund to boost supply in private and tourist sectors and provide resilience to East Suffolk Council's statutory housing service. SZC Co. and the Councils have been working to develop an appropriate approach to governance and implementation of a Community Fund, including options for ring-fencing provision for the areas where change is most likely to occur as a result of the Project, independent management of the Fund by Suffolk Community Foundation, and a role for an Oversight Panel including the Councils. The approach will be based on the Hinkley Point C Community Fund which has been implemented successfully in Somerset through various strategic, small and open grants.
Transport	
Impact on the A12	Further information has been provided in SZC Co.'s submission in January 2021. Additional traffic modelling, journey time analysis and supporting trip generation evidence is provided in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266]. The

Matter raised	SZC Co.'s Response
Crucially, Melton does not want its already significant traffic congestion to be exacerbated by SZC -[Redacted] MPC's major concerns are: 1. The current A12 is inadequate to cope with additional traffic generated by the new energy Projects at Friston and Sizewell. EDF's plans for improving the A12 do not solve the problem. Our supporting evidence contains suggestions for road improvements on the A12 and A1152 (paragraphs 17 to 19).	Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] summarises the development of a VISSIM micro-simulation model of the A12 corridor in order to provide more detail on the impact of Sizewell C traffic on driver delay. Based on the VISSIM modelling, no material impact on driver delay is predicted and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the A12 corridor between Seven Hills and Melton.
Impact on Martlesham, Woodbridge and Melton 2. The Friston and SZC energy Projects will also lead to an explosion of rat-running through Martlesham, Woodbridge and Melton when drivers seek alternative north-south routes that avoid the A12 or the Southern P&R (supporting evidence paragraphs 13 to 15)	Further information has been provided in SZC Co's submission in January 2021. Additional traffic modelling, journey time analysis and supporting trip generation evidence is provided in the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266]. The VISUM strategic model is used to understand the potential for re-routing of traffic in congested areas. The junction models take account of any potential re-routing of traffic as the flows have been derived from the VISUM strategic model. The Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] summarises the VISUM strategic model and junction modelling as well as the development of a VISSIM micro-simulation model of the A12 corridor, which was developed in order to provide more detail on the impact of Sizewell C traffic on driver delay on the A12 corridor between Seven Hills and Melton. Based on the VISSIM modelling, no material impact on driver delay on the A12 corridor is predicted and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the A12 corridor between Seven Hills and Melton.
Water Resources, Drainage and Flood Risk	
Water supply	Sizewell C's demand for potable water is estimated to be around 4Ml/day at peak during construction, and 2Ml/day during the operational phase when both units are in normal operation, and

Matter raised	SZC Co.'s Response
6. SZC will need 2-3m litres of freshwater daily, from an area of low rainfall where the frequency and severity of drought will worsen with climate change. We are concerned this will impact adversely on agricultural and domestic supplies and cause ecological problems in the region.	2.8Ml/day when one unit is in normal operation and one unit is in outage. Essex and Suffolk Water (ESW) has confirmed that they would be able to meet this demand in full from its Barsham Water Treatment Works (WTW), subject to ongoing environmental and feasibility studies. The Sizewell C scheme would likely involve bringing forward ESW's planned upgrade of Barsham WTW, installation of 30km new or replacement water mains between Shadingfield and Sizewell, and construction of a new pumping station at Holton. The scheme would likely connect into Saxmundham Water Tower and would be designed to increase the capacity and resilience of the local distribution network as well as meeting Sizewell C's demand. Further information can be found in Volume 1, Chapter 2, Section 2.2 a) iii) 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3, Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021.

A.3. Elected Representatives

Thérèse Coffey MP for Suffolk Coastal (RR-1215)

Table A.17: Thérèse Coffey MP for Suffolk Coastal

Matter raised	SZC Co.'s Response
Freight Management Strategy	
I wish to bring the following matters to the Examining Authority's attention:	SZC Co. is pleased to have been able to respond to these concerns through the accepted changes (April 2021) to the Application, submitted in January 2021. In particular, the changes would enable

Matter raised	SZC Co.'s Response
Transport I still think an increase in the proportion of freight arriving on site from rail and sea-borne transport methods should be provided during the construction phase. The documents confirm that over 60% of materials are proposed to be transported into the site by HGV. I understand that a jetty cannot be constructed because of environmental concerns and potential coastal erosion issues but EDF really do need to maximise the amount of materials that can come in by sea by increasing the use of the beach landing facility.	an increase in train movements to 4 trains per day and the construction of a new temporary Beach Landing Facility (BLF). Submitted with the changes is an updated Freight Management Strategy (Doc Ref. 8.18) [AS-280] which confirms that the effect of these changes would be to enable the movement of 60% of construction materials by rail or sea. The updated Strategy confirms that 40% is the minimum amount that must be moved by HGVs due to the nature of the goods.
Use of Rail <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> Similarly, considering the constraints on sea freight, it is disappointing that EDF have not developed proposals to upgrade the East Suffolk line by commissioning the GRIP 3 process to ensure a greater percentage of construction material is delivered by rail. As the County Council's response notes, the rail-led strategy previously proposed would have resulted in allowing a minimum of five rail deliveries per 24-hrs which would all have taken place during the day. This is compared to the now proposed three rail deliveries per 24-hrs, mostly taking place at night-time – as the capacity of the line won't have been increased by building the passing loop. It is disappointing that a solution was not found for the passing loop. Currently, there are no night-time rail movements on the East Suffolk Line or the Leiston branch line and I'm concerned on behalf of constituents that rail movements during construction will	SZC Co. have been working closely with Network Rail for a number of years in order to optimise the potential for the movement of construction materials by rail. Network Rail have advised that substantial changes to the East Suffolk line could not be undertaken in time to enhance rail capacity for the Sizewell C construction programme. Nevertheless, the close working has identified the potential to enhance the Integrated Strategy that was explained in the submitted Application. The accepted changes (April 2021) allow for up to 4 trains per day and (together with the new temporary BLF) would enable the maximum amount of goods practical to be transported by rail or sea. Detailed noise assessments have been submitted to the Councils and a draft Rail Noise Mitigation Strategy (Volume 1, Appendix 9.3.E of the ES Addendum (Doc Ref 6.14) [AS-258]) has been shared which would add to the Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES (Doc Ref. 6.3) [APP-210]) submitted with the Application. SZC Co. is confident that all necessary mitigation can be achieved to enable the acceptable movement of trains at night.

Matter raised	SZC Co.'s Response
adversely impact the residents of Woodbridge, Melton, Saxmundham and to a certain extent, Leiston, before the new branch line is built into the construction site. I would urge the examining authority to challenge this and that if the passing loop is not constructed then to put conditions to ensure the relevant mitigation is put in place to minimise both vibration and noise. I am not an engineer but I understand that there are a variety of mitigations that could be undertaken including requiring welding and lubrication to the track to reduce vibrations and train screech, sound barriers and also the use of quieter rolling stock (which are available in the UK).	The GRIP 3 process is well advanced for the necessary rail enhancements and there is intense, detailed working with Network Rail which is presented to the joint planning authorities on a fortnightly basis.
Use of Rail <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> The green rail route is welcomed though as it removes the unloading activity from the centre of Leiston into the site itself. I should declare an interest as I live quite close to the East Suffolk railway line. In the event that the examiners consider EDF's transport strategy acceptable, then I back Suffolk County Council's (as Highway Authority) list of additional assurances and mitigations required for the road network. Limiting the number of lorry movements to that used in Hinkley or capping at the number that would have been the case in the rail led strategy of earlier proposals would go a considerable way to reducing the impact on local communities and other businesses.	SZC Co. shares these aspirations and is working closely with the authorities to develop the detail of the Freight Management Strategy and the necessary controls and mitigations that need to be put in place to enable the sustainable movement of goods whilst protecting the amenity of residents and communities. This includes a Delivery Management Scheme which would enable the tracking and monitoring of HGV movements. Further information is set out in the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608].

Matter raised	SZC Co.'s Response
I also consider the use of APNR an effective way to ensure compliance on the modes of transport and routes used for the conveyance of materials and people to and from the site.	
General Project	
Principle of Nuclear Power Station at Sizewell Relevant Representation of Dr Thérèse Coffey MP for Suffolk Coastal concerning EDF's proposals for the Sizewell C Nuclear Power Station. Tackling climate change and ensuring we have enough electricity as we phase out fossil fuels is vital to the success and sustainability of this country. Nuclear power as a zero carbon energy source is a key part of the energy mix and Sizewell is an important nuclear cluster, generating electricity before the area was designated an AONB in 1970.	Noted. The support is welcomed.
Impacts on the local community and transport network The economic gain from a Project the size of this would be really positively felt - with the creation of thousands of jobs including well-paid, long term jobs - but changes need to be made even at this stage to get my full support. The construction of Sizewell C is extremely important for the UK's future energy supply. While I recognise and understand why many local residents are opposed, nuclear power has been a long-standing sector in our part of Suffolk – and the construction of a new nuclear reactor would have significant benefits for the local community and local economy, which is very important for local prosperity given the low average income in this part of Suffolk and the country.	SZC Co. is grateful for the support. The accepted changes (April 2021) to the Application address comments received from stakeholders, including but not limited to changes to increase the number of rail and sea vessel movements, re-use former Sizewell A land for Sizewell B relocated facilities and therefore minimise development in AONB, changes to the SSSI crossing design and the provision of a bridleway link between Aldhurst Farm and Kenton Hills. SZC Co. also intends to bring the growing Sizewell estate into the management of an independent Environment Trust which will focus on biodiversity and the stewardship of the natural habitat. It has the opportunity to extend beyond the estate, which will provide a positive legacy for Suffolk. A Community Fund will be implemented via the Section 106 Agreement to help mitigate and compensate for intangible, residual or in-combination effects on local communities. Details of the Community

Matter raised	SZC Co.'s Response
That said, I recognise that many people have moved or retired here to enjoy the very special nature and environment of the Suffolk coast and will not have experienced the construction of Sizewell B nor Sizewell A. I fully understand their concerns that a new nuclear power plant at Sizewell will create significant disruption to local communities and the transport network, especially during the construction phase. I also share people's concerns about the environmental impact. Mitigation against all of these impacts is absolutely key.	Fund are included in the draft Section 106 Agreement [PDB-004], which stakeholders have the opportunity to comment on.
Design of Nuclear Power Station at Sizewell There is a further cohort of constituents who have always opposed nuclear power and think it unsafe. Our regulatory regime is best in class and I do have full confidence in the Office for Nuclear Regulation (ONR). I declare that as Secretary of State for the Department of Work and Pensions (DWP), the ONR is an arms' length body sponsored by DWP. I met the ONR early on in my time as an MP and have facilitated conversations between the ONR and officials and councillors, particularly during the GDA stage of the type of reactor being proposed at Sizewell C. It is through those conversations that it quickly became clear that aesthetic design changes to the reactor would not be possible, unlike what had happened with the iconic Sizewell B. None of those meetings happened since I became a DWP minister. Ever since I became the MP in 2010, the consideration of Sizewell C has taken a significant part of my time.	Noted. No further action.
Impacts on the local community and transport network	Noted. The accepted changes (April 2021) to the Application address comments received from stakeholders, including but not limited to

Matter raised	SZC Co.'s Response
I have worked with our local councils, residents, businesses and other organisations to go through the details of this huge Project. I want to pay tribute to our councillors and particularly our council officers for the amount of work they have done on much more of the detailed assessment and consideration they have undertaken. Over the summer, I have read through the documentation and held meetings with key organisations and regulators including Network Rail, the Environment Agency, Natural England and Essex & Suffolk Water. I rely considerably on the regulators' examinations and submissions regarding environmental matters. I also will refer regularly to the submissions made by the district and county councils which understandably have asked for changes particularly regarding transport and the natural environment.	changes to increase the number of rail and sea vessel movements, re-use former Sizewell A land for Sizewell B relocated facilities and therefore minimise development in AONB, changes to the SSSI crossing design and the provision of a bridleway link between Aldhurst Farm and Kenton Hills. SZC Co. also intends to bring the growing Sizewell estate into the management of an independent Environment Trust which will focus on biodiversity and the stewardship of the natural habitat. It has the opportunity to extend beyond the estate, which will provide a positive legacy for Suffolk. A Community Fund will be implemented via the Section 106 Agreement to help mitigate and compensate for intangible, residual or in-combination effects on local communities. Details of the Community Fund are included in the draft Section 106 Agreement [PDB-004], which stakeholders have the opportunity to comment on.
Worker accommodation campus and housing fund <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> Accommodation Campus I understand the concerns regarding the proposed site for the accommodation campus at Eastbridge. I had previously asked EDF and the local council to find different sites but I understand the local authority have been unable to find viable alternatives. Whilst the location selected is not ideal, I recognise the work EDF have done throughout the various consultation stages to reduce the height, with the tallest buildings closest to the reactor site. Although not ideal, an accommodation campus close to the site will also reduce traffic movements.	Noted. No further action.

Matter raised	SZC Co.'s Response
Various funds have been proposed including a housing fund to help take the pressure off the local housing market, details of which need to be worked through with the council. I recognise and welcome that off-site sports pitches will also be provided as part of the campus including a 3G pitch and two multi-use games areas at Alde Valley School and adjacent to Leiston Leisure Centre. As well as construction workers sharing these with the school and community during construction - the pitches will also be left as a legacy benefit.	
Conclusion In conclusion, while there is a significant amount of work that needs to take place during the DCO process including satisfying regulators that appropriate mitigation measures are put in place and further work with the county and district councils regarding transport, the environmental impact and legacy, I do think that the local and national economic gain plus the national and global environmental gain - including jobs, skills and legacy benefits, the UK's future energy need and contribution to achieving zero carbon – means that I support the construction of Sizewell C.	Noted. SZC Co. welcomes the support.
General EIA	
Environmental Enhancement and Net Gains <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> Environmental Impacts It seems from the documentation that EDF have done a lot of work on this to ensure mitigation.	Noted. SZC Co. are progressing Statements of Common Ground with its statutory stakeholders to agree the environmental assessment results and mitigation required.

Matter raised	SZC Co.'s Response
The question for Natural England, the Environment Agency and the Marine Management Organisation though is whether it is enough. As the Defra Minister responsible for the 25-year Environment Plan when it was published, I'm keen to see this scheme stand out as an environmental exemplar with EDF contributing to nature recovery as well as just mitigation. The examining authority needs to look carefully at whether the regulators are satisfied that the measures submitted are enough to ensure the safe protection of Minsmere and Sizewell Marshes.	
Main Development Site	
SSSI Crossing <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> I am aware of the issue regarding the SSSI and encourage EDF to proactively change their plan to be in line with the requirements of Natural England and the Environment Agency. There is also the need to adequately address the issues regarding light and noise pollution, principally on the site, though there are measures that can be taken along the transport routes to mitigate, e.g. window glazing and black out blinds.	The SSSI crossing design as submitted in the DCO Application (May 2020) has been subject to change as proposed in the DCO Change submission in January 2021. The design of the SSSI crossing has been changed, to comprise separate embankments at either end with an approximately 30m long single-span bridge connecting them. The bank and channel of Leiston Drain would be unaffected. This new bridge design would retain substantially more space around the Leiston Drain. The revised design retains an approximate crest width of 40m at road level and an overall width of up to approximately 70m at its base. Splayed wing walls over the Leiston Drain would maximise daylight. The proposed single span bridge option would reduce the permanent land take of wet woodland habitat from the SSSI by approximately 0.08ha and reduce the potential for fragmentation compared to the culvert option.

Matter raised	SZC Co.'s Response
	The Application included a Lighting Management Plan (Volume 2, Appendix 2B of the ES (Doc Ref. 6.3) [APP-182]) which demonstrated how a dark corridor could be delivered on the SSSI crossing to facilitate movements by bats and to minimise light spill to the SSSI. The Application also includes an extensive boundary treatment including a 5m bund/noise barrier along the southern edge of the temporary construction area which will greatly reduce noise spill to the SSSI and this is demonstrated in relevant modelling outputs.
Associated Development – two village bypass	
Two village bypass <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> Two-Village Bypass I strongly support this scheme by-passing the villages of Stratford St Andrew and Farnham and it is absolutely essential this is put in place prior to construction. It has been a longstanding ambition to upgrade the A12 in this location, albeit on a larger scale. I think it is right to bypass the two villages, rather than the solution of only bypassing Farnham proposed in earlier consultations. There is still an issue of contention on the precise routing, particularly regarding Foxburrow Wood. I would encourage Natural England to resolve with EDF the precise status of the woodlands (in regards to protection levels) and to modify the route as appropriate.	SZC Co. welcomes the positive response for the two village bypass and will continue to work with Suffolk County Council, East Suffolk Council and the Environment Agency on the detailed design of the two village bypass. No further work is required regarding the woodlands. Foxburrow Wood and Palant's Grove are both classified as County Wildlife Sites (CWSs). The woodland block which connects Foxburrow Wood and Palant's Grove has been downgraded and thus is no longer classified as ancient woodland. However, it provides ecological benefits in connecting the CWSs and its removal to run the two village bypass through between Foxburrow Wood and Palant's Grove would result in ecological severance and irreversible harm to the interconnectivity of these important habitats. The proposed alignment avoids this impact.
Associated Development – Sizewell link road	

Matter raised	SZC Co.'s Response
Sizewell link road <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> Sizewell Link Road I support the construction of a new Sizewell Link Road to take the pressure of the B1122 and the communities of Theberton and Middleton Moor during the construction phase but would strongly suggest that this should be removed on the completion of the Project rather than kept as proposed by the DCO Application. A permanent road in that location would have a detrimental impact on the landscape and have no legacy benefit.	SZC Co. welcomes the support for the Sizewell link road. As a response to the Stage 4 consultation, a decision was made to propose the Sizewell link road as a permanent facility, rather than temporary. It was considered by SZC Co. that it would be preferable to avoid further disruption to local residents and the environment by removing the road and to leave it as a lasting legacy of the Sizewell C Project. Retaining the Sizewell link road as a permanent road will be helpful in ensuring that vehicles that need to access Sizewell B and C during operation of the power station have an efficient route to site without travelling through the B1122 communities. Furthermore, retaining the Sizewell link road offers permanent benefits, particularly in relation to the Theberton element of the bypass, including improvements in noise and air quality in the village. Suffolk County Council and East Suffolk Council jointly summarised these benefits in their response to the Stage 4 consultation (paragraph 246). The Application therefore proposes to leave the road in place and be adopted by the Highways Authority. SZC Co. anticipate that the existing B1122 would be downgraded by Suffolk County Council to an unclassified road once the Sizewell link road is operational. As the majority of traffic would reassign to use the Sizewell link road, the B1122 will experience much lower traffic volumes and could become more popular among cyclists, helping improve cycling connectivity in the immediate area. SZC Co. is currently undertaking further engagement with East Suffolk Council and Suffolk County Council regarding this proposal.
Socio-economics	
Tourism <i>[I wish to bring the following matters to the Examining Authority's attention:]</i>	SZC Co. welcomes the recognition that issues raised can be addressed through mitigation funding and has been working with regional stakeholders to ensure measures are in place to reduce the

Matter raised	SZC Co.'s Response
Impact on other businesses Tourism is an important part of the Suffolk economy and I am conscious of the concerns of some local employers and organisations on whether tourists will be put off by the large construction site and whether their employees will migrate to work on the construction. While it is for individuals to decide for whom to work, I think issues can be addressed through any mitigation funding and legacy benefits.	risk of effects, as stated here, on the perception of the tourist economy and the labour market. In terms of labour market effects: The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, as set out in the Employment, Skills and Education Strategy (Appendix A to the Economic Statement (Doc Ref. 8.9) [APP-611]), there may be some effects on local businesses, such as some vacancies being harder to fill. In order to tackle this: • A SZC Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Project and wider employment market. • Local firms will be supported through local supply chain engagement activities to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. • Upskilling will benefit the Project and the wider market – focus will be on 'legacy' roles (as determined by the Council's research base)

Matter raised	SZC Co.'s Response
	that the region and the Project both need for the long term. SZC Co. and Suffolk County Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy (Appendix A to the Economic Statement (Doc Ref. 8.9) [APP-611]) that will be secured by the Section 106 Agreement. Broad scope and implementation has been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region - for example providing revenue funding to deliver on existing capital investment in skills centres in the region. • SZC Co. proposes to use part of the Skills or Public Service mitigation funds to provide a contribution to workforce planning at the outset of the Sizewell C Project may help to improve Suffolk County Council's capacity to retain staff in the social care sector, plan for recruitment and training and provide resilience. Funding would be for the purposes of measures that provide resilience to workforce planning for the social care sector in Suffolk. In terms of Tourism Effects: • SZC Co. and local tourism stakeholders recognise that there is a need to provide pre-emptive support for the tourist sector to promote and market the region, and provide a clear strategy including investment in physical infrastructure and support for tourist accommodation providers in order to reduce risks identified through quantitative research, set out in the Economic Statement (Doc Ref. 8.9) [APP-610] and Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195].

Matter raised	SZC Co.'s Response
	- SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. - An Accommodation Strategy (Doc Ref. 8.10) [APP-613] has been developed to minimise harm to the sector during the peak seasons, when tourist and worker demand for accommodation may overlap. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects such as marketing, promotion, research and supporting local Projects. - SZC Co. agree that it is prudent to address the risk of any uncertainties and therefore have developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/reconfiguration of existing tourist accommodation sites.
Water Resources, Drainage and Flood Risk	
Flood Risk <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> Sea Defences I note the mitigation plans that have been submitted to prevent any additional coastal erosion from that which would naturally occur. It is important that regulators are satisfied with that mitigation and that the relevant monitoring programme is also put in place. There is a specific issue regarding a phase in the construction where there will be an	The Main Development Site Flood Risk Assessment (FRA) (Doc Ref. 5.2(A)) [AS-018] includes tables that summarise the overall flood risk to the main development site. These show some medium risks related to coastal and breach flooding during the construction and decommissioning phases and low risk for all types of flooding during the operational phase. Mitigation measures are provided in the FRA, Volume 2, Chapter 19 (Groundwater and Surface Water) of the ES (Doc Ref. 6.3) [APP-297] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]. Accepted changes (April 2021) include

Matter raised	SZC Co.'s Response
increase to flooding risk upon removing the sea wall (albeit temporary) and back-up flood defences are clearly needed.	for a temporary sheet pile wall during construction which would limit flooding to a low risk. This is assessed in the Main Development Site Flood Risk Assessment Addendum (Doc Ref. 5.2(A)Ad) [AS-157] .
Water Supply <i>[I wish to bring the following matters to the Examining Authority's attention:]</i> Water There are significant points in the construction phase where significant amounts (circa 3 megalitres) of water per day are required for cooling tunnels. Having spoken to the Environment Agency and Essex and Suffolk Water (ESW), this is significantly higher than previously planned. I am confident that the proposals put forward by ESW – which does not rely on very local water sources – will be sufficient though they are dependent on EDF contracting prior to DCO outcome to ensure that the water can be piped in at the necessary moment in the timeline. More information is required on this as well as assurances there won't be any risk to private water supplies as a result.	Sizewell C's demand for potable water is estimated to be around 4MI/day at peak during construction, and 2MI/day during the operational phase when both units are in normal operation, and 2.8MI/day when one unit is in normal operation and one unit is in outage. Essex and Suffolk Water (ESW) has confirmed that they would be able to meet this demand in full from its Barsham Water Treatment Works (WTW), subject to ongoing environmental and feasibility studies. The Sizewell C scheme would likely involve bringing forward ESW's planned upgrade of Barsham WTW, installation of 30km new or replacement water mains between Shadingfield and Sizewell, and construction of a new pumping station at Holton. The scheme would likely connect into Saxmundham Water Tower and would be designed to increase the capacity and resilience of the local distribution network as well as meeting Sizewell C's demand. Further information can be found in Volume 1, Chapter 2, Section 2.2 a) iii) 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3, Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021.

Dr Daniel Poulter MP (RR-0610)

Table A.18: Dr Daniel Poulter MP

Matter raised	SZC CO.'s Response
Impact of the Project on Suffolk landscape and habitats Dr Poulter has noted various concerns with the current proposals, including: Extensive damage to Suffolk's coastline and protected landscapes and habitats	SZC Co. has given careful consideration to the location of the Sizewell C site within the AONB and Heritage Coast and has sought to minimise and mitigate landscape and visual effects and effects on the natural beauty and special qualities of the AONB through an iterative design process. SZC Co.'s assessment (refer to Volume 2, Chapter 13 (Landscape and Visual) of the ES (Doc Ref 6.3) [APP-216], as updated by Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]) has concluded that local effects on the AONB will not result in any widespread effect on the AONB. SZC Co. has deployed extensive mitigation as part of the embedded design for operation and construction phases to reduce adverse effects.
Transport of materials <i>[Dr Poulter has noted various concerns with the current proposals, including:]</i> Due to the change from sea-based to land-based delivery of construction materials, existing infrastructure is insufficient to support the volume and weight of construction traffic Dr Poulter will also likely note other local implications of the Project as well as the upgrade needed to infrastructure to support such a large development in the region.	With the accepted changes (April 2021), SZC Co. is now proposing an enhanced rail service and the addition of a new temporary beach landing facility which would enable 60% of construction materials to be moved by sea or rail. At the same time, SZC Co. has maintained its proposals for enhanced road infrastructure set out in the Application including particularly the Sizewell link road and the two village bypass. Additionally, the two park and ride sites and the freight management facility at Seven Hills will act to limit and manage the movement of HGV and other vehicles on the road network. In combination, this is considered to be a comprehensive strategy and the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] submitted in January 2021 demonstrates the acceptable impact of the proposals on the highway network.

County Councillor Christopher G Hudson (RR-0259)

Table A.19: County Councillor Christopher G Hudson

Matter raised	SZC Co.'s Response
Freight Management Strategy	
Transport of materials For the following reasons, I submit my Representation: - Vast increase in HGV's and other vehicles on roads that are inadequate through rural and green belt areas, causing gridlock and environmental pollution.	With the accepted changes (April 2021), SZC Co. is now proposing an enhanced rail service and the addition of a new temporary beach landing facility which would enable 60% of construction materials to be moved by sea or rail. At the same time, SZC Co. has maintained its proposals for enhanced road infrastructure set out in the Application, including particularly the Sizewell link road and the two village bypass. Additionally, the two park and ride sites and the freight management facility at Seven Hills will act to limit and manage the movement of HGV and other vehicles on the road network. In combination, this is considered to be a comprehensive strategy and the Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266] submitted in January 2021 demonstrates the acceptable impact of the proposals on the highway network.
Project Funding and Mitigation Funding	
Funding for the Project <i>[For the following reasons, I submit my Representation:]</i> EDF is in debt and the coatings are unsustainable and lacks funding to complete Sizewell, with the U.K. bearing the costs of an unproven system, French-owned, with liabilities at other stations in Flamanville and Finland, both plagued with financial and technical problems-EDF's Finance Director resigned accordingly. The Folz report is essential reading to prevent Sizewell's completion. The disbenefits outweigh the benefits to both Suffolk and U.K. taxpayers.	Information on the Project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) [APP-066]. Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-011] and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-150]. The EPR™ design is now successfully operating at Taishan 1 and 2 in China. The French (Flamanville) and Finnish (Olkiluoto) Projects experienced delays as a result of an incomplete design. In the case of Olkiluoto, this was not agreed with the regulator until well after construction started. Both Projects also faced quality issues arising from restarting new nuclear build after a long gap. Flamanville has had

Matter raised	SZC Co.'s Response
	a delay in order to ensure the recommendations of the French regulator are met to the letter. Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. SZC Co. have a very good understanding of Project risks and how to mitigate them. SZC Co. has been able to learn from the experiences of EPR™ construction and this has informed the construction assumptions set out in the Environmental Statement (ES). For new nuclear power stations to be built, the Government has been clear that costs must come down. New nuclear costs are driven by construction and financing and both can be cheaper by replicating the design of Hinkley Point C. Evidence shows repetition brings costs down in nuclear development, just like other technology. Many of the design and qualification costs for Sizewell C have been paid for already at Hinkley Point – as well as the costs of setting up the supply chain and training workers. With the right timing, SZC Co. can directly transfer the skills from Hinkley Point C to Sizewell C. In 2019 the Government carried out a consultation on the use of a Regulated Asset Base model of financing (which was used for the Thames Tideway Tunnel) for new nuclear Projects. This consultation invited responses on all of the impacts of using such a model and the Government is now considering the responses that were received in forming its conclusion.
Landscape and Visual	
Impacts of the Project on the AONB <i>[For the following reasons, I submit my Representation:]</i>	SZC Co. recognise that the main development site will affect the performance of the immediate AONB during construction as recorded in the Volume 2, Chapter 13 of the ES (Doc Ref 6.3) [APP-216], and updated by the ES Addendum (Doc Ref. 6.14) [AS-181], but that

Matter raised	SZC Co.'s Response
There will be significant damage to an AONB visually and materially, since the new road infrastructure will dissect the AONB.	reasonable mitigation measures have been put in place to minimise effects. SZC Co.'s assessment has concluded that local effects on the AONB will not result in any widespread effect on the AONB. It is noted that NPS EN-6 recognises <i>"the potential for long-term effects on visual amenity"</i> (para 3.10.3) and that <i>"the scope for visual mitigation will be quite limited"</i> (para 3.10.8). SZC Co. have deployed extensive mitigation as part of the embedded design for operation and construction phases to reduce adverse effects. SZC Co. notes that nuclear infrastructure has been a feature of the AONB since its designation, with Sizewell A being in place before the AONB itself was designated. As such energy infrastructure has, and will continue to be, a feature of this part of the AONB and the AONB would not be 'overwhelmed' by it. In addition, SZC Co. note that the AONB is 'supported' by wider expanses of non-designated open countryside which forms a recognised setting to the AONB and is not impacted during construction. Sizewell C will deliver wider environment improvements to the AONB and its setting through the Section106 Agreement to be agreed as part of the Application.
Socio-economics	
Impact on tourism and employment opportunities <i>[For the following reasons, I submit my Representation:]</i> - Most of the jobs will be imported from the existing Hinkley station-local jobs will be unskilled, plus a significant blow to Tourism, as visitors will avoid a congested vast building site and seek a quieter environment.	In terms of supply chain and replication of Hinkley Point C: Sizewell C's construction phase will support around 2,600 jobs for local residents at the peak of activity in a range of different skills, roles and in both construction and non-construction sectors that would not otherwise arise (without the Sizewell C Project).

Matter raised	SZC Co.'s Response
	Replication of some parts of the supply chain developed for the first of a kind new fleet of UK nuclear new builds (at Hinkley Point C) is important to enable efficiencies – but there will be substantial opportunities for Suffolk-based firms to benefit from contracts over the lifetime of the Sizewell C Project, as has been identified in the Economic Statement (Doc Ref. 8.9) [APP-610] and within the Supply Chain Strategy, provided in Appendix B of the Economic Statement (Doc Ref. 8.9) [APP-611]. Work has been underway in advance of the DCO submission to provide information and support to local companies with an interest in bidding for contracts on the Sizewell C Project through the Supply Chain Portal (run by the Suffolk Chamber of Commerce, funded by SZC Co.). SZC Co. has committed to measures to support the local and regional supply chain to compete for and win work on the Sizewell C Project. These are set out in the Supply Chain Strategy appended to the Economic Statement (Doc Ref.8.9) [APP-611]. Some measures are already being enacted including the on-going operation of the Supply Chain Portal and other supply chain engagement activities by the Suffolk Chamber of Commerce on SZC Co.'s behalf. SZC Co. is working with the Councils, NALEP and Suffolk Chamber of Commerce to finalise governance and monitoring arrangements for the local supply chain engagement activity during the construction phase. As set out in the Supply Chain Strategy (Doc Ref.8.9) [APP-611], this will include 'on the ground' activities for potential local suppliers including 'meet the buyer' events and information sharing. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain.

Matter raised	SZC Co.'s Response
	In terms of impact on tourism: SZC Co. recognises the importance of the tourist economy within and around the Suffolk Coast, and has undertaken an assessment of the effects of the Sizewell C Project on tourism, in-line with the requirements of National Policy Statement EN-1, as part of Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195]. A Tourism Fund to promote the area and support the longevity of the very important and diverse tourist economy of the Suffolk Coast is proposed and will be secured in the Section 106 Agreement. The principles for this are set out in Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] and the Economic Statement (Doc Ref. 8.9) [APP-610], and have since been developed in collaboration with the local authorities. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects, such as marketing, promotion, research and supporting local Projects. SZC Co. is aware that monitoring through governance, as well as public datasets, has shown no adverse effect on the Somerset tourist economy from the construction activity at Hinkley Point C where a Tourism Fund has been applied. Separate Resilience Funds will be agreed bilaterally with RSPB Minsmere and National Trust Dunwich Heath. This will ensure that the activities funded through those measures do not overlap but can complement the plans, programmes and Projects supported by the proposed Tourism Fund (and other funds, where applicable).
Water Resources, Drainage and Flood Risk	
Water Supply	Sizewell C's demand for potable water is estimated to be around 4Ml/day at peak during construction, and 2Ml/day during the

Matter raised	SZC Co.'s Response
<i>[For the following reasons, I submit my Representation:]</i> There will be a vast increase of water needed for the Project in our dry area plus a threat to marine life from the suction pumps.	operational phase when both units are in normal operation, and 2.8MI/day when one unit is in normal operation and one unit is in outage. Essex and Suffolk Water (ESW) has confirmed that they would be able to meet this demand in full from its Barsham Water Treatment Works (WTW), subject to ongoing environmental and feasibility studies. The Sizewell C scheme would likely involve bringing forward ESW's planned upgrade of Barsham WTW, installation of 30km new or replacement water mains between Shadingfield and Sizewell, and construction of a new pumping station at Holton. The scheme would likely connect into Saxmundham Water Tower and would be designed to increase the capacity and resilience of the local distribution network as well as meeting Sizewell C's demand. Further information can be found in Volume 1, Chapter 2, Section 2.2 a) iii) 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3, Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021. An assessment of the likely effects of removing fish and crustaceans in the cooling water system is provided within Volume 2, Chapter 22 (Marine Ecology and Fisheries) of the ES (Doc Ref. 6.3(A)) [AS-035] and demonstrates that there would not be a significant impact on fish stocks or, therefore, local fishermen's livelihoods.

Caroline Page County Councillor for Woodbridge (RR-0177)

Table A.20: Caroline Page County Councillor for Woodbridge

Matter raised	SZC Co.'s Response
Freight Management Strategy	
Discounting marine-led freight management strategy I wish to register additional concerns about the delivery of both building materials, and subsequently the energy generated by land rather than by sea. I wish to register my concerns as to the environmental and societal impact of that overland delivery.	SZC Co. shares the ambition that the Sizewell C Project should be optimising the use of sustainable modes of transport. For these purposes, the Application has always included a rail strategy and a permanent beach landing facility for larger loads. In the January 2021 changes, the rail strategy was enhanced and a new temporary beach landing facility added to optimise the use of marine transport and limit the use of road transport to that which is strictly necessary.
General Project	
Cost of Energy and Nuclear Waste I wish to register my concerns as to the cost of the power produced, especially in light of the waste that remains.	Information on the Project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) [APP-066]. Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-011] and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-150]. These provide details on how the acquisition of additional land necessary to build the Sizewell C Project would be funded and on how the Sizewell C Project generally is to be funded. For new nuclear power stations to be built, the Government has been clear that costs must come down. New nuclear costs are driven by construction and financing and both can be cheaper by replicating the design of Hinkley Point C. Evidence shows repetition brings costs down in nuclear development, just like other technology. Many of the design and qualification costs for Sizewell C have been paid for already at Hinkley Point – as well as the costs of setting up the supply chain and training workers. With the right timing, we can directly transfer the skills from Hinkley Point C to Sizewell C. In 2019 the government carried out a consultation on the use of a Regulated Asset Base model of financing (which was used for the Thames Tideway

Matter raised	SZC Co.'s Response
	Tunnel) for new nuclear Projects. This consultation invited responses on all of the impacts of using such a model and the government is now considering the responses that were received in forming its conclusion. The costs of decommissioning, waste and spent fuel management (post End of Generation) and disposal of all higher activity waste will be funded through a Funded Decommissioning Programme (FDP), which would need to be approved by the Secretary of State (Department for Business, Energy and Industrial Strategy) before construction work on buildings with nuclear safety significance commences. Through the FDP, SZC Co. must demonstrate that it has a robust plan in place, to decommission the station and manage any liabilities (including waste), a robust cost estimate, to deliver the plan, and arrangements that ensure that SZC Co. sets aside funds over the operating life of the Sizewell C power station to cover these costs in full. The legal framework that implements these arrangements has been established through the Energy Act 2008 and the Nuclear Decommissioning and Waste Handling (Finance and Fees) Regulations 2013.
Safety of the Project Finally I want to register my concerns as to the potential danger that this plant can cause the inhabitants of the Suffolk Coast, including those in my division	The Office for Nuclear Regulation (ONR) is Great Britain's principal independent regulator for the design, construction and operation of nuclear reactors. The safety and security of nuclear installations is assured by a system of strict regulatory control based on a licensing process by which SZC Co. is required to seek a license from ONR. In 2012, after more than 850,000 hours of engineering studies, the EPR™ successfully completed the UK regulator's Generic Design Assessment. The EPR™ was then awarded Design Acceptance Confirmation (DAC) by the ONR and received a Statement of Design Acceptability (SoDA) by the Environment Agency. The DAC and SoDA

Matter raised	SZC Co.'s Response
	demonstrate that the UK EPR™ power station design meets the UK's stringent safety and regulatory requirements. The UK EPR™ design is based on the Flamanville EPR™ (FA3) plant being built in France but incorporates a number of design changes agreed through the Generic Design Assessment with the UK Regulators. The EPR™ is a proven reactor design which is now in full commercial operation in China (Taishan 1 and Taishan 2). The EPR™ has been developed from Pressurised Water Reactor (PWR) designs already operating around the world. More than 270 PWRs have safely generated electricity for millions of people over the last 30 years. The EPR™ offers improved safety and enhanced environmental and financial performance: • It is the most powerful reactor design in the world, capable of achieving around 1,650 MW of power output (compared to 1,450 for the most modern reactors). • It requires 17% less fuel and produces 30% less long-term radioactive waste than other PWR designs. • Four safety systems operate alongside each other. Each one can shut down the reactor safely and automatically. • A 'core catcher' has been specially designed to recover, contain and cool the reactor core in the event of an accident. • A concrete shell is constructed over the most sensitive parts of the installation to protect against the risk of external attack. In the UK, EPR™ reactors are currently under construction at Hinkley Point C. Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. We have a very good understanding of Project risks and

Matter raised	SZC Co.'s Response
	how to mitigate them. SZC Co. has been able to learn from the experiences of EPR™ construction and this has informed proposals submitted with the Application.
Landscape and visual	
Impacts of the Project As elected county councillor for a division affected by this proposed development, I wish to register concern about the development's long-term - in some cases irreparable -effect upon and damage to the heritage coast, the AONBs and ancient landscape of Suffolk coastal.	SZC Co. recognise that the main development site will affect the performance of the immediate AONB during construction as recorded in the Volume 2, Chapter 13 of the ES (Doc Ref 6.3) [APP-216], and updated by the ES Addendum (Doc Ref. 6.14) [AS-181], but that reasonable mitigation measures have been put in place to minimise effects. SZC Co.'s assessment has concluded that local effects on the AONB will not result in any widespread effect on the AONB. It is noted that NPS EN-6 recognises “<i>the potential for long-term effects on visual amenity</i>” (para 3.10.3) and that “<i>the scope for visual mitigation will be quite limited</i>” (para 3.10.8). SZC Co. have deployed extensive mitigation as part of the embedded design for operation and construction phases to reduce adverse effects. SZC Co. notes that nuclear infrastructure has been a feature of the AONB since its designation, with Sizewell A being in place before the AONB itself was designated. As such energy infrastructure has, and will continue to be, a feature of this part of the AONB and the AONB would not be ‘overwhelmed’ by it. In addition, SZC Co. note that the AONB is ‘supported’ by wider expanses of non-designated open countryside which forms a recognised setting to the AONB and is not impacted during construction. Sizewell C will deliver wider environment improvements to the AONB and its setting through the Section106 Agreement to be agreed as part of the Application.

Matter raised	SZC Co.'s Response
Marine and Coastal	
Coastal geomorphology and sea level rise I wish to register concerns about building this power plant on a shoreline threatened by both erosion and sea level rise at a time of increasing climate change	In accordance with the Nuclear Site Licence conditions, SZC Co. must demonstrate to the Office for Nuclear Regulation that the Sizewell C power station is designed, constructed, commissioned, operated and decommissioned safely, whilst taking into account any potential internal and external hazards, including coastal erosion and flooding. The flood risk to and from the development has been assessed in relation to all forms of flooding and the proposed development designed to be safe and operable under foreseeable conditions, also taking account of climate change and rising sea levels. In line with the requirements of the Nuclear Site Licence, Sizewell C has been designed to be able to withstand a 1 in 10,000 year flood event. Sea defences included within the proposals will be the primary embedded mitigation for coastal erosion. The Coastal Processes Monitoring and Mitigation Plan (Doc Ref. 6.14) [AS-237] outlines the monitoring and management measures for maintaining the coastline at Sizewell frontage. SZC Co. used the latest climate change predictions from the Met Office (UKCP18) in the assessment of inland flows, rainfall, sea level rise and wave propagation. A periodic and systematic review and reassessment of the Nuclear Safety Case would be undertaken in line with the requirements of the Nuclear Site Licence.
Socio-economics	
Impact on tourism and employment opportunities I wish to register my concerns about the impact this construction will have on local people's way of life. I wish to register my concerns that the income brought in by both construction and operation will in no way ameliorate the	Impact on tourism: SZC Co. recognises the importance of the tourist economy within and around the Suffolk Coast, and has undertaken an assessment of the effects of the Sizewell C Project on tourism, in-line with the requirements of National Policy Statement EN-1, as part of Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195].

Matter raised	SZC Co.'s Response
damage of this Project to the income to the tourist industry on which this Heritage Coast relies. I wish to register my concern about the seeming paucity of truly local jobs gained and how many other local jobs lost through Sizewell C. I wish to register my concerns as to the disproportionate loss caused to our community and environment by this Project, and the correspondingly disproportionate benefits that are offered elsewhere.	A Tourism Fund to promote the area and support the longevity of the very important and diverse tourist economy of the Suffolk Coast is proposed and will be secured in the Section 106 Agreement. The principles for this are set out in Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] and the Economic Statement (Doc Ref. 8.9) [APP-610], and have since been developed in collaboration with the local authorities. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects, such as marketing, promotion, research and supporting local Projects. SZC Co. is aware that monitoring through governance, as well as public datasets, has shown no adverse effect on the Somerset tourist economy from the construction activity at Hinkley Point C where a Tourism Fund has been applied. Separate Resilience Funds will be agreed bilaterally with RSPB Minsmere and National Trust Dunwich Heath. This will ensure that the activities funded through those measures do not overlap but can complement the plans, programmes and Projects supported by the proposed Tourism Fund (and other funds, where applicable). Supply chain and replication of Hinkley Point C: Sizewell C's construction phase will support around 2,600 jobs for local residents at the peak of activity in a range of different skills, roles and in both construction and non-construction sectors that would not otherwise arise (without the Sizewell C Project). Replication of some parts of the supply chain developed for the first of a kind new fleet of UK nuclear new builds (at Hinkley Point C) is important to enable efficiencies – but there will be substantial opportunities for Suffolk-based firms to benefit from contracts over the lifetime of the Sizewell C Project, as has been identified in the

Matter raised	SZC Co.'s Response
	Economic Statement (Doc Ref. 8.9) [APP-610] and within the Supply Chain Strategy, provided in Appendix B of the Economic Statement (Doc Ref. 8.9) [APP-611]. Work has been underway in advance of the DCO submission to provide information and support to local companies with an interest in bidding for contracts on the Sizewell C Project through the Supply Chain Portal (run by the Suffolk Chamber of Commerce, funded by SZC Co.). SZC Co. has committed to measures to support the local and regional supply chain to compete for and win work on the Sizewell C Project. These are set out in the Supply Chain Strategy appended to the Economic Statement (Doc Ref.8.9) [APP-611]. Some measures are already being enacted including the on-going operation of the Supply Chain Portal and other supply chain engagement activities by the Suffolk Chamber of Commerce on SZC Co.'s behalf. SZC Co. is working with the Councils, NALEP and Suffolk Chamber of Commerce to finalise governance and monitoring arrangements for the local supply chain engagement activity during the construction phase. As set out in the Supply Chain Strategy (Doc Ref.8.9) [APP-611], this will include 'on the ground' activities for potential local suppliers including 'meet the buyer' events and information sharing. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. SZC Co. also recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local

Matter raised	SZC Co.'s Response
	communities which seek to improve quality of life for those most affected.

Councillor Mary Schedrin (RR-0258)

Table A.21: Councillor Mary Schedrin

Matter raised	SZC Co.'s Response
Transport Impacts on the A12 and A1094 Off the A12 by Friday Street Farm is the beginning of the A1094. This road is likely to be deluged with polluting traffic and subject to even more serious traffic accidents, should SZC and SPR be granted planning permission. It is a narrow enough single track road with dangerous junctions including popular Rights of Way, along its 7 miles route to Aldeburgh on the coast. There is alarm and despondency at the thought that SZC workers and its suppliers will likely not be content to use the very busy A12 but follow the lead of SPR heavy goods vehicles, lorries, vans and cars, to travel instead along the A1094. Therefore, it is anticipated there will be a substantial increase in serious traffic accidents and congestion as well as adverse impacts to air quality and the environment in general.	Sizewell C HGVs will be required to route via the A12 and B1122 / Sizewell link road. They will not be permitted to route on the A1094. The HGV routes will be monitored through the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608] via GPS. Compliance will be reported to the Transport Review Group (TRG) on a quarterly basis throughout the construction phase. The vast majority of workers will travel to work at the main development site via sustainable modes. The accommodation strategy provides a campus and caravan pitches in close proximity to the site, which would enable workers to walk/cycle to work. In addition, workers will be bussed to work either via the proposed park and ride facilities or direct buses. The worker travel to site will be managed through the Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] and compliance with the mode share targets will be reported to the TRG.

Councillor Alexander Nicoll (RR-0257)

Table A.22: Councillor Alexander Nicoll

Matter raised	SZC Co.'s Response
Freight Management Strategy	
Transport - Use of the East Suffolk line B) failure to plan for greater use of East Suffolk Line, suitably upgraded, for movement of construction materials by day to leave less to be moved by road.	SZC Co. has worked extensively with Network Rail to explore the potential of the East Suffolk line. The updated Freight Management Strategy (Doc Ref. 8.18) [AS-280] submitted in January 2021 maximises the practical use of the East Suffolk line and is complemented by a marine transport strategy, both of which will limit the number of HGVs. There is no realistic potential for more substantial upgrade of the East Suffolk line within the timescale necessary for the construction of the Sizewell C Project. Network Rail's responses to the Sizewell C consultations have confirmed that this is the case.
Associated Development – Southern Park and Ride	
Southern Park and Ride - Requests further details on landscaping and details for lighting C) landscaping of the proposed Southern Park & Ride site including a reduced bunding from previous indicative plans coupled with incomplete details for lighting and impact on existing landscape features including significant oak and Whin belt woodland.	The accepted changes (April 2021) included extending bunding adjacent to the north-west boundary of the site. The extension of the landscape bund would provide some additional screening to views from the B1116 and a nearby footpath. This change was discussed and agreed during meetings with local stakeholders, including Wickham Market Parish Council and Suffolk County Council. Design principles for lighting are described within the Associated Developments Design Principles (Doc Ref. 8.3) [APP-589]. Lighting within the car parking areas would be restricted to 6m in height to minimise visibility during day and night time. Lighting columns along the proposed access road would be 8m in height to reduce the number of columns necessary to produce a lighting scheme that meets highway authority requirements. The lighting columns would utilise LED base lights with zero-degree tilt to minimise light spill and along the perimeter would be fitted with demountable shields to reduce backward spill of light into properties and adjacent habitats.

Matter raised	SZC Co.'s Response
	A 10m buffer zone would be maintained between the proposed development and woodland blocks outside the site boundary, including the Whin Belt woodland. With the exception of fencing, there would be no above ground buildings or structures within these buffer areas to assist in minimising any indirect impacts (e.g. from noise, lighting and human disturbance) on species using those habitats within and adjacent to the site. Further information on the impacts of the southern park and ride on landscape and ecology receptors is provided within Volume 4, Chapters 6 and 7 of the ES (Doc Ref. 6.5) [APP-390 to APP-394].
Design of the Southern park and ride Further mitigation on the A12 required D) failure of proposals to include required mitigation works on the A12 with a focus on the stretch from Martlesham to north of Wickham Market and despite problems being set out in detail by Suffolk County Council as Highways Authority during previous rounds of public consultation undertaken by the applicant.	Since the Application was submitted, SZC Co. has developed a VISSIM micro-simulation model of the A12 corridor between the A14 at Seven Hills and Melton in order to provide more detail on the impact of Sizewell C traffic on driver delay. The VISSIM traffic modelling is summarised in the Transport Assessment Addendum (Doc Ref 8.5(A)Ad) [AS-266]. Based on the VISSIM modelling, no material impact on driver delay is predicted and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the A12 corridor between Seven Hills and Melton, which includes Martlesham and Woodbridge.
Transport	
Transport Congestion A) Sizewell C site to be served for ten+ years primarily by HGVs travelling on Suffolk's roads with resultant congestion, potential reduction in access and mobility for other road users	The accepted changes (April 2021) to rail and marine proposals optimise the use of sustainable modes and minimise HGV movements as far as practical. The Transport Assessment Addendum (Doc Ref 8.5(A)Ad) [AS-266] summarises the traffic modelling of the study area and the forecast effect of Sizewell C traffic on the highway network during the early years, peak construction and operational phases of the Project. It is

Matter raised	SZC Co.'s Response
and significant increase in carbon emissions as bulk of HGVs, and other supply chain vehicles, will be diesel fuelled.	considered by SZC Co. that significant adverse transport effects have been mitigated. The updated Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] specifies that contractors must seek to ensure that all HGVs comply with the Euro VI emission standards where possible, and Euro V standards as a minimum, unless otherwise agreed with the Transport Review Group.

Councillor Tony Cooper (RR-0247)

Table A.23: Councillor Tony Cooper

Matter raised	SZC Co.'s Response
Draft Development Consent Order, consultation and process	
5. Monitoring and accountability - I would like to see clear transparent mechanisms in place early in the Project to ensure all predicted impact effects are monitored, reported upon and that action is taken where necessary. - They would also support ESC in their comments regarding the assessments of some of the impacts throughout the DCO.	SZC Co. has taken steps to identify all likely significant effects on the environment during the Sizewell C Project's construction and operational phases. All necessary mitigation is then secured to ensure that it will provide effective and reliable mitigation on which the Project can rely on. This also includes all necessary monitoring during the construction and operational phases. The mitigation measures identified are summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the draft DCO, if granted, and the Section 106 Agreement. A breach of the DCO would be a criminal offence. The Section 106 Agreement will set up various review groups with the local authorities and relevant stakeholders to ensure that there is visibility on the delivery of mitigation and that enforcement

Matter raised	SZC Co.'s Response
	bodies have the information that they need to carry out their function. Monitoring and funding commitments are made through the DCO and the Section 106 Agreement.
Project Funding and Mitigation Funding	
12, Mitigation Funds. - Community - Costed mitigation package for Leiston. - Contribution towards highway improvements in and around Leiston to eliminate traffic through town centre. - Improved cycle routes - Should changes not be able to be made to Leiston recycling centre on Lovers Lane then a Finance mitigation fund be given to re-site.	Mitigation funds are the subject of active discussion with the local authorities. This includes bespoke transport mitigation proposals in Leiston and also the design of funds such as the Tourism, Community, Housing and Natural Environment Funds which recognise the legitimacy of Leiston to bid into the funds. Further information is provided within the draft Section 106 Agreement [PDB-004]. The access to the waste recycling centre in Leiston is to be improved with a right turn lane into the facility on Lover's Lane.
General Project	
Provision of LEEIE 8. LEEIE. I fully support the Group as it removes rail movements and unloading activity proposed primarily at night from the centre of Leiston.	Noted. No further action
Socio-Economics	
Employment 2. Socio – economic • I would welcome the opportunities for employment and skills in Suffolk from the development, which would have real potential to create a positive long-lasting legacy in the region.	SZC Co. has undertaken a ward-level assessment of the likely demographic and population change as a result of the temporary, non-home-based construction workforce, and the knock-on implications for housing and public services, and community cohesion as a result. This is included within Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195].

Matter raised	SZC Co.'s Response
- Well over 80% of the construction work and workforce will be based in the parish of Leiston-cum Sizewell. - Personnel movement into and out of the town to access services, leisure and businesses will put a lot of pressure on the amenity of local residents and will make huge changes to the current socio-economic activity. The effect on residents needs to be acknowledged and mitigated for.	As a result of this assessment, a range of mitigation measures have been developed, as summarised in Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195], to avoid or reduce significant effects. This includes a Housing Fund, a Public Services Resilience Fund and implementation strategies like the Accommodation Strategy (Doc Ref. 8.10) [APP-613] and the Community Safety Management Plan (Doc Ref. 8.16) [APP-635]. SZC Co. also recognises that there will be residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. has proposed a Community Fund that will be used to fund measures, Projects and programmes in local communities which seek to improve quality of life for those most affected.
3. Education and Skills The effort being put in by EDF to support Education and skills is welcomed and LTC would like to see further specific references and efforts put into ensuring that apprenticeships and skills are primarily sourced through Alde Valley Academy and Suffolk College on the Coast.	SZC Co. welcomes the recognition that the Sizewell C Project will provide lasting community benefits in terms of employment, skills, training, education and supply chain benefits. SZC Co. has worked closely with stakeholders to ensure that the economic benefits can be enhanced in-line with the aspirations for sustainable sectoral growth across the region – plans to implement these enhancements are set out in Appendix A, the Employment, Skills and Education Strategy; and Appendix B, the Supply Chain Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-610] and [APP-611], which quantifies the overall economic benefits. SZC Co. and local and regional stakeholders are designing measures that focus on the ability of local resources and providers of skills, training and education to access funds and support to enable them to create pathways for local people into the labour market and employment both at Sizewell C and other major infrastructure Projects locally.

Matter raised	SZC Co.'s Response
4. Legacy benefits The provision of sports facilities is welcome. Not just within the Sports centre but also for local sports and social clubs within the town, Sport is not the only cultural or recreational activity in the town however and further mitigation in this area is requested. Especially as, during construction, the provided sports facilities, which are there for SZC workforce as did many during the Sizewell B construction, would not be as readily accessible as maybe wished by residents. I would want positive and wide ranging mitigation proposal to offset this for both residents and workers families which would need SZC Co. support. It will be important to ensure robust community cohesion during the inevitable upheaval this Project brings and it is intended to provide an oasis for families where this can be achieved at not only the Waterloo Centre but also the Leiston Town Athletic association, where level 3 football is played and had SZB employees playing during their time in Leiston.	SZC Co. welcomes the recognition that the proposed sports facilities provided for shared use between the Sizewell C workforce and community will promote social and community wellbeing. As statutory provision, sports facilities will also help to mitigate the potential for adverse effects on temporary demand for formal recreation. Other cultural and recreational facilities can also provide substantial benefit to communities, and financial support for these may be sought through Applications to a Community Fund where investment in a Project can demonstrate meaningful positive effects on community cohesion, wellbeing and wider community benefits in an area likely to experience change as a result of the Sizewell C Project. SZC Co. will also provide a Public Service Resilience Fund with the aim of supporting the Councils' existing structure of community safety and support services for vulnerable members of communities, and those accessing social care and public health services, where there may be an enhanced risk as a result of the Project. In addition, SZC Co. propose to fund transport improvements in Leiston and to recognise the legitimacy of Leiston as a recipient from a range of proposed economic, social and environmental funds which are being developed with the local authorities.
7. Labour Market A Major concern is with SZC Co. for the potential “leaching” of local workforce from local jobs to meet the rather high estimate of HB workers they suggest will come from local communities. Robust training and skills programmes have to be put in place to help counter this.	Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195] uses a conservative assessment case for assumptions about Home-Based (HB) and Non-Home Based (NHB) workers. This is to ensure mitigation for the NHB component, e.g. with regard to demand for accommodation and other services, is sufficiently robust. SZC Co. will seek to maximise the HB recruitment beyond this assessment. Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195] sets out a reasonable expected level which takes into account the measures funded by the Employment, Skills and

Matter raised	SZC Co.'s Response
	Education Strategy enhancement measures. There is clearly benefit in promoting local employment for economic and social benefit, but also to reduce scale of NHB workforce, meaning fewer accommodation, community safety, public services effects. Bringing people into work from worklessness is an important part of the drive for sustainable employment and upskilling. The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, as set out in the Employment, Skills and Education Strategy appended to the Economic Statement (Doc Ref. 8.9) [APP-611], there may be some effects on local businesses such as some vacancies being harder to fill. In order to tackle this: • A Sizewell C Jobs Service will be open to some local employers, who will be able to access the skilled pool of labour generated by the Project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Sizewell C Project and wider employment market. • Local firms will be supported through local Supply Chain Strategy to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the Project opportunities. SZC Co., NALEP and the Suffolk Chamber of

Matter raised	SZC Co.'s Response
	Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. Upskilling will benefit the Sizewell C Project and the wider market – focus will be on 'legacy' roles (as determined by Suffolk County Council's research base) that the region and the Project both need for the long term. SZC Co., Suffolk County Council and East Suffolk Council are meeting on a weekly basis to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy (Doc Ref. 8.9) [APP-611] that will be secured by the Section 106 Agreement. Broad scope and implementation has been agreed for most of the key measures, including the ASEC Fund, Outreach Fund, Sizewell C Bursary, Contribution for Funding for Regional skills coordination function. The scope for each measure has been based around existing measures in the region, for example providing revenue funding to deliver on existing capital investment in skills centres in the region.
11. Tourism. Mitigation is required to offset loss tourism. The requested public realm improvements in Leiston will help ensure that access remains desirable to the attractions there but there is concern about the wider, overall, effect that this Project will have.	SZC Co. and local tourism stakeholders recognise that there is a need to provide pre-emptive support for the tourist sector to promote and market the region, and provide a clear strategy including investment in physical infrastructure and support for tourist accommodation providers in order to reduce risks identified through quantitative research, set out in the Economic Statement (Doc Ref. 8.9) [APP-610] and Volume 2, Chapter 9 of the ES (Socio-economics) (Doc Ref. 6.3) [APP-195]. SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance through the draft Section 106 Agreement [PDB-004]. These matters are largely agreed

Matter raised	SZC Co.'s Response
	with outstanding positions on the scale of the Fund, and the potential for early release. An Accommodation Strategy (Doc Ref. 8.10) [APP-613] has been developed to minimise harm to the sector during the peak seasons, when tourist and worker demand for accommodation may overlap. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects such as marketing, promotion, research and supporting local Projects. SZC Co. agree that it is prudent to address the risk of any uncertainties and therefore have developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/ reconfiguration of existing tourist accommodation sites.
Transport	
Concerns regarding congestion on the highway network around Leiston. Requests further mitigation for non-motorised users I am focus on the immediate local effects on Leiston. The main issues I would like to raise and take forward to the examination are; 1. Transport. - Controls are required for bus movements and monitoring of light vehicle movements to main development site and Park and Ride sites to ensure that impacts do not exceed those assessed in both the early years and peak years of	The park and ride buses would route via the A12 and Sizewell link road and not through Leiston. There is proposed to be a direct bus service from Leiston to the main development site, which would be agreed with the Transport Review Group (TRG). LGV deliveries to the main development site would be booked in via the Delivery Management System and the number of LGV deliveries monitored via the Construction Traffic Management Plan (Doc Ref. 8.7) [APP-608] and reported to the TRG as part of the quarterly monitoring reports. The monitoring and management of "fly parking" is included as part of the Construction Worker Travel Plan (Doc Ref. 8.8) [APP-609] and, in a similar way to Hinkley Point C, a fly parking team would be established to monitor fly parking. The majority of workers will travel to site via sustainable modes and any worker living in Leiston would be

Matter raised	SZC Co.'s Response
construction. In addition, controls and measures to deal responsively with problems associated with informal “fly-parking” in Leiston. - The effects that increased traffic will have on the town centre, residential areas and the main entrances into Leiston. The effect on King George Avenue (and the Town Centre) is not clearly identified in the DCO. - Ensuring that cycle routes are safe and that improvements to the cycle network outside the DCO are supported to ensure they tie in with the proposed routes seamlessly and enhance the travel plan. - Mitigation fund for construction and operational traffic in Leiston.	required to walk, cycle take a direct bus to work at the main development site. SZC. Co is currently liaising with Leiston Town Council, Suffolk County Council and East Suffolk Council to agree a package of transport improvements for Leiston town centre, which would be funded through the Section 106 Agreement.
Provision of appropriate signage to main development site 6. Associated infrastructure I would expect that the road signage from the A12 through to the site entrances need to be clear and need to have local input to incorporate and complement existing routing.	A signage strategy for Sizewell C is to be agreed with Highways England and Suffolk County Council, as the strategic and local highway authorities.
Concerns regarding congestion and road safety at recycling site on Lover's Lane 9. Household Waste and Recycling site, Lover's Lane. Increased traffic, particularly of HGV's will have major impact on road safety for access to the Recycling centre, a safe solution is required.	The access to the waste recycling centre in Leiston is to be improved with a right turn lane into the facility on Lover's Lane.
Concerns regarding safety at Lover's Lane / Kenton Hills	The accepted changes (April 2021) provide for a bridleway link between Aldhurst Farm and Kenton Hills following construction.

Matter raised	SZC Co.'s Response
10. Safety issues safety issues with DCO. for cyclists (and pedestrians) using the proposed DCO routes. There will be a desire to cross Lovers Lane near the bend by Kenton Hills where no provision exists in the Application. This has to be addressed. There is also a real safety issue with cyclists using the (very welcome) cycle track along the east of Lovers Lane going South where the cycle lane stops and cyclists have to cross Sizewell Gap Road by a fast blind bend to get access to the existing cycle way on the south side of gap road. This needs to be examined.	Cyclists will be able to access Bridleway 19 and from Lover's lane via this link. Cyclists are expected to cross the road via a dropped curb, this has been agreed via consultation with the Highways Authority.

Councillor Louise Gooch for East Suffolk (RR-0701)

Table A.24: Councillor Louise Gooch for East Suffolk

Matter raised	SZC Co.'s Response
Draft Development Consent Order, consultation and process	
Consultation Covid and access to documents As a Cllr, I am concerned also about the lack of democratic engagement that has been permitted in the 'public consultation' process. Covid-19 has restricted public access to meetings and documents, and when EDF was requested by ESC, representing its parish councils, to delay Section 56 to	The approach to pre-submission public consultation on the Sizewell C Project was submitted to the Suffolk local authorities in the original Statement of Community Consultation (SoCC) (2012) and the revised updated SoCC (2016). The Project took on board the councils' comments and conducted four stages of formal public consultation which met the spirit and the letter of the SoCC. SZC Co. fully recognised the impact of the COVID pandemic and the need for local communities and councils to respond. As such:

Matter raised	SZC Co.'s Response
prolong the consultation process, the response was a flat 'no'. In short, this is the wrong technology, in the wrong place, and in the hands of the wrong company.	• Whilst the Sizewell C Application was ready for submission in February 2020, SZC Co. took the decision to defer its submission until May 2020 in recognition that the pandemic would impact upon the resources available to all stakeholders. • Nevertheless, SZC Co. shared the Application material in draft in October 2019 with the Defra family and in its full form on its submission in May, prior to its acceptance; • The period provided for relevant representations then ran for 12 weeks until 30 September – again in recognition of the scale of the Application but also the continuing implications of the pandemic. • A number of services compliant with COVID-19 restrictions were put in place to aid the local community in accessing the information. SZC Co. provided a mobile library (a single decker bus) with hard copies of the Application, laptops and printing facilities. Residents booked appointments or could collect information from the mobile library. The Sizewell C Information Office was open for booked appointments with facilities to read documents and in line with COVID-19 restrictions. Posters directing people to where the information was accessible were placed in local libraries, which were open but not fully operational. SZC Co. also operated a laptop lending service with all the information uploaded and a delivery and collection service for any respondents who were self-isolating. • There has been an extended timeframe before the preliminary meeting was held, to ensure stakeholders have sufficient time to prepare for the examination. The Application proposals have therefore already had an unusually long period between submission and examination, substantially so that parties may have sufficient time to study the Application material.

Matter raised	SZC Co.'s Response
	Rather than run the Section 56 consultation process for the minimum statutory period of 28 days, SZC Co. agreed with the Planning Inspectorate to extend this to three months. SZC Co. also outlined to the Planning Inspectorate and the local authorities how the Application would be shared both online and through activities such as a mobile bus, provision of hard copies at the Project office in Leiston, mailing out USB sticks and through providing guidance on accessing the information on the Planning Inspectorate website.
Project Funding and Mitigation Funding	
Funding for the Project I have concerns about the funding of EDF and its ties to Chinese state authorities, and its financial wherewithal to make good on the necessary decommissioning over the next century.	Information on the Project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) [APP-066]. Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-011] and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-150]. The ownership of SZC Co. for the construction period is expected to be made up of third party investors (predominantly pension investment funds which may include foreign investment) but has not yet been fixed. Foreign investment has been used to enable infrastructure development throughout the UK and external finance (equity and debt) is expected to be required to fund the construction of the Sizewell C Project. Although EDF Energy and China General Nuclear (CGN) have funded the development phase of Sizewell C to date this will change for construction and operation of Sizewell C. In order to operate Sizewell C, SZC Co. must obtain a Nuclear Site Licence from the Office for Nuclear Regulation who will consider the Project to a great level of detail including considering as assessment of national security. The costs of decommissioning, waste and spent fuel management (post End of Generation) and disposal of all higher activity waste will

Matter raised	SZC Co.'s Response
	be funded through a Funded Decommissioning Programme (FDP), which would need to be approved by the Secretary of State (Department for Business, Energy and Industrial Strategy) before construction work on buildings with nuclear safety significance commences. Through the FDP, SZC Co. must demonstrate that it has a robust plan in place, to decommission the station and manage any liabilities (including waste), a robust cost estimate, to deliver the plan, and arrangements that ensure that SZC Co. sets aside funds over the operating life of the Sizewell C power station to cover these costs in full. The legal framework that implements these arrangements has been established through the Energy Act 2008 and the Nuclear Decommissioning and Waste Handling (Finance and Fees) Regulations 2013.
General Project	
Nuclear waste This erosion and the risk of flooding could maroon the proposed site within a century leaving an island of radioactive nuclear waste. The current government and those preceding have tried for seventy years to attract a community to 'house' a nuclear waste repository for the backlog at a cost of £12 billion. This is still uncertain and supporting an industry that will simply add to this waste with a radioactive life of 100,000 years is reckless in the extreme.	UK Government Policy is for the UK's Higher Activity Radioactive Waste (Intermediate Level Waste and High Level Waste) and Spent Fuel to be disposed of via a UK Geological Disposal Facility. The delivery of this facility is managed by Radioactive Waste Management Limited, a subsidiary of the Nuclear Decommissioning Authority. Geological Disposal Facilities are a tried and tested technology and similar types of facilities are currently in operation in countries around the world. As an example, Finland and Sweden have been operating repositories since the 1990's for the disposal of Low and Intermediate Level Waste. Spent Fuel Repositories are currently undergoing design and construction in Finland and Sweden, along with several other countries. Low Level Radioactive Waste in the UK is managed via existing permitted disposal facilities.

Matter raised	SZC Co.'s Response
	UK Government Policy requires that for New Nuclear Builds Intermediate Level Waste and Spent Fuel is stored on-site until the availability of the Geological Disposal Facility. Under its Nuclear Site License, Sizewell C is required to demonstrate that the on-site facilities for the interim storage of Intermediate Level Waste and Spent Fuel can be designed, constructed, commissioned, operated and decommissioned in a safe manner that ensures any risks to the workers, public and environment is suitably and sufficiently controlled. This includes due consideration of any potential internal and external hazards, including flooding. In June 2020, Sizewell C applied for a Nuclear Site License and its Application is currently being assessed by the Office for Nuclear Regulation. Construction of Sizewell C cannot commence should a license not be granted. In addition, prior to construction commencing Sizewell C is required to obtain the approval of the Secretary of State for a Funded Decommissioning Programme (FDP). The FDP ensures that Sizewell C has taken appropriate steps within the design and construction of a new nuclear build to ensure the plant can be decommissioned and will have secure financing arrangements in place to meet the full costs of decommissioning once the power plant ceases generation.
General EIA	
Environmental impacts of nuclear energy Nuclear energy is not green or clean. The forthcoming book by Mark Z. Jacobson, Professor of Civil Engineering at the University of Stanford, dismisses in chapter three any such claims.	The ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap

Matter raised	SZC Co.'s Response
	Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and the section 106 Agreement. SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station. SZC Co. has worked hard to bring forward a Project that is acceptable in planning terms. We have taken all reasonable steps to limit the adverse environmental effects of the Sizewell C Project, embedding mitigation and good practice measures in order to avoid, reduce or compensate for adverse impacts wherever possible. In accordance with paragraph 4.1.3 of NPS EN-1, in making a determination of the Application, the decision maker will take the following matters into account when determining whether a Development Consent Order should be granted: - the potential benefits, including in addition to its contribution to meeting the need for energy, its contribution to job creation and any long term or wider benefits; and - the potential adverse impacts, including any long term and cumulative adverse impacts as well as any measures to avoid, reduce or compensate for any adverse impacts. Since the submission of the Application, SZC Co. has continued to engage with the local authorities, environmental organisations, local stakeholder groups and the public with regard to the Application. This process has identified potential opportunities for changing the Application to further minimise impacts on the local area and environment in many cases, whilst reflecting the additional design detail that has come forward in preparation for implementation of the Sizewell C Project. For the reasons set out in Part 1 (Doc Ref. 8.19) [AS-281] of the proposed changes (January 2021) submission, SZC Co. considers all of these changes (now referred as 'accepted changes (April 2021)')

Matter raised	SZC Co.'s Response
	and Additional Information go some way in positively addressing concerns of stakeholders.
Climate Change	
GHG emissions The building of the Project will not be carbon neutral. Assuming that the plant is completed in 2034, it will take a further six years for the Project to 'pay-off' the carbon debts of construction; and the actual operation of the plant in terms of the ongoing needs in campus servicing and transportation will detract from the energy gains.	The UK Government has made it clear in its recent statements that it considers new nuclear to have an important role in the UK's pathway to achieving its net zero carbon emissions. The Energy White Paper stated that nuclear continues to be 'an important source of reliable clean energy' and nuclear power forms one part of the Prime Minister's Ten Point Plan to continued decarbonisation. The Energy White Paper announced a specific aim to bring at least one large-scale nuclear Project to the point of Final Investment Decision by the end of this Parliament (by 2024) as additional nuclear power (beyond Hinkley Point C) will 'be needed in a low-cost 2050 electricity system of very low emissions'. Under the Government's net zero scenarios, the UK electricity demand will increase between around 250TWh and 350TWh between 2030 and 2050. This is equivalent to another nine to twelve low-carbon power stations of Sizewell C's output which would be required to come online after Sizewell C. Demand for electricity will increase substantially throughout the period to 2050 as other sectors such as heating, transport and industry increasingly electrify in order to decarbonise. Moreover, new low carbon generation of all technologies is expected be required on a continual basis up to, and beyond, 2050 in order to meet increasing electricity demand and to replace existing low-carbon generation as it reaches the end of its technical life. In other words, rather than Sizewell C being too late to contribute to decarbonisation, it will come online in a timely fashion to help meet the rising demand for low carbon electricity in the 2030s and 2040s and there will still be a requirement for very large amount of additional low

Matter raised	SZC Co.'s Response
	new low carbon generation after Sizewell C for the 2050 net zero target and beyond. Nuclear has a critical and complementary role alongside other low carbon energy provision in a decarbonised power system.
Ecology and Biodiversity	
I write as an East Suffolk Council Cllr. I am opposed to Sizewell C for the following reasons: - The site itself is a nationally and internationally recognized SSSI and AONB; as such, the Project is opposed by the Suffolk Wildlife Trust and Friends of the Earth. Ancient woods such as Coronation Wood would be felled, and such precious resources would be lost forever.	The impact of the proposed development on the AONB is recorded in Volume 2, Chapter 13 (Landscape and Visual) of the ES (Doc Ref. 6.3) [APP-216], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181], and is based on a thorough understanding of the natural beauty and special qualities of the AONB. SZC Co. do not consider that the impact of the proposal on this part of the AONB affects the purposes of the AONB to the extent that the area will not contribute to its purposes. NPS EN-1 and EN-6 recognises that effects on the AONB are inevitable. SZC Co. notes that nuclear infrastructure has been a feature of the AONB since its designation, with Sizewell A being in place before the AONB itself was designated. As such energy infrastructure has, and will continue to be, a feature of this part of the AONB and the AONB would not be 'overwhelmed' by it. In relation to the SSSI, the quantum of permanent landtake for all habitats were presented in the Volume 2, Chapter 14 (Terrestrial Ecology and Ornithology) of the ES (Doc Ref. 6.3(A)) [AS-033] and following updated National Vegetation Classification mapping in 2020, were updated in the ES addendum (Doc Ref. 6.14) [AS-181] in January 2021. The new SSSI crossing design with a 40m wide bridge has been brought forward which slightly reduced landtake compared to the earlier 68m long culvert option. It also minimises the potential for fragmentation of habitats and removes shading from 28m of the Leiston Beck.

Matter raised	SZC Co.'s Response
	The wetlands at Aldhurst Farm provide 6ha of high quality open water, ditches and wet reedbeds, which have already attracted breeding marsh harriers from 2019 and otters from 2021. The total quantum of compensatory habitat greatly exceeds the permanent landtake of these wetland habitats from the SSSI. The Fen Meadow Strategy (refer to Volume 3, Appendix 2.9.D of the ES Addendum) (Doc Ref. 6.14) [AS-209] was subject to extensive consultation and was submitted in January 2021. An updated version has been included within the submission for Deadline 2. The Strategy will lead to a Fen Meadow Plan and is secured by a DCO requirement. It includes a contingency strategy if the quantum of fen meadow delivered falls short of 4.5ha after 10 years of on-site works. This strategy will ensure more fen meadow is created than the 0.46ha which will be lost from the SSSI. Coronation Wood is not an ancient woodland. The proposed development retains existing trees along the outer edge of Coronation Wood, as far as practicable, to retain a visual screening function. Trees lost will be mitigated by new native tree planting within Pillbox Field in the ratio of approximately ten new trees planted for every one tree lost, and through the implementation of the Woodland Management Plan across EDF Energy Estate. Over 70% of the trees lost were determined by the arboricultural assessment as being category 'C' or less, i.e. trees of low value and with limited life expectancy.
Marine and Coastal	
Concerns regarding 'marine churn' and impact on marine life	The abstraction of cooling water for the operation of the station will not cause a churn, and will be permitted by the Environment Agency having been demonstrated not to impact the marine environment.

Matter raised	SZC Co.'s Response
It is not just the land and air that would suffer degradation, but also the water. The sea water intake would create 'marine churn' relying as it does on sucking in tonnes of fish every day; in addition, the fresh water demand of Sizewell C would be 3 million litres per day from the water reserves of an area that is the driest region in the country. The site is prone to coastal erosion and was described by ESC in 2019 as one of the most "unstable coasts" in Europe.	The discrete stretch of coastline where Sizewell C will be constructed and operated is comparatively stable and the sea defences will protect the station from sea level rise and climate change. Further information on impacts on marine ecology is provided within Volume 2, Chapter 22 (Marine Ecology and Fisheries) and Volume 2, Chapter 20 (Coastal Geomorphology and Hydrodynamics) of the ES (Doc Ref. 6.3) [AS-035 and APP-311], as updated by the ES Addendum (Doc Ref. 6.14) [AS-181] for the accepted changes (April 2021). Information on water supply can be found in Volume 1, Chapter 2, Section 2.2 a) iii 'Water Supply Strategy update' of the ES Addendum (Doc Ref. 6.14) [AS-181] and Volume 3, Appendix 2.2.D Water Supply Strategy Update of the ES Addendum (Doc Ref. 6.14) [AS-202] submitted in January 2021.
Socio-economics	
Impact on tourism and local farming Over 100 local businesses have recently written to the government to voice concerns on the impact this Project might have on local tourism and farming.	In terms of Tourism Effects: SZC Co. and local tourism stakeholders recognise that there is a need to provide pre-emptive support for the tourist sector to promote and market the region, and provide a clear strategy including investment in physical infrastructure and support for tourist accommodation providers in order to reduce risks identified through quantitative research, set out in the Economic Statement (Doc Ref. 8.9) [APP-610] and Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195]. SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance through the draft Section 106 Agreement [PDB-004]. These matters are largely agreed

Matter raised	SZC Co.'s Response
	with outstanding positions on the scale of the Fund, and the potential for early release. An Accommodation Strategy (Doc Ref. 8.10) [APP-613] has been developed to minimise harm to the sector during the peak seasons, when tourist and worker demand for accommodation may overlap. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects such as marketing, promotion, research and supporting local Projects. SZC Co. agree that it is prudent to address the risk of any uncertainties and therefore have developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/ reconfiguration of existing tourist accommodation sites.
Transport	
Concerns regarding congestion on the A12 The A12 is not a trunk road even though it is the main highway from first and second towns in Suffolk of Ipswich and Lowestoft. The insertion of five new roundabouts would cause greater traffic congestion and environmental pollution.	Some of the roundabouts are proposed to replace existing priority junctions (e.g. Yoxford roundabout and A12/A1094 at Friday Street) and would provide capacity and road safety improvements. Traffic modelling has been undertaken of all of the roundabouts proposed on the A12 and they have been designed to operate within capacity. Further information can be found within the Transport Assessment (Doc Ref. 8.5(A)) [AS-017] and Transport Assessment Addendum (Doc Ref. 8.5(A)Ad) [AS-266].

Councillor T J Haworth-Culf (RR-0246)

Table A.25: Councillor T J Haworth-Culf

Matter raised	SZC Co.'s Response
Draft Development Consent Order, consultation and process	
Consultation Pre-Application consultation, Covid and access to documents Despite the 8 years of involvement in this Project, the lack of in-depth detail is astounding, and of the information provided sufficient amounts to give concern require further challenging and interrogation. Mental wellbeing of residents affected by the process so far lasting 8 years and ongoing into the future, stress. Additional burdens relating to COVID restrictions – learning new ways of communicating for all – leaves residents feeling confused and disenfranchised.	The approach to pre-submission public consultation on the Sizewell C Project was submitted to the Suffolk local authorities in the original Statement of Community Consultation (SoCC) (2012) and the revised updated SoCC (2016). The Project took on board the councils' comments and conducted four stages of formal public consultation which met the spirit and the letter of the SoCC. SZC Co. presented information in as accessible a way as possible across all four stages of formal consultation. Detailed information was provided in main consultation documents at each stage along with Summary Documents with questionnaires to aid the feedback process for respondents. Every stage of consultation was open to all residents and SZC Co. put in place specific activities to help hard-to-reach groups respond, such as provide Easy Read versions of the summary document. SZC Co. fully recognised the impact of the COVID pandemic and the need for local communities and councils to respond. As such: • Whilst the Sizewell C Application was ready for submission in February 2020, SZC Co. took the decision to defer its submission until May 2020 in recognition that the pandemic would impact upon the resources available to all stakeholders. • Nevertheless, SZC Co. shared the Application material in draft in October 2019 with the Defra family and in its full form on its submission in May, prior to its acceptance; • The period provided for relevant representations then ran for 12 weeks until 30 September – again in recognition of the scale of the Application but also the continuing implications of the pandemic.

Matter raised	SZC Co.'s Response
	• A number of services compliant with COVID-19 restrictions were put in place to aid the local community in accessing the information. SZC Co. provided a mobile library (a single decker bus) with hard copies of the Application, laptops and printing facilities. Residents booked appointments or could collect information from the mobile library. The Sizewell C Information Office was open for booked appointments with facilities to read documents and in line with COVID-19 restrictions. Posters directing people to where the information was accessible were placed in local libraries, which were open but not fully operational. SZC Co. also operated a laptop lending service with all the information uploaded and a delivery and collection service for any respondents who were self-isolating. • There has been an extended timeframe before the preliminary meeting was held, to ensure stakeholders have sufficient time to prepare for the examination. The Application proposals have therefore already had an unusually long period between submission and examination, substantially so that parties may have sufficient time to study the Application material. Rather than run the Section 56 consultation process for the minimum statutory period of 28 days, SZC Co. agreed with the Planning Inspectorate to extend this to three months. SZC Co. also outlined to Planning Inspectorate and the local authorities how the Application would be shared both online and through activities such as a mobile bus, provision of hard copies at the Project office in Leiston, mailing out of USB sticks and by providing guidance on accessing the information on the Planning Inspectorate's website. This lengthened period of time also allowed more people and organisations, such as parish councils, to get used to the new ways of working.

Matter raised	SZC Co.'s Response
Consultation Disagreement regarding level of detail provided at pre-Application consultation The consultation process has been lacking without the correct detail/s needed for many to contribute and respond at all levels. People should not have to wait until the DCO has been submitted to see vital information needed. Clearly this Project means that any building within the AONB is permitted and sets a precedent for all other Applications, however large or small.	The approach to pre-submission public consultation on the Sizewell C Project was submitted to the Suffolk local authorities in the original Statement of Community Consultation (SoCC) (2012) and the revised updated SoCC (2016). The Project took on board the councils' comments and conducted four stages of formal public consultation which met the spirit and the letter of the SoCC. SZC Co. presented information in as accessible a way as possible across all four stages of formal consultation. Detailed information was provided in main consultation documents at each stage along with Summary Documents with questionnaires to aid the feedback process for respondents. Every stage of consultation was open to all residents and SZC Co. put in place specific activities to help hard-to-reach groups respond, such as provide Easy Read versions of the summary document. Issues raised in responses has been addressed in the Consultation Report (Doc Ref. 5.1) [APP-069 to APP-092] submitted with the Application.
Freight Management Strategy	
Transport of materials Lack of acknowledgement by the applicant of the rural Parish's input by those most nearly affected by the Application. Woefully insufficient mitigation for the areas locally affected. Unacceptable road over rail and sea bias for transport of materials. It would have an unreasonably adverse impact on local communities, and significantly damage the important tourism economy and the wider area.	SZC Co. has not discounted the use of rail or marine options for the transport of materials. A rail strategy has always formed part of the Sizewell C proposals and this has been complemented by an enhanced rail and marine strategy in the January 2021 changes, particularly the addition of a new temporary beach landing facility capable of delivering bulk materials directly to the site. The ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260], identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. A Community Fund will be implemented via the Section 106 Agreement to help mitigate and

Matter raised	SZC Co.'s Response
	compensate for intangible, residual or in-combination effects on local communities.
General Project	
Concerns regarding adequacy of mitigation/compensation Some items are way beyond mitigation or compensation.	SZC Co. has taken steps to identify all significant effects on the environment during the Sizewell C Project's construction and operational phases. An extensive and detailed evaluation of the environmental effects of the Sizewell C Project has been undertaken in accordance with the provisions of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and Marine Works (Environmental Impact Assessment) Regulations 2007. The ES (Doc Ref. 6.1 to 6.11) [APP-159 to APP-582], as updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260], identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are summarised in the Mitigation Routemap [APP-616] and Mitigation Routemap Addendum [AS-276] (a consolidated version will be provided at Deadline 1) and will be secured as commitments and controls imposed through the Development Consent Order, if granted, and section 106 Agreement. SZC Co. is continuing to engage with stakeholders, such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation, to develop mitigation, compensation and monitoring proposals for the Sizewell C Project and to agree Statements of Common Ground covering these points.
General EIA	
Cumulative impacts Cumulative impact of this Project alongside the multiple Energy NSIP's coming forward on this coast requires consideration as the current plans would result in chaos. An	The cumulative impact assessment reported within Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578] included the assessment of impacts from the proposed development in-combination with potential impacts from third party (non-Sizewell C) Projects, plans

Matter raised	SZC Co.'s Response
early overview from the Inspectorate to the Secretary of State would be vital on this subject.	and/or programmes. A staged process was followed to assess cumulative impacts with other plans, Projects and programmes as recommended by the Planning Inspectorate's Advice Note 17. The cumulative impact assessment includes the potential cumulative impacts with other NSIP Projects, in particular the Scottish Power new offshore wind farm Projects East Anglia ONE North and East Anglia TWO.
Associated Developments - Two Village Bypass	
Preference for a four village bypass A12 4 village bypass is paramount, there is time to look into this.	The option of a four village bypass has been considered extensively, both historically and through the DCO submission. Principally, a bypass of the four villages is not justified to mitigate the impacts resulting from the construction of Sizewell C. Furthermore, in the decision letter from the Department for Transport (9 May 2019) concerning Suffolk County Council's proposals for a four village bypass (Suffolk Energy Gateway proposals), the DfT rejected the four village bypass options and suggested, " <i>There may also be alternative options that you want to consider to improve value for money, such as a smaller two-village bypass</i> ". More detail can be found in Volume 5, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.6) [APP-414] and the Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591] .
Associated Developments - Sizewell Link Road	
Preference for D2 route. Concerns regarding early years mitigation EDF has not offered justification for the choice of the current route. The current route is without legacy or merit. B1122, Sizewell Gap Road – no acceptable solution offered	SZC Co. has undertaken a robust site selection process to determine the route of the Sizewell link road. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref 8.4) [APP-591] and in the Volume 6, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref 6.7) [APP-450] . The Application proposes to leave the road in place as a legacy benefit and be adopted by the Highways Authority. SZC Co. anticipates that the existing B1122 would

Matter raised	SZC Co.'s Response
for the first 2 years usage before completion of the Link Road, or mitigation to make safe the latter. Currently suggested usage of both, causing an unreasonable burden on residents in close proximity to the B1122 and users of the Sizewell Gap Road together with similarly situated residents in proximity to other access roads both immediately surrounding and approaching. So far no confidence that any economic boom will not result in a corresponding bust.	be downgraded by Suffolk County Council to an unclassified road once the Sizewell link road is operational. As the majority of traffic would reassign to use the Sizewell link road, the B1122 will experience much lower traffic volumes and could become more popular among cyclists, helping improve cycling connectivity in the immediate area. SZC. Co is currently undertaking further engagement with East Suffolk Council and Suffolk County Council regarding this proposal. During early years, when the Sizewell link road is not in place, the Transport Assessment (Doc Ref 8.5(A)) [AS-017] notes that the additional traffic generated by the proposed development would, prior to completion of any mitigation, result in increases in journey times on the majority of routes. However, these increases are all less than one minute in the 08:00–09:00 peak hour and unlikely to be noticeable on a day to day basis, since these are mostly changes of 1% or less. As set out in the Transport Assessment (Doc Ref 8.5(A)) [AS-017], SZC Co. will provide transport related funding through the Section 106 Agreement for maintenance of the B1122 prior to the completion of the Sizewell link road to mitigate impacts of Sizewell C construction traffic using the early construction phase.
Ecology and Biodiversity	
Impact on AONB and Ramsar land Irreparable damage potentially to be caused to Minsmere and other RAMSAR / AONB land, together with biodiversity reduction, no amount of 'recreation' can replace these.	The impact of the proposal on the AONB is assessed in Volume 2, Chapter 13 (Landscape and Visual) of the ES (Doc Ref. 6.3) [APP-216] and is based on a thorough understanding of the natural beauty and special qualities of the AONB. SZC Co. does not consider that the impact of the proposal on this part of the AONB affects the purposes of the AONB to the extent that the area will not contribute to its purposes. NPS EN-1 and EN-6 recognise that effects on the AONB are inevitable. The Shadow Habitats Regulations Assessment (HRA) (Doc Ref. 5.10) [APP-145 to APP-152] assesses the potential effects of water-

Matter raised	SZC Co.'s Response
	borne pollution on the Minsmere-Walberswick SPA and Minsmere-Walberswick Ramsar site from all elements of the Sizewell C Project, including mitigation (Outline Drainage Strategy (Doc Ref. 6.3) [APP-181] and Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273]). To supplement the assessment reported in the Shadow HRA, further within-Project in-combination assessment has been undertaken within the Shadow HRA Addendum (Doc Ref. 5.10Ad) [AS-173 to AS-178] to support the conclusions drawn in the Shadow HRA. This further assessment provides additional analysis of the potential for the various pathways for effect on European sites, including Minsmere, to interact or combine. No adverse effects on integrity are identified. Biodiversity Net Gain (BNG) Assessments have been prepared which demonstrate that net gain would be achieved across the Project (Doc Refs. 9.7- 9.9). The BNG at the main development site (Doc Ref. 6.3 14E(A)) would be delivered across the wider EDF Energy estate, including the Aldhurst farm area (terrestrial), Studio Field complex, the marsh harrier habitat improvement area in the short term and in the longer term, through the creation of habitats across the temporary construction area. This represents a large switch from former arable to grassland, heathland, compared to the baseline and a net increase in scrub and woodland planting and which generates the predicted net gain. In addition to the BNG commitments, SZC Co. is committed to establishing an Environmental Trust, which will partner with other organisations, and is likely to include long-term management of the estate but also deliver on other initiatives to enhance habitats in the vicinity, so that SZC Co. contribute to 'creating a true legacy landscape' within and beyond the site boundary for the Application and make a major contribution to 'bigger, better and more joined up' habitats in the area.

Matter raised	SZC Co.'s Response
Socio-economics	
Apprenticeships and skills/ Campus Socio – Economic - with in excess of 80% of the construction work and workforce Projected to be based in the parish of Leiston-cum Sizewell, the effect on residents needs to be acknowledged and mitigated for. Currently there has been no reassurance that promised apprenticeships and skills are primarily sourced through Alde Valley Academy and Suffolk College on the Coast which is of great importance. Alde Valley Academy must be the GO TO place of education to fill these skills and the possible 900 permanent jobs. Emergency services support, so as not to have deficiencies of cover and availability during construction. There is no mention of how this would be mitigated against yet. Campus - alternative options for location of this campus offered require real consideration by EDF; there is no legacy for the current site(s), which will have significant impact on local communities due to their location, noise, light, pollution particularly by traffic and also notably social pressures. Lack of meaningful engagement with Parishes affected. There has been no recognition that the relief road and all other significant infrastructure works ought to be completed prior to commencement of building SZC to date.	The Sizewell C Project will provide lasting community benefits in terms of employment, skills, training, education and supply chain benefits. SZC Co. has worked closely with stakeholders to ensure that the economic benefits can be enhanced in-line with the aspirations for sustainable sectoral growth across the region. Plans to implement these enhancements are set out in Appendix A, the Employment, Skills and Education Strategy; and Appendix B, the Supply Chain Strategy appended to the Economic Statement [APP-610 and APP-611], which quantifies the overall economic benefits. SZC Co. and local and regional stakeholders are designing measures that focus on the ability of local resources and providers of skills, training and education to access funds and support to enable them to create pathways for local people into the labour market and employment both at Sizewell C and other major infrastructure Projects locally. SZC Co. has developed its proposals for a single, on-site accommodation campus for Sizewell C and considered alternatives, including alternative locations, throughout four stages of consultation. A range of factors have led to the finalization of a strategy for the on-site accommodation campus. Specifically, it would allow to: • reduce the number of journeys on local roads; • balance the economic benefits of workers integrating within housing markets and communities, without overwhelming local communities with new residents; • allow flexible working patterns and out of hours working that would be necessary to maintain construction productivity and progress. Details of this process are set out in the Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591] and the Accommodation Strategy (Doc Ref. 8.10) [APP-613].

Matter raised	SZC Co.'s Response
	Appendix A of the Design and Access Statement (Doc Ref. 8.1) [APP-587] sets out the design principles for the accommodation campus to minimise environmental effects within the AONB, including (but not limited to) limiting the height of the buildings, locating taller four-storey buildings further away from sensitive receptors and the sympathetic use of the colour palette for facades. An indicative phasing schedule for the Sizewell C Project as a whole is provided in the Implementation Plan, Appendix 8.4I of the Planning Statement (Doc Ref. 8.4) [APP-599]. The construction of the associated developments to reduce the impact of construction traffic would be undertaken early in the programme (within approximately the first two years of the construction period) and be in place prior to the peak of construction on the main development site.
Concerns housing fund will not be sufficient to mitigate impacts on local communities Housing – displacement of private rentals. Even though there may be a housing fund this will not help those families already embedded within the community who will be left homeless (family/job/school/mental health)	SZC Co. is aware of the potential effects from workers accessing rented accommodation in the local area that is an important resource for local residents. An assessment of the likely effects is set out in Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195]. SZC Co. has developed an Accommodation Strategy (Doc Ref. 8.10) [APP-613] and will provide a Housing Fund to avoid potential adverse effects on the housing market. SZC Co has developed a Housing Fund including measures to boost supply of housing stock in order to reduce or avoid effects on the housing market, particularly for those at most risk of housing need or vulnerability within the private rented sector. Additionally, SZC Co. proposes a 'resilience' element to the Housing Fund to allow East Suffolk Council's statutory housing services to respond to increased Applications for support should this arise, and prevent these issues from occurring.

Matter raised	SZC Co.'s Response
	SZC Co. and East Suffolk Council agree that the Housing Fund should be robust and flexible to meet the needs of a potentially changing housing market, and spent within the first seven years of construction in order to address peak effects.
Tourism Tourism – all sectors in tourism may suffer due to lack of accommodation/traffic/noise/light tripadvisor will play an important part as bad reviews will have an ever lasting impact on the whole district. Legacy has to be placed to stop Leiston repeating as a boom and bust town, being left in a disgrace once again.	SZC Co. and local tourism stakeholders recognise that there is a need to provide pre-emptive support for the tourist sector to promote and market the region, and provide a clear strategy including investment in physical infrastructure and support for tourist accommodation providers in order to reduce risks identified through quantitative research, set out in the Economic Statement (Doc Ref. 8.9) [APP-610] and Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195]. SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), and governance through the draft Section 106 Agreement [PDB-004]. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. An Accommodation Strategy (Doc Ref. 8.10) [APP-613] has been developed to minimise harm to the sector during the peak seasons, when tourist and worker demand for accommodation may overlap. The Tourism Fund will include funding for measures deemed appropriate to avoid or reduce effects, such as marketing, promotion, research and supporting local Projects. SZC Co. agree that it is prudent to address the risk of any uncertainties and therefore have developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of

Matter raised	SZC Co.'s Response
	support for planning, licencing, and development/ reconfiguration of existing tourist accommodation sites.

Richard W L Smith, MVO, County Councillor for Blything Division (RR-1029)

Table A.26: Richard W L Smith, MVO, County Councillor for Blything Division

Matter raised	SZC Co.'s Response
Draft Development Consent Order, consultation and process	
Consultation EDF Energy have 'gone through the motions' with their four stages of consultation and the local community has worked hard at each stage to put forward reasoned arguments against the proposals.	The approach to pre-submission public consultation on the Sizewell C Project was submitted to the Suffolk local authorities in the original Statement of Community Consultation (SoCC) (2012) and the revised updated SoCC (2016). The Project took on board the councils' comments and conducted four stages of formal public consultation which met the spirit and the letter of the SoCC. SZC Co. presented information in as accessible way as possible across all four stages of formal consultation. Detailed information was provided in main consultation documents at each stage along with Summary Documents with questionnaires to aid the feedback process for respondents. Every stage of consultation was open to all residents and SZC Co. put in place specific activities to help hard-to-reach groups respond, such as provide Easy Read versions of the summary document. Issues raised in responses have been addressed in the Consultation Report (Doc Ref. 5.1) [APP-068 to APP-092]. The report clearly shows that feedback to consultation resulted in changes to the evolving proposals for Sizewell C and that SZC Co. listened and responded.

Matter raised	SZC Co.'s Response
	Several responses from the local community also reflected support for the Project.
Project Funding and Mitigation Funding	
Funding for the Project I also believe that this development is too costly and that arranging funding for it (EDF is, as you know, a company on the edge of bankruptcy, prevented from falling into that state by the French Government. I do realise, however, that these matters are outside your scope for this Development Consent Order Application. They remain relevant in the actual world outside these deliberations. I look forward to playing my full part as the local County Councillor during your process, hampered as I may be by having to fight the four-yearly County Council Election, planned for 6 May 2021.	Information on the Project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) [APP-066]. Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-011] and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) [AS-150]. These provide details on how the acquisition of additional land necessary to build the Sizewell C Project would be funded and on how the Sizewell C Project generally is to be funded. For new nuclear power stations to be built, the Government has been clear that costs must come down. New nuclear costs are driven by construction and financing and both can be cheaper by replicating the design of Hinkley Point C. Evidence shows repetition brings costs down in nuclear development, just like other technology. Many of the design and qualification costs for Sizewell C have been paid for already at Hinkley Point C, as well as the costs of setting up the supply chain and training workers. With the right timing, SZC Co. can directly transfer the skills from Hinkley Point C to Sizewell C. In 2019 the Government carried out a consultation on the use of a Regulated Asset Base model of financing (which was used for the Thames Tideway Tunnel) for new nuclear Projects. This consultation invited responses on all of the impacts of using such a model and the Government is now considering the responses that were received in forming its conclusion.
General Project	
Summary of concerns	SZC Co. is engaging with East Suffolk Council and Suffolk County Council to develop a Statement of Common Ground, covering the key

Matter raised	SZC Co.'s Response
As the County Councillor for Blything Division of Suffolk County Council I represent c.7,500 electors (excluding, of course, those under 18 who will increase the figure to c.8,500). My electors live in the town of Saxmundham (which is where I live) and the twelve villages of Blythburgh, Bramfield, Darsham, Dunwich, Kelsale-cum-Carlton, Middleton, Theberton, Thorington, Walberswick, Wenham, Westleton and Yoxford. The people who live at Eastbridge within the parish of Theberton are the closest community to the Sizewell C proposed development site. I wish to have the opportunity to speak on behalf of my constituents at the appropriate time during the Public Hearings. I echo their concerns on the whole gamut of issues, primarily the pressure on road and rail routes and the detrimental effect on the natural environment, but on many other issues too. I have been involved closely with the drawing-up and approval of the position statement adopted by Suffolk County Council, which I support totally.	issues raised on the Application. The accepted changes (April 2021) to the Application address comments received from stakeholders, including but not limited to changes to increase the number of rail and sea vessel movements, re-use former Sizewell A land for Sizewell B relocated facilities and therefore minimise development in AONB, changes to the SSSI crossing design and the provision of a bridleway link between Aldhurst Farm and Kenton Hills. SZC Co. also intends to bring the growing EDF Energy estate into the management of an independent Environment Trust which will focus on biodiversity and the stewardship of the natural habitat. The Trust has the opportunity to extend beyond the estate, which will provide a positive legacy for Suffolk. A Community Fund will be implemented via the Section 106 Agreement to help mitigate and compensate for intangible, residual or in-combination effects on local communities. Details of the Community Fund are included in the draft Section 106 Agreement [PDB-004], which stakeholders will have the opportunity to comment on.
Associated Development – Sizewell link road	
Preference for D2 route and concerns over the alternatives considered EDF Energy have simply not listened, and have done exactly what they wanted in ignoring local opinions. The proposed access route to site is one notable case. As a result of the Enquiry into the Sizewell B proposals Sir Frank Layfield proposed that a new route to site from the A12 was needed, and of the four options the 'D2' route was the best. That road	SZC Co. has undertaken a robust site selection process to determine the route of the Sizewell link road. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref 8.4) [APP-591] and in Volume 6, Chapter 3 (Alternatives and Design Evolution) of the ES (Doc Ref 6.7) [APP-450]. The most southerly routes considered were named Route W (north and south) during consultation. Route W South is the route most similar to Route D2. Route W (South) is no longer feasible because it follows the same alignment as the green rail route, from where the route crosses the Saxmundham to Leiston

Matter raised	SZC Co.'s Response
was never constructed, but it remains the best route into the Sizewell C site area. At an early stage EDF Energy set their minds against this route and, despite strongly advocacy from Suffolk County Council, have never done anything positive to evaluate the route, for unknown and perplexing reasons. This arrogant attitude has been evident in many other areas, the proof of which will, I trust, come out in your public hearings. The reasons against the Sizewell C development are many and varied; they are well-researched and clearly stated by the County Council and others. The hearings will amplify these considerable concerns.	branch line. The green rail route is required as part of the integrated freight management strategy to transport larger quantities of freight by rail. Route W (North) is not considered suitable for a number of reasons. For example, Route W North would require a crossing of both the East Suffolk line and the Saxmundham to Leiston branch line (two rail crossings on bridge structures), as well as at least two substantial watercourse crossings of the River Fromus and Hundred River (Flood Zone 3), as well as other tributaries. The crossings of the two rivers will likely require large span bridge structures and earthworks to ensure clearance beneath the bridge. These would be prominent structures which would be visible in the surrounding landscape. The proposed Sizewell link road does not require these structures. In addition, the link road works the contours of the landscape, whilst alternatives to the south would be significantly more prominent in an open landscape. Route W (North) is also the longest route of the options considered (8.2km) and would require the greatest amount of agricultural land and result in a larger area of habitat loss. Furthermore, the objective of the Sizewell link road is to mitigate potential impacts caused from the construction associated with Sizewell C. Traffic modelling undertaken predicts that construction traffic associated with Sizewell C would cause impacts that would require mitigation at Yoxford, Theberton and Middleton Moor. Therefore, the purpose of the Sizewell link road is to alleviate the villages of Yoxford, Theberton and Middleton Moor from the construction associated with Sizewell C. Route 'W North' would not provide as much traffic relief to Yoxford, Middleton Moor or Theberton compared with the proposed Sizewell link road.

A.4. International Agencies

Ministry of Energy, Agriculture, the Environment, Nature and Digitalization (Germany) (RR-0801)

Table A.27: Ministry of Energy, Agriculture, the Environment, Nature and Digitalization

Matter raised	SZC Co.'s Response
Major Accidents and Disasters	
Controllability of a core melt-down Nuclear power plants of the so-called III. Generation, to which the EPR belongs, is attested by its proponents "inherent safety". In contrast to nuclear power plants of the 1st and 2nd generation, they are supposed to have sufficient safety equipment to control a complete core meltdown. The claim that it is possible to develop, build and operate for decades a pressurized water reactor with "inherent safety" is decades old. In 1989 a company from France and a German company merged by founding a joint company. This was supposed to develop what was called a "competitive product for the world market", the European Pressurized Reactor (EPR). The aim was to limit even hypothetical accidents to the interior of the nuclear power plant. Radiation exposure of the population or even evacuation measures should be excluded. This goal should be achieved by developing a safety containment that is integral for all operating states in the short and long term, in which any core meltdown could be stabilized and long-term cooled. The exclusion of serious incidents or accidents should be ensured without recourse to active components and without intervention by the operating personnel of the nuclear power plant. These efforts have not	Prior to the construction of Sizewell C, the future operator must obtain a nuclear site licence granted by the Office for Nuclear Regulation (UK Nuclear Regulator). This is a legal document, issued for the full life cycle of the facility. It contains site-specific information, such as the licensee's address and the location of the site, and defines the number and type of installations permitted. A set of 36 Standard Conditions, covering design, construction, operation and decommissioning, is also attached to each licence. These conditions require licensees to implement adequate arrangements to ensure compliance. Under Licence Condition 14, the future operator is required to submit a Nuclear Safety Case that demonstrates that Sizewell C is designed, constructed, commissioned, operated and decommissioned safely. This includes eliminating hazards where possible and ensuring there are a suitable and sufficient number of controls to prevent and / or mitigate the impacts of any potential faults or incidents. In relation to transboundary impacts under Article 37 of the Euratom Treaty, the UK Government (on behalf of operators) submits information to the European Commission on plans to dispose of radioactive waste. This includes an assessment of the impacts to member states from both planned routine discharges and in the event of an accident and allows the Commission to make a determination as to whether implementation

Matter raised	SZC Co.'s Response
yet led to a European pressurized water reactor being connected to the grid in Europe. Projects in Finland (Olkiluoto), France (Flamanville) and Great Britain (Hinkley Point C) are partly characterized by considerable planning and construction delays and they are characterized by the fact that they can only be maintained with considerable support from the state treasury in the respective countries. Two EPRs went online in Taishan, China, in 2018 and 2019, respectively. But the evidence that these are inherently safe reactors has not been provided with such short running times. In current EPR Projects, terms of 60 years are envisaged. In addition, the European pressurized water reactors - compared to nuclear power plants of the 1st or 2nd generation - are nuclear power plants with a very high output and a significantly higher activity inventory. This is now the case again with the two reactor blocks from Sizewell C. Nobody can prove that the integrity of the respective containment will be guaranteed over six decades of full-load operation and that there will be no serious incidents or accidents as a result. Worldwide there was and is no nuclear power plant that can look back on 60 years of high performance. In addition, there are no longer operating balances of nuclear power plants that would have been operated with such a high electrical output as the planned reactors of Sizewell C. It is unclear how these operating conditions would affect the probability of occurrence and the controllability of a core melt. In this respect, however, there is no solid basis for ruling out substantial environmental impacts in neighbouring countries from a nuclear accident at the Sizewell C site.	of a plan is liable to result in radioactive contamination of a member state. SZC Co. must await an opinion from the Commission before obtaining domestic environmental permits or proceeding with the Project. In August 2020, a General Data Set was submitted by UK Government to the European Commission in relation to Sizewell C. This has been formerly sent to representatives from European member states including Germany. Chapter 6 of the submission covers an assessment of the transboundary impacts from unplanned releases of radioactive effluents. This includes an evaluation of the impacts from a range of accidents to the most affected member states which in this instance would be France, Netherlands, Belgium and Ireland, on the basis of a variety of factors including their distance, wind direction, deposition and food intake. A copy of Chapter 6 of the Article 37 submission has been provided in Appendix B of this report for information.

Matter raised	SZC Co.'s Response
The influencing Human Factor As already explained, inherent security must not depend on the EPR operating team being able to take the right measures in a timely manner when required. However, it is neither possible nor would it make sense to completely exclude the influence of humans on the safety of reactor operation. Nuclear power plants are developed, built, operated and supervised by people. Sufficiently competent and reliable staff who work in these areas are increasingly difficult to find in Germany. This is especially true for suitable junior staff. There are no indications that this situation in Great Britain is significantly more favourable. According to previous experience, the majority of construction delays and operational disruptions, including nuclear incidents and accidents, are caused by human error worldwide. In Fukushima a natural event (the height of the tsunami) was significantly underestimated, in Flamanville numerous manufacturing defects (e.g. faulty welds) caused delays lasting several years and the reactor accident in Chernobyl arose from, among other things, unauthorized experiments by the operating personnel. Such influencing factors cannot be ruled out anywhere and it must be expected that the Sizewell C reactor blocks would not be able to cope with them either - even if they were to be regarded as inherently safe.	As part of the Nuclear Safety Case, Human Factors are explicitly covered to ensure that where possible the dependency on a human is minimised, and where this is not possible the potential for human error is minimised. All System, Structures and Components (SSC) identified as having an impact on Nuclear Safety are classified according to its importance as part of the Nuclear Safety Case, this ensures that additional quality assurance requirements are applied throughout the design, construction, commissioning and operation of the SSC, along with additional levels of independent oversight and assessment. Under Nuclear Site Licence Condition 12, Sizewell C is also required to demonstrate it has adequate arrangements to ensure that only suitably qualified and experienced persons perform any duties which may affect the safety or operations on the site.
Terrorist Attacks Effects that are aimed at endangering the safe operation of the reactor would be of a completely different quality than human errors, as described in the previous chapter. In the document "Major Accidents and Disasters", the description of	Throughout the design, construction, commissioning, operation and decommissioning of Sizewell C, the operator will be required to demonstrate that it has adequate security arrangements to prevent the theft or sabotage of nuclear or other radioactive materials and the sabotage of nuclear facilities, taking into account the full spectrum of

Matter raised	SZC Co.'s Response
the Project for Sizewell C refers to acts of terrorism, including “unauthorized vehicles approaching the power plant site”. For this purpose, however, only the information is given that to this extent safety precautions are taken and "appropriate measures" are taken for safe plant operation. On the one hand, it is understandable that the public cannot expect a very detailed description of countermeasures in this matter. On the other hand, this leaves the uncertainty as to whether adequate precautions are actually taken. In this context, the issue of cyber crime is becoming increasingly important for the responsible authorities. The document “Major Accidents and Disasters” also makes statements on this, but in almost the same way as on terrorist attacks in general (see previous paragraph). Apart from the fact that it is not clear to outsiders whether the safety precautions are sufficient in this problem area either, there is another aspect to consider: If the monitoring of reactor safety and the initiation of safety measures are largely carried out via a digital system, this is also the case. The use of the latest security technology in itself is associated with the risk that this technology will fail and possibly not be replaced by an adequate system in a timely manner. In this respect, it would be of interest in relation to which use cases and to what extent in Sizewell C it might be necessary to resort to external emergency measures.	protective measures, including physical protection, personnel security, cyber security and information assurance. These arrangements will be independently approved by the UK Nuclear Regulator (Office for Nuclear Regulation) Civil Nuclear Security and Safeguards (CNSS) division who are responsible for approving security arrangements within the civil nuclear industry and enforcing compliance.
Implications of the British Euratom withdrawal The UK's exit from Euratom can have negative effects on reactor safety and radiation protection, not only in relation to existing plants but also to planned Projects. This results in detail from the following: It is not clear how the regulations of	The following question is outside the remit of the consultation for the DCO Application. It should however be noted that the UK Government agreed in the Political Declaration that there should be a Nuclear Cooperation Agreement (NCA) between Euratom and the UK. The UK

Matter raised	SZC Co.'s Response
the Euratom Treaty on the control powers of the EU Commission in Great Britain are to be replaced. With these regulations there are for example, established inspection visits within the Euratom community by Euratom inspectors, who guarantee independent monitoring of the safety level in the individual member states. It is unclear which mechanisms will be used to ensure this independent monitoring in the future. According to the Euratom Treaty, the European Commission has the right to review the functioning and effectiveness of the facilities for monitoring radioactivity in the environment and compliance with the basic standards. The facilities for controlling emissions from nuclear facilities and, in addition, the environmental monitoring as well as the state monitoring system and quality assurance measures are checked on a random basis. It would be of great interest to know how the relevant Euratom inspections are to be replaced. It is also not clear which regulations are intended to replace the monitoring system agreed between the Euratom member states with regard to the intended use of fissile materials and the transboundary movement of radioactive waste, in particular spent fuel elements. A Euratom directive also obliges all Euratom member states to draw up national waste management programs. This is to ensure the responsible and safe disposal of spent fuel elements and radioactive waste within a European legal framework. With regard to high-level radioactive waste, deep geological repositories are preferred within the EU according to the current state of science. It is also possible that individual Euratom member states get together and strive for a common repository. It is not transparent which national plans	Government are now negotiating this Agreement as part of the future relationship talks with the EU.

Matter raised	SZC Co.'s Response
exist in Great Britain in this regard, which will replace the regulations in the EU directive. The solution to this question is of great importance for Great Britain, as the volume of spent fuel elements will increase significantly as a result of the new nuclear power plant Projects in Hinkley Point and in Sizewell, if they are realised. In addition, there will be waste from reprocessing. For comparison: The Federal Environment Ministry reckons that “around 10,500 tons of heavy metal in the form of irradiated fuel elements from the operation of nuclear power plants” will have to be disposed of in Germany. If one assumes that the two units of Sizewell C will actually - as intended - be in power operation for 60 years each, this would mean that highly radioactive heavy metal in the order of about 4,000 tons would have to be disposed of from these two reactors alone. There is uncertainty - beyond the Sizewell C Project - as to how the British relationship with the International Atomic Energy Agency (IAEA) will develop after the exit from Euratom, what agreements have been made with the IAEA and to what extent these are suitable to replace the obligations assumed by Great Britain as partners of the Euratom Treaty. The documents made available do not indicate what effects the British withdrawal from the EU internal market will have on the supplies for the construction of the Sizewell C reactor units. It is also not clear what consequences Great Britain's withdrawal from the Euratom Treaty will have on the fuel supply for the planned nuclear power plant. It follows from this that neither the financial consequences for the Project nor the effects on the security standards at Sizewell C can currently be reliably assessed. As far as research and development is concerned, there are	

Matter raised	SZC Co.'s Response
Projects within the Euratom community to maintain and further develop reactor safety, to develop long-term disposal solutions, to develop skills through training and mobility measures or to improve radiation protection. For this purpose, more than 2 billion euros in EU research funds are expected to be available by 2027. There is no information on the extent to which Great Britain will participate in such Euratom programs as a third country in the future or whether Great Britain will set up its own, equivalent research programs. Especially for those Espoo contract partners whose national territory is relatively close to Great Britain (e.g. Germany), it would be very important to receive comprehensive information on the extent to which the high safety standards in the fields of reactor safety and radiation protection will be complied with by Great Britain in the future and to what extent there will be compromises/trade-offs. This applies not only to the obligations under the Euratom Treaty, but also in particular to the various obligations arising from EU secondary law. The EU Commission has described in detail further consequences of the UK's withdrawal from Euratom and currently still open points in its "Notice to Stakeholders - Withdrawal of the United Kingdom and the EURATOM Acquis" of August 24, 2020	
Recommendations It is recommended that the British licensing authority take another critical look at the Sizewell C Project in the light of the previous information. Most of the evidence suggests that serious incidents or accidents in Sizewell C due to radioactive fallout would have a substantial impact not only on Great Britain itself, but also on neighbouring countries	As per responses above. In addition, prior to the construction of Sizewell C, the future operator must obtain a Nuclear Site Licence granted by the Office for Nuclear Regulation (UK Nuclear Regulator). This is a legal document, issued for the full life cycle of the facility. It contains site-specific information, such as the licensee's address and the location of the site, and defines the number and type of installations permitted.

Matter raised	SZC Co.'s Response
such as Germany. The financial consequences have to be added to such a risk. Great Britain will already have to co-finance the Hinkley Point C nuclear power plant Project due to government commitments in the double-digit billions. It would be questionable if the Sizewell C Project had a similar consequence. It can be stated that the generation of electricity from nuclear energy has developed into a form of energy that can no longer be financed privately anywhere in the world. It could therefore be worth considering to part with this form of energy and instead to use and develop sustainable alternatives. It is not only in the national interest of Great Britain, but also in the international interest, to establish a sustainable, environmentally friendly energy transition. With relatively little financial support, significantly more plants for the use of renewable energies could be built and operated in the wind-resource rich UK than is already the case. Fortunately, Great Britain is already aiming for a 40% share of renewable energies in electricity generation. The British Government is advised to continue on this path. The increase in the share of nuclear power, on the other hand, would mean countering the risk of a climate catastrophe with the risk of a nuclear disaster. That should be avoided.	

Danish Emergency Management Agency (RR-0265)

Table A.28: Danish Emergency Management Agency

Matter raised	SZC Co.'s Response
Major Accidents and Disasters	
Dear Sirs My main points of interest are the safety measures to prevent and mitigate accidents that might cause a release of radioactive matter to the environment, as such releases might have a considerable impact on the environment, even inside Denmark and the Danish economic zone.	Under Article 37 of the Euratom Treaty, the UK Government (on behalf of operators) submits information to the European Commission on plans to dispose of radioactive waste. This includes an assessment of the impacts to member states from both planned routine discharges and in the event of an accident and allows the Commission to make a determination as to whether implementation of a plan is liable to result in radioactive contamination of a member state. SZC Co. must await an opinion from the Commission before obtaining domestic environmental permits or proceeding with the Project. In August 2020, a General Data Set was submitted by UK Government to the European Commission in relation to Sizewell C. This has been formerly sent to representatives from European member states including Denmark. Chapter 2 of the submission provides a description of the installation including those systems related Gaseous Discharges, Liquid Waste Treatment, Solid Waste Treatment and Containment. A copy of Chapter 2 of the Article 37 submission has been provided in Appendix B of this report for information.

Belgian State (RR-0127)

Table A.29: Belgian State

Matter raised	SZC Co.'s Response
Major Accidents and Disasters Belgium candidates to be considered as an 'interested party', for the following reasons: - In emergency situations, in case of atmospheric – and to a lesser extent also liquid – discharges, an impact on the terrestrial and the marine environment in Belgium cannot be excluded; During routine operations we should be able to forecast and evaluate what the Belgian nuclear authority will monitor across our networks, peculiarly as regards the monitoring in the North Sea. This is important for the nuclear authority, but also pertains to the Belgian OSPAR and EU duties. Therefore, we are asking to enquire the following elements with due punctiliousness: The radiological consequences for Belgium of the discharges as a result of design accidents have to be calculated. These reference accidents need to be addressed in the environmental impact report (EIR) and the choice for the references needs to be motivated. In case no radiological accidents with an impact on Belgium have been selected, this should also be motivated in the EIR; The impact on the cooperation with the Belgian authorities with respect to nuclear emergency planning shall be described, with specific attention for: - o The exchange of information in emergency cases; - o The coordination of contingency plans	
Under Article 37 of the Euratom Treaty, the UK Government (on behalf of operators) submits information to the European Commission on plans to dispose of radioactive waste. This includes an assessment of the impacts to member states from both planned routine discharges and in the event of an accident and allows the Commission to make a determination as to whether implementation of a plan is liable to result in radioactive contamination of a member state. SZC Co. must await an opinion from the Commission before obtaining domestic environmental permits or proceeding with the Project. In August 2020, a General Data Set was submitted by UK Government to the European Commission in relation to Sizewell C. This has been formerly sent to representatives from European member states including Belgium. Chapters 6 and 7 of the submission cover an assessment of the transboundary impacts from unplanned releases of radioactive effluents and details of the emergency plans and agreements with other member states. Copies of Chapters 6 and 7 of the Article 37 submission have been provided in Appendix B of this report for information.	

Ministry for the Environment and Natural Resources National Planning Agency (Iceland) (RR-0876)

Table A.30: Ministry for the Environment and Natural Resources National Planning Agency

Matter raised	SZC Co.'s Response
General EIA	
INTRODUCTION The National Planning Agency is a state authority, under the Ministry for the Environment and Natural Resources, responsible for the administration and implementation of the Environmental Impact Assessment Act. The National Planning Agency wishes to register as an interested party on behalf of Iceland. REPRESENTATION -Significant transboundary effects not likely- After consulting with the relevant authorities on the proposed development, Iceland is of the view that the proposed development is not likely to have a significant effect on the environment of our state under normal operation.	Noted. No further action.
Major Accidents and Disasters	
Major accidents might lead to significant effects on marine environment around Iceland- A major accident and disaster event might possibly cause significant impact on the marine environment around Iceland. This could be from airborne contamination, long term transport with currents and via uptake through the foodweb in particular with migrating species such as Northeast Atlantic mackerel (<i>Scomber scombrus</i>) and Norwegian spring-spawning herring (<i>Clupea harengus</i>). It is well known from literature that radioactive nucleotides from both Sellafield and La Hague reprocessing plants make their way north along the Norwegian coast and recirculate in the Nordic Seas, reaching Icelandic waters	Under Article 37 of the Euratom Treaty, the UK Government (on behalf of operators) submits information to the European Commission on plans to dispose of radioactive waste. This includes an assessment of the impacts to member states from both planned routine discharges and in the event of an accident and allows the Commission to make a determination as to whether implementation of a plan is liable to result in radioactive contamination of a member state. SZC Co. must await an opinion from the Commission before obtaining domestic environmental permits or proceeding with the Project. In August 2020, a General Data Set was submitted by UK Government to the European Commission in relation to Sizewell C. This has been

Matter raised	SZC Co.'s Response
within a few years. Iceland suggests such accidents should be addressed in the EIA.	formerly sent to representatives from European member states including Iceland. Chapters 6 of the submission covers an assessment of the transboundary impacts from unplanned releases of radioactive effluents. This includes an evaluation of the impacts to the most affected member states which in this instance would be France, Netherlands, Belgium and Ireland, on the basis of a variety of factors including their distance, wind direction, deposition and food intake. A copy of Chapter 6 of the Article 37 submission has been provided in Appendix B of this report for information.

Swedish Environmental Protection Agency (Naturvårdsverket) (RR-1196)

Table A.31: Swedish Environmental Protection Agency

Matter raised	SZC Co.'s Response
General Project	
Our representation is primarily to have the opportunity to follow the process and in case it is deemed necessary, the opportunity to take part in and comment on parts concerning potential transboundary environmental impacts, risk mitigation and use of Best Available Technology (BAT).	Noted. No further action.

Ministry of Infrastructure and Water Management for Netherlands (RR-0802)

Table A.32: Ministry of Infrastructure and Water Management for Netherlands

Matter raised	SZC Co.'s Response
Major Accidents and Disasters	
At this stage, we can agree with your conclusion that the construction and commissioning of the new Sizewell C reactor is not likely to have significant adverse consequences for the Netherlands. From past experience though we know that in the eventuality of an incident with a nuclear reactor, adverse effects will also occur at longer distances, beyond 100 kilometres. The Netherlands would therefore like to receive information on developments, both during the preparations for construction and during the construction itself and, of course, when the operator will commission the reactor. In addition to this, it is important for the Netherlands to know whether transport by sea will take place of radioactive waste or materials. If so, please indicate the impact of these journeys on the international adopted shipping routes, with special interest on the route between Harwich and Rotterdam. We would also like to receive updates on this particular subject.	Under Article 37 of the Euratom Treaty, the UK Government (on behalf of operators) submits information to the European Commission on plans to dispose of radioactive waste. This includes an assessment of the impacts to member states from both planned routine discharges and in the event of an accident and allows the Commission to make a determination as to whether implementation of a plan is liable to result in radioactive contamination of a member state. SZC Co. must await an opinion from the Commission before obtaining domestic environmental permits or proceeding with the Project. In August 2020, a General Data Set was submitted by UK Government to the European Commission in relation to the construction, operation and decommissioning of Sizewell C. This has been formerly sent to representatives from European member states including the Netherlands. Chapter 6 of the submission covers an assessment of the transboundary impacts from unplanned releases of radioactive effluents. This includes an evaluation of the impacts to the Netherlands. A copy of Chapter 6 of the Article 37 submission has been provided in Appendix B of this report for information. In relation to the transport of radioactive waste by sea, all Intermediate Level Waste and Spent Fuel will be stored on the Sizewell C site until the UK Geological Disposal Facility becomes available. Low Level Waste will be disposed of as soon after generation as possible via a permitted disposal facility. There is currently no intention transport radioactive waste by sea.

Department of Housing, Planning and Local Government (Ireland) (RR-1280)

Table A.33: Department of Housing, Planning and Local Government (Ireland)

Matter raised	SZC Co.'s Response
General Project	
Dear Sir/Madam, I am registering Ireland as an Interested Party in order to ensure that Ireland is kept informed of progress with this Application and the final decision. Regards, Declan Grehan EU & International Planning Regulation Unit Department of Housing, Planning and Local Government Ireland	Noted. No further response required.

A.5. Other Statutory Consultees

Ministry of Defence (RR-0800)

Table A.34: Ministry of Defence (MOD)

Matter raised	SZC Co.'s Response
Main Development Site	
The site for the development falls outside of MOD safeguarding areas, however, falls within a military Low Flying area and offshore activity falls within quadrant 52 Blocks 24 & 25 and quadrant 53 Block 2 and may infringe a quadrant route. Therefore, the DIO Safeguarding team would require future consultation in order to make relevant safeguarding assessments as the proposals progress through the planning	The heights of the proposed structures within the main development site are set out in Tables 2.1, 2.2, 2.3, 2.5 and 2.7 of Volume 2, Chapter 2 (Description of Permanent Development) of the ES (refer to Volume 3, Appendix 2.2.A of the ES Addendum for the latest version (Doc Ref. 6.14) [AS-202]) and the zones shown on the Main Development Site Operational Parameter Plans - Operational Platform (SZC-SZ0100-XX-100-DRW-100043) (Doc Ref. 2.5(A)) [AS-

Matter raised	SZC Co.'s Response
process. With regards to the heights of the proposed structures, the MOD request any obstruction over 150 metres is lit in accordance with the Air Navigation Order. In the interests of air safety, the MOD requests that any obstruction between 50 to 149.9 metres is lit with a minimum intensity 25cd omni directional flashing red light or equivalent infra-red light fitted at the highest practicable point of the structure. Whilst we have no safeguarding objections to this Application, the height of the permanent obstructions will necessitate that aeronautical charts and mapping records are amended. Defence Infrastructure Organisation (DIO) Safeguarding therefore requests that, as a condition of any planning permission granted, the developer must notify UK DVOF & Powerlines at the Defence Geographic Centre with the following information prior to development commencing: - Precise location of development. - Date of commencement of construction. - Date of completion of construction. - The height above ground level of the tallest structure. - The maximum extension height of any construction equipment. - Details of aviation warning lighting fitted to the structure(s) This information can be sent by e-mail to the Defence Geographic Centre at: dvof@mod.gov.uk or post it to: D-UKDVOF & Power Lines Geospatial Air Information Team Defence Geographic Centre DGIA Elmwood Avenue Feltham Middlesex TW13 7AH	118]. This identifies that there will be a number of buildings and structures that are above 50m. The tallest permanent structures are located within parameter zones S1 and S2 (nuclear auxiliary building stacks) and are expected to be between 77m and 79m AOD. During construction, a number of buildings and structures would be between 50m and 149.9m AOD, and structures in Construction Zones C1, C1 (Exceptional Structures) and C2a would have heights of up to 160m, 250m and 160m (AOD) respectively (refer to Main Development Site Construction Parameter Plans (Doc Ref. 2.5(A) [AS-287])). It is therefore acknowledged that there will be a number of buildings and structures that will need to include the following: - Temporary and permanent buildings of between 50 and 149.9m AOD: shall be lit with a minimum intensity 25cd omni directional flashing red light or equivalent infra-red light fitted at the highest practicable point of the structure; and - Temporary structures of more than 150m AOD shall be lit in accordance with the Air Navigation Order. SZC Co. suggest that the following commitments are secured through the draft DCO: No building or structure greater than 50m AOD shall be erected until the following details have been provided to the Defence Geographic Centre (dvof@mod.gov.uk or post to: D-UKDVOF & Power Lines Geospatial Air Information Team Defence Geographic Centre DGIA Elmwood Avenue Feltham Middlesex TW13 7AH). These details shall relate to the relevant building(s) in questions and shall include: - Precise location of the relevant building or structure; - Date of commencement of construction;

Matter raised	SZC Co.'s Response
	c. Date of completion of construction; d. The height above ground level; e. The maximum extension height of any construction equipment; and f. Details of aviation warning lighting fitted to the structure(s).

Suffolk Local Access Forum (RR-1175)

Table A.35: Suffolk Local Access Forum

Matter raised	SZC Co.'s Response
Amenity and Recreation	
1. Impact on rights of way network With regard to the local rights of way network SLAF has accepted the loss of Bridleway 19 during the construction period and welcomed the provision of an off-road route adjacent to the Eastbridge Road but would ask that this route is continued to Eastbridge itself. We would also ask for a safe pedestrian link from the B1122 through Aldhurst Farm to meet with Sandy Lane. What is now the Suffolk Coast Path will shortly become part of the England Coast Path. Regrettably the route suggested by EDF is along soft sea defences which over time could disappear with coastal erosion. SLAF therefore requests that the definitive route of the path is moved onto the top of the new hard sea defences being constructed to protect the new power station.	SZC Co. aims to minimise physical disturbance to users of recreational resources by providing appropriate diversion routes where temporary closure cannot be avoided. Treatment of public rights of way (PRoW), National Trails and other publicly accessible land and routes within the main development site and green rail route site are described in the Rights of Way and Access Strategy (refer to Volume 2, Appendix 15I of the ES (Doc Ref. 6.3) [APP-270]). Temporary and permanent closures, diversions and creation of new PRoW for all sites are set out in the detailed Access and Rights of Way Plans (Doc Ref. 2.4(B)) [AS-113 to AS-114] and in Schedule 10, 11 and 13 of the draft DCO (Doc Ref. 3.1(B)) [AS-143]. The amenity and recreation chapters assess effects on users of these recreational resources (Volumes 2 to 9 of the ES). Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195] assesses the impacts on tourism and sets out that: there

Matter raised	SZC Co.'s Response
	is limited empirical evidence that the Sizewell C Project would lead to a quantifiable reduction in visitor numbers, a change in visitor behaviour, expenditure or business viability in the sector over and above normal variation. The tourist economy is subject to substantial volatility year-on-year, and is affected by externalities beyond the effects of a single Project such as Sizewell C. There is no empirical evidence that the construction of Sizewell B had a substantial effect on the sector within the Suffolk coast area, or that – with a well-managed and effective mitigation package via a Tourism Fund – the construction of Hinkley Point C is having a substantial effect in Somerset. However, engagement with local tourism stakeholders, review of environmental effects and mitigation identified across the ES, and SZC Co.'s understanding of perceived visitor sensitivities based on quantitative survey of previous and potential visitors has identified that without mitigation there is potential for very local effects on businesses and activities where there is a combination of significant residual environmental effects; and perception-related effects as a result of sensitivities to different aspects of the Sizewell C Project. SZC Co. is therefore proposing a Tourism Fund. SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation and governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early release. SZC Co. propose that the Coast Path will be routed along the platform east of the hard sea defence, where the higher hard sea defence to the west will screen lower level buildings and structures within the power station and provide some noise mitigation, allowing people to enjoy the coastal landscape and minimise intrusion by the

Matter raised	SZC Co.'s Response
	power station. This is similar to the existing Coast Path and coastal defence alongside Sizewell B. SZC Co. will provide an alternative informal footpath along the top of the hard sea defence. This will be within the permanent coastal margin (permanent accessible coastline which is being established by Natural England) which people will be available to use at all times, including if the lower PRoW is eroded by extreme sea events. SZC Co. does not intend to provide an off-road footpath or bridleway route from the campus north into Eastbridge. Use of this section of Eastbridge Road by construction workers in cars is likely to be low. Any construction workers residing north or west of Blythburgh would be required to use the Park and Ride and not drive directly to the main development site. A small number of construction workers may live in Eastbridge. Any workers living in other nearby villages such as Westleton and Theberton would be expected to use the B1122 and not travel via Eastbridge. Eastbridge Road is also not a permitted route for HGV deliveries and so there would be no increase in HGV numbers.
2. Impact of proposed road schemes Whilst SLAF has accepted the proposed new road schemes to help mitigate traffic impact on Farnham/Stratford St Andrew and Theberton, we welcome the dialogue that has occurred between EDF and the Highway Authority regarding the provision of safe crossing points for public rights of way on these new routes. However, we have concerns that in the early years' construction traffic will access the site via Sizewell Gap which coupled with Sizewell A decommissioning traffic could lead to conflict with the use of local rights of way. Given the impact the additional traffic will have on the A12 from not only HGV movements but also	Volume 2, Chapter 10 of the ES (Doc Ref. 6.3) [APP-198], as updated by Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181], includes an assessment of accident and road safety, severance, and fear and intimidation, as part of the transport environmental assessment. Sizewell C HGV movements will be managed through the Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7) [APP-608]. HGV deliveries will be booked via the Delivery Management System in order to spread deliveries over the course of the day and manage the flow of HGVs on the highway network and at the site itself. HGV movements to the main development site will be required to route via the A12 and B1122 or

Matter raised	SZC Co.'s Response
construction workers and park and ride vehicles, we would ask that all points where public rights of way cross this road should be subject to a risk assessment audit.	Sizewell link road and compliance with the HGV routes will be monitored through the CTMP. In addition, HGV drivers will be required to adhere to HGV driver rules. These mitigation measures will act to reduce the effect on the public rights of way crossings.
3. Access strategy and legacy This area of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty between Aldeburgh and Southwold attracts large number of visitors who enjoy the local access network and bring significant economic benefits to the area. SLAF is concerned that temporary and permanent closure of key north to south and east to west routes during the construction period would severely affect the local economy. We would expect EDF to provide local authorities, businesses, and communities with up to date information to enable the local population and visitors to make best use of the access available for walkers, equestrians, and cyclists. For example, when the Coast Path is closed whilst there are seaborne deliveries. Post construction, SLAF are requesting that there should be a significant legacy benefit to the public access to the wider area around the power station including the permissive routes around Kenton Hills becoming definitive, with a new link to the coast path and better off-road cycle routes between Aldeburgh and Southwold.	Treatment of PRow, National Trails and other publicly accessible land and routes within the main development site and green rail route site are described in the Rights of Way and Access Strategy (refer to Volume 2, Appendix 15I of the ES (Doc Ref. 6.3) [APP-270]). Temporary and permanent closures, diversions and creation of new PRow for all sites are set out in the detailed Access and Rights of Way Plans (Doc Ref. 2.4(B)) [AS-113 to AS-114] and in Schedule 10, 11 and 13 of the draft DCO (Doc Ref. 3.1(B)) [AS-143]. The amenity and recreation chapters assess effects on users of these recreational resources (Volumes 2 to 9 of the ES). SZC Co. do not propose to convert permissive routes close to the site into definitive rights of way as SZC Co. wish to maintain the ability to close certain routes should the need arise. SZC Co. will deliver wider PRow improvements to the local network, in addition to the beneficial improvements included within the Application, through the Section 106 PRow fund.

The Maritime and Coastguard Agency (RR-0747)

Table A.36: The Maritime and Coastguard Agency (MCA)

Matter raised	SZC Co.'s Response
Marine/ Coastal	
Infrastructure in the marine environment and any Harbour Orders Part of the Maritime and Coastguard Agency's (MCA) wide remit includes responsibilities for the safety of navigation and search and rescue in the UK. We would like to be consulted on the establishment of any infrastructure or works in or over the marine environment, and any Harbour Orders providing statutory powers for the ongoing safe operation of the facility.	SZC Co. consulted on the Harbour facility and marine infrastructure with MCA on 9 September 2020 when feedback was positive. SZC Co. will continue to engage with MCA as required during examination.
Marine Licence We would also like to consider whether the works may have any impact on MCA infrastructure in the area, which on initial inspection is unlikely. Should any works be required in or over the marine environment, a Marine Licence may be required under the Marine and Coastal Access Act 2009, at which time the MCA will be invited to comment on the licence Application from the safety of navigation safety perspective.	Noted.
Port Marine Safety Code (PMSC) and its Guide to Good Practice In addition, the MCA would point the developers in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice; they would need to liaise and consult with any relevant Statutory Harbour Authority to develop a robust Safety Management System (SMS) for the Project under this code.	Noted.

A.6. Other Statutory Undertakers

British Telecommunications plc (RR-0159)

Table A.37: British Telecommunications plc

Matter raised	SZC Co.'s Response
General Project	
I represent British Telecom and their property department. I wish to be kept informed of any updates on the planning for Sizewell C so as to ensure any BT property interests are protected.	Noted.

National Grid Ventures (RR-0875)

Table A.38: National Grid Ventures (NGV)

Matter raised	SZC Co.'s Response
Land Interest	
This is a Relevant Representation submitted by National Grid Ventures (NGV) requesting that NGV are treated as an Interested Party throughout the Examination process of the Development Consent Order (DCO) Application for The Sizewell C Project by NNB Nuclear Generation (SZC) Limited (PINS ref: EN010012). NGV is a ringfenced division of National Grid plc, responsible for both developing and operating businesses in our UK and US territories. NGV is proposing to develop two high voltage direct current (HVDC) electricity Interconnector Projects between Suffolk and Europe, the Nautilus and EuroLink Projects. Nautilus and EuroLink Interconnector Projects	SZC Co. has been and continues to engage with NGV on their proposals. A cumulative assessment of the Nautilus and EuroLink Interconnector Projects with Sizewell C on the basis of publicly available information is presented within Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578].

Matter raised	SZC Co.'s Response
Both the proposed Nautilus and EuroLink Interconnector Projects have grid connection agreements in place with the National Grid Electricity System Operator (ESO) to connect these Projects at a new 400kV electricity substation located close to the existing Sizewell 400kV line, provisionally referred to as “Leiston 400kV.” NGV’s proposed Nautilus and EuroLink Interconnector Projects share the same connection offer location as SPR’s East Anglia ONE North and East Anglia TWO Projects, both of which are currently subject to ongoing DCO Applications. Each Interconnector Project will involve the construction of an electricity converter station in each country and the installation of offshore and onshore underground (HVDC) cables between each converter station and underground high voltage alternating current (HVAC) cables between the converter station and electricity substation in each country. The Nautilus Interconnector is a proposed HVDC electricity link between the British and Belgium transmission systems connecting between a substation in Suffolk and a substation in Belgium. On the 29th April 2019 NGV received a Direction by the Secretary of State under Section 35 of the Planning Act 2008, confirming that the Nautilus Interconnector Project would be treated as National Significant Infrastructure Project under the Development Consent Order regime. The EuroLink Project is a proposed HVDC electricity link between the British and Dutch transmission systems connecting between a substation in Suffolk and a substation in The Netherlands. NGV’s interest in the Sizewell C Project DCO Application NGV have identified potential site options for location of infrastructure required for the Nautilus and EuroLink Projects including landfall sites, converter station sites and associated	

Matter raised	SZC Co.'s Response
cable routes for each Project. Further technical assessment, survey work and refinement is currently being undertaken and will need to be completed before NGV are ready to present options for non-statutory public consultation and progress to seek an EIA Scoping Opinion. Dependant on the location of preferred sites identified during NGVs assessment work, it may be necessary for NGV to discuss the opportunity for locating NGV's infrastructure on land associated with the Sizewell C Project. NGV will continue to engage with Sizewell C and the Nautilus and EuroLink Interconnector Projects develop and throughout the Sizewell C Examination. Without prejudice, NGV may wish to participate during the Examination in relation to the interests we set out above. NGV reserve the right to make further comments through the Examination process. NGV welcomes engagement with NNB Nuclear Generation (SZC) Limited in relation to our common interests.	

A.7. Other Non-Statutory Consultees

Eastern Inshore Fisheries and Conservation Authority (RR-0348)

Table A.39: Eastern Inshore Fisheries and Conservation Authority (EIFCA)

Matter raised	SZC Co.'s Response
Marine/ Coastal	
The role of Eastern IFCA is to lead, champion and manage a sustainable marine environment and inshore fisheries within our district, which extends from the Humber to Harwich, and six	Noted. No further comment.

Matter raised	SZC Co.'s Response
nautical miles out to sea. As the proposed Sizewell C facility is within those boundaries, and the Project may generate effects which interact with our core role, we consider it appropriate that Eastern IFCA comment on the proposed Project.	
We acknowledge the considerable amount of work which the Sizewell team and consultants have undertaken, and the large volume of documents that this work has produced. We restrict our comments to those aspects of the potential Project that interact with our remit – namely effects which may have an impact on fishing opportunities and quality (including related impacts on the wider marine environment), and any activity with the potential to directly affect access to such opportunities.	Noted. No further comment.
Within the Project there are aspects of potential impacts on features of Marine Protected Areas. We defer to the advice and comments of the relevant Statutory Nature Conservation Body in connection with these potential impacts, except where there may be an interaction with Eastern IFCA core remit.	Noted. No further comment.
Within the Project there are aspects of potential inputs of substances (whether radioactive, toxic or not) and energy (such as heat) into the marine environment. We defer to the advice and comments of the relevant authority (such as the Environment Agency) in connection with these potential impacts, except where there may be an interaction with Eastern IFCA core remit.	Noted. No further comment.
In connection with our core remit, we retain concerns over the general approach to the assessment of potential impacts on fish populations as presented in numerous studies and publications connected with the Sizewell C Project. It is the norm in such	While the approach taken by SZC Co. for the fish assessment, and the scale of those assessments in particular, is agreed by the Marine Management Organisation, SZC co. has consulted further with the EIFCA to address the scale of assessment. This consultation has led

Matter raised	SZC Co.'s Response
studies that effects of e.g. mortalities due to interaction with the water abstraction / fish return systems are considered against the population (or some proxy measurement) over a wide area, such as the southern North Sea (or even wider). We do not consider that this is an appropriate approach, and we suggest that such local effects need to be considered against a much more local population.	to the development of an additional method, based on the tidal excursion of the abstraction, to be developed at the suggestion of the IFCA (a 'heat map' approach). The additional method has been reported in the supplementary material provided in Volume 3, Appendix 2.17.A of the ES Addendum (Doc Ref. 6.14) [AS-238]. SZC Co. continues to refine this additional method with continued consultation with the EIFCA.
We note that early proposals for the Project (for instance, The Sizewell C Project 5.1 Consultation Report Appendices D.1 - D.7 Part D: Stage Two Pre-Application Consultation, Section 7.4.56) included provision for a fish deterrence system associated with the cooling water intakes. This deterrence system would have the effect of reducing the number of fish that would interact with the cooling water system. We have not identified any section within the package of material supplied that determines that such a system would have no beneficial effect, and we suggest that the option should be considered.	SZC Co. agrees that an Acoustic Fish Deterrent (AFD) system would likely provide some mitigation to entrapment of those fish species that have good or general hearing. However, there is no evidence of their efficacy in offshore environments and installation of such systems in offshore environments provides significant safety issues. This, and a consideration of other mitigation at the intake heads, is described in Volume 2, Chapter 6 (Alternatives and Design Evolution) of the ES (Doc Ref. 6.3) [APP-190]. A separate document providing further details of AFD installation and maintenance issues has been prepared and can be provided to EIFCA. Given the assessments demonstrate no significant effect on fish populations, and the significant safety and technical issues of installing an AFD system, SZC Co. maintains its position that an AFD system is neither required or justified at this location.
"Due to our concerns over this fundamental aspect of the assessment of effects, it is not possible for us to supply more detailed appraisal of any impacts which may arise. We are willing and eager to engage with the Sizewell C team in order to develop an appropriate approach to the assessment of impacts which interact with the Eastern IFCA remit. Eastern IFCA continually seek to improve how we respond to consultations, both in terms of efficiency and content. Therefore,	Noted. SZC Co has continued to engage with the EIFCA since submission of the ES and will continue to do so with the aim of achieving agreement on the SZC Co. submission.

Matter raised	SZC Co.'s Response
if any of the points raised in this response are reflected in the outcome we would appreciate being informed. "	

NATS (RR-n/a)³

Table A.40: NATS

Matter raised	SZC Co.'s Response
General Project	
The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this Application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this Application which become the basis of a revised, amended or further Application for approval, then as a statutory consultee NERL requires that it be further consulted on	Noted. No further action

³ The submission from NATS was not registered by the Examining Authority as a formal relevant representation, however, as an additional submission. For completeness, the response to the submission from NATS is included within **Appendix A** of this report.

Matter raised	SZC Co.'s Response
any such changes prior to any planning permission or any consent being granted.	

New Anglia Local Enterprise Partnership (RR-0883)

Table A.41: New Anglia Local Enterprise Partnership (LEP)

Matter raised	SZC Co.'s Response
Socio-economics	
Positive impacts on local economy and employment New Anglia LEP would like to highlight our support for Sizewell C and the opportunity it offers to tackle the climate emergency and progress to 'Net Zero' while boosting the economy in Suffolk and throughout East Anglia. We are interested in the positive impact on local business growth and investment, supply chains, local employment, skills and education, infrastructure and impact on key sectors such as tourism. The East of England and especially Suffolk is in a position to host a necessary major infrastructure Project which will generate huge local employment, education and skills opportunities as well as delivering welcome infrastructure improvements and the potential for wider energy and environmental benefits such as the production of hydrogen. We have seen the employment created at Hinkley Point C in Somerset and note that nearly half of the jobs have been taken by local people. Over 650 apprentices have worked on the site. Contracts with businesses in the region have reached £1.7bn. We should be proud that the value of	SZC Co. welcomes the LEPs support and its very helpful input as part of ongoing engagement on the Economic Strategy, including on employment, skills and education, supply chain and tourism. We look forward to continuing to work with the LEP to maximise the benefits of the Sizewell C Project for the region.

Matter raised	SZC Co.'s Response
contracts with East of England businesses for the Hinkley Point C Project is now nearly £1bn. That offers a great foundation for these regional firms if Sizewell C starts soon. We must take this opportunity for the benefit of our region's young people. They deserve the same opportunities at Sizewell C, which will bring at least 1,500 apprenticeships and thousands of jobs to the area during an employment crisis. We support Sizewell C because we want to help Suffolk's young people stay and develop their skills in the county so they can live, work and bring up their families in an area with a bright future.	

NHS Norfolk & Waveney Clinical Commissioning Group (RR-0886)

Table A.42: NHS Norfolk & Waveney Clinical Commissioning Group

Matter raised	SZC Co.'s Response
General Project	
Our neighbouring STP including the NHS North East Essex Clinical Commissioning Group, NHS Ipswich & East Suffolk Clinical Commissioning Group & NHS West Suffolk Clinical Commissioning Group have submitted a detail representation to the Application. NHS Norfolk & Waveney CCG support the representation being put forward by these parties.	Noted. No further action

Ramblers Association – Suffolk Area (RR-1005)

Table A.43: Ramblers Association – Suffolk Area

Matter raised	SZC Co.'s Response
Amenity and Recreation	
Deficiencies in the PRow network We will explain that we are a registered charity and a company limited by guarantee. We will recite our objects. We will explain our policy regarding changes to the public rights of way system. We will emphasize the health and economic benefits of walking. We will talk about the dangers of walking on roads. We will set out the general principles which the Ramblers say should apply to all the proposals to divert public rights of way. We will say how the proposed development will affect the beauty of the countryside. We will comment on the effect of the proposed development on the public rights of way network. We will demand proportionate planning gains if the DCO is approved. We will give instances of deficiencies in the public rights of way network in the general area which must be addressed by way of obligations under agreements pursuant to s. 106 of the Town and Country Planning Act 1990.	SZC Co. aims to minimise physical disturbance to users of recreational resources by providing appropriate diversion routes where temporary closure cannot be avoided. Treatment of public rights of way (PRow), National Trails and other publicly accessible land and routes within the main development site and green rail route site are described in the Rights of Way and Access Strategy (refer to Volume 2, Appendix 15I of the ES (Doc Ref. 6.3) [APP-270]). Temporary and permanent closures, diversions and creation of new PRow for all sites are set out in the detailed Access and Rights of Way Plans (Doc Ref. 2.4(B)) [AS-113 to AS-114] and in Schedule 10, 11 and 13 of the draft DCO (Doc Ref. 3.1(B)) [AS-143]. The amenity and recreation chapters assess effects on users of these recreational resources (Volumes 2 to 9 of the ES). A Section 106 PRow fund will provide further local network benefits and will be agreed with East Suffolk Council and Suffolk County Council.

Suffolk Coast Acting for Resilience (SCAR) (RR-1171, RR-1172)

Table A.44: Suffolk Coast Acting for Resilience (SCAR)

Matter raised	SZC Co.'s Response
Marine/ Coastal	

Matter raised	SZC Co.'s Response
Detailed design of the coastal defences The aim of SCAR is to preserve and protect, for future generations, the Suffolk coastline, tidal rivers and surrounding land area. SCAR is a strategic partnership of organisations and individuals of all political persuasions representing groups on the Suffolk coastline. SCAR submits that because the DCO submitted by EDF contains no detailed design of the coastal defences the Application should be rejected.	As for all large infrastructure Projects, detailed design information is often not available at the time of submission of the DCO. The detailed work follows when the responsible designer and construction contractor is appointed. However, the parameters of the sea defence and the basic design have been provided within the DCO submission. It is these parameters that the impact assessments presented in the Environmental Statement are based and the detailed design will be made based on those parameters. This is a Rochdale envelope approach so that the worst case is assessed.
The approach to future coastal processes and the assessment of future shoreline change – the appointment of the seven expert geomorphologists, set out in section 7.2 of document 6.3, Revision: 1.0; PINS Reference Number: EN010012; Volume 2 Main Development Site; Chapter 20 Coastal Geomorphology and Hydrodynamics; Appendix 20A Coastal Geomorphology and Hydrodynamics: Synthesis for Environmental Impact Assessment – lacks proper professional rigour in that none of the seven experts have signed off the report of their views.	All geomorphologists consulted in the expert geomorphological assessment (EGA) have signed off the assessment (which is provided in Volume 2, Appendix 20A of the ES (Doc Ref. 6.3) [APP-312]) highlighting any differences of opinion.
Geology and Land Quality	
No report of the ground conditions has been supplied which makes any assessment of the coastal defences impossible.	The Geology and Land Quality chapter (Volume 2, Chapter 18 of the ES (Doc Ref. 6.3) [APP-280]) presents the baseline environment for the main development site. Further detailed information on ground conditions can be found in Volume 2, Appendix 18A of the ES (Doc Ref. 6.3) [APP-281 to APP-291]. Additional information was also submitted within Volume 3, Appendix 2.13.A of the ES Addendum (Doc Ref. 6.14) [AS-211 to AS-235].

Matter raised	SZC Co.'s Response
There is no mention of how to take account of long term settlement which is a real risk given the soft eroding materials making up the bulk of the local geology.	The design of the sea defence structure will take into account potential ground settlement. This includes making an allowance for settlement when specifying the height of the structure and using ground improvement techniques, such as rigid inclusions with load transfer platforms.
Water Resources, Flood Risk and Drainage	
Flood Risk Policies EDF has not complied with the precautionary principle as laid down in the Principles for Flood and Coastal Erosion risk Management (PFCERM). EDF has not complied with Policy Statements EN-1 and EN-6 as laid down in government guidance for nuclear power stations within Flood and Coastal Erosion Management guidelines.	The Sizewell C Main Development Site Flood Risk Assessment (FRA) (Doc Ref. 5.2(A)) [AS-018] includes tables that summarise the overall flood risk to the main development site. These show some medium risks related to coastal and breach flooding during the construction and decommissioning phases and low risk for all types of flooding during the operational phase. Mitigation measures are provided in the FRA, Volume 2, Chapter 19 (Groundwater and Surface Water) of the ES (Doc Ref. 6.3) [APP-297] and the Code of Construction Practice (Doc Ref. 8.11(A)) [AS-273] . The accepted changes (April 2021) include for a sheet pile wall during construction which would limit flooding to a low risk. This is assessed in the Main Development Site Flood Risk Assessment Addendum (Doc Ref. 5.2(A)Ad) [AS-157] .
H++ scenario EDF does not comply with the H++ scenario.	The assessment of the H++ scenario is not appropriate for the environmental impact assessment presented in Volume 2, Chapter 19 (Groundwater and Surface Water) of the ES (Doc Ref. 6.3) [APP-297] . The EIA Regulations require an assessment of the 'likely' significant effects of the development on the environment. However, the flood risk assessment (FRA) for the main development site does consider the H++ scenario (Doc Ref. 5.2(A) [AS-018] and as updated in January 2021 (Doc Ref. 5.2(A)Ad) [AS-157]). In the FRA, to assess the full range of risks that might need to be managed, there is a need to understand the reasonably foreseeable and credible maximum climate change impacts. The reasonably foreseeable is defined as a reasonable level of certainty that

Matter raised	SZC Co.'s Response
	the future impacts of climate change would lie somewhere between the Central and Upper allowances, whereas an example of the credible maximum climate change is the H++ scenario provided by the UKCP09 Projections. Refer to the Main Development Site Flood Risk Assessment (Doc Ref. 5.2(A)) [AS-018] and Main Development Site Flood Risk Assessment Addendum (Doc Ref. 5.2(A)Ad) [AS-157] for more detail. The H++ scenario is also considered in the Safety Case assessment for the Nuclear Site Licence which will need to be ratified by the Office for Nuclear Regulation (ONR) prior to issue of the nuclear site licence (NSL).

Trinity House (RR-0255)

Table A.45: Trinity House

Matter raised	SZC Co.'s Response
Marine/ Coastal	
Impact on navigation within Trinity House's area of jurisdiction Trinity House is the General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar with powers principally derived from the Merchant Shipping Act 1995 (as amended). The role of Trinity House, as a General Lighthouse Authority under the Act, includes the superintendence and management of all lighthouses, buoys and beacons within its area of jurisdiction. Trinity House wishes to be a registered interested party due to the impact the development would have on navigation within Trinity	Noted. SZC Co has provided Project updates to Trinity House during pre-Application. SZC Co. would welcome further feedback and comments from Trinity House. An assessment of effects on marine navigation is presented within Volume 2, Chapter 24 of the ES (Doc Ref. 6.3) [APP-337]. An assessment of the accepted changes (April 2021) to the Application is presented within Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181].

Matter raised	SZC Co.'s Response
House's area of jurisdiction. It is likely that we will have further comments to make on the Application and the draft Order throughout the Application process.	

APPENDIX B: ARTICLE 37 CHAPTERS 2, 6 AND 7

2 THE INSTALLATION

2.1 Main Features of the Installation

2.1.1 Nature and purpose of the installation

156. The Areva/EDF design UK EPR™, is a modern PWR, the design of which incorporates technology from French N4 and German KONVOI reactors. Two UK EPR™ units are to be constructed on the SZC site of approximately 1670MWe (Net) each, cooled through an open system which works broadly in the same way as other PWR's already in operation. As the chosen model, the third generation EPR™ offers improvements to the first and second generation reactors currently in operation in Europe. Examples of these improvements are presented in Section 2.1.5.

157. The principle on which a nuclear power plant operates is very similar to that of a conventional power station: the boiler that burns fossil fuel is replaced by the nuclear reactor, where the heat produced comes from the fission of fuel nuclei.

158. The heat produced converts water into steam which is then released in the turbine, driving the AC generator and producing electricity. Between the heat source (the nuclear fuel) and the heat sink (the sea), a PWR has three physically separate systems, as shown in Figure 2-1:

- the primary system extracts the heat produced by the fuel in the reactor;
- the secondary system uses this heat to convert water into steam for the turbine; and
- the cooling system condenses the steam released into the turbine.

2.1.1.1 The primary system

159. The primary system is located within the sealed containment in the reactor building, and extracts the heat produced by the fuel in the core.

160. The reactor core is responsible for the production of heat. The reactor core typically consists of fuel assemblies, with each fuel assembly formed by an array of Zircaloy M5 tubes made up of fuel rods. The fuel rods consist of enriched uranium dioxide (UO₂) pellets stacked into the Zircaloy M5 cladding. The reactor also has equipment to control the nuclear reaction and to shut it down automatically.

161. The containment of the reactor consists of a cylindrical internal pre-stressed concrete wall and an exterior wall constructed from reinforced concrete, separated by an inner space called the "inter-containment annulus". The internal surface of the interior containment is covered by a metallic leak tight skin.

162. The heat produced is transferred by means of a coolant of pressurised water that passes in a closed circuit around the fuel. The heat is then transferred to the secondary system via a heat exchanger; the steam generator.

2.1.1.2 The secondary system

163. The secondary system is the water-steam system. The steam produced by the steam generator is sent into the turbine which drives the AC generator that produces the electric current. The electrical energy is then transferred via electrical power lines.

164. When it leaves the turbine, the spent steam is condensed in a second type of heat exchanger; the condenser. It is converted into water and then returned to the steam generator to start a new cycle. The electromechanical equipment is installed in the turbine hall.

2.1.1.3 The cooling system

165. The UK EPR™ cooling system comprises four cooling loops as part of the primary system; on each cooling loop is a steam generator and a primary pump. On one of these cooling loops is also a pressuriser, this cooling loop is shown in Figure 2-1 (there is only one pressuriser in a UK EPR™).

166. The condenser is itself continuously cooled by water circulating in a third system; the plant cooling system. This comprises:

- the seawater intake tunnel;
- the pumping station that filters and pumps the sea water and sends it to the condenser; and
- an outfall pond which releases cooling water back into the sea by means of an overflow and an underwater tunnel, ending in a diffuser which is anchored to the seabed.

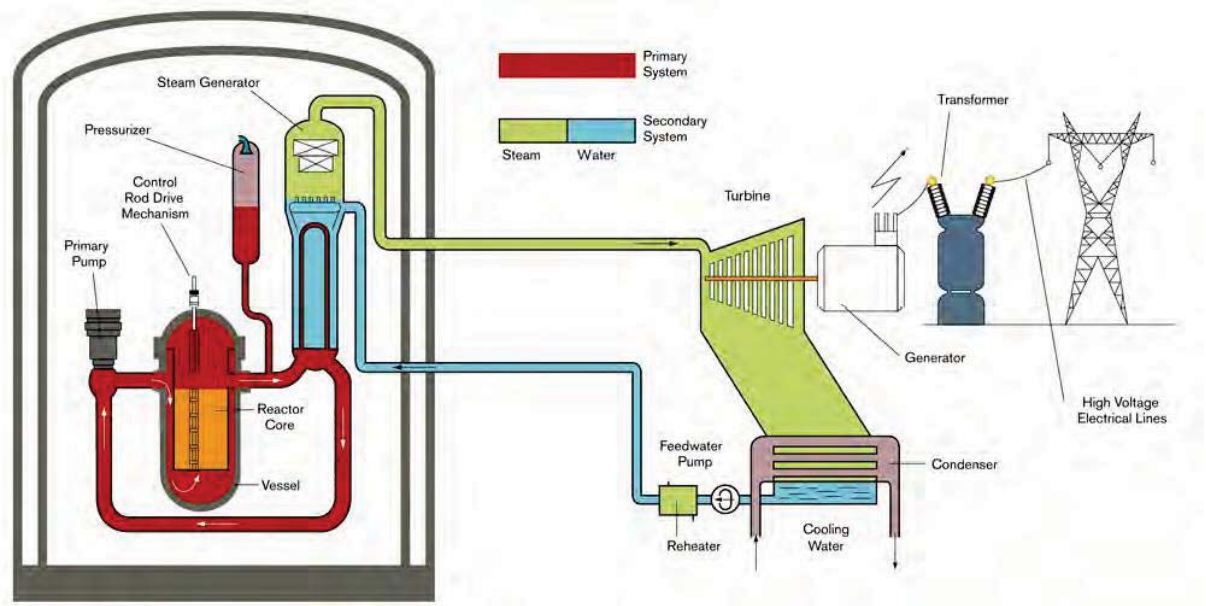


Figure 2-1 Schematic layout of the EPR™ power generation process

2.1.2 General design and installation plan for the EPR™

167. The EPR™ unit is a PWR with a thermal power rating of 4,500MW and with a design life of 60 years. The plant can operate at base load, i.e. at 100% capacity and can also perform load follow operations, monitoring variations in the grid's demand for electrical energy by working at between 20% and 100% of nominal power.

168. SZC will consist of two UK EPR™ reactor units, each provided with ancillary systems and common buildings and facilities.

169. The description below is related to an individual reactor unit, the two units being essentially identical. Shared facilities are described separately.

170. One UK EPR™ unit comprises the following structures, as shown in the site layout plan provided in Figure 2-2.

- Reactor building, used principally to house the nuclear steam supply system (NSSS);
- Safeguard buildings (auxiliary safeguard electrical and mechanical). These are divided into four divisions, each containing a series of emergency systems along with their associated electrical systems;
- Fuel building;
- Nuclear auxiliary building – (NAB);
- Diesel generator buildings;
- Turbine hall containing the turbine generator, the condenser and the feedwater plant;
- Conventional island electrical building houses the electrical systems for the conventional (non-nuclear) parts of the plant;
- Transformer platforms containing the main, unit and auxiliary transformers and switchgear;
- Pumping station including the forebay;
- Cooling water discharge plant including the filtering debris recovery pit and the outfall pond;
- Fire fighting water storage building; and
- Access building.

171. The following facilities are shared by the two reactor units (see Figure 2-2). A description of the main shared structures is provided in Section 2.1.2.2.

- Effluent treatment buildings;
- Hot workshop, Hot warehouse and Decontamination facility;
- Discharge tanks building;
- Outfall tunnel;
- ISFS;
- ILW ISF;

- Tunnels (for personnel use);
- Oil and grease store;
- Chemicals store;
- Contaminated tools store;
- Non-radioactive waste store;
- Transit area for VLLW;
- Operational service centre;
- Demineralisation station;
- Permanent sewage wastewater treatment plant;
- Services buildings (garage, emergency services, security); and
- Technical galleries.

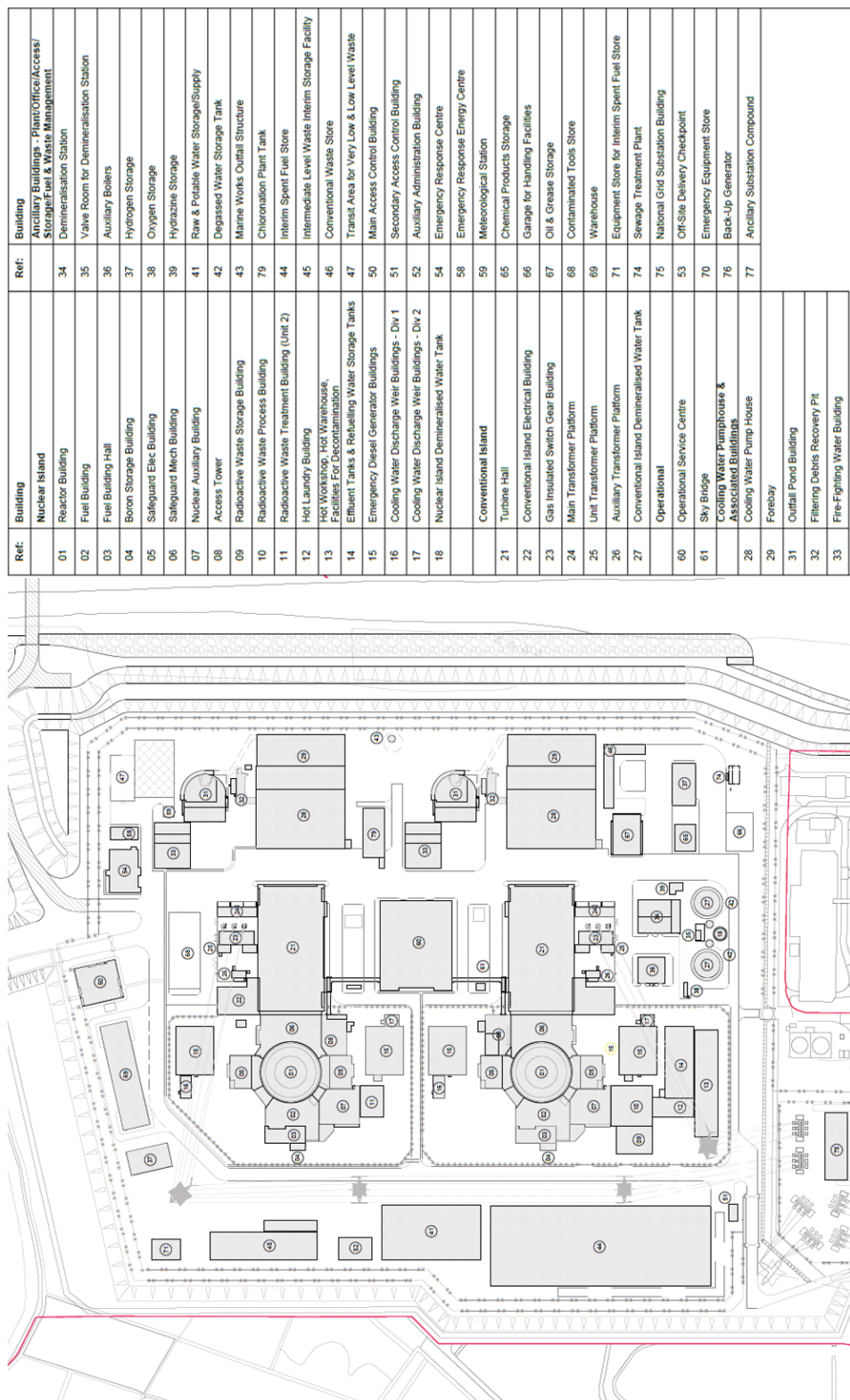


Figure 2-2 Sizewell C indicative plot plan

2.1.2.1 Description of structures of each unit

172. The structures described below are provided for each of the two units.

Reactor Building

173. The reactor building houses the NSSS and some of its associated operational and safety equipment. The building is the third barrier protecting the public against the effects of an accident (the first is the cladding around the fuel and the second is the primary circuit structures).

174. In normal operation, this building protects the reactor cooling system against external events and screens radiation from the reactor core. In abnormal or accident conditions, the reactor building provides containment and limits the radiological consequences at the site boundary.

175. The reactor building, the four safeguard buildings and the fuel building share the same foundation raft. This minimises the relative movement of the buildings in the event of an earthquake. They are also designed to withstand the effects of shock waves (from an external explosion).

176. The reactor building consists of an external framework, known as the containment, and internal structures. The containment is designed to withstand internal accidents involving the steam supply system, as well as external damage from natural and manmade causes.

177. The containment consists of:

- an inner chamber of pre-stressed concrete, which is pressure-resistant in the case of an accident, has a metal liner and is adequately leak proof when under pressure;
- an outer reinforced concrete shell; and
- a space between the containments, maintained below atmospheric pressure, so that leakage from the internal chamber can be contained. After treatment using High Efficiency Particulate Air (HEPA) filtration and iodine traps, leaks are discharged into the atmosphere via the NAB stacks.

178. The reactor building houses the primary system, which serves as an envelope to maintain the reactor coolant at its operating pressure and temperature, and minimise leaks and radioactive discharge into the enclosures atmosphere. This system fulfils three main functions:

- transfers heat from the reactor core to the steam generators;
- controls reactivity by adjusting the boron concentration together with the control rods; and
- controls the pressure via the pressuriser.

179. The elements that make up the primary system are the reactor vessel, the pressuriser, four heat transfer loops, each with a steam generator and a primary coolant pump and the connecting pipework. The concrete shield wall surrounding the primary system protects the containment from accidentally generated projectiles and reduces radiation levels in the areas surrounding the primary loops.

180. The primary coolant is borated, demineralised water which serves at the same time as a moderator, a neutron reflector and a diluter for the boric acid used to control the reactivity.

181. The liquid effluent produced during normal operation of the primary circuit, is directed to the coolant storage and treatment system (TEP), and the gaseous discharge is sent to the gaseous waste processing system (TEG), through either the chemical and volume control system (RCV) or the nuclear vent and drain system (RPE).
182. Leaks during operation and discharge from venting and draining during maintenance or repair, are collected by the RPE.
183. The reactor building also includes the in-containment water storage tank (IRWST), which is shown in blue in Figure 2-3. This is installed in the reactor building to ensure a water reserve is available to:
- ensure water is available for recycling following injection after draining a tank, when primary coolant has been lost, or after a breach; and
 - cool the corium (a lava like molten mixture of portions of nuclear reactor core, formed during an uncontrolled core overheating incident), among other Severe Accident safety systems, in the unlikely case of this type of incident.
184. The installation's structural arrangements to mitigate a core meltdown accident, consist of the area provided for the molten core material to spread and the channel leading from the reactor pit to this area. The spreading area extends over approximately 170m² and is situated to the side of the reactor pit. It is surrounded on two sides by the in-containment refuelling water storage tank.

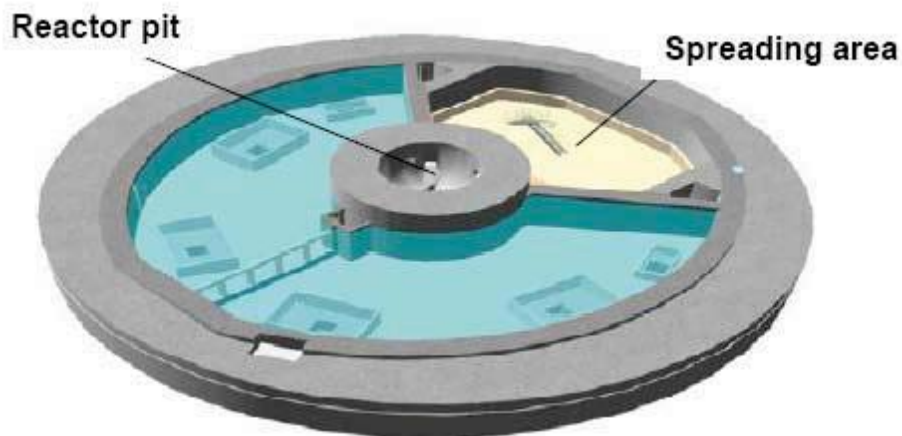


Figure 2-3 View of the lower section of the reactor building

Safeguard Buildings

185. These buildings house the safety equipment including the pumps and valves for the safety injection system, the pumps and heat exchangers for the cooling system and the corresponding ventilation system. There are four safeguard buildings per unit, each building houses one division of the safety systems described below.
186. All systems classed as safeguards are designed with redundancy and are sited in physically separate divisions (i.e. different buildings).

187. Each division has:

- a low-pressure safety injection system;
- a medium pressure safety injection system;
- a component cooling water system; and
- an emergency feedwater system.

188. In addition, divisions one and four, provide cooling for the Containment Heat Removal system.

189. The buildings also contain the electrical safety systems, the instrumentation and control, the control room and ventilation systems. The buildings are divided into a mechanical part and an electrical part, providing further segregation and protection from combined internal hazards.

Fuel Building

190. There is one fuel building dedicated to each unit, each houses:

- equipment relating to fuel, including the fuel building fuel pool, the fuel transfer area, the fresh fuel area and the loading area for the irradiated fuel containers;
- equipment associated with the reactor cavity and fuel pool cooling (and purification) system (PTR);
- equipment for the reactor's TEP and storage facilities for the reactor boron and water make-up system and the extra boration system (RBS); and
- some ventilation equipment for the fuel building and for the space between the containments.

191. To ensure sufficient segregation, some of the above systems (PTR and RBS) are divided into two divisions within the fuel building. The fuel building is designed to enable new or irradiated fuel elements to be handled and stored in a controlled atmosphere. It houses the equipment necessary for these operations and enables their use.

Nuclear Auxiliary Building

192. The NAB is built on an independent foundation raft next to the fuel building. The NAB for each reactor, houses some of the operational systems and dedicated maintenance areas.

193. The main systems installed in the NAB are:

- TEP;
- PTR;
- the TEG;
- part of the steam generator blowdown system (APG);
- the NAB ventilation system;

- the operational chilled water system;
- the reactor boron water make-up system; and
- the sampling equipment and laboratories.

194. All air extracted from the ventilation systems of radiologically controlled areas in the nuclear island, is channelled, collected and checked in the NAB before it is discharged via the stack.

Diesel Generator Buildings

195. Each of the two diesel generator buildings (four across the two units) houses two main diesel generator sets and one station black out diesel generator set for plant cooling. The diesel generator buildings are constructed from reinforced concrete and are built on an independent foundation raft.

196. The two diesel generator buildings are geographically separated. Their positions are determined by maintenance imperatives and to enable the easy movement of diesel motors in and out of the building.

197. Each diesel generator building houses two main diesel generator sets, each of which supplies a safety train within a division of one of the safeguard buildings, as well as a station black out unit. The two main diesel generator sets and the station blackout generator with their auxiliaries are each protected against internal hazards by a separating wall.

198. Both diesel generator buildings are designed to withstand external hazards and contain internal hazards.

Turbine Hall

199. The turbine hall contains:

- the turbine generator set and associated auxiliary systems;
- the condenser and heating station that supplies water to the steam generators; and
- a device for bypassing steam from the turbine to the condenser, to enable house load operation in the case of an electrical system fault.

Conventional Island Electrical Building

200. The conventional island electrical building adjoins the turbine hall near the transformer platforms. The building houses the permanent and secured electrical distribution panels, which supply the conventional island's auxiliary equipment and the automated controllers that manage and monitor it.

201. The electrical building also supplies electricity continuously at 10kV to each of the four safeguard buildings in the nuclear island.

Transformer Platforms

202. The platforms for each unit adjoin the turbine hall and are located close to the conventional island electrical building. Each platform houses the main transformer, the two unit transformers and the line and coupling breakers. A dedicated platform houses the auxiliary transformer, which is always live.

Pumping Station

203. The pumping station supplies raw water to the power plant primarily for cooling the condensers via the forebay which is a semi-circular basin located adjacent to the pumping station. Seawater is transferred to the forebay via the intake tunnel.

204. The pumping station has four separate channels:

- two central channels which mainly supply the essential service water system and the circulating water condenser cooling system; and
- two side channels, each fitted with a chain-filter which mainly supply the essential service water systems, the auxiliary (raw water) cooling system and the ultimate cooling water system.

205. The supply of seawater to the essential service water systems and ultimate cooling water system pumps (used respectively for the component cooling water system and the containment heat removal system) is designed so that if a drum or chain-filter stops working, the seawater is still supplied.

Outfall Building

206. The cooling water discharge plant for each unit consists of a filtering debris recovery pit (pre-discharge section) for collecting marine debris from the pumping station and an outfall pond (discharge pond), which is connected to the outfall tunnel. The outfall tunnel of both outfall ponds (Unit 1 and Unit 2) meet at a connecting structure that connects to the common outfall tunnel shared by both units.

Fire-fighting Water Storage Building

207. The main function of the fire fighting water storage building is to store and supply large volumes of water to be used in the event of a fire or other safety issues and in case of loss of the heat sink for the emergency feedwater system pumps.

Access Building

208. The access buildings main function for each unit is to control access to the nuclear island. The building contains a room for maintaining and decontaminating small pieces of equipment, operations rooms and technical rooms.

2.1.2.2 Description of shared structures

209. The following building and facilities described are shared by both units on the SZC twin unit site:

Effluent Treatment Buildings

Radioactive Waste Storage Building

210. The radioactive waste storage building (referred to as part of the Effluent Treatment Buildings (ETB)) stores solid intermediate and low level wastes prior to disposal or onward transfer.

211. The building comprises:

- a room for storing drums and containers of solid waste that is accessible to road convoys;
- areas for checking drums before disposal;
- an area for storing the resins used to treat the steam generator drains;
- a reception room for the mobile resin treatment stations; and
- a handling crane and baler used to package the LLW.

Radioactive Waste Process Building

212. The radioactive waste process building (referred to as part of the ETB) treats the liquid radioactive waste and conditions the solid intermediate and low level waste prior to disposal or onward transfer.
213. The building consists of a heavy-duty area that mainly houses the liquid waste processing system (TEU) (head storage, processing) and the solid waste treatment system (storage of resins and concentrates, filter encapsulation cell). It also houses a plant for producing concrete and storing aggregates. In addition, it contains the buildings control room and the electrical rooms.
214. The radioactive waste process building is shared between the two units and is adjoined to Unit 1. Therefore, the solid radioactive wastes (LLW and ILW) generated in Unit 2 will be pre-conditioned in the radioactive waste treatment building of Unit 2 before transfer by road to the shared process building.

Radioactive Waste Treatment Building

215. The radioactive waste treatment building of Unit 2 (referred to as part of the ETB) is a dedicated building for pre-conditioning and preparing solid radioactive wastes (LLW and ILW) generated in Unit 2, for transport to the shared radioactive waste storage building and radioactive waste process building for treatment, conditioning and storage. Liquid effluents and resins produced in the nuclear auxiliary building of Unit 2 will be flushed through the piping in the effluent gallery and radioactive waste process building.
216. The two main functions of the radioactive waste building of Unit 2 are:
- pre-conditioning of filters (used on RCV, PTR, TEP of Unit 2) in 500L metal drums, closed with a temporary biological plug; and
 - preparation and transfer to the shared radioactive waste process building adjoined to Unit 1, of the waste packaged in concrete drums (filters and sludges) or metallic boxes (low activity ion exchange resins).
217. The ETBs are shared between the two units, the storage and process buildings are adjoined to Unit 1, which the treatment building is adjoined to Unit 2. Therefore, the solid radioactive wastes (LLW and ILW) generated in Unit 2 will be pre-conditioned in the radioactive waste treatment building of Unit 2 (described below) before transfer by road to the shared storage building.

Hot Workshop, Hot Warehouse and Decontamination Facility

218. The hot workshop, hot warehouse and decontamination facility are encompassed in a single structure.

219. The hot workshop is designed to perform machining of radioactive contaminated components or tools. The hot workshop may generate liquid effluents, which will be stored and sent to the TEU for treatment prior to discharge off-site.

220. The hot warehouse is designed to store radioactive contaminated tools.

221. The decontamination facility is designed to reduce or suppress radioactive contamination of tools, components or wastes. Decontamination of equipment enables reuse of tools and minimisation of the volume of material requiring disposal.

Discharge Tanks Building

222. The radioactive effluent from the liquid radwaste monitoring and discharge system (KER), additional liquid waste discharge system (TER) and site liquid waste discharge system (SEK) will be stored in stainless steel tanks in the discharge tank building, near to the Radioactive Waste Buildings.

223. The discharge tanks store effluent prior to discharge and comprise the following:

- KER (system for collection, monitoring and discharge of effluent from the nuclear island);
- TER (system for additional storage capacity, if required, and for return of effluent from the KER and SEK back to the TEU if retreatment is required); and
- SEK (system for monitoring and discharge of effluent from the secondary circuit and collects and treats effluent from the turbine hall). The SEK tank will also be used to receive, store and discharge radioactive effluent from the RPE floor drain 3.

224. The contents of the KER, TER and SEK tanks may be transferred to the TEU for retreatment via the TER if required.

225. Liquid effluents from Unit 2 are routed via underground galleries to the radioactive waste storage building or directly to the relevant storage tank.

Containment Tank Building

226. The containment tank building which collects and processes the site's waste water and rain water from the roads and roofs, contains a system for the collection of oils and hydrocarbon effluents, sedimentation (settling) tank and an oil filter (separator). The containment tank building also recovers contaminated water after a fire or an accidental spillage on a road. The water processed in the containment tank building is transferred to the forebay.

Outfall Tunnel

227. A common outfall tunnel is shared between the two UK EPR™ units at SZC and is the main discharge outlet for radioactive liquid waste. The location of the two outfall heads are approximately 3km off-shore.

Interim Spent Fuel Storage

228. The ISFS facility provides safe and secure passive storage of spent fuel once it leaves the spent fuel pool of the fuel building from both UK EPR™ units. After removal from the reactor, spent fuel will be initially stored in the spent fuel pool in the fuel building for an initial cooling period. The spent fuel will then undergo treatment (drying) and loaded into a Multi-Purpose

Canister (MPC) which will be sealed and is capable of passively cooling the contained spent fuel with no external support. The loaded and sealed MPCs are transported from the fuel building along the haul route to the ISFS facility, where they are stored. The spent fuel will remain here until disposal at the national GDF is available, the intended design life for the ISFS facility is for storage of spent fuel up to 120 years after End of Generation. When operational the ISFS facility will contain stored MPCs in HI-Storm containers, equipment for unloading MPCs from the transporter and moving MPCs within the building, an area for inspection and testing, as required. Whilst in storage, cooling is completed passive and there is no need for any active cooling systems to be used. Throughout the operational life of this facility, an inspection and monitoring regime is expected to be implemented to ensure that fuel is safely stored. A more detailed description is given in chapter 5, section 5.1.3.1.

ILW Interim Storage Facility

229. ILW generated during the operational phase will be placed in the ILW ISF. ILW generated during the 60 years of UK EPR™ operation, primarily from the solid waste treatment, resins and spent liquid effluents in the radioactive waste storage building, will be conditioned and packaged in the radioactive waste process building before transfer to the ILW ISF. The ILW packages provide containment, whilst the ILW ISF itself also contributes to containment. The ILW ISF will provide interim storage for all ILW pending removal to a final national GDF, when available. The early decommissioning and site clearance strategy relates to the intention that following End of Generation the operation ILW will be repackaged and disposed of, off-site, and the ILW ISF can be decommissioned as soon as practicable. ILW is planned to undergo repackaging as some ILW is expected to have decayed to LLW during interim storage and therefore can be disposed as LLW (reducing the volume of ILW). Any ILW generated during decommissioning will be managed appropriately as part of the decommissioning activities. A more detailed description is given in chapter 5, section 5.1.3.2.

Technical Galleries

230. The buildings on the site are linked by various engineered galleries, effectively large underground tunnel structures. The galleries provide access between the operation centre and the access tower for personnel and the service galleries used for ducts and/or cableways.

2.1.3 Main operational and safety procedures

2.1.3.1 Description of the nuclear steam supply system

231. The NSSS includes the following elements (see Figure 2-4):

- The core which contains 241 fuel assemblies with each fuel assembly formed by a 17x17 array of Zircaloy M5 tubes made up of 265 fuel rods and 24 guide thimbles. The fuel rods consist of Uranium dioxide (UO₂) pellets stacked into a Zircaloy M5 cladding tube which is then plugged and seal welded.
- Four cooling circuits containing water at a pressure of 155 bar absolute. Each circuit comprises a primary pump, a steam generator and the connecting pipework. The steam from the secondary side of the steam generators is saturated and at a pressure of around 80 bar absolute.
- A pressuriser which maintains the water in the primary system at a constant pressure. A heater within the pressuriser is used to increase the temperature of the water/steam mixture and therefore increases the pressure in the pressuriser. The sprayers in the pressuriser are used to cool the water/steam mixture to reduce the pressure in the pressuriser.

- A protection system comprising the instrumentation that controls the various operating parameters in the NSSS. This automatically activates the safety devices which prevent normal operating limits from being exceeded.
- 89 control clusters, each comprising 24 control rods. A control rod is made up of two parts: the lower part is made of a silver/cadmium/indium alloy and the upper part is made of carbon and boron (B4C). The control clusters, together with diluted boron in the water of the main cooling system, are used to control the core reactivity.
- Various auxiliary systems required either for correct operation (normal operating systems), or for the safety of the reactor (safeguard systems).

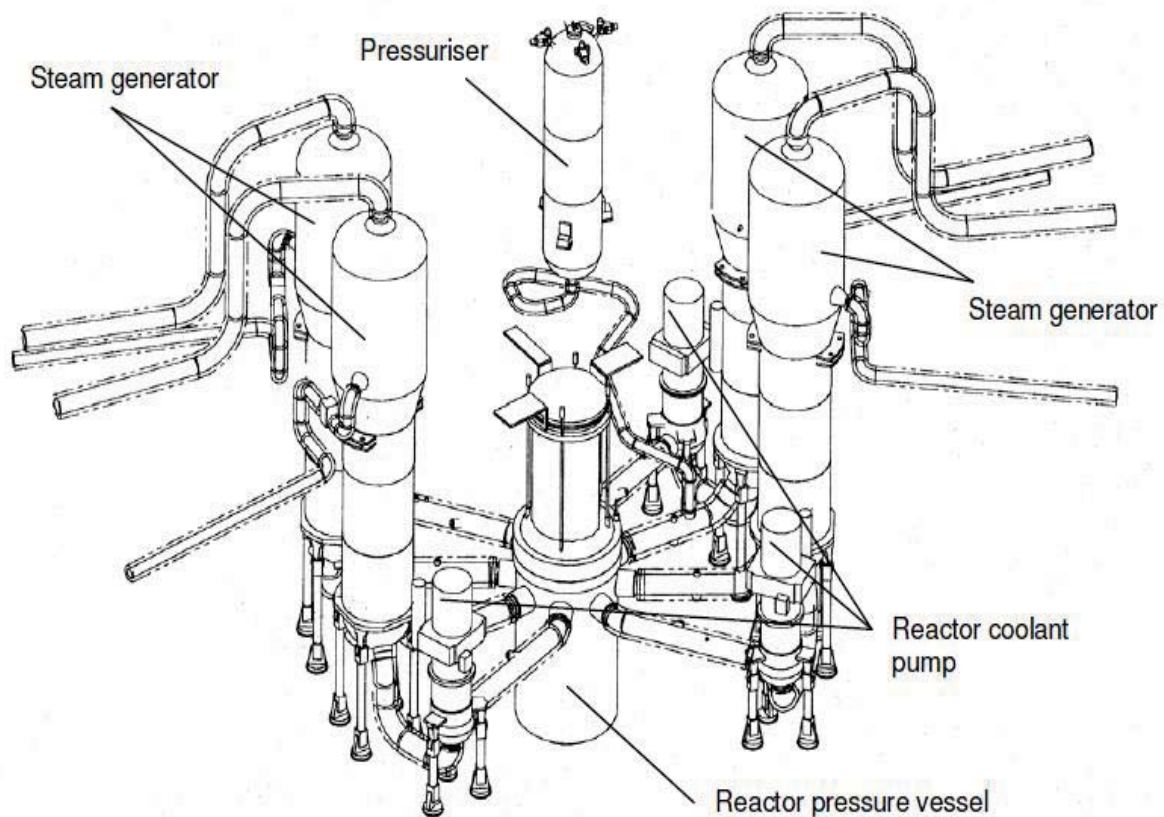


Figure 2-4 Nuclear steam supply system

2.1.3.2 Safety Injection System and Residual Heat Removal System

232. The safety injection system, and residual heat removal system, combine safety injection functions with reactor cooling on shutdown (see Figure 2-5). Configured to operate as a safety injection system, it provides water to cool the reactor core and maintain it below sub-critical conditions in the event of the accidental loss of primary coolant, for example:

- if a pipe is breached, leading to a discharge of coolant that cannot be replaced by the normal make-up system;

- if the mechanism driving a control rod assembly fails, causing the accidental ejection of a rod; or
- if a steam generator tube fractures.

233. When configured to cool the reactor core on shutdown, it removes heat from the primary system in a controlled way, most of which is the residual heat from the core.

234. The safety injection system and residual heat removal system comprises four separate and independent trains. Each train injects into the primary system. The system comprises an accumulator, a medium-pressure safety injection pump and a low-pressure safety injection pump, with a heat exchanger at the pump outlet. The components used depend on the mode of operation.

235. The accumulators inject into the cold leg of the primary system. In injection mode the pumps discharge into the cold legs of the reactor loops, leaks from the primary circuit collect in the IRWST. The low-pressure trains may be operated manually to inject into the hot leg and the cold leg simultaneously.

236. In normal operation, low-pressure safety injection also acts as the reactors residual heat removal system, via the low-pressure exchangers, by pumping out the primary coolant in the hot leg. Electricity is supplied to each train by an independent train, which is backed up by a dedicated main diesel generator.

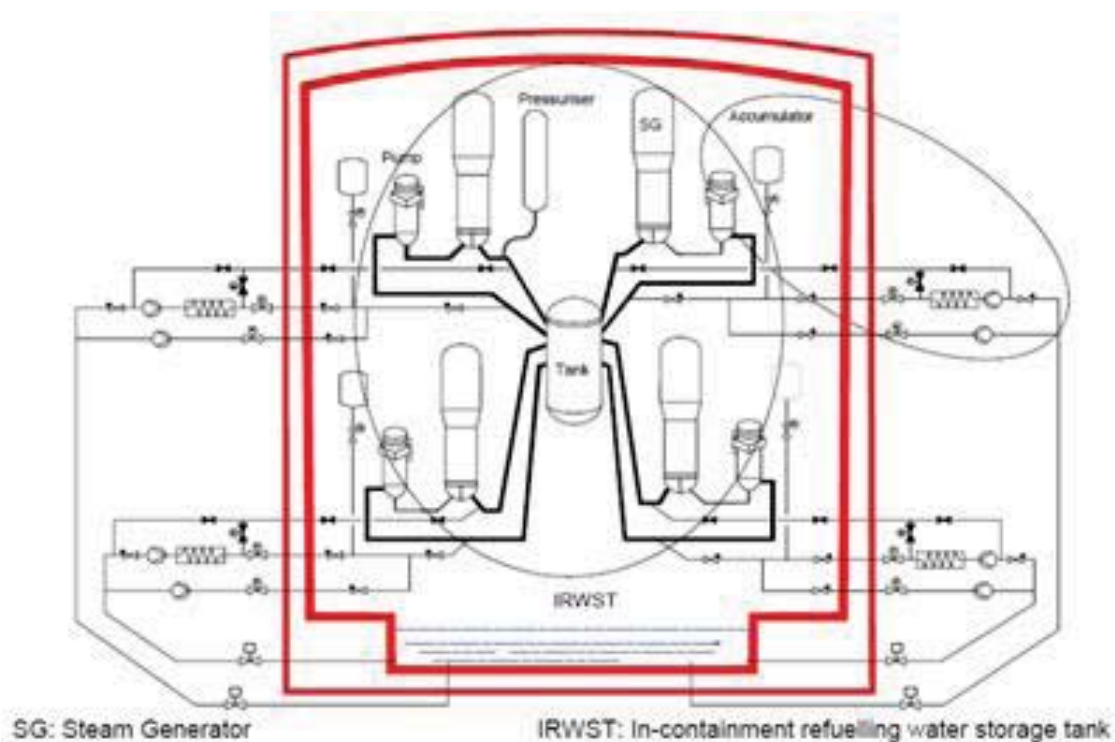


Figure 2-5 Safety injection system and residual heat removal system

2.1.3.3 In-containment Refuelling Water Storage Tank (IRWST)

237. In the event of a transient or small break Loss of Coolant Accident (LOCA) whilst secondary side heat removal is unavailable, the actuation of safety relief valves results in a high energy flow of air and water through the de-pressurisation and vent system; and a flow of steam from the pressurizer, into the IRWST. The IRWST contains these fluids and absorbs the blowdown energy.

2.1.3.4 Extra Boration System

238. The extra boration system comprises two distinct and independent trains, each designed to inject boron at high-pressure using a boron tank, a positive displacement pump and two injection lines. Each of the four injection line (two per RBS train) inject into a separate primary loop cold leg (see Figure 2-6).

239. The extra boration system pumps and tanks located in the fuel building. Electricity is supplied to each train by an independent train, which is backed up by a dedicated main diesel generator.

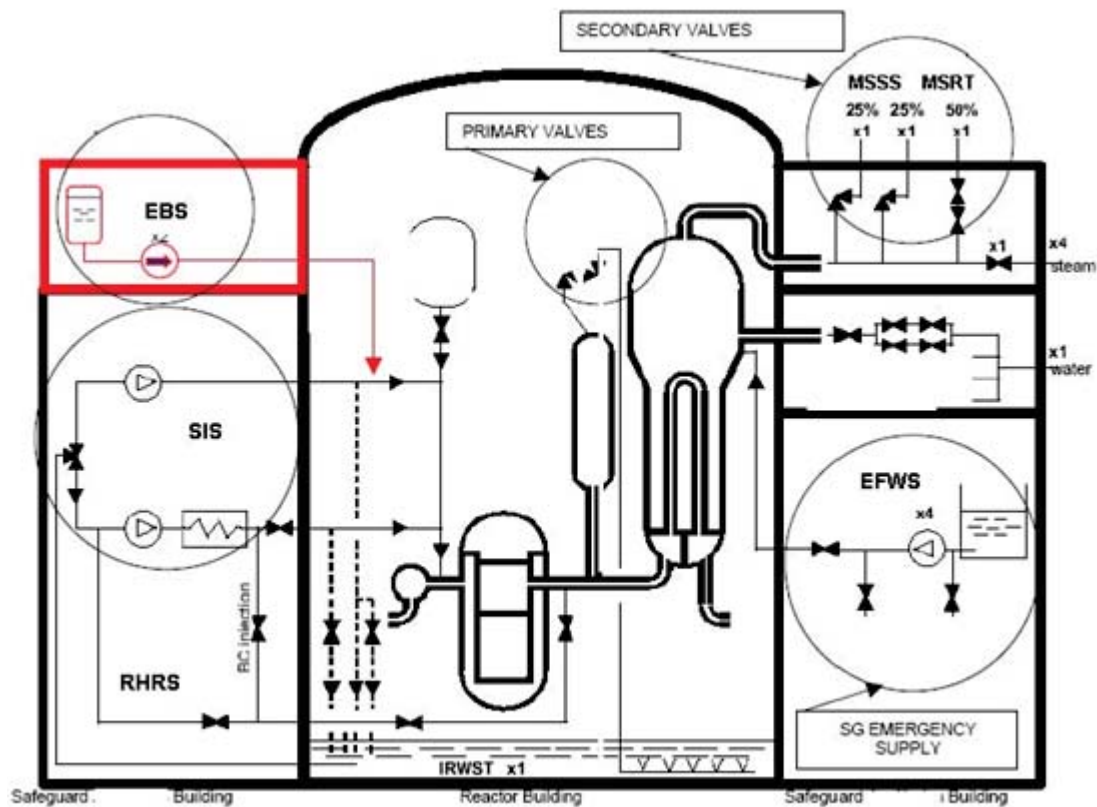


Figure 2-6 EPR™ safeguard systems

2.1.3.5 Emergency Feedwater System

240. This is an emergency system that supplies water to the steam generators should the normal water supply system fail.

241. The emergency feedwater system (SEC) (see Figure 2-6) comprises four separate and independent trains, each supplying the secondary side of a steam generator with demineralised water from the emergency feedwater system tank. The tanks can be replenished by the fire-fighting system (JAC). Header systems for pump suction and discharge, enable the use of the entire tank volume and allow the injected flow to be redirected if necessary, during pump maintenance, or if the secondary pipework is fractured.
242. Electricity is supplied to each train by an independent train, which is backed up by a dedicated main diesel generator. Furthermore, in order to withstand a generalised voltage loss (loss of the external power supplies and non-availability of the four main diesel generators), the power supply to trains in divisions one and four, is backed up by two station black out generators which start-up manually and provide an alternative to the four main diesel generators.

2.1.3.6 Nuclear Island Component Cooling Water System

243. The nuclear island component cooling water system (RRI) is designed to remove heat from the components and systems installed in the nuclear island, particularly those that are important for safety.
244. The RRI comprises four closed circuit trains, each independent and acting as a containment barrier. Each train has a pump and a heat exchanger, cooled by the essential service water system.
245. Each train independently cools a safety injection system train, when it is operating in residual heat removal system mode. The common line headers between trains one and two, and between trains three and four, cool the other systems and since either of the associated RRI trains can cool these systems, the arrangement is reliable and flexible.
246. Isolating valves are fitted between the headers to keep the component cooling water system trains mutually independent. The valves are designed so that when the headers are normally open to one of the two connected trains, the other is shut off.

2.1.3.7 Essential Service Water System

247. The purpose of the essential service water system is to cool the component cooling water system. It comprises four separate and independent trains, each providing a cooling function between the component cooling water system heat exchangers and the natural environment. The essential service water system pumps are installed in the pumping station and the water is supplied from the corresponding division within the pumping station.

2.1.3.8 Chemical Volume and Control System

248. The RCV is responsible for the following:
- Controlling reactivity by regulating the boron concentration in the primary coolant during controlled boration, or dilution procedures performed by the reactor boron and water make-up system. The RCV pumps can also discharge directly into the in-containment refuelling water storage tank and inject borated water into the primary system in some circumstances;
 - Regulating the volume of primary coolant by loading and discharging it. Fluid discharged from the primary system is cooled first by an exchanger-regenerator that reheats the loaded fluid, then by non-regenerating exchangers (cooled by the component cooling water system);

- Purifying the primary coolant, by removing the fission and activation products in the form of ions or particles, using demineralisers or filters;
- Adding the chemical lithium hydroxide to control the pH and hydrazine to remove oxygen when the reactor is started from cold, and also during hot shutdown to prevent corrosion risk. The lithium can also be re-covered from the RCV fluid using the Advanced pH Concept (APC), allowing for re-use and excess lithium removal from the primary coolant;
- Injecting water into the no.1 seals on the primary pumps to ensure they are leak resistant;
- Transferring the primary coolant to the TEP; and
- Auxiliary pressuriser spraying in addition to the normal spraying.

249. The RCV tank and charging pumps are located in the fuel building. Electricity is supplied by independent trains. Most of the RCV actuators are backed up by the main diesel generators.

2.1.3.9 System for collecting, processing and discharging radioactive waste

250. Effluent that is radioactive or likely to be contaminated is collected separately, depending on its state (gas, liquid or solid) and quality (reusable or spent) by different systems and is sent to the liquid, gas or solid waste processing plants. After treatment and sentencing via an appropriate waste management system, liquids are stored, if necessary, before being reused within the power plant or discharged. Gases are discharged after passing through retardant filters to allow radioactive decay. Solid waste is treated before disposal off-site.

251. Reusable effluent from the primary water discharged from the TEP and RCV during plant operation, is collected without being polluted by oxygen, sent to the TEP tanks and recycled in make-up water and boric acid for the primary system. This category also includes most of the controlled leaks and bleeds from system equipment carrying the primary coolant. These are carefully collected by RPE and sent to the TEP.

252. Spent effluent from the nuclear installations that cannot be recycled is collected by the RPE and sent to the TEU, situated in the radioactive waste process building. To facilitate processing and prevent contamination from spreading, the effluent is sorted according to the degree of chemical and radioactive pollution. In order to do this, spent effluent is divided into three categories:

- process drains (primary quality water that cannot be recycled);
- Floor drainage (system leaks, water from the floors of nuclear buildings and from showers); and
- chemical effluent (chemically polluted water containing primary coolant).

253. After processing, the spent liquid effluent is sent to the appropriate tank of the KER, TER or the SEK.

2.1.3.10 Fuel Pool Cooling (and Purification) System

254. The PTR is divided into two sub-systems; the fuel pool cooling system and the pool water purification system.

Fuel Pool Cooling System

255. This system has two main trains that are separate and independent. Each cools the fuel pool by means of two pumps and a heat exchanger. The system also has a third emergency train, for use in the event of a total loss of the two primary trains, which has a pump and a heat exchanger.
256. The trains empty the liquid from the fuel pool and then re-inject it. The main pumps and exchangers are located in the fuel building. Each main train is linked to one of the headers in the nuclear island component cooling water system (RRI) which cools it, the RRI is then cooled by the essential service water system (SEC). Each main PTR train may therefore be cooled by either of the two RRI trains associated with the header.
257. The third train is cooled by the containment heat removal system (EVU), which is cooled by the ultimate cooling water system (SRU).
258. Electrical power is supplied by independent trains. Each pump can be supplied by two electrical power trains. The electrical power supply is backed up by the main diesel generators. In the event of a generalised voltage loss, the third train is also backed up by the station black out generators.

Pool Water Purification System

259. The pool water purification system comprises a purification circuit for the spent fuel pool in the fuel building, a purification circuit for the reactor pool and in-containment refuelling water storage tank and skimming circuits for the spent fuel pool and reactor pool.
260. The system also includes two cartridge filters, a demineraliser and a fine resin filter. An additional cartridge filter is installed in the spent fuel pool skimming circuit.
261. The pool water purification system transfers water between the in-containment refuelling water storage tank and the reactor pool, which is necessary during refuelling shutdown.

2.1.3.11 Steam and Energy Conversion Systems

Turbine Generator Unit

262. The purpose of the turbine generator unit is to receive steam from the steam generators and convert thermal energy into electrical energy. It comprises a turbine and a three-phase AC generator.
263. The turbine converts the energy from the steam into mechanical energy. It consists of one high-pressure cylinder, one medium-pressure cylinder, three dual-flow low-pressure cylinders and two vertical moisture separators/reheaters which are used for drying when the steam expands.
264. Residual energy is transferred to the heat sink via the condenser. The turbines nominal rotation speed is 1,500rpm.
265. The AC generator is cooled by hydrogen and pressurised water. The turbine generator unit is not a safety system, but it is designed to trip automatically if certain reactor protection systems are stressed.

Main Steam Supply System

266. The main steam supply system:

- provides the main steam to the turbine and the other devices that use the main steam supply in the turbine hall during normal operation;
- removes the residual heat by transferring steam to the condenser or into the atmosphere in abnormal operating conditions;
- protects the steam generators against excess pressure, using an atmospheric steam dump system and safety pressure release valves;
- cools the primary system until it reaches the injection pressure for the medium-pressure safety injection system in the event of a small breach in the primary system or a break in the steam generator pipes;
- isolates the steam circuit if there is an excessive increase in the flow of steam; and
- contains the activity in the event of a small breach in the primary system or a break in the steam generator pipes by isolating the steam side.

267. The main steam supply system has four identical trains (one for each steam generator). Each train comprises:

- a main steam isolation valve;
- an atmospheric steam dump train, comprising a pressure relief valve and an isolating valve (main steam relief train system);
- two safety valves;
- pipework from the gas system flow limiter to the main steam valve cubicle outlets;
- valves and pipework for the treatment lines; and
- valves for the operating condensate drainage system.

Main Condenser

268. The main condenser receives the steam discharged from the three low-pressure turbine cylinders and the turbine bypass, and cools it using the plant's circulation water system. It comprises six modules (two for each low-pressure cylinder).

Turbine Bypass System

269. The role of the turbine bypass, with regard to the condenser, is to compensate for the difference in power between the turbine and the NSSS. During normal operation, the power provided by the NSSS is equal to the power consumed by the turbine. During rapid transients, or when the power fluctuates at low loads, the turbine bypass system opens to compensate for the power imbalance between the turbine and the reactor.

2.1.3.12 Feedwater Plant

270. The feedwater unit comprises:

- a set of pumps to extract water from the condenser (three pumps 50%/condenser extraction system);
- a set of low and high-pressure reheaters;
- a feedwater tank, which is also used for degassing and reheating the water from the low-pressure reheaters;
- four motorised feed pumps, each designed to provide 33% of the required nominal flow (motor driven feedwater pump system) and a start-up and shutdown pump; and
- a main feedwater system valve unit for very-low-flow, low-flow and high-flow, which feeds water to the steam generators.

2.1.3.13 Pumping Station

271. The pumping station supplies water from the forebay, the pumped and filtered water is sent to:

- the circulation water system;
- the essential service water system for the nuclear auxiliaries;
- the circulation water filtration system;
- the feedwater system for the pumps that wash the filter drums (circulation water filtration system);
- the demineralised water production system;
- the auxiliary cooling water system for the conventional auxiliaries; and
- the SRU, for cooling the two EVU trains and the third PTR train. The emergency cooling water pumps can draw from two different filtration channels and as a last resort, from the unit's outfall pond.

2.1.3.14 Description of the Electrical Supply

272. The electrical power supply installation needs to provide the auxiliary systems with the electricity required for the various plant operating phases. It is divided into two parts:

273. The external electricity supply, comprising:

- the main electricity supply system (400kV), used to supply the auxiliary devices (step-down transformer) and to feed energy into the grid (main transformer); and
- the auxiliary electricity supply system (auxiliary transformer), used to shut down the power plant if the main supply system and the AC generator are lost at the same time.
- The emergency electricity supply, which comprises four main diesel generators providing 10kV and two ultimate diesel generators supplying 690V.

274. The station is connected to the main electricity supply system via a line breaker. When the station is connected to the electrical system, the 400kV supply is connected via the main transformer (27kV/400kV), the coupling breaker and the line breaker.
275. The electrical supply for each reactor unit's safeguard devices in each of the safeguard buildings is connected via two step-down unit transformers with three sets of windings (400kV/3x10kV). Each secondary winding on the step-down transformers is connected to a 10kV distribution panel, which supplies each of the four trains comprising the supply to the safeguard buildings.
276. The preferred method for supplying electricity to each unit is via the step-down transformers. If this supply is lost, an automatic process switches the source so that the auxiliary transformer supplies the unit's distribution panels.

2.1.4 Reactor Operating Principles and Safety Provisions

2.1.4.1 Plant Operation

277. The reactor will be permanently managed by an operational management team, which includes at least one Operations Shift Manager and operators for each shift and each unit. Each unit will be managed from a control room that contains all information and control devices required to operate the unit during normal power operations, shutdown and incidental and accidental situations. The control room is connected to the outside of the power plant by various means, including telephones, radio links, etc.
278. If the control room is unavailable (e.g. fire) and needs to be evacuated, the unit can be brought to a safe shutdown state from the remote shutdown station, situated in the unit's electrical rooms. The remote shutdown station and the actuators and sensors are linked, so that the safety and reliability associated with the normal connections between this equipment and the control room are not reduced.
279. It is also possible to operate the plant manually. In particular, operation at below 20% of nominal power is only performed manually (with the exception of steam generator regulation).
280. The reactor can operate either in base mode (the operating power is determined and established manually), or by remote control over a limited range (the operating power is then continually reassessed, based on demand from the grid).
281. When operating automatically, the production unit allows the following transients, without adjusting the steam generator safety valves or opening the condenser bypass valves:
- a rapid change in load, amounting to 10% of the nominal power, but not exceeding 100% of the nominal load; and
 - an increase or decrease in load at a rate of 5% of the full load per minute.
282. Refuelling takes place when the reactor is shut down and the reactor pool is full of water, after removing the head from the reactor vessel. When spent fuel is removed from the reactor, it is stored underwater in the fuel building spent fuel pool for up to ten years for an initial cooling period. After this initial cooling period, the spent fuel is transferred to ISFS facility, as described in Section 2.1.2.2.

2.1.4.2 Safety Principles for Plant Operation

283. During the unit's lifetime, safety mechanisms are required at all times when the plant is in operation. This is achieved by:

- defining the minimum conditions required for the various normal operating conditions, in particular when equipment or functions are not available;
- defining the conditions under which systems can be used;
- periodic testing to check the performance of systems and equipment;
- validating and inspecting the systems and equipment;
- defining operating procedures in the event of an incident or accident; and
- applying quality assurance procedures.

284. These requirements are set out in the safety case, Operating Rules and the operator's Safety Management System.

285. The operation of a unit is subject to the following main constraints:

- operating instructions must be followed;
- the safety and protection systems and automated controls must be available and the safety injection tanks topped up;
- The reactor building must be closed, the building is however accessible via secure access doors when the reactor in operation;
- activity in the primary system must be restricted if flaws are found in the fuel cladding; and
- leakage from the primary system into the sealed containment must be restricted.

2.1.5 Summary of Improvements for the UK EPR™ Design

286. The reactor is described as third generation and its design has been derived directly from the pressurised reactors using light water and slightly enriched uranium that are in operation today. The decision to use it makes it possible to take full advantage of the wealth of previous experience in design and operation. The main developments in the UK EPR™ design are improvements to the safety of installations, particularly as a result of:

- the in-depth reinforcement of the principle of defence in depth;
- the consideration of severe accidents in the design;
- the increased consideration of internal and external hazards at the design stage;
- the redundancy and diversification of safety systems;
- the enhancement of reactor behaviour during transient operating conditions; and

- an improvement in the quality of components.

287. Reduced environmental impact and increased radiological protection for all persons concerned by:

- more efficient use of fuel;
- a reduction in the production of waste and effluent from plant operation;
- reduced exposure for plant personnel; and
- consideration of decommissioning in the design.

288. Figure 2-7 presents a high-level schematic view of the main design safety improvements in the EPR™.

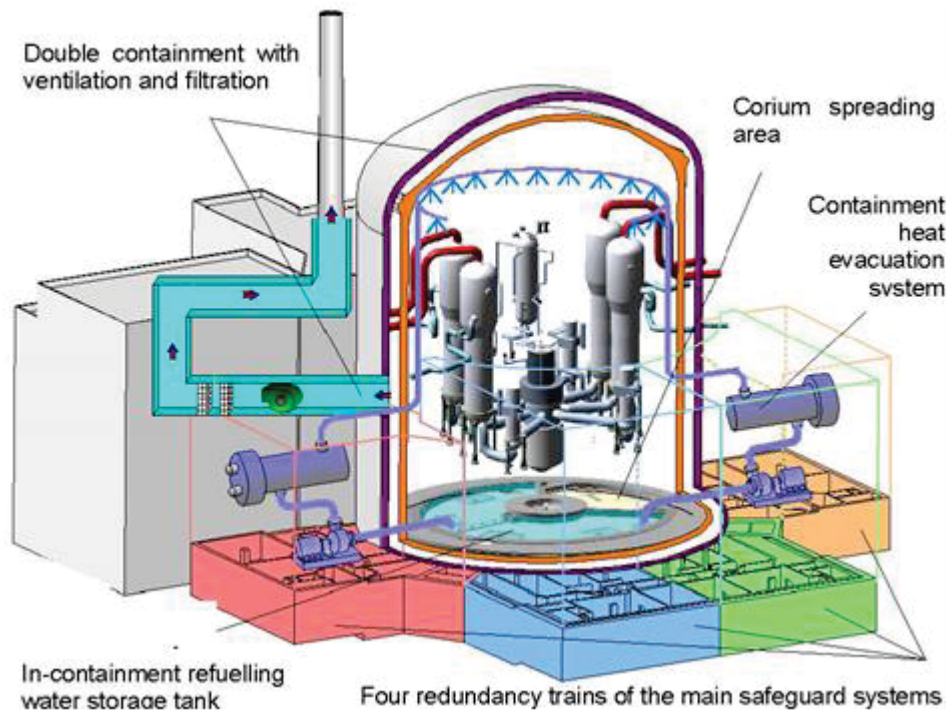


Figure 2-7 Main design choices for improved safety

2.2 Ventilation Systems and the Treatment of Gaseous and Airborne Wastes

289. The gaseous effluent management process can be broken down schematically as shown in Figure 2-8.

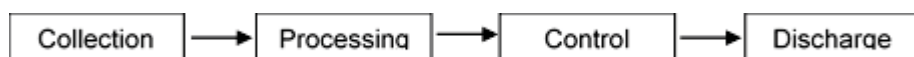


Figure 2-8 Effluents management process

2.2.1 Nature of Gaseous Radioactive Effluent

290. Gaseous radioactive waste includes:

- **Noble gases**, formed through fission mainly comprising xenon-133 and xenon-135 and to a lesser degree, krypton-85. These are largely eliminated via radioactive decay in the TEG retarding beds, with the exception of Kr-85. Opening the primary system to load fuel may increase the activity concentration of noble gases discharged into the stack. Argon-41 (with a half-life of under two hours), formed by the activation of atmospheric argon, may also be detected when the air in the reactor building is changed;
- **Tritium** formed by ternary fission in the fuel, by activation of the beryllium in the secondary neutron sources, and by the activation of the boron and lithium added to the primary coolant. This can be found in the form of tritiated water in the various reactor tanks and pools. It is transported by the ventilation system and continuously discharged as steam via the main stack and other outlets;
- **Carbon-14** formed mainly by the activation of oxygen and nitrogen dissolved in water. Carbon-14 is discharged to atmosphere mainly in the form of methane and also to a lesser extent, as carbon dioxide;
- **Radioiodines**, consisting mainly of iodine-131 and iodine-133, formed through fission. The iodines are retained in the iodine traps installed in the ventilation systems (these traps are activated as required); and
- **Aerosols** formed mainly through activation (cobalt-58 and cobalt-60) and through fission (caesium-134 and caesium-137). The air carried by the ventilation systems is constantly filtered. Radioactive discharge into the environment in the form of aerosols, represents a mass of less than one microgram per year (largely cobalt-60). The devices for treating gaseous radioactive waste (filters, iodine traps, recombination, retarding beds) help to limit the activity discharged into the environment.

2.2.2 Sources of Gaseous Radioactive Effluent

291. Gaseous radioactive waste is divided into three categories, as shown in Figure 2-9. These three categories are described in the following paragraphs.

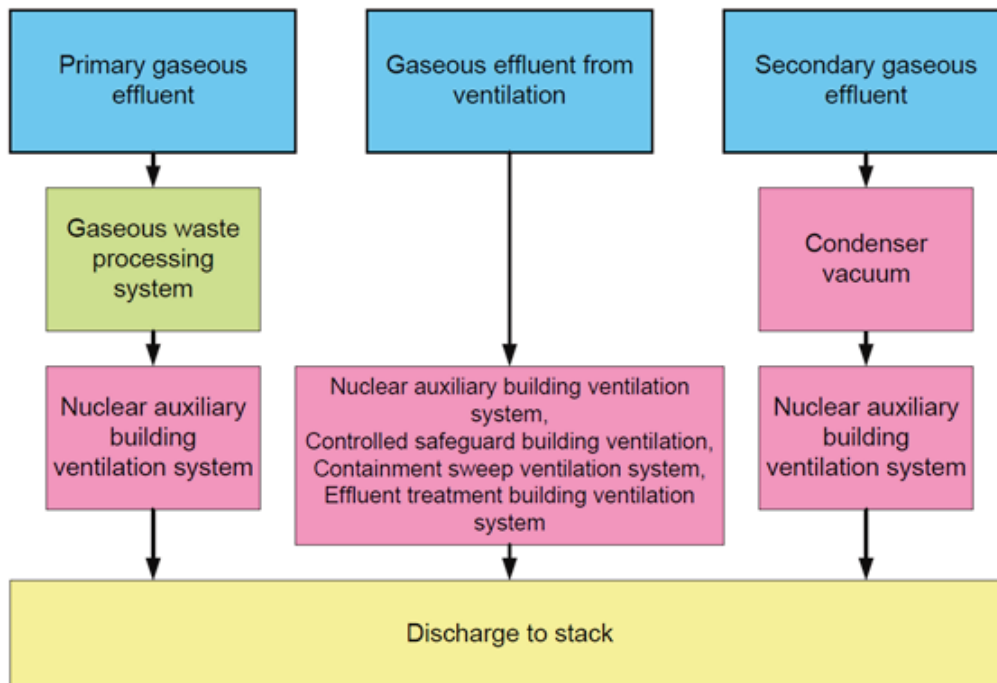


Figure 2-9 Nature of gaseous radioactive effluent

2.2.2.1 Gaseous Effluent from the Primary System

292. Gaseous effluent from the primary system comes from the degassing of the primary effluent by the TEP degassers and degassing in the gas caps of the tanks containing primary coolant or primary waste (RCV, TEP and reactor coolant system tanks, and some RPE tanks). It comprises mainly hydrogen, nitrogen and gaseous fission and activation products and is therefore radioactive.

293. Nitrogen purging is used to maintain low levels of hydrogen and oxygen. Hydrogenated or aerated effluent is therefore not found in the gaseous discharge from the unit's primary system. Primary gaseous effluent is directly discharged into the TEG.

2.2.2.2 Gaseous Effluent from Ventilation

294. This effluent comes from the ventilation extraction systems in the rooms that may be contaminated or present an iodine risk in the NAB, the fuel building, the safeguard buildings, the reactor building, the operational service centre, the access building and the radioactive waste buildings.

2.2.2.3 Gaseous Effluent from the Secondary System

295. Gaseous effluent from the secondary system comes from vapour that is extracted when the condenser is evacuated.

296. This air may be slightly contaminated, particularly with tritium if there is a leak between the primary and secondary systems at the steam generator tubes.

297. The effluent is collected by the condenser vacuum system then sent to the NAB ventilation system, where it passes through a HEPA filter before being discharged via the stack.

2.2.2.4 Gaseous Effluent from the Spent Fuel Management

298. There is no gaseous effluent anticipated from the storage of spent fuel in the ISFS facility and therefore there are also no gaseous effluent treatment systems associated.

299. Regarding any gaseous effluent produced during the initial storage in the spent fuel pool and loading into dry storage, this takes place within the nuclear island (fuel building) and therefore is managed according to Section 2.2.2.1 and 2.2.2.2 above.

2.2.3 Treatment of Gaseous Radioactive Effluent

300. Different types of gaseous effluent are treated by different systems, depending on their nature. Primary gaseous effluent is treated by the TEG. Ventilation air is filtered by the respective building ventilation systems such as the NAB ventilation system, fuel building ventilation system, controlled safeguard building ventilation system, containment sweep ventilation system (high and low flow rate), operational service centre ventilation system, access building ventilation system and the radioactive waste building ventilation systems.

301. These treatment systems are described in the following paragraphs.

2.2.3.1 Treatment of Gaseous Effluent from the Primary System

302. The treatment of primary gaseous effluent includes, the regulation of oxygen and hydrogen levels, the purging of the tanks and the recycling of the treated gases.

303. A diagram with an overview of the TEG is shown in Figure 2-10.

304. Primary gaseous effluent is treated by the TEG. This system compensates for the variations in the free volume of the purged tanks and confines the gases by keeping the pressure below atmospheric pressure. It limits the hydrogen concentration through recombination with oxygen, manages the excess gas produced and retains the radioactive noble gases for a period of decay.

305. The effluent is collected, and the hydrogen is then recombined. The recombined effluent is compressed using two compressors so that it can either be redistributed to purge the facilities or sent to the delay beds and discharged via the stack.

306. There are three delay beds, whose purpose it is to retain the noble gases for a period of decay; xenon is retained for 40 days and krypton for 40 hours. Discharging via the stack is automatic and depends on the pressure in the retarding beds. When discharged, the gaseous effluent is passed through a HEPA filter.

307. The following diagram summarises the processes for discharging gaseous effluent from the primary system.

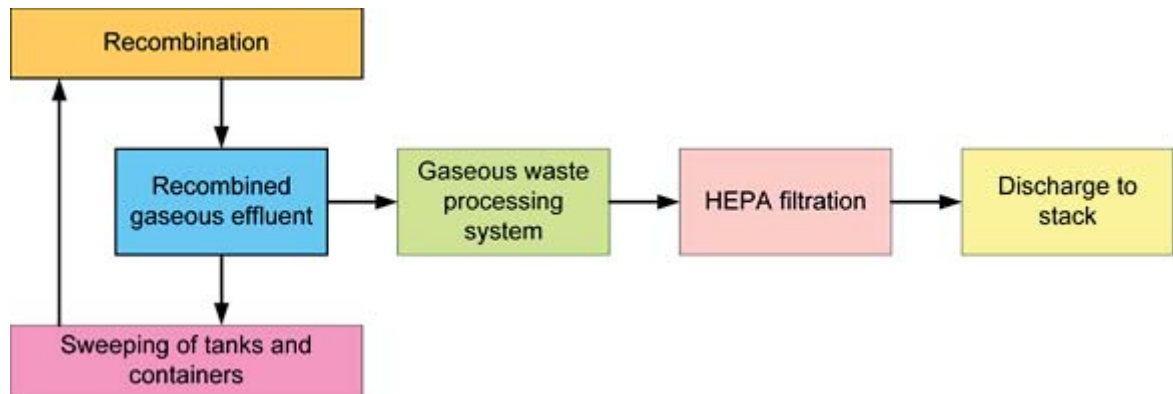


Figure 2-10 Processes for discharging primary gaseous effluent

2.2.3.2 Treatment of Gaseous Effluent from Ventilation

308. Figure 2-11 summarises the treatment of gaseous effluent from ventilation.

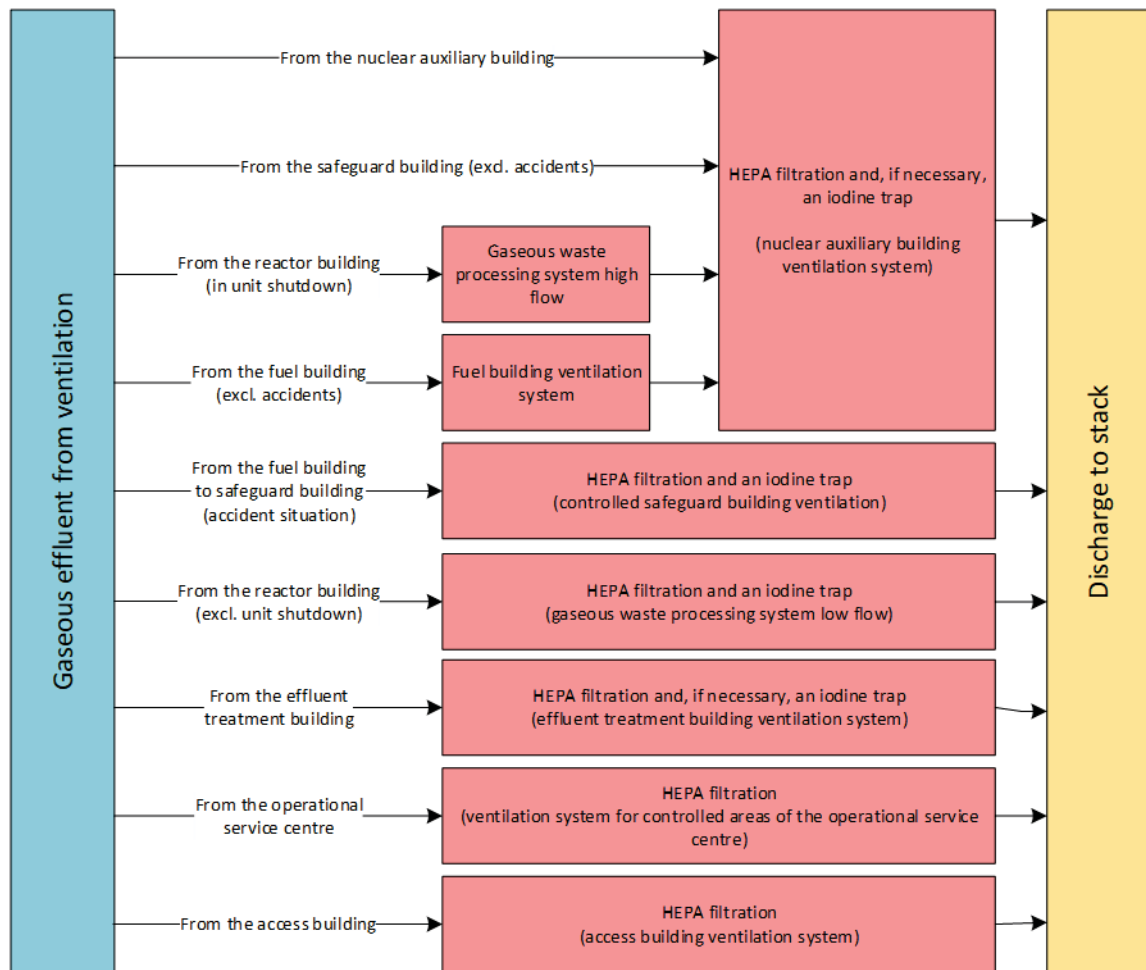


Figure 2-11 Treatment of gaseous effluent from ventilation

2.2.4 Ventilation System of the Nuclear Auxiliary Building

309. The gaseous effluent from ventilation extracted from the rooms in the NAB, the safeguard building (excluding incidents), fuel building and from the purging of the reactor when the unit is shut down (high flow rate containment sweep ventilation system), is treated by the NAB ventilation system. A NAB ventilation system operates for each unit and each will include extraction equipment connected to the stack with pre-filters and HEPA filters which can be switched to iodine traps that are bypassed in normal operation.

310. The extraction system connected to the stack comprises:

- six filtration trains with a unit flow rate of $20,000\text{m}^3.\text{h}^{-1}$: three for output from the nuclear auxiliary ventilation, two for fuel building ventilation and one for safeguard building ventilation;
- one $25,000\text{m}^3.\text{h}^{-1}$ filtration train for the high flow containment sweep ventilation system;
- four extraction fans;

- four iodine traps, each with its own heater; and
- four booster fans to make up the additional pressure loss.

311. The ventilation system also discharges treated primary gaseous effluent from the TEG via the stack. The NAB ventilation system includes iodine traps which are used if high iodine levels are detected in the gaseous effluent.

Ventilation System of the Fuel Building

312. The fuel building ventilation system manages the supply, extraction, filtration, monitoring and discharge of ventilation air from the fuel building. This ventilation air goes to the NAB ventilation system for treatment prior to discharge via the stack.

Ventilation System of the Controlled Area in the Safeguard Buildings

313. In normal operating conditions, extraction and discharging are performed by the NAB ventilation system. The controlled safeguard building ventilation system is only used in accident situations, such as incidents involving the loss of primary coolant or fuel handling accidents in the fuel building. It has two filtration trains, consisting of pre-filters, HEPA filters and iodine traps.

Ventilation System of the Reactor Building

314. Low flow rate containment sweep ventilation system:

315. This system conditions, extracts and filters the air used to purge the containment. It operates whether the unit is shut down or operational so that personnel can access the reactor building. It has two filtration trains, consisting of pre-filters, HEPA filters and iodine traps.

316. High flow rate containment sweep ventilation system:

317. During unit shutdown, this system conditions and discharges the air that ventilates the containment via the stack. The air flowing through the system also filters through an iodine trap in the NAB ventilation system.

Ventilation System of the Controlled Area in the Operational Service Centre

318. The controlled area in the operational service centre comprises laboratories and changing rooms. The system has two filtration trains with pre-filters and HEPA filters.

Ventilation System of the Effluent Treatment Building

319. This system conditions, extracts and filters the ventilation air from the radioactive waste buildings. It comprises a network of extraction ducts connected to the NAB stack, with pre-filters & HEPA filters; and also includes iodine traps which are used if high iodine levels are detected in the gaseous effluent.

Ventilation System of the Controlled Area in the Access Building

320. The system includes two filtration trains with pre-filters and HEPA filters.

2.2.4.1 Treatment of Gaseous Effluent from the Secondary System

321. Figure 2-12 summaries the treatment of gaseous effluent from the secondary system.

322. Gaseous effluent from the secondary system is collected by the condenser vacuum system and then sent to the NAB ventilation system. It is discharged to the stack after passing through a HEPA filter.

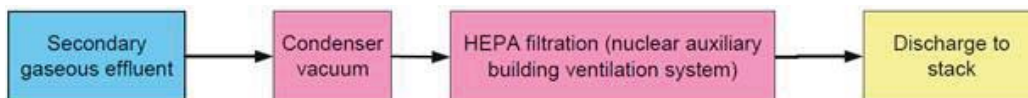


Figure 2-12 Treatment of gaseous effluent from the secondary system

2.2.4.2 Discharge of Gaseous Radioactive Effluent

323. Gaseous radioactive waste is discharged to one of the stacks located on the NAB for each unit, depending on the origin of the effluent (see Figure 2-13 and Figure 2-14). The rate of extraction to the stack must remain above a minimum value and the effluent is checked by measuring the different categories of nuclides. Details of the requirements associated with the inspection and discharge of gaseous waste are provided in Chapter 3.

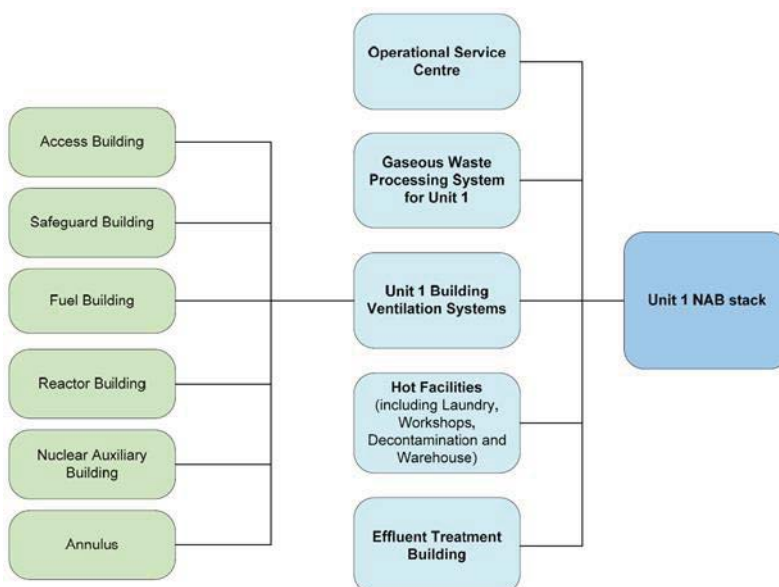


Figure 2-13 Unit 1 stack discharges

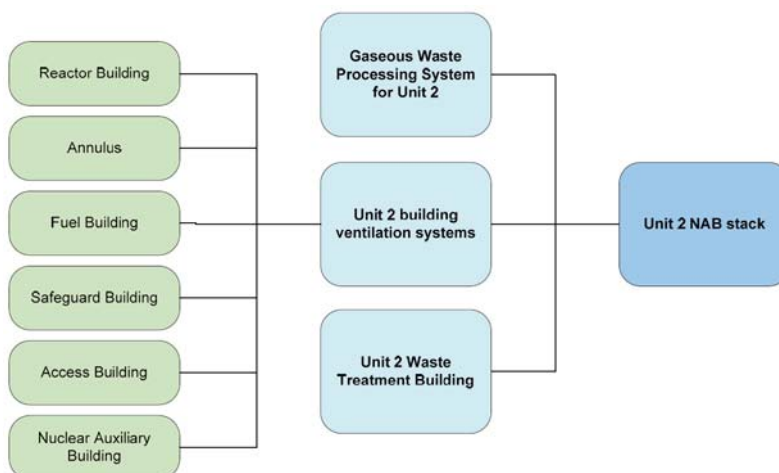


Figure 2-14 Unit 2 stack discharges

2.2.4.3 Summary of optimisation measures for limiting the impact of gaseous radioactive waste from SZC

324. The UK EPR™ facilitates a reduction of gaseous radioactive effluent discharges to the environment when compared to previous generation reactors. This is achieved by a newly designed TEG, the absence of pneumatic valves in the reactor building, the absence of TEP intermediate tanks and improved ventilation and filtering. These features are described in more detail below.

Gaseous Waste Processing System

325. The UK EPR™'s design provides a significant reduction in gaseous radioactive discharge due to its TEG. In particular, this system offers the advantage of being able to treat gaseous effluent and to operate in quasi-closed loop mode when in normal operation. The main improvements which allow this are:

- the sharing of the TEP and reactor boron water make-up system tank covers, which restrict the volume of gaseous discharge in normal operating conditions (constant gaseous balance during water movement);
- continuous nitrogen flushing of the tank covers, lowering the hydrogen content and standardising the gas treatment, whether its composition is hydrogen or oxygen dominant;
- recycling of gases, which restricts the volume of gaseous discharge in normal operating conditions;
- recombination of hydrogen;
- decay of noble gases with a short half-life (especially xenons and kryptons) on retarding beds (charcoal beds); and
- automatic discharge via the stack as soon as a threshold pressure is reached (this threshold may be modified (setpoint) according to the volumes of gas to be treated, allowing the system's storage capacity to be adapted).

Absence of Pneumatic Valves in the Reactor Building

326. The absence of pneumatic valves in the reactor building reduces the gaseous discharge from this building, limiting the amount of waste during maintenance operations and the commissioning of its containment sweep ventilation system.

Reduction of Gaseous Tritium Discharge

327. Unlike the 1300MWe plant series, the UK EPR™ design applies the design measures adopted for the French N4 unit, the TEP has no intermediate tanks (in the case of the 1300MWe plant, 80% of the gaseous tritium discharge comes from these tanks). Consequently, in the case of the UK EPR™, the majority of gaseous tritium discharge comes from the evaporation of the fuel pool.

An Improved Ventilation/Filtering System

328. All of the ventilation systems for the rooms in the NAB, safeguard building and the fuel building have improved iodine filtration. As regards the 1300MWe plant series, only some of the NAB rooms can be switched to iodine traps after filtration through a HEPA filter. For the UK EPR™, all of the rooms which are grouped into "cells" (two for the fuel building, three for the NAB, one for the safeguard building) associated with the ventilation systems, the ventilation air filters through HEPA filters and iodine traps, may be used if iodine is detected.

2.3 Liquid waste treatment

2.3.1 Nature of Liquid Radioactive Effluent

329. Liquid radioactive effluent includes:

- **Activated corrosion products**, the majority of which (iron, nickel and cobalt) are released as a result of the corrosion of the steam generator pipes. These products circulate and are deposited in the reactor's primary system. Corrosion products are present in the primary coolant in soluble or particulate form. As they pass through the reactor core, they are activated by neutrons. The activated corrosion products formed are mainly cobalt-58 (from nickel-58), cobalt-60 (from cobalt-59), silver-110 (from silver-109), manganese-54 (from iron-54), and antimony-124 (from antimony-123). They may go into suspension when the water is physically or chemically changed, for instance, when the unit is shut down. These activated corrosion products are mostly retained in the resins and filters in the RCV;
- **Activation products** from chemicals in the primary coolant and secondary neutron sources. These are carbon-14 (produced from oxygen-17 in the molecules of the primary cooling water and from any dissolved nitrogen-14), and tritium (produced from beryllium-9, boron-10 and lithium-6). These two activation products are generated in proportion to the energy produced. They are not retained by the resins in the RCV; and
- **Volatile fission products** (caesium-134, caesium-137 and iodine-131), usually in soluble form in the primary cooling water, may originate from fuel "leaks" due to the fuel elements being insufficiently sealed (cladding defects). As the primary cooling system is purified continuously, these radioactive fission products are retained in the resins in the RCV. Tritium produced by ternary fission is almost entirely retained in the fuel cladding.

330. The liquid effluent treatment devices (filters, demineralisers, evaporators and degassers) help to limit the radioactivity released into the environment.

2.3.2 Sources of Liquid Radioactive Effluent

331. Liquid radioactive effluent is divided into three categories, as shown in Figure 2-15 and detailed in the below sections.

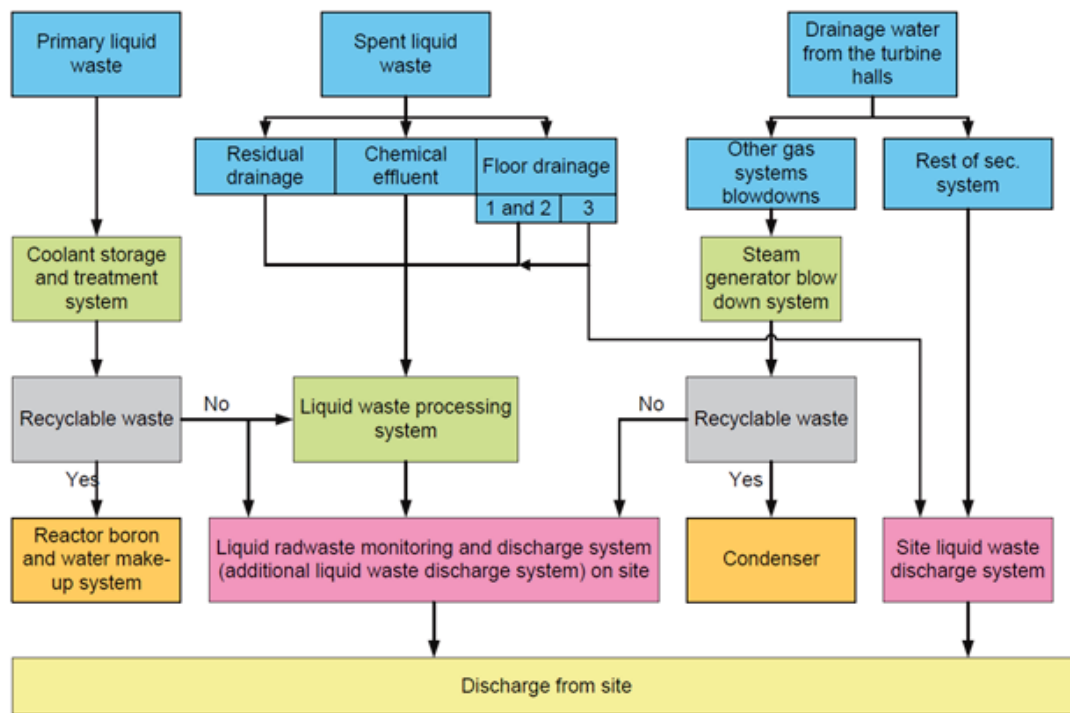


Figure 2-15 Sources of liquid radioactive effluent

2.3.2.1 Primary Liquid Effluent

332. Primary liquid effluent includes liquid that has leaked or been drained from the primary coolant water which is not chemically polluted and water from the systems containing primary coolant, which is discharged when the concentration of boric acid in the primary water is changed.

333. It consists of water containing dissolved hydrogen (when the reactor is in operation) or dissolved oxygen (when the unit is shutdown), which is borated and contaminated by fission and activation products.

334. The liquid effluent is sent to the TEP where it is decontaminated and degassed by the evaporator-degasser. After treatment in the evaporator-degasser, they may be recycled as make-up water and boric acid in the primary system. Primary effluent that cannot be recycled is sent either to the on-site KER tanks before discharging (distillates only), or to the TEU.

2.3.2.2 Spent Liquid Effluent

335. This is divided into three categories described below:

336. **Residual drainage** consists of polluted primary coolant as a result of equipment bleeds and leaks after rinsing. It is not recycled owing to its low boron concentration and potential contamination (inappropriate chemical properties, matter suspension rates too high) in the event

of decontamination. Generally speaking, its contamination level means that it may be treated in a different way from chemical drainage.

337. **Chemical effluent (or drainage)** produced in the NAB, and consists of water that is more chemically and radiologically contaminated than the residual drainage water. It comes from the nuclear sampling system laboratory and the TEP.

338. **Floor drainage** is divided into three categories:

- Floor drainage 1: this is potentially contaminated and comes from leaks from equipment carrying primary coolant and from washing the floors. The sumps are installed in areas with rooms that contain equipment transporting primary coolant;
- Floor drainage 2: this is potentially uncontaminated and comes from leaks, floor washing and the bleeding of equipment (feedwater or component cooling water system). The sumps are installed in controlled areas with rooms that do not contain equipment transporting primary coolant; and
- Floor drainage 3: this effluent is solely produced in uncontrolled zones. It is usually uncontaminated and comes from leaks, floor washing and the bleeding of equipment (feedwater or component cooling water system).

339. With the exception of Floor drainage 3 effluent, which is sent to the SEK tanks, the spent liquid effluent is either sent to the TEU, or treated in a specific way depending on its nature. This usually means demineralisation for residual drainage, evaporation for chemical effluent and filtration for floor drainage. After treatment, the waste is collected in on-site storage tanks before being discharged.

2.3.2.3 *Steam Generator Blowdown Water*

340. Blowdown water from the steam generators is largely made up of secondary feedwater, which may be polluted with tritium if there is a leak between the primary and secondary systems at the steam generator pipes.

341. It is sent to the APG, where it is filtered and demineralised, then recycled to the condenser. When recycling is not possible, the blowdown is sent to the KER tanks before discharge.

2.3.2.4 *Turbine Hall Drainage Water*

342. Water drained from the turbine halls comes from leakage and from blowing down and emptying the secondary system, with the exception of blowdown from the steam generators. It is sent directly to the SEK tanks used for turbine hall drainage water.

2.3.3 *Treatment of Liquid Radioactive Effluent*

343. A diagram providing an overview of the liquid effluent treatment system is shown in Figure 2-16.

344. Liquid effluent is treated by different systems, depending on its nature. Primary liquid effluent is treated by the TEP. The spent liquid effluent collected by the RPE is treated by the TEU installed in the radioactive waste building. The turbine hall drainage water is either treated by the APG, or directed to the SEK tanks.

2.3.3.1 *Treatment of Primary Liquid Effluent*

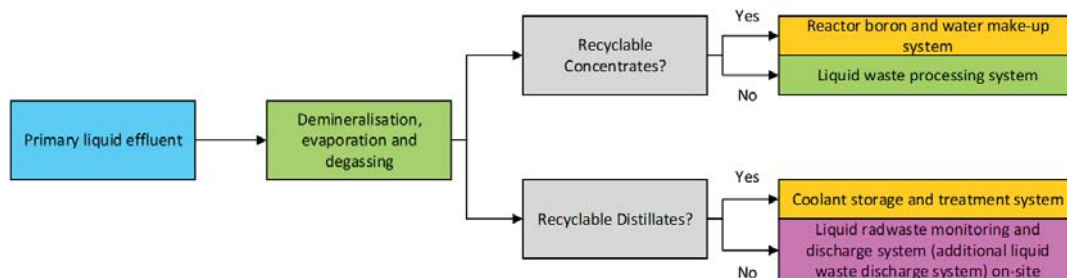


Figure 2-16 Treatment of primary liquid effluent

345. An overview of the treatment of primary liquid effluent is shown in Figure 2-16.

346. Primary liquid effluent is treated by the TEP. The main function of this system is to recycle the boron and water in the primary system after the primary effluent has been treated.

347. In conjunction with the TEG for gaseous effluent, the TEP treats all primary liquid effluent, whether it contains dissolved hydrogen or dissolved oxygen.

348. The installation comprises:

- six tanks that may be used for demineralised water, distillates or primary coolant;
- a system for purification by demineralisation;
- an evaporation and degassing station; and
- a degasser on the TEP discharge.

349. The entire TEP is installed in the NAB. The system is described below.

350. The filtration-decontamination system comprises:

- a mixed-bed demineraliser containing resins that reduce the activity of the primary effluent;
- a filter, which prevents fine particles of resin escaping into the rest of the treatment system; and
- a feed line to the downstream evaporation and degassing station.

351. The evaporator separates the primary coolant into concentrates and distillates. The degasser treats the evaporation distillates and the demineralised water to produce make-up water.

352. The degasser on the TEP discharge, extracts the gases produced.

2.3.3.2 Treatment of Spent Liquid Effluent

148. The spent liquid effluent is treated in the TEU. Figure 2-17 below provides an overview of the TEU.

149. The purpose of this system, designed for two units is to limit the activity of spent effluent before it is transferred to the KER tanks prior to discharging, while adapting treatment to each category of spent effluent.
150. The spent liquid effluent is collected depending on its source and characteristics. It is then stored in one of three sets, of two tanks. These are the residual drainage tanks, the chemical effluent tanks and the floor drainage tanks.
151. Each set of two tanks has a mixing system, so that the contents of the tanks can be homogenised for sampling. The type of effluent treatment is determined based on the results from this sampling.
- demineralisation for active effluent that has little chemical pollution (residual drainage);
 - evaporation for active effluent that is chemically polluted (chemical effluent); and
 - filtration for effluent containing little activity (floor drainage).

Residual Drainage

152. Residual drainage water is sent from the residual drainage storage tanks to the demineralisation plant which consists of:
- an initial filtration to remove suspended solids from the spent effluent;
 - three demineralisers containing resins to reduce the activity of the spent effluent; and
 - a second filter, which prevents fine particles of resin escaping into the rest of the treatment system.
153. There are two successive stages in the demineralisation process:
- Recirculation: the spent effluent treated in the demineralisers is returned to the front tank from which it originated; and
 - Processing through the open system: once the activity has been checked, the treated spent effluent is sent to the KER tanks.
154. The residual effluent may also be treated through evaporation.

Chemical Effluent

155. Chemical effluent is sent from the tanks where it is stored to the evaporation plant. This comprises an evaporator to separate the spent effluent into distillates (with low activity and little chemical pollution) and concentrates (containing most of the activity and chemical pollution) and a storage tank for distillates.
156. The concentrates resulting from evaporation are sent to the solid waste treatment system.
157. The evaporation distillates may be sent, depending on the activity measured during sampling, for re-input to the evaporation system, for additional treatment or to the KER tanks before being discharged.

Floor Drainage

158. Floor drainage water from potentially contaminated areas, is sent from the front tanks where it is stored, to the filtration plant in the TEU. This system comprises a filter for the removal of

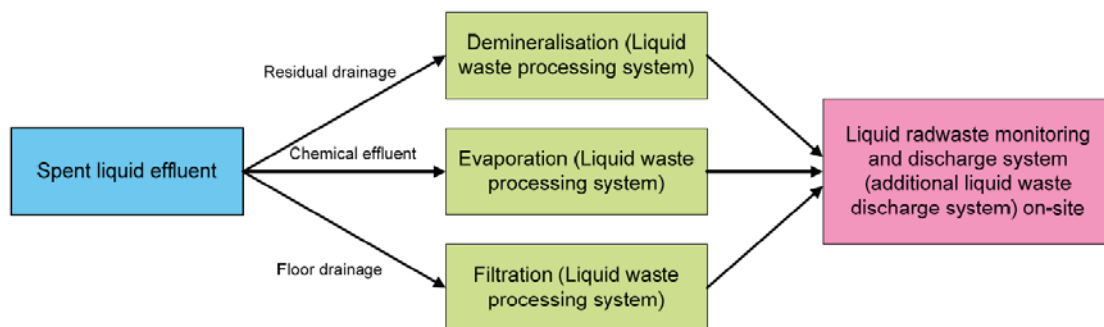


Figure 2-17 Treatment of spent liquid effluent

suspended solids, and the filtered effluent is then sent to KER tanks before being discharged. Floor drainage water may also be treated through evaporation and/or demineralisation. Following analysis of contents in the head tanks, the optimum treatment technique can be selected.

2.3.3.3 Treatment of Steam Generator Blowdown Water

159. Figure 2-18 below provides an overview of the treatment of blowdown water from the steam generators.

160. Steam generator blowdown water is treated by the APG. One system is used for each unit to purify the blowdown water before it is recycled.

161. The purification plant for the steam generator blowdown water comprises:

- two parallel filters that remove some of the suspended solids from the blowdown water; and
- two parallel demineralisation lines, each with two demineralisers containing resins, plus a second filter that prevents fine particles of resin escaping into the rest of the treatment system.

162. After purification, the blowdown water is sent to the condenser where it is recycled. It may also be sent to the discharge storage tanks before being discharged if the tritium level in the secondary system is lowered, or if the condenser is not available.

163. If the APG is not available, the blowdown water can be sent directly to the discharge storage tanks before discharge.

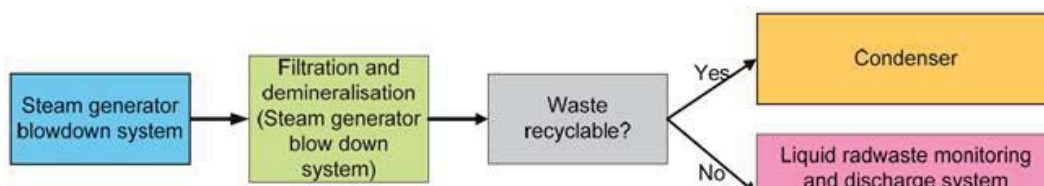


Figure 2-18 Treatment of steam generator blowdown water

2.3.3.4 Treatment of Turbine Hall Drainage Water

164. The turbine hall drainage water (secondary system leaks, blowdown water and drainage, aside from steam generator blowdown water) is sent directly to the TER (see Figure 2-19).

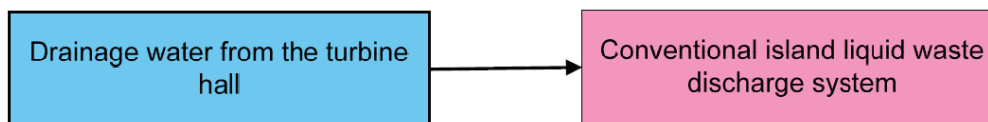


Figure 2-19 Treatment of turbine hall drainage water

2.3.4 Storage and Release of Radioactive Liquid Effluent

165. Liquid effluent undergoes different treatment depending on its source. Either primary effluent treatment, spent effluent treatment or turbine hall drainage water treatment.
166. All of the effluent collected in the KER is passed through a filter.
167. The different types of effluent are sent to three specific types of tank for temporary storage and checking before discharge:
- the KER tanks for primary and spent effluent;
 - the SEK tanks for water collected from the turbine hall; and
 - the TER tanks.
168. The liquid radioactive effluent is pre-diluted with cooling water from one of the two units, in one of the pre-discharge ponds before it is released offshore via one of the underwater discharge tunnels. The effluent is checked in accordance with the procedures used for the different categories of nuclides before and during discharge. These checks are carried out in the discharge storage tanks.
169. Details of the requirements associated with the inspection and discharge of liquid waste are provided in Chapter 4.

2.3.5 Summary of Optimisation Measures for Limiting the Impact of Liquid Radioactive Waste

2.3.5.1 Reducing the Production of Liquid Chemical and Radioactive Effluent

170. The UK EPR™ installation incorporates design improvements that aim to reduce the production of liquid radioactive effluent. These include:
- a choice of materials that limit the release of substances which, through the process, cause the generation of radioactive elements (the reduction of stellites, for example, which cause the release of cobalt);
 - reinforced sealing requirements for active parts (pumps and valves) and the recovery of primary leaks.
171. The production of tritium is an intrinsic feature of pressurised water reactors. In order to minimise the amount of spent fuel generated, the reactor can be operated with a high fuel burn-

up, which enables more energy to be produced using the same quantity of fuel. However, higher burn-up leads to an increase in tritium in liquid waste. To limit the increase in tritium, the fuel rods are clad with a zirconium alloy to limit the diffusion of tritium through the cladding and lithium in the primary coolant is enriched with lithium-7. The following additional measures have also been taken:

- an increased number of gadolinium rods absorbing the neutrons in the reactor core, which enables the use of a lower boron (a source of tritium on activation) concentration of the primary water;
- optimisation of the primary chemistry by boron-lithium coordination, releasing an optimal lithium content to prevent the high concentrations that generate tritium; and
- reduced mass of beryllium in the secondary neutron sources, therefore reducing the amount of tritium generated by activation.

2.3.5.2 Design of Optimal Effluent Sorting and Treatment Systems

172. The liquid radioactive effluent sorting and treatment systems are designed to minimise activity in the liquid effluent and the discharge of liquid radioactive waste into the sea.

173. The design efforts aim to optimise the sorting and treatment systems for:

- optimal recycling of primary water in the process. In the UK EPR™, the aerated primary water can be treated and recycled, particularly due to the design of the TEG for the processing of aerated gas emissions. This has the effect of reducing the volume and activity of the liquid effluent in relation to the current units; and
- optimal selective collection of the different types of effluent. In the UK EPR™, more advanced sorting of the drains that collect leaks from equipment, bleeds and floor washing water, means that treatment can be better adapted to the chemical and radiological characteristics of the different types of effluent. This enables a marked reduction in the activities discharged without increasing the production of solid radioactive waste (filters, concentrates and resins).

2.3.5.3 Design of Storage and Discharge Systems adapted to the Site

174. The systems for storing and discharging the liquid radioactive effluent are designed to check and quantify the activity of the effluent before it is discharged and to minimise the impact of liquid radioactive effluent on the environment by achieving optimal dilution.

175. The operator can also optimise the use of the storage tanks available, by using the control reservoirs to reduce the activity of the effluent by deliberately extending the holding time before the waste is discharged. In this way, advantage can be taken of radioactive decay, particularly for short-lived radionuclides such as iodine-131 and cobalt-58.

2.4 Solid Waste Treatment

176. Solid radioactive waste from each unit is collected and sent to the shared radioactive waste process and storage buildings, and the radioactive waste process and storage buildings are shared between the two units and adjoins the Unit 1 NAB. The majority of the waste from Unit 2 is pre-conditioned in the radioactive waste treatment building of Unit 2 to allow transfer by internal road within the site to the radioactive waste storage building; except for resins which are pumped via underground pipework.

177. The waste consists of active resins from the RCV, PTR and TEP demineralisers, APG resins (low activity) and irradiated waste, such as effluent from the RCV, TEP and the TEP filters.
178. The site system collects and sorts the solid waste produced by the unit, provides buffer storage for the containers, manages the radioactive decay of radioactive effluent and partially or completely treats waste for transfer or disposal off-site.
179. Solid waste from the nuclear island and radioactive waste buildings during normal operation, is sent to the solid waste treatment system and then conditioned for transfer off-site to an appropriately permitted and licensed final disposal facility.
180. Radioactive waste produced by the power plant is divided into two categories:
- Process waste is associated with the operation of the plant. This is produced by the treatment of liquids with the aim of, either limiting contamination deposits and reducing their activity to minimise occupational exposure, or reducing the activity of the discharged effluent, whether gas or liquid. The process waste produced by the treatment of gaseous effluent mainly consists of filters and iodine traps. From the treatment of liquids, the waste includes filters, concentrates and ion exchange resins; and
 - Operational waste is produced as a result of maintenance work (repair work, reworking, replacement of active materials, etc.). This mainly consists of compactable materials, but includes metals and some potentially incinerable waste streams.

2.4.1 Waste treatment in the Nuclear Auxiliary Building

181. The NAB waste treatment system is operated when spent resins are transferred from the unit to one of the solid waste treatment system resin storage tanks via the solid waste treatment system header. These resins include:
- the active resins contained in the RCV, PTR and TEP demineralisers; and
 - the inactive resins in the APG demineraliser.
182. The system also discharges spent filter cartridges from the production unit to the solid waste treatment system in the Effluent Treatment Building for encapsulation.
183. Operational waste (e.g. contaminated paper, clothing) produced in the NAB, is stored in the NAB before being transferred to the radioactive waste process building.

2.4.1.1 Transfer of Filter Cartridge Holders

184. Spent filter cartridges are transferred from the NAB to the radioactive waste process building by means of a handling machine, which discharges the spent filter and replaces it with a new one in the same operation (barrel system). The filters are handled in a bay, which is common to the NAB and the radioactive waste process building and drumming of the filters is also carried out in the radioactive waste process building.
185. The handling machine also collects effluent drips from the spent filter cartridges. This drip-off is then recovered by the RPE for subsequent treatment (See Section 2.3.3.2).
186. The spent filter cartridges from Unit 2 are pre-conditioned in 500L metal drums and transferred within an overpack by road to the radioactive waste process building.

2.4.1.2 *Transfer of Resins from the Nuclear Auxiliary Building to the Radioactive Waste Process Building*

187. The spent resins from the RCV, TEP, PTR and APG, are transferred by flushing via permanent connection from the system or buffer storage to one of the radioactive waste process building solid waste treatment system resin storage tanks.
188. Liquid radioactive wastes including active ion exchange resins (from demineralisers in the RCV, PTR and sometimes TEP) generated in Unit 2, are transferred directly to the shared radioactive waste process building via underground galleries.
189. Low activity ion exchange resins generated in Unit 2 are those from the demineralisers of the APG and sometimes from the TEP if monitoring shows activity is low. These resins will be packaged prior to transfer by road to the shared radioactive waste process building.

2.4.2 *Waste Treatment in the Radioactive Waste Process Building*

190. Solid radioactive waste will be stored in the radioactive waste storage building before it is disposed of. The methods used, enable the waste to be conditioned so that it can be stored safely and permanently at a surface site away from the plant, in accordance with current regulations and so that it can be safely transported off-site in accordance with current national transportation regulations. The process also involves the encapsulation of water filters, resins, concentrates and sludges. ILW will be sent to the ILW ISF on-site for storage and LLW will be sent off-site for disposal at the appropriate disposal facility as discussed in Chapter 5.
191. This radioactive waste process building solid waste treatment system provides the following functions:
- selective collection of all radioactive solid waste produced by the units including spent resins, evaporator concentrates and filter cartridges;
 - buffer storage for waste (tanks and metal drums);
 - conditioning of solid waste for transfer or disposal off-site; and
 - intermediate storage of full and empty waste containers.

2.4.2.1 *Packaging of Spent Resins*

192. The active resins are evacuated from each demineraliser by flushing into one of the two temporary storage tanks, depending on their level of activity, via the network of pipes and valves in the radioactive waste storage building solid waste treatment system. Spent resins can also come from the demineralisers. These are also evacuated by flushing via a network of pipes and valves specific to the solid waste treatment system.
193. The active resins are then packaged in C1 pre-cast concrete casks after decay storage, if required.
194. The resins are collected from the tanks and transferred for encapsulation. The active resins are conditioned and drummed in a portable treatment unit which can be moved from one site to another. This is known as the Mercure portable encapsulation unit and is the process used for SZC.
195. The Mercure process involves mixing the resins with an epoxy polymer inside the concrete container. The epoxy polymer then hardens during the polymerisation process. An initial steel

plug is inserted after mixing. The packages are then permanently sealed with a concrete plug in the radioactive waste storage building.

196. The Mercure machine has an “open tunnel” type design and comprises:

- a station for loading and identifying the containers;
- a station for weighing the containers;
- a station for packaging the waste and inserting/removing the steel plug; and
- a station for sealing the cover (cold welding on the shell) and discharging the containers¹.

197. The machine is located in a controlled area and is connected to the permanent TEU by flexible pipework. It has a pump with a diaphragm, which feeds the spent resins into a hopper, where they are weighed, and their activity is measured by gamma spectrometry. The waste is then immediately transferred to a concrete container.

198. The machine is also connected by flexible pipework to a mobile tank located outside the building, which is used for storing the epoxy resin and hardener.

199. Figure 2-20 summarises the spent resin packaging process.

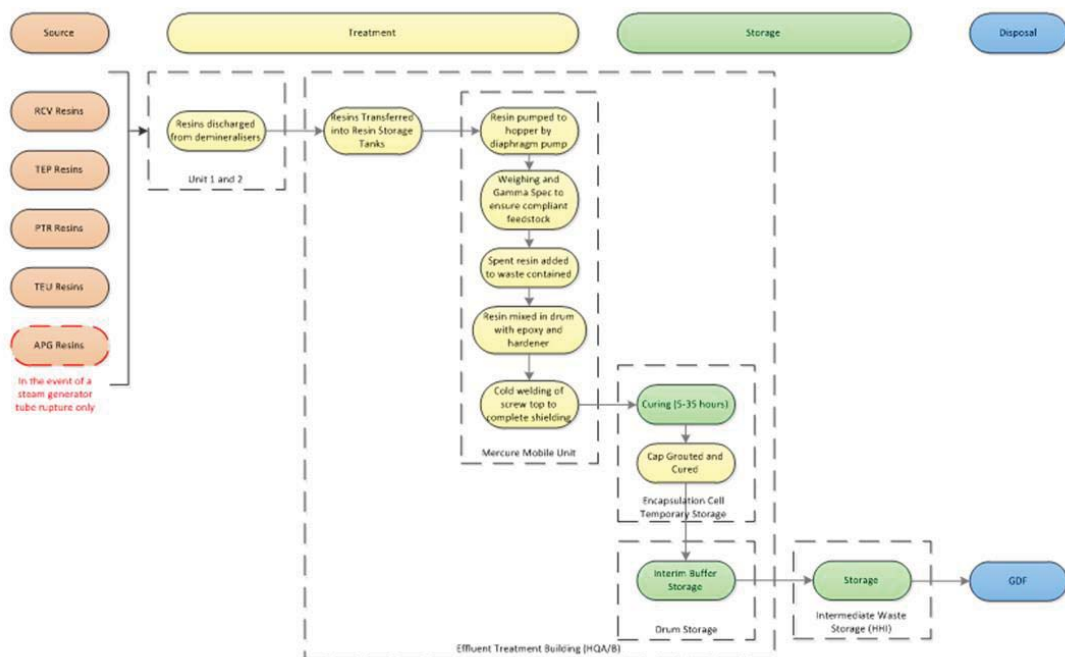


Figure 2-20 Active Resin Packaging Process

¹ This is a reference process which may alter.

2.4.2.2 Packaging of Evaporator Concentrates and Sludges

200. Concentrates from evaporation are collected by the TEU evaporators and are temporarily stored in one of the storage tanks. The most likely treatment for this waste is encapsulation followed by disposal to an off-site facility.

201. Sludges are collected from where they have accumulated around the plant (e.g. sumps).

202. Figure 2-21 Summarises the sludge and concentrate encapsulation process

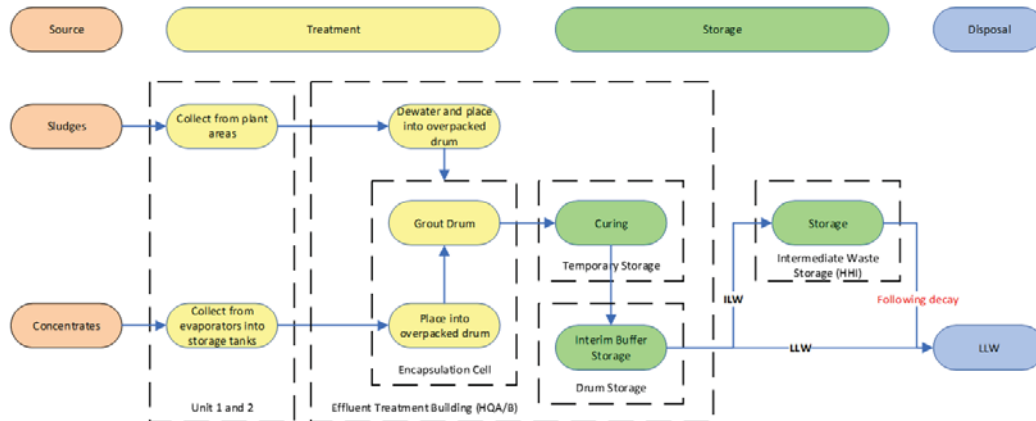


Figure 2-21 Sludge and Concentrate Encapsulation Process

2.4.2.3 Packaging of Spent Filters

203. Spent filters are transported by the solid waste treatment system's handling machine, through a transfer tube leading to the encapsulation cell. The filter then travels down the transfer tube and is deposited into a container for packaging.

204. Figure 2-22 summarises the water filter packaging process.

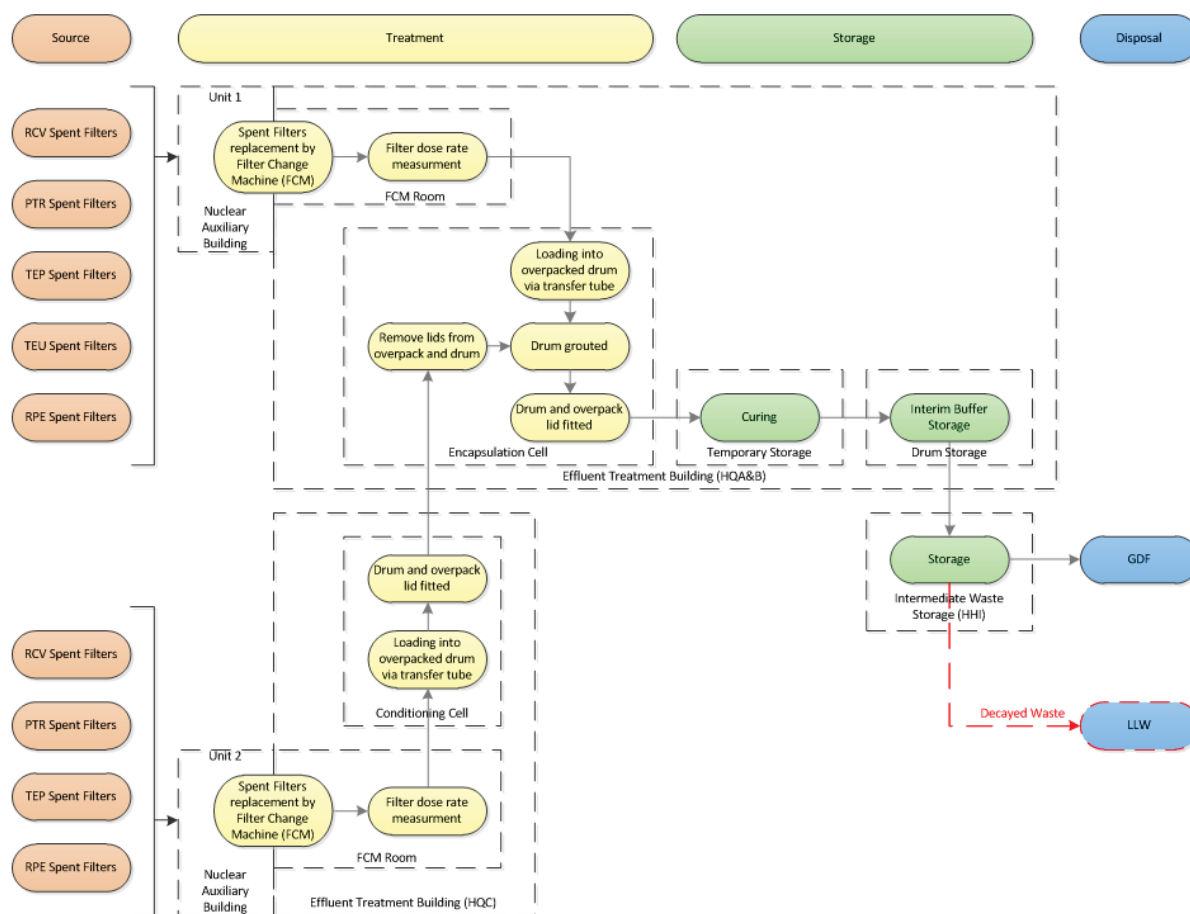


Figure 2-22 Water Filter Packaging Process

2.5 Containment

2.5.1 Description of Radioactive Product Containment Barriers

205. The risk of spreading radioactive products, in gaseous or liquid form, is prevented by an in-depth defence procedure, involving the interposition of three static barriers between the radioactive material contained in the environment:

- the fuel and its cladding, which in normal conditions, retains fission products and almost all of the tritium resulting from fission; and
- the primary system and the systems transporting the primary coolant, which retain the fission and activation products.
- The reactor building, which contains the gaseous radioactive effluent released into the containment and retains leaks of liquid from the systems transporting the primary coolant.

206. These measures are complemented by a dynamic containment function, performed by the ventilation systems in the rooms and buildings that house contaminated fluids (the reactor building, NAB, fuel building, radioactive waste building and safeguard building).

2.5.1.1 Measures implemented to Preserve the Integrity of the Fuel Cladding

207. The fuel rod cladding provides the first containment barrier, where its role is to contain radioactive substances (actinides and fission products). The integrity of the cladding is assured in Category 1 and 2 situations (normal operation and predictable transient conditions). The use of niobium alloy cladding, combined with the implementation of the new in-core instrumentation (based on sensors distributed evenly inside the core), help to reduce the risk of cladding fractures due to pellet-cladding interaction or stress corrosion.

2.5.1.2 Measures implemented to Preserve the Integrity of the Primary System

208. The entire primary cooling system acts as a barrier against radioactive product leaks. The shell is designed, manufactured, assembled and tested to ensure that there is an extremely low probability of sealing defects, fast propagating cracks and significant ruptures.

209. Codes and regulations are used for its design, taking into account the most extreme operating conditions and the most unfavourable transient conditions (static and dynamic loads, normal or exceptional thermal cycles, vibrations, etc.), in order to guarantee its resistance to the occurrence of targeted damage.

210. Materials are chosen based on experience and the tests carried out, with a particular focus on irradiation and inter-granular corrosion. Pressurisation is carried out with sufficient temperature margins so as not to risk the spreading of fragile ruptures (depending on irradiation, changes in the steel transition temperature are monitored by test specimens placed inside the vessel).

211. Support structures are installed for the large pieces of primary equipment to limit the stresses exerted on the primary pipework during normal operation, or in the event of an incident or accident, and to protect against the risks of cracking or ruptures in the pipework.

212. Protection against primary overpressure is provided by safety devices. In the event of an accident, this function is performed by the pressuriser safety valves in addition to automatic reactor shutdown. In the event of a severe accident, these measures are complemented by a depressurisation line, which is specially designed for these situations.

213. The chemical quality of the primary water is defined, to prevent the corrosion of the steels that constitute the primary shell. Boric acid and lithium hydroxide dissolved in the water controlled by the RCV, therefore provide protection against corrosion and the deposit of corrosive products on both the fuel cladding and in the primary cooling system.

214. With reference in particular to the primary pumps, leaks along the pump shafts are avoided due to a specific sealing system comprising:

- the RCV, which performs injections to ensure that the seals are leak proof and that leaks are contained;
- the component cooling water system, which cools the coolant fluid as it flows toward the seals; and
- a sealing system for use during shutdown, which can be activated when the pumps are stopped.

2.5.1.3 Measures implemented to Preserve the Integrity of the Containment

215. The UK EPR™ containment consists of a double enclosure: the outer enclosure is made of reinforced concrete and the inner enclosure is made of pre-stressed concrete. The sealing of the unit is strengthened by:

- a metal liner, which covers the inner enclosure; and
- a leak recovery system for the inner enclosure, known as the containment annulus ventilation system, which prevents the spread of contamination and filters potential leaks before discharge to the NAB stack.

216. Based on experience acquired at the design stage of previous enclosures, the design of the UK EPR™ containment is based on its resistance to an absolute dimensioning pressure. This pressure is used to dimension the entire civil engineering structure and in particular, the pre-stressing system. It includes all of the pressures reached in accidental situations, taken into account at the reactor's design stage, whether these result from benchmark transients, incidents or accidents (Plant Condition Categories 2 to 4), or multiple failures and hypothetical accidents involving core meltdown (Risk Reduction Categories A and B). Based on results from corresponding studies, the internal containment of the UK EPR™ is designed to ensure containment up to a pressure of 6.5 bars.

217. Furthermore, in addition to this containment, some systems and buildings also assist the containment function. The installation is designed so that all of the routes through the containment lead to the peripheral buildings. These buildings and systems are subject to sealing requirements for the situations in which they might be used. With reference to the equipment access buffers in situations when the primary system is open, resealing times are established to ensure rapid recovery of the containment in the event of an accident.

218. Finally, the base mats of the lower parts of the nuclear buildings, provide a barrier to protect the water tables from contamination by the leakage of radioactive liquid.

2.5.1.4 Measures Implemented to ensure Dynamic Containment

219. Rooms and buildings containing contaminated liquids are equipped with ventilation systems. These systems are installed to graduate the pressure levels, by forcing circulation from the less contaminated areas to the more contaminated areas, by maintaining a constant negative pressure inside the areas that can be contaminated, by blowing and extracting air. The systems allow any risk of dissemination in normal operation to be prevented.

220. The air extracted by ventilation is treated by HEPA filters before being discharged to the NAB stack. The air flow is automatically diverted to iodine traps in the event of high radioactivity being detected in the ventilation system (see the description of ventilation systems in Section 2.2).

2.5.2 Monitoring of Containment Barrier Seals

2.5.2.1 Measures implemented to Monitor and Limit Spreading outside the Fuel Cladding

221. The monitoring of the fuel assembly seals in the reactor, is based on radiological activity measurements taken from the primary coolant during reactor operation. This allows any rupture affecting the fuel, to be detected and ensures that follow-up procedures are carried out. The containment of leaks from the first barrier is ensured by the primary cooling system which provides the second barrier.

222. The measures implemented to control the core's reactivity, help to protect the integrity of the fuel cladding.

223. When the fuel is handled during unit shutdown, the fuel assembly seals are monitored by measuring the activity in the reactor building and the fuel handling bay. Potential leaks are contained by enclosing the shell of the corresponding buildings and carrying out the associated ventilation procedures.

2.5.2.2 Measures implemented to Monitor and Limit Spreading outside the Reactor Coolant Pressure Boundary

224. The primary cooling system's water inventory is monitored via the water levels in the reactor pressure vessel and pressuriser. Significant primary leaks are detected by comparing the amount of primary water made-up and discharged (RCV and collection systems).

225. Changes in the primary inventory are also monitored by measuring the water level in the tanks or the bleed, vent and drainage sumps. These monitoring methods are supplemented in the reactor building and the rooms containing auxiliary systems, by activity measurement sensors used for the ambient air and sump water. Furthermore, special monitoring of the steam generator pipe seals and other heat exchangers is carried out by examining the activity in the cooling systems.

226. With regard to the long-term resistance of the pressurised primary shell, irradiation of the reactor vessel's steel is monitored during operation. This parameter allows ageing to be checked by examining the irradiation of the steel in relation to the risk of the vessel rupturing.

227. The entire primary shell is also subjected to an important inspection programme, which aims to monitor any changes in the materials and structures, particularly with regard to the welding. The programme consists of periodic inspections and hydraulic tests.

228. If an isolable leak is detected in the primary shell, the two production isolation devices installed on all of the systems connected to the primary system are sealed. These devices isolate the primary system, even in the case of failure to seal one of the two devices due to a mechanical, electrical or instrumentation and control fault. In the case of a non-isolable primary leak in the reactor building, containment is assured by the enclosure and the base mat.

2.5.2.3 Measures implemented to Monitor and Limit Spreading outside the Containment

229. The containment is monitored regularly by performing resistance and global tests to check that it is sealed to withstand pressure levels higher than or equal to the accident pressure. The inter-containment space (annulus) is kept at sub-atmospheric pressure to create a negative pressure gradient to prevent leakage escaping to the external environment. It is also equipped with an activity measurement system and a leakage recovery system, with switchable filters on iodine traps for use in the event of an accident.

230. The containment itself is monitored during normal operation by performing radiological checks on the incoming and outgoing equipment, personnel and waste packages when they leave the nuclear area. Environmental radioactivity monitoring in the vicinity of the facility is also undertaken and ensures that any increased levels of radioactivity in the environment are detected.

231. In accident situations, the containment is automatically isolated at all of the enclosure routes that are not required for the management of accidents. The atmosphere in the containment is checked for fission products and hydrogen. A permanent hydrogen recombination system limits the hydrogen concentration and guarantees the containment's resistance.

232. In the event of liquid leaks in the nuclear island buildings, the radioactive effluent is recovered by sumps, retention pits and retention tanks. In terms of the reactor building, the base mat is sealed by the metal liner which covers the inner containment below the base mat and above the common raft. The core catcher provides the containment function of the base mat, even in severe accident situations.

233. Finally, a leak in the safety injection system or containment heat removal system, which transports contaminated water outside the reactor building to cool the core or the containment in accident situations, is taken into account in the design by installing contaminated waste re-injection systems in the reactor building.

2.6 Decommissioning and Dismantling

234. The UK EPR™ has a design life of 60 years before decommissioning. At the end of its operational life, the last spent fuel will be removed and transferred to join the previously discharged spent fuel, in the spent fuel interim storage facility for continued cooling and awaiting the availability of the GDF. It is currently planned that the spent fuel will be transferred to a deep GDF for disposal.

2.6.1 Design for Decommissioning

235. The UK EPR™ has been designed with maintenance and decommissioning in mind, enabling radiation doses to workers and radioactive waste quantities to be minimised when decommissioning takes place. The design incorporates a number of features to achieve this objective including:

- choice of construction materials to minimise activation - low cobalt steels are to be used wherever possible;
- optimisation of neutron shielding - neutron shielding is utilised between the core and reactor vessel to reduce irradiation of the steel and reactor compartment;
- optimisation of access routes to nuclear areas - the layout of the primary circuit plant takes account of the handling and access routes for decommissioning;
- reactor systems design - designed to minimise activation products and circuit contamination;
- ease of removal of major process components - major components can be removed as a single item for size reduction in purpose built facilities elsewhere;
- submerged disassembly of reactor pressure vessel;
- modular thermal insulation - the design facilitates easy removal minimising worker dose;
- fuel cladding integrity - improved fuel cladding reduces contamination of the circuit with fission products;
- careful control of primary circuit chemistry to minimise level of activity in the primary circuit;
- design for decontamination - plant design facilitates decontamination during decommissioning;

- prevention of contamination spread - containment, ventilation and segregation are utilised to prevent contamination spread; and
- minimisation of hazardous materials - the use of materials which would result in the creation of hazardous waste during decommissioning is minimised as far as possible.

236. In summary, the design of the UK EPR™ includes measures which will:

- minimise the activity level of irradiated components; • reduce worker dose during decommissioning;
- permit easy decontamination;
- minimise the spread of contamination;
- facilitate the access of personnel and machines for decommissioning and the removal of waste from the reactor building;
- minimise the volume of radioactive waste;
- reduce the operator intervention time; and
- minimise the toxicity of the waste.

2.6.2 Outline of Regulatory Provisions

237. The 2008 Nuclear White Paper² sets out the UK Government's policy, that the owners of new nuclear power stations must set aside funds over the operating life of the power station, to cover the full costs of decommissioning and their full share of waste and spent fuel management and disposal costs. This includes the costs of providing safe, secure, environmentally acceptable interim storage for spent fuel and ILW until a GDF is ready to accept this material.

238. The costs for decommissioning, waste and spent fuel management and disposal would be funded through a Funded Decommissioning Programme (FDP), approved by the Secretary of State, which must be in place before the operator uses the site by virtue of the site licence. This ensures that SZC Co sets aside funds over the operating life of the power station to cover these costs in full. The FDP is periodically reviewed, revised and developed in detail, in readiness for the closure of the site. The FDP describes the totality of the decommissioning process, covering all facilities on the site, commencing up to five years prior to closure and concluding with the removal of all facilities and remediation of the site as necessary to make it available for reuse.

239. Before decommissioning can take place, there is a requirement for the operator to obtain consent from the ONR under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) (Amendment) Regulations 2018 (EIADR). This requires the submission of an Environmental Impact Assessment specific to decommissioning activities and a period of

² Meeting the Energy Challenge - A White Paper on Nuclear Power, Cm7296, Department for Business Enterprise and Regulatory Reform, 2008. (Note that BERR became the Department for Business Innovation and Skills in 2009, which has now been superseded by the Department for Business, Energy and Industrial Strategy (BEIS))

public consultation. This will demonstrate that decommissioning will take place with no unacceptable environmental impact.

240. Current UK policy is set out in a statement published in September 2004, The Decommissioning of the UK Nuclear Industry's Facilities³. Key aspects include:

- Each operator is expected to produce and maintain a decommissioning strategy and plans for its sites.
- Decommissioning operations should be carried out as soon as reasonably practicable, taking all relevant factors into account as provided for in the relevant operator's strategy and plan.
- Sites of decommissioned nuclear facilities may represent a potentially valuable resource. The future use of the site, once decommissioning operations have been safely completed, could therefore be a significant factor in determining decommissioning operations.
- The use of BAT to minimise the volumes of radioactive wastes which are created, particularly the volume of ILW. Wherever possible wastes should not be created during decommissioning until an appropriate management solution is, or will shortly be, available for use; and
- Any new facility covered by this policy should be designed and built so as to minimise decommissioning and associated waste management operations and costs.

241. Following End of Generation (EoG), the decommissioning plan sets out that SZC will be defueled after 3 years and the site will be completely cleared within 20 years; with the exception of the ISFS facility. This will continue to store the spent fuel until a suitable disposal facility has been commissioned, whilst the remainder of the site will be delicensed.

242. Regulation of the decommissioning of a nuclear facility is carried out under a Nuclear Site Licence and relevant environmental permits.

³ Statement of the UK Government and devolved administrations' on the decommissioning of nuclear facilities, September 2004

2.7 References

None

6 UNPLANNED RELEASES OF RADIOACTIVE EFFLUENTS

6.1 Review of Accidents of Internal and External Origin which could result in Unplanned Releases of Radioactive Substances

6.1.1 UK EPR™ safety principles

630. Nuclear safety includes all the technical provisions and organisational measures relating to the design, construction, commissioning, operation and decommissioning of installations. It involves the use of fissile material, or the transportation, storage and disposal of radioactive waste, intended to control the hazard and prevent accidents and to ensure risks are ALARP i.e.:

- to ensure normal plant operation, while keeping the radiological impact for workers and the public As Low As Reasonably Practicable (ALARP), below the limits prescribed by the Ionising Radiations Regulations 2017; and
- to prevent faults and hazards leading to failures of safety functions (control of reactivity, maintain heat removal, maintain containment) and where this is not practicable, limit the consequences of any possible fault or hazard by taking measures to control radiation risks to ensure that no individual bears an unacceptable risk of harm.

631. In terms of normal operation, the methods implemented for the UK EPR™ (including its spent fuel and ILW interim storage facilities at SZC) and the resulting impacts are described in detail in Chapter 3, Chapter 4 and Chapter 5.

632. Nuclear and radiological risks are controlled using measures which ensure that the plant can be managed, by assessing a comprehensive range of potential faults and hazards and demonstrating the maintaining of safety functions related to:

- Reactivity control;
- Removal of residual thermal power and decay heat; and
- Containment and shielding of radioactive substances.

633. With reference to risk management, the measures put in place during the plant design, construction, commissioning, operation and decommissioning stages, cover:

- risk prevention to reduce the probability of occurrence of initiating events;
- monitoring and detection of operating anomalies; and
- limiting consequences with the aim of making residual risks acceptable with regard to personnel, the public and the environment.

634. In order to guarantee a high level of safety, a large number of independent measures are implemented. This collection of measures results from the application of the 'defence in depth' concept, which involves systematically taking plant or human failures into account and providing several levels of protection against potentially significant faults and hazards.

635. The UK EPR™ safety process, which has been implemented at the design stage, is based on defence in depth over five levels, based on the detail in IAEA Safety Requirements SSR2/1 [1].

- Level 1 is a combination of design, quality assurance and control margins aimed at preventing the occurrence of abnormal operating conditions or plant failures.

- Level 2 consists of the implementation of protection devices which make it possible to detect and correct the effects of deviations from normal operation or the effects of system failures. This defence level is aimed at ensuring the integrity of fuel cladding and that of the primary cooling system so as to prevent accidents.
- Level 3 consists of safeguard systems, protection devices and operating procedures which make it possible to control the consequences of accidents that may occur, so as to contain radioactive material and prevent the occurrence of severe accidents.
- Level 4 comprises measures aimed at preserving containment integrity and controlling severe accidents.
- Level 5 includes, in the event of the failure of previous levels of defence, all measures for protecting the public against the effects of significant radiological releases.

636. A systematic, comprehensive analysis of all potential faults and hazards is carried out to verify that even in these situations, defined safety objectives are met and consequences for the environment and populations are minimised so far as is reasonably practicable and remain below the thresholds prescribed by national and international authorities.

637. Design Basis Initiating Faults (DBIFs) are identified via identification of Postulated Initiating Events (PIEs) – plant failures or human errors, which if unmitigated could challenge some or all of the main safety functions and hence lead to an unacceptable off-site release. Once identified, DBIFs are recorded in a 'Fault and Protection Schedule' (F&PS), which list faults and the means by which they are protected against / mitigated.

638. The hazards approach is based on ensuring that hazards cannot lead to onerous DBIFs. Internal hazards are those originating inside the licenced site but outside the primary circuit. These include hazards such as fire, flood, etc and if these hazards are not controlled they have the potential to initiate DBIFs and simultaneously damage the Structures, Systems and Components that are included in the design to manage initiating events. Internal hazards are also managed in accordance with the defence in depth concept in paragraph 6. In addition, the divisionalisation / segregation of safety trains plays a significant role in ensuring that sufficient safety trains remain available in order that reactivity control, containment and cooling can be maintained following the occurrence of an internal hazard and any initiated reactor fault.

639. External hazards are those hazards of man-made origin (e.g. aircraft crash) or natural origin (e.g. seismic) which are initiated outside the boundary of the Nuclear Licenced site. If external hazards are not adequately catered for in the design, then they could simultaneously initiate reactor faults and cause wide spread damage to the Structures, Systems, and Components that are included in the design to manage DBIFs. The approach to the control of the hazard is to demonstrate robustness to design basis external hazard events (i.e. the magnitudes that occur at return frequencies of 1E-5/year for man-made hazards, and 1E-4/year for natural hazards). In addition, the safety case provides additional demonstration that 'cliff edge' effects leading to the inability to control reactivity, maintain containment and cooling, do not take place even if higher magnitude events that are just beyond the design basis occur.

640. With regard to reducing the potential consequences of DBIFs and hazards, safety performance is improved in the following four main ways:

- By accounting for, eliminating and where this is not possible reducing the frequency of initiating events (which cause transients) liable to occur during the different states which the reactor may encounter during operation (including full power and shutdown states, and states with the core completely unloaded in the spent fuel pool). The defence in depth approach is enhanced by taking internal hazards into account on a deterministic basis in accordance with design principles similar to those used for simple initiating events.

- By taking into account external hazards at high severity levels, whether the hazards are of human origin (aircraft crashes, explosions etc.) or of natural origin (earthquakes, extreme temperatures, flooding etc.). In addition to their direct effects, these hazards are studied from the point of view of the damage they may cause on non-protected structures and equipment, inside or outside the plant.
- By taking severe accidents (such as a core melt accident) into account at the design stage and implementing physical measures to ensure "practical elimination" of events and sequences that could have a significant radiological impact on the environment during the power plant's service life. For events which cannot be prevented by design, the probability of environmental releases is minimised by strengthening the containment, including conditions which could lead to containment bypass.
- By use of Probabilistic Safety Analysis (PSA) at the concept design phase, to confirm the design approach and identify the multiple failure sequences that should be considered in the design basis, so as to prevent core meltdown accidents.

641. The safety assessment performed in support of the GDA of a single UK EPR™ (as described in Section 0.2.2) is based on the well-established deterministic methods, augmented by probabilistic methods using appropriate numerical targets and analysis. The main deterministic method is adoption of a defence in depth approach and the concept of independent physical barriers against the escape of radioactivity. The principal quantitative safety targets are outlined below and are based upon UK practice:

- The collective dose to workers shall be ALARP;
- Doses to workers during normal operation of the plant will not exceed UK statutory limits. The dose limits to be applied, shall be those specified in the Ionising Radiations Regulations 2017.
- Doses to the public during normal operation of the plant will not exceed UK statutory limits. The dose limits to be applied shall be those specified in the Ionising Radiations Regulations 2017.
- An annual whole body effective dose for individual employees and contracted workers involved in the operation of SZC due to normal operation of a reactor unit shall not exceed 10mSv.
- The maximum dose to an individual off-site (member of the public) due to normal operation of SZC shall not exceed 0.3mSv.y^{-1} and the combined dose from discharges from SZC, and the existing reactors at the site (Sizewell A and Sizewell B) shall not exceed 0.5mSv.y^{-1} .
- The risk of an individual worker fatality due to exposure to radiation from an on-site accident (all facilities) will be below $1 \times 10^{-6} \text{ y}^{-1}$ and/or demonstrated as ALARP.
- The risk of fatality of any person off-site (member of the public) due to exposure to radiation from on-site accidents (all facilities) will be below $1 \times 10^{-6} \text{ y}^{-1}$ and at least demonstrated as ALARP.
- The total predicted frequency of accidents (from all facilities) resulting in more than 100 fatalities (either immediate or delayed) of members of the public will be below $1 \times 10^{-7} \text{ y}^{-1}$ and/or demonstrated as ALARP.

642. The primary purpose of the GDA was to demonstrate that the generic aspects of a UK EPR™ unit have been conservatively assessed and the reactor technology is acceptable to be built in the UK.

643. A number of additional safety reports will be produced for SZC taking into account any site specific considerations, the twin UK EPR™ units to be built, and additional nuclear facilities such as the ILW ISF and ISFS facility. This will build on the arguments in the GDA and demonstrate that people and the public are protected from the harmful effects of ionising radiation.

6.1.2 Development of the safety reports for SZC

644. The GDA for the UK EPR™ was submitted by AREVA and EDF SA in the form of a Generic Pre-Construction Safety Report and Generic Pre-Construction Environmental Report for a single UK EPR™ reactor unit. This demonstrated that a series of fundamental safety principles are applied to the design, construction, commissioning, operation and eventual decommissioning of a UK EPR™ reactor.

645. Assessment of the UK EPR™ was completed in July 2011 by the regulators, the Office for Nuclear Regulation (ONR) covering safety and security, and the Environment Agency (EA) covering waste management and environmental protection. The ONR and the EA granted DAC and SoDA for the UK EPR™ Reactor Design in December 2012.

646. A safety case will be produced for SZC encompassing the twin units and additional support facilities on site. This will demonstrate that the nuclear and radiological risks are ALARP taking account of the site specific nature and additional facilities not covered under the GDA. SZC has a phased approach to the development of safety cases which allows the identification, assessment and mitigation of hazards and their associated risks. The phases of the safety case are aligned with the key phases of the design, construction, commissioning and operation of facilities on the site and are summarised as:

- Pre-Construction Safety Report (PCSR). A series of reports that are prepared during detailed design and are submitted prior to the construction of key safety related structures.
- Pre-Commissioning Safety Report (PCmSR). Prepared during construction of the facility and submitted before the start of plant and process commissioning (non-active commissioning).
- Pre-Operation Safety Report (POSR). Prepared during non-active commissioning and submitted before the start of nuclear operations (active commissioning).
- Station Safety Report. Documents the Safety Case throughout the operational phase of the site.

647. The safety case will be produced for SZC in line of the recommendations of the ONR. The ONR is the regulatory body with responsibility for regulating the nuclear power industry in the UK. Each nuclear site licence includes the requirement to produce and manage safety cases. The safety case will be subjected to rigorous and comprehensive internal assessment by the site operator.

648. The ONR will then assess the SZC safety case as part of the licensing process for the project. This independent regulatory scrutiny examines both plant design and the management systems supporting the lifecycle of the station. It provides additional confidence that the claims made within the safety case are valid and that the safety targets referenced above will be met. Once the safety case has been implemented the ONR will undertake a programme of inspection and review. This programme is designed to demonstrate that the plant and systems and operators correctly implementing them are performing as expected and that the claims that are made within the safety case remain valid. Deviations are the subject of corrective action which could include enforcement activities.

649. It should be noted that HPC, for which Sizewell C is a replica, is successfully undergoing construction, with the site specific PCSR approved, and PCmSR under development.

6.1.3 Design scope

650. The object of the design scope is to define the events taken into account in the design basis and to categorise them. The PSA is a confirmatory step which is used to support the robustness of the design.

651. The initiating events considered are grouped and are dealt with differently. In terms of the design process, the overall approach is the same:

- Definition of the design basis list of plant-based faults, internal and external hazards, and events/sequences with consideration of combinations.
- Quantification of the event/sequence impacts, the results being used for the design of systems and structures and/or the demonstration that the safety requirements are met.
- Design verification which completes the safety analysis by providing a further demonstration that the safety requirements are met. It invariably includes the use of PSA and in some cases a deterministic verification is carried out. This step can result in design feedback.

6.1.4 UK EPR™ Reactor Faults – Design Basis Analysis

652. The safety approach applied to the UK EPR™ requires consideration of a number of representative reactor faults and enveloping conditions, which could occur during normal operation and various associated reactor states. The relating initiating events are grouped together in four categories based on their estimated frequency of occurrence and their impact.

653. On this basis, events are grouped into four Plant Condition Categories (PCC's) as follows:

- PCC-1 which includes all normal operating conditions characterised by initiating events whose estimated frequency of occurrence is greater than 1 per year.
- PCC-2 which includes design basis transients, characterised by initiating events with an estimated frequency of occurrence in the range of 10^{-2} to 1 per year.
- PCC-3 which includes all design basis incidents characterised by initiating events with an estimated frequency of occurrence is within the range of 10^{-4} to 10^{-2} per year.
- PCC-4 which includes all design basis accidents characterised by initiating events with a frequency of occurrence is within the range of 10^{-6} to 10^{-4} per year.

654. Identification of these events and their classification by category determines the design of systems intended to control them, preventing unacceptable consequences for the plant or the environment. The transients of categories 2, 3 and 4 for a single UK EPR™ unit, ISFS facility and ILW ISF are listed in the following tables.

655. The PCC design basis transients consider a number of operating conditions or 'states' which are summarised below.

- State A. Power states and hot and intermediate shutdown ($P > 130\text{bar}$). In these shutdown states, all the necessary automatic reactor protection functions are available as in the power state.
- State B. Intermediate shutdown above 120°C ($P < 130\text{bar}$). State B covers all shutdown states during normal plant operation, where primary heat is removed by the steam generators.

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- State C. Intermediate and cold shutdown with safety injection system/residual heat removal.
- State D. Cold shutdown with the reactor cooling system open so that the steam generators cannot be used for decay heat removal.
- State E. Cold shutdown with the reactor cavity flooded for refuelling.
- State F. Cold shutdown with the core fully unloaded.

6.1.4.1 Category 2 events (PCC-2): design basis transients

656. The Category 2 transients studied in the Generic Design Assessment of a single UK EPR™ unit are listed in Table 6-1.

Table 6-1 Category 2 events (PCC-2): design basis transients

Design basis transients with internal causes¹
Main feed water system malfunction causing a reduction in feed water temperature
Main feed water system malfunction resulting in an increase in the feed water flow rate
Excessive increase in secondary steam flow
Spurious turbine trip
Loss of condenser vacuum
Short-term loss of off-site power (≤ 2 hours)
Loss of normal feed water flow (loss of all main feed water system pumps, start-up and shutdown pump)
Partial loss of core coolant flow (loss of one reactor coolant pump)
Uncontrolled rod cluster control assembly bank withdrawal at power
Uncontrolled rod cluster control assembly bank withdrawal from hot zero power conditions
Rod cluster control assembly misalignment up to rod drop, without control system action
Start-up of an inactive reactor coolant loop at an incorrect temperature
Chemical volume and control system (RCV) malfunction resulting in an uncontrolled increase or decrease in boron concentration in the reactor coolant

¹ Where the status of the reactor is not shown, the event is assumed to be analysed for at power state

Design basis transients with internal causes¹
RCV malfunction causing increase or decrease in reactor coolant inventory
Primary side pressure transients (spurious operations of pressuriser sprays or heaters)
Uncontrolled reactor cooling system level drop (states C, D)
Loss of one cooling train of the safety injection system/residual heat removal system in residual heat removal mode (states C, D)
Loss of one train of the fuel pool cooling system or of a supporting system
Spurious reactor trip (state A)

6.1.4.2 Category 3 events (PCC-3): benchmark incidents

657. The Category 3 incidents studied in the preliminary safety report are listed in Table 6-2.

Table 6-2 Category 3 events (PCC-3): benchmark incidents

Design basis incidents with internal causes²
Small steam or feed water system piping failure (DN<50), including break of connecting lines to a steam generator (DN<50) ³ (states A, B)
Long-term loss of off-site power (>2 hours)
Inadvertent opening of a pressuriser safety valve (state A)
Inadvertent opening of a steam generator relief train or a safety valve (state A)
Small break Loss Of Coolant Accident (LOCA) ($\leq$ DN 50), including a break on the extra boration system injection line (states A, B)
Steam Generator Tube Rupture (1 tube)
Inadvertent closure of one or all main steam isolation valves
Inadvertent loading of a fuel assembly in an incorrect position

² Where the status of the reactor is not shown, the event is assumed to be analysed for an initial power state

³ DN - Nominal diameter in mm

Design basis incidents with internal causes²
Forced reduction of reactor coolant flow (4 pumps)
Leak in the gaseous or liquid waste processing systems
Uncontrolled rod cluster control assembly bank withdrawal (states B, C, D)
Uncontrolled single control rod withdrawal
Long term loss off-site power, fuel pool cooling aspects (state A)
Loss of one train of the fuel pool cooling system or supporting system (state F)
Isolatable piping failure on a system connected to the fuel pool

6.1.4.3 Category 4 events (PCC-4): benchmark accidents

658. The Category 4 accidents studied in the PCSR are listed in Table 6-3.

Table 6-3 Category 4 events (PCC-4): benchmark accidents

Design basis accidents with internal causes⁴
Long term loss of off-site power in state C (>2 hours)
Main steam line break
Feed water system pipe break
Inadvertent opening of a steam generator relief train or of a safety valve (state B)
Spectrum rod cluster control assembly ejections
Intermediate or large break LOCA (up to surge line break – states A, B)
Small break LOCA ($\leq$ DN 50), including a break on an extra boration system injection line (states C, D)
Reactor coolant pump seizure (locked rotor)
Reactor coolant pump shaft break

⁴ Where the status of the reactor is not shown, the event is assumed to be analysed for an initial power state

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Design basis accidents with internal causes⁴
Steam Generator Tube Rupture (2 tubes in 1 steam generator)
Fuel handling accident
Boron dilution due to a non-isolatable rupture of a heat exchanger tube
Rupture of systems containing radioactivity in the nuclear auxiliary building
Isolatable safety injection system break ($\leq$ DN 250) in residual heat removal mode (states C, D)
Non-isolatable small break ($\leq$ DN 50) or isolatable safety injection system break residual heat removal mode ($\leq$ DN 250), fuel pond drainage aspects (state E)

6.1.5 Multiple failure accidents under Risk Reduction Category A (RRC-A)

659. In addition to examining the incidental and accidental situations with simple initiating events, the scope of the analysis is extended to situations involving multiple failures based on probabilistic safety evaluation. The purpose of studying operating conditions involving multiple failures is to define specific measures, which may be manual actions intended to limit the risks of core melt associated with these scenarios. The accidental transients associated with RRC-A multiple failure, studied in the GDA are listed in Table 6-4.

Table 6-4 Category RRC-A internal accidental transients

Accidental transients with internal causes
Anticipated transient without scram through the mechanical blocking of the rods (state A)
Anticipated transient without scram due to the failure of the protection system (state A)
Total loss of off-site power and failure of the four main diesel generators (state A)
Total loss of the water supply to the steam generators (state A)
Total loss of the cooling chain and failure of the stand still seal system leading to a loss of primary coolant (state A)
LOCA up to 20cm ² and failure of the protection system for the safety injection signal activation (state A)
LOCA up to 20cm ² without medium head safety injection (state A)

Accidental transients with internal causes
LOCA up to 20cm ² without low head safety injection (state A)
Uncontrolled level drop and failure of the protection system for the activation of the safety injection system (state C and D)
Total loss of the cooling chain (state D)
Total loss of the ultimate heat sink for 100 hours (states A to C)
LOCA without medium head safety injection (states C and D)
LOCA outside containment on safety injection system and residual heat removal system train (states C and D)
LOCA outside containment on safety injection system and residual heat removal system train and failure of the automatic isolation signal (states C and D)
Non-isolatable homogenous boron dilution outside the volume control tank and failure of the operator's actions (states C and D)
Loss of the two main trains of the spent fuel pool cooling system during core refueling (state F)

6.1.6 Core melt accidents under category DEC-B

660. The purpose of some specific safety improvements made to the UK EPR™ is to reduce the risk of core melt accidents involving perforation of the reactor vessel, to one tenth of that associated with the existing reactors, for which the risk is already extremely low. The risk of such an event occurring is estimated overall for the UK EPR™ using a probabilistic approach, at:

- 1 in 100,000 per reactor per year when taking into account all the reactor states and all types of event (internal events, internal and external hazards).
- 1 in 1,000,000 per reactor per year when taking into account internal events only, i.e. with internal and external hazards excluded.

661. The practical measures contributing to this reduction in risk are, for example:

- The physical separation of important safety systems into four compartments, to increase the reliability of these systems.
- The installation of a borated water tank inside the reactor building.
- Improvements to protection measures for the main external hazards (aircraft crashes, earthquakes, extreme temperatures, etc.).
- Improved diversification of support systems (diversified main diesel generators, diversified ultimate heat sink, etc.).

- An optimised human-machine interface, based on information from the most recent unit commissioned in France.

662. A core melt accident is still taken into account at the design stage even though the probability is extremely low. Measures are employed to prevent any premature failure of the containment, manage low pressure meltdown scenarios and reduce any associated impacts.

663. The specific aim is to eliminate the need to evacuate any population beyond the immediate vicinity of the power station, even in the event of a severe accident. This aim is achieved by the presence of a molten fuel spreading area, installed below the reactor vessel to enable cooling and a metal lined containment installed to minimise accidental releases to the environment.

664. The low pressure core meltdown scenarios studied in the PCSR cover all water loss events which could lead to exposure of the core and subsequent damage. Since safety injection is unavailable, the progress of an accident is dictated by the size of the break of the reactor coolant system if there is one and the heat removal capacity of the steam generators.

6.1.7 Consideration of additional safety related scenarios

665. The scenarios considered above relate to the presence of a single UK EPR™ unit. SZC will have two UK EPR™ units, ILW ISF and ISFS facility. The presence of these additional nuclear facilities has been considered to determine the degree to which they influence the identification and selection of reference accidents for the purpose of this submission. The current assumption is that, in terms of design basis accidents, any release from an accident in these additional facilities and that any release associated with an interaction between these facilities in an accident scenario, is bounded by the DEC-B reference accident for a single UK EPR™ unit. This assumption has been developed using the arguments presented in Section 6.1.7.1, Section 6.1.7.2 and Section 6.1.7.3.

6.1.7.1 Presence of two UK EPR™ units on the site

666. The site specific PCSR prepared for HPC did not identify any design basis accidents that relate to both units. Noting that the Nuclear Island of SZC is a replica of HPC the same argument therefore stands.

667. The interactions between the two UK EPR™ units have been explored in the probabilistic safety assessments that were undertaken to support the preparation of the HPC PCSR. These assessments show that interactions between the two UK EPR™ units do not make a significant contribution to the overall risk associated with the HPC site and that the numerical targets identified in Section 6.1.1 will be met and ensures risks are ALARP.

668. Interaction between the two units will be subjected to additional safety analysis and risk assessment during the further development of the safety reports described in Section 6.1.2. These developments will provide a comprehensive demonstration that the numerical targets will be met and ensures risks are ALARP.

6.1.7.2 Presence of an interim storage facility for spent fuel

669. The ISFS was excluded from the original GDA of the UK EPR™. Since the GDA the design of the ISFS has been developed.

670. After removal from the reactor, spent fuel will be initially stored in the spent fuel pool in the Fuel Building for an initial cooling period. The spent fuel will then be loaded into a MPC which will be sealed, drained, dried and filled with helium. The MPC provides the confinement barrier and is designed to ensure passive cooling of the spent fuel. The loaded MPC will then be transferred in a shielded transfer container (HI-TRAC) to the ISFS facility where it will be placed into a concrete storage shelter (HI-STORM) which provides shielding and protects the MPC. The spent fuel will be stored in this way for up to 120 years. The process is reversible should it be

deemed necessary to return an MPC containing spent fuel to the fuel building for inspection. At the EoG, defueling of the reactors and transfer of the fuel from the reactor core to the fuel building pool is planned to be undertaken at the earliest safely practicable opportunity. After a period of cooling in the fuel building pool the final spent fuel assemblies will be transferred from the Fuel Building to the ISFS facility via a series of ISFS operational campaigns. At some point after all spent fuel has been removed from the Fuel Building, but well within the 120-year operation of the ISFS facility, the Fuel Building will be decommissioned. This will foreclose the ability to carry out reverse operations. To offset this risk, space on the SZC Site Plot Plan has been reserved for a Spent Fuel Inspection and Repackaging Facility (SFIRF). Prior to the start of decommissioning of the Fuel Building, the SFIRF will be operational and able to provide capability for the ISFS reverse operations including inspection and repackaging if required. Pending the availability of a Geological Disposal Facility (GDF), the SFIRF will ultimately be converted into a Spent Fuel Encapsulation Facility (SFEF) wherein spent fuel will be transported from the ISFS facility for repackaging prior to offsite disposal to the GDF.

671.A preliminary safety assessment for ISFS has been written into the HPC safety case, and incorporated in the RC2 design adopted into SZC, based on: identifying a suitable concept design; demonstrating the feasibility of implementing that concept within the existing Station design; and gaining confidence that the risks associated with operating the concept design will be tolerable and ALARP. This includes fault and hazard assessments allowing the process of screening faults into those which are reasonably foreseeable and those which are not.

672.The bounding transients identified in these assessments are listed in Table 6-5.

Table 6-5 ISFS bounding accidental transients

Bounding accidental transients associated with the ISFS
Loss of cooling fault during drying of the fuel canister prior to transfer to ISFS
2 m drop and topple of a HI-TRAC containing an MPC during handling in the Fuel Building Extension Building
Turbine disintegration impacting HI-STORMs in the ISFS facility

673.Loss of Cooling during drying of the fuel canister was deemed to be bounded by the loss of cooling in the spent fuel pool in the fuel building which is already covered by the GDA and earlier sections of this report.

674.Whilst in the case of turbine disintegration or 2 m drop and topple the probability of such an event occurring and resulting in a radiological release has been deemed as not reasonably foreseeable ($\sim 1 \times 10^{-6}$ per year).

6.1.7.3 Presence of an interim storage facility for ILW

675.The ILW ISF was also excluded from the original GDA of the UK EPR™, but the design of the facility has since been developed.

676.The site will have a ILW for the safe storage of solid intermediate level radioactive waste generated during the operation and decommissioning of SZC. This will store the ILW until it can be disposed of to the GDF.

677.The design of the ILW ISF is in the form a shielded store, designed to interpose physical barriers and a proportionate number of safety measures between the ILW and the environment. During

the design development a number of bounding faults have been identified which are likely to have the greatest consequences while being credible enough to fall with the design basis.

678. The bounding transients identified are listed in Table 6-6.

Table 6-6 ILW Interim Storage Facility bounding accidental transients

Bounding accidental transients associated with the ILW Interim Storage Facility
Handling fault involving dropped packages within the facility
Internal fire involving multiple packages
Earthquake involving dropped packages within the facility

679. The ongoing development of the design will ensure the risks are such that events leading to a radiological release from operations in the ILW ISF will be eliminated and / or appropriately mitigated.

680. In addition, in the highly unlikely event that an event was to occur the accidental releases and associated impacts from these facilities will be enveloped by those identified for an UK EPR™ unit noting:

- the design of the waste packages - These packages are designed to remain leak tight should they drop following any handling fault or earthquake. In addition, packages are required to sustain fire loadings while maintaining the containment of radioactive materials;
- the design of the facility - the building is seismically qualified and the fire loadings are strictly limited by design.
- the timescale of operation - the ILW ISF is expected to be emptied and decommissioned promptly after the GDF is available for receiving new build ILW wastes. The radiological inventory is significantly smaller than the inventory contained elsewhere on the Sizewell C site.

6.1.7.4 Interactions between facilities in accident scenarios

681. The methodology adopted for the preparation and evolution of the SZC safety report is not expected to result in the identification of additional design basis accidents related to multiple facilities on the site. Interactions have been explored during preliminary probabilistic safety assessments.

682. Comprehensive safety analysis and risk assessment will be undertaken to demonstrate that the numerical targets identified in Section 6.1.1 will be met so far as to ensure risks are ALARP.

6.2 Reference Accidents Taken in Consideration

683. An assessment of the radiological consequences of the following design basis accidents (PCC-4) is presented:

- Fuel handling accident;
- Steam generator tube rupture; and

- LOCA.

684. These three design basis accidents are considered, which represent the worst design basis accidents, as they present the most significant consequences to the local reference group in terms of radiological impact.

685. In addition, a severe accident scenario (DEC-B), based on a core melt accident is also assessed.

686. Representative operating conditions, from the point of view of radiological consequences, are selected from the design basis accidents studied in the GDA PCSR of the UK EPR™. These set out the initial operating conditions and the limit conditions, such as the discharge type, path, height and operating modes, for SZC.

687. Among the ILW ISF and ISFS facility design basis faults, none are identified as a reference accident comparable with those of the reactors in terms of frequency, inventory released or resultant impact. The design is such that large scale releases are not conceivable in those situations and therefore it is considered appropriate not to undertake an assessment of the ILW ISF and ISFS facility design basis faults.

688. For atmospheric discharges, the different possible locations of leaks inside the plant were considered (containment, safeguard buildings, fuel building, nuclear auxiliary building, main steam and feed water systems, steam generators, etc.) in order to select representative cases.

689. For liquid waste, the precautions taken to ensure total containment in the event of an accident are described in Section 2.5, this includes the ability to recover radioactive effluent by sumps, retention pits and retention tanks. In addition, the core catcher provides the containment function in severe accident situations. On the basis of the above, and taking into account the considerations of ONRs Report on Fukushima [2], accidental releases of radioactive liquid waste into aquatic environments are therefore excluded from any further assessment.

690. The radiological consequences of the design basis accidents studied below, therefore relate only to accidental atmospheric radioactive discharges.

691. The approach to identifying reference accidents has resulted in the selection of three Plant Condition Category (PCC)-4 design basis accidents and one Design Extension Condition (DEC)-B accident as the reference accidents relating to the reactors. The accidents have been selected on the basis of their radiological consequences.

692. The reference accidents selected reflect the design basis that is defined for the UK EPR™ in the UK regulatory context. The DEC-B accident is considered bounding for accidents that inform the design basis for reactors at Sizewell C. While it is recognised that the ISFS facility will continue operation well beyond EoG and defueling of the reactors, the consequence of an event is still bounded by the DEC-B accident.

6.2.1 Category 4 (PCC-4) accidents

6.2.1.1 Main hypotheses

693. The main hypotheses used to evaluate the radiological consequences of accidents are as follows:

6.2.1.1.1 Activities taken into account in the primary circuit and secondary circuit water

Primary circuit water activity

694. The activity selected for primary circuit water is based on the maximum values adopted for the technical specifications for all French nuclear power plants in operation, equal to:

- primary circuit activity in stable operation: 20GBq t⁻¹ equivalent to Iodine-131⁵; and
- primary circuit activity after power transient (iodine spiking): 150GBq t⁻¹ equivalent to Iodine-131.

Secondary circuit water activity

695. The maximum water activities on the secondary side of the steam generators are calculated based on the following hypotheses:

- Primary circuit water activity in the unit, corresponding to the maximum values specified in the technical operating specifications.
- A primary-secondary leakage rate of 20L h⁻¹.
- A drainage rate from all of the steam generators corresponding to the plant operating at nominal power.
- Drive factors in the steam from the steam generators corresponding to the values detailed below.

6.2.1.1.2 Drive factors in steam from the steam generators

696. The drive factors taken into account for the transfer of activity during the steam generator steam phase are as follows:

- All noble gases present in the steam generator water are assumed to be transferred in the gaseous phase.
- For other radionuclides, 'healthy' steam generators are distinguished from damaged steam generators (due to a steam generator tube rupture, for example).
- For "healthy" steam generators, the drive factor taken into account is 0.25%.
- For damaged steam generators, the drive factor taken into account is 1%.

6.2.1.1.3 Release of activity in the event of cladding failure

697. During some accidents (particularly LOCAs), the fuel cladding is subject to a thermo-hydraulic transient, which can cause it to fail. The fission product activity, accumulated as a result of pellet/cladding gap, can then be released into the primary system.

698. The release rates for the proportion of fission products in the fuel rod inventory assumed to be discharged into the system when the cladding fails are presented here. Information is provided for both uranium oxide and mixed-oxide (MOX) fuel. The use of MOX fuel in the UK EPRTM is not currently planned. It is included here because it is used in assessments to provide a more conservative estimate of impact.

699. The overall release rates selected, based on the considered fuel assemblies, are shown in Table 6-7.

Table 6-7 Activity release rate in the event of cladding failure

Elements	Selected burn-up for the evaluation of discharge – UO ₂ fuel	Selected burn-up for the evaluation of discharge – MOX fuel

⁵ Iodine-131 equivalent = I131 + I132 ÷ 30 + I133 ÷ 4 + I134 ÷ 50 + I135 ÷ 10

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	$\leq 47 \text{ GWd tU}^{-1}$	$> 47 \text{ GWd tU}^{-1}$	$\leq 33 \text{ GWd tU}^{-1}$	$> 33 \text{ GWd tU}^{-1}$
Krypton-85	8%	25%	8%	50%
Other noble gases	2%	8%	2%	15%
Bromine, rubidium, iodines, caesium	2%	8%	2%	15%

6.2.1.1.4 Deposition of fission products

700. The physical laws on aerosol and molecular iodine deposits in the containment take into account an exponential decay term, the deposition constants of which are equal to 0.035 h^{-1} and 0.014 h^{-1} respectively.

6.2.1.1.5 Leakage rate from the containment vessel

701. The overall leakage rate through the containment inside the UK EPR™ (which has a metal liner) is 0.3% volume per day at the design pressure (5.5bar).

6.2.1.1.6 Filter performance

702. The retention performances of the extraction filters used to reduce radioactive waste are as follows:

703. High efficiency filters:

• Noble gases	0%
• Aerosols (including particulate iodine)	99.9%
• All other substances	0%

704. High efficiency filters and iodine traps:

• Noble gases	0%
• Iodine in organic form	99%
• Elemental iodine	99.9%
• Aerosols (including particulate iodine)	99.9%

6.2.1.2 Specific hypotheses relating to the accidents under consideration

705. In addition to the general hypotheses described above, particular hypotheses relating to the accidents examined are presented below.

6.2.1.2.1 Large primary circuit break during operation at nominal power

706. The Category 4 LOCA is defined as a rupture in the safety injection line in the nozzle of the primary coolant system's cold leg.

707. During this accident, it is assumed that the reactor core becomes uncovered, with a 10% break in the fuel rod assembly. The discharge considered for this accident is a result, on the one hand, of leaks in the containment vessel and on the other hand, of leaks assumed to occur in the reactor core cooling systems outside the containment vessel, in the ventilated and filtered safeguard auxiliary buildings.

6.2.1.2.2 Rupture of two steam generator pipes

708. The radiological consequences of this accident are the result of the release of activity to atmosphere, via the atmospheric steam dump valves on a faulty steam generator. The activity is due to contamination of the secondary circuit by the primary circuit through a break in the steam generator tubes.

709. The peak of activity in the primary circuit (iodine spiking), caused by the transfer of activity due to pellet/cladding gap in the primary coolant following automatic reactor shutdown, is considered for the assessment of the radiological consequences of this accident. To create a more conservative scenario, it is assumed that the iodine spiking is fully developed when emergency shutdown occurs.

6.2.1.2.3 Fuel handling accident

710. The accident examined involves a fuel assembly with a maximum irradiation, dropped into the spent fuel pit in the fuel building. All fuel rods in the damaged assembly are pessimistically assumed to be broken.

711. The cooling time for the damaged assembly is 60 hours, corresponding to the minimum time required between reactor shutdown and the start of fuel handling.

712. The release rates considered are those provided in Section 6.2.1.1.

713. It is assumed that the radioactive isotopes released from the pit in the hall are distributed immediately and evenly throughout the entire free volume of the hall.

714. The automatic closure command for the main air extraction system's cut-off devices enables the activity to be contained by switching to reduced ventilation and iodine traps. This command is automatically activated by means of a high activity measurement signal, which is located on the operating floor for the irradiated fuel pit.

6.2.2 DEC-B conditions - core melt accident

715. This extreme type of accident, which was not considered in the design of the existing nuclear reactors at the site, has been taken into account in the design measures specific to the UK EPR™ for SZC. The associated radiological consequences are analysed to ensure compliance with objectives in terms of population protection.

716. The design of the UK EPR™ is such that the risk of a core meltdown is extremely low. As part of the implementation of an improved defence in depth philosophy, low pressure core melt accidents constituting DEC-B conditions, have been addressed by means of specific design features that aim to ensure that the integrity of the containment is maintained and the release of radioactive products outside the plant remains within prescribed limits.

717. An examination of DEC-B conditions shows that, given the design features adopted, the following radiological objectives associated with these situations are met:

- Limited requirement for sheltering;
- No requirement for emergency evacuation outside the immediate vicinity of the plant;
- No requirement for permanent relocation; and
- No long term restrictions on the consumption of foodstuffs.

718.The Emergency Reference Levels (ERLs) of averted dose associated with sheltering, evacuation and stable iodine are presented in Chapter 7, together with a discussion on the effectiveness of longer-term protective measures.

719.Any restrictions concerning consumption of foodstuffs produced in the vicinity of the plant are governed by relevant European marketing regulations applicable in the event of a nuclear accident or other radiological emergency, such as by regulations from the Council of the European Communities which specify intervention levels for radioactive contamination in marketed foods and animal feeds. These are known as the Council Food Intervention Levels (CFILs).

720.Exposures beyond the local population are further discussed in Section 6.3.1.6.

6.2.2.1 Source term

721.A benchmark source term has been defined, based on reasonably conservative disconnection hypotheses which are independent of the accident scenario. The main hypotheses are as follows:

- A 100% core melt is assumed.
- The radionuclide release rates, in terms of the radiological consequences on populations (noble gases, iodine and caesium) have been maximised (100% release into the containment vessel).
- The quantity of suspended aerosols in the containment falls due to natural deposition. The effectiveness of the containment spray systems has not been taken into consideration.
- Iodine is mainly released into the containment in the form of aerosols. A fraction of suspended organic iodine equal to 0.15% is taken into account from the beginning of the accident. This value has been used to bound the quantity measured in the long term phase of the accident at Three Mile Island.

722.During a DEC-B type accident, the integrity of the UK EPR™ containment is guaranteed by specific provisions. This special design justifies the use of hypotheses developed for PCC accidents to assess discharge into the environment:

- An internal containment leakage rate of 0.3% volume per day (maximum internal containment leakage rate at its absolute pressure and design temperature).
- Filtration, downstream from the ventilation, which allows 99.9% of the aerosols and elementary iodine and 99% of the organic iodine to be retained. Noble gases are not removed by filtration.

723.This source term conservatively covers DEC-B type accident sequences.

6.2.2.2 Fraction discharged

724.The UK EPR™ source term, calculated using these hypotheses, is shown in Table 6-8. It is expressed as a percentage of the fractions discharged, in comparison with the initial core activity for a certain number of radionuclides (total activity discharged, taking radioactive decay into account).

Table 6-8 Fraction of radionuclides discharged

Radionuclides	Source Term (% initial core inventory)

Xenon-133	1.50E+00
Iodine-131	6.10E-01
Caesium-137	7.00E-06
Tellurium-132	5.10E-06
Strontium-90	1.30E-06
Ruthenium-106	2.60E-07
Cerium-141	2.60E-07
Plutonium-241	4.60E-08

6.3 Evaluation of the Radiological Consequences of the Reference Accident(s)

6.3.1 Release to atmosphere

725. The assessment considers the impacts from releases to atmosphere to reference groups in the vicinity of the facility and in other Member States. The local reference group is assumed to be located 2km from the facility. The Member State reference groups and their locations have been selected on the same basis as for the assessment of airborne releases in normal conditions (Section 3.4). These reference groups are located in France, Belgium, the Netherlands and Ireland. Distances and bearings from Sizewell C to the reference groups are provided in Table 3-7.

6.3.1.1 Methods and parameters used to calculate the releases to atmosphere

726. The assessment of impacts to the local representative group in the vicinity of the facility uses the approach adopted for the GDA. The GDA defines a set of site characteristics appropriate for the development of an UK EPR™ in the UK. The parameters are chosen as they represent the 'typical data' of potential sites where a new UK EPR™ reactor could be located.

727. The long range assessment takes a simplified approach, based on NRPB-R124 [3] and assessing only key radionuclides. These key radionuclides include the activity contributions of the other radionuclides but they are modelled as a single radionuclide. This presentation of only key radionuclides represents a conservative approach whilst addressing security concerns expressed by the UK nuclear regulator on presenting a full radionuclide inventory. Table 6-9 identifies the key radionuclides used to represent radionuclide groups. The key radionuclides have been chosen as those with the highest radiotoxicity from the members of the radionuclide group. The long range assessment also makes the assumption of a uniform release rate over the duration of the release.

Table 6-9 Key radionuclides and other radionuclides considered

Assessed radionuclide	Other radionuclides included in group
Krypton-85	Other isotopes of Krypton (e.g. Krypton-85m, Krypton-87, Krypton-88)
Xenon-133	Including Xenon-133m
Xenon-135	Including Xenon-135m and Xenon-138
Iodine-131	Other isotopes of tellurium, Iodine (e.g. Iodine-132, Iodine-134, Iodine-135)
Iodine-133	-
Caesium-137	Other beta gamma radionuclides (e.g. Strontium-90, Caesium-138, Barium-140, Lanthanum-140, Cerium-141, Cerium-143, Praseodymium-143, Cerium-144, Neptunium-239)
Alpha	Other actinides (e.g. Plutonium-238, Plutonium-239, Curium-242, Curium-244)

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6.3.1.2 Release duration

728. The design basis accidents have different release durations from one hour up to seven days. The simple long range model conservatively assumes that the weather conditions remain constant for the duration of the release and for the time the long range reference group is affected by the plume. For events that last more than a few hours it is unlikely that the weather patterns will remain constant and in reality changes will result in enhanced dispersion that would result in lower impacts than those presented.

729. The DEC-B could result in a longer duration release, of the order of approximately one month, although the majority of particulate activity is released in the first 48 hours. Therefore, the modelling for the severe accident is based on a release duration of 48 hours. This is more realistic in terms of the underlying assumption of constant weather conditions for the duration of the release.

6.3.1.3 Amounts and physico-chemical forms of those radionuclides which are significant from the point of view of health

730. It is likely that, in the event of an accident, the physico-chemical forms of those radionuclides released can only be determined after the event. Dose per unit intake values have therefore been chosen based on the most conservative form of the radionuclide. For iodine, this corresponds to isotopes of iodine being inhaled in vapour form. The accident scenario, presented in the GDA PCSR, assumes a mixture of elemental and aerosol of isotopes of iodine. Table 6-10 presents the lung classes⁶ used in the long range assessment for all accidents, which correspond to the highest dose per unit intake values for these isotopes.

Table 6-10 Lung class used in assessment for key radionuclides

Radionuclide	Lung class
Iodine-131	V
Iodine-133	V
Caesium-137	F
Plutonium-239 [#]	M

[#]Alpha represented as Plutonium-239

731. Table 6-11 describes the quantities of the assessed key radionuclides (Table 6-9) released in each of the accidents assessed.

Table 6-11 Amounts of key radionuclides assessed in each scenario

Assessed Radionuclide	Source Term Released to the Environment (Bq)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B
Krypton-85	1.6E+14	2.2E+13	1.1E+13	5.7E+16
Xenon-133	2.1E+16	1.1E+14	3.5E+14	1.5E+17
Xenon-135	6.1E+14	4.0E+13	1.9E+13	1.1E+15
Iodine-131	3.2E+10	6.1E+11	4.8E+10	4.5E+12
Iodine-133	3.0E+09	3.6E+11	2.1E+10	1.5E+12
Caesium-137	3.8E+09	2.7E+11	1.9E+11	1.2E+12
Alpha (Plutonium-239)	0.0E+00	0.0E+00	1.2E+09	5.3E+08
TOTAL	2.2E+16	1.7E+14	3.8E+14	2.1E+17

⁶ Lung classes, developed by ICRP, are indicative of the rate of clearance of inhaled activity from the pulmonary region of the lung, very fast or vapour (V), fast (F), medium (M) and slow (S) are used to represent the clearance rate.

6.3.1.4 Models and parameter values used

732. This section outlines the models and parameters used in the assessment of consequences from the defined accident scenarios. In order to consider the effects of dispersion of activity over long distances, a different model was adopted for the long range assessment to that used in the local assessment.

733. Data for the local assessment is taken from information already presented to the UK regulators as part of the GDA process.

6.3.1.4.1 Short range model used for local reference group

734. The short range model is based on that used in the PCSR developed in support of the GDA process. The most exposed members of the public to gaseous discharges are assumed to be a farming family living 2km from the discharge point.

Local meteorological conditions

735. Depending on the prevailing weather conditions, the dispersion and the deposition of the released radionuclides is subject to a wide variability. Therefore, a probabilistic approach was used using meteorological data. Wind direction is included in the probabilistic assessment. Using this approach, the value which covers 95% of the cases is judged to be adequately conservative.

736. Atmospheric dispersion is calculated using a Gaussian model. The models CORRA and ASTRAL, developed by Institut de Radioprotection et de Sûreté Nucléaire (IRSN) and used by EDF in their assessments, were used to assess the initial and longer term impacts respectively.

Deposition data

737. Deposition and washout factors in the model are used to calculate the amount of radioactive substances that would be deposited during dry weather or during precipitation respectively. The fallout and washout factors are not only a function of atmospheric parameters, e.g. wind velocity or precipitation rate, they also depend on the physico-chemical form of the radionuclides. Deposition velocities and the washout coefficients used in the local assessment are presented in Table 6-12.

Table 6-12 Deposition parameters used in the local assessment model

Substance group	Deposition velocity (m s ⁻¹)	Washout coefficient (s ⁻¹)
Iodine isotopes	1.0E-02	7.0E-05
Others	1.0E-04	7.0E-07
Noble gases	1.5E-03	7.0E-05

Exposure pathways

738. The following exposure pathways are considered in the dose calculation for the design basis accidents.

- Gamma radiation from the passing plume.
- Inhalation of radioactive substances by persons affected by the plume for the time during which the plume passes.
- Gamma radiation from radioactive substances deposited onto the ground surface.

- Ingestion of foodstuffs contaminated by radionuclides.

739. The exposure period for the radioactive substances deposited on the ground surfaces, as well as the ingestion of foodstuffs, is assumed to be the whole life of the individual. This is 50 years for adults. Due to the changing dietary habits of children, ingestion doses are not calculated beyond the first year. Given that most of the dose is delivered in the first year this is seen as being a reasonable approach. The committed effective dose from the intake of radionuclides related to internal radiation exposure, due to inhalation and ingestion, is assumed to be 70 years for infants and 50 years for adults.

740. It is assumed that local food consumption restrictions are in place 24 hours after the beginning of the accident, within a radius of 2km from the release point. It is assumed that the food produced in this area is not used for the first year after the accident. Outside this area no mitigation measures are assumed. Therefore, for the ingestion pathway the dose at 2km distance may be greater than the dose at 1km distance.

741. The assessment of food doses is based on the ASTRAL code. The ASTRAL spreadsheets provide dose per unit deposition for each radionuclide, for adult and infants summed across the assessed food groups. The ASTRAL foodchain factors are presented in Table 6-13.

**Table 6-13 Dose per unit deposition via food ingestion from ASTRAL (mSv Bq⁻¹ m⁻²)
(adapted from Table 6.11, HPC Article 37 Submission [4])**

Radionuclide	Adult	Infant
Iodine-131	6.80E-09	1.80E-08
Iodine-133	6.80E-09	1.80E-08
Cobalt-58	4.70E-10	1.30E-09
Cobalt-60	3.90E-09	1.30E-09
Caesium-137	3.30E-08	1.10E-08
Alpha (Plutonium-239)	1.10E-07	9.20E-08

742. In addition, the dose from exposure of the thyroid by the inhalation of radioiodine is assessed.

Dose coefficients

743. The age-dependent dose coefficients for ingestion and inhalation of radionuclides used in the GDA assessment are taken from the International Commission on Radiological Protection (ICRP) publication 72 (compiled in [5]).

6.3.1.4.2 Long range model used in the assessment of impacts to reference groups in other Member States

744. The process for identifying the reference groups for other Member States is described in Chapter 3.4. In summary this was based on:

- proximity to the Sizewell C site;
- wind directions from the location of Sizewell C towards other Member States;
- intake rates of terrestrial foods and habit data;
- information on exports from the area local to Sizewell C.

745. The Member State reference groups identified are located in France, Belgium and the Netherlands. Ireland has also been assessed as a reference group.

746. The long range model used to estimate the consequences to the reference groups for France, Belgium, the Netherlands and Ireland, was based on NRPB-R124 [3]. This makes some simple but conservative assumptions regarding the travel of a short term release over longer distances, where traditional Gaussian plume models are not appropriate. The model used is a deterministic one, which assumes the wind is blowing towards the assessed critical groups for the duration of the release. In addition, it assumes a constant boundary layer height and wind speed. As a result of the same wind speed being applied to each long range reference group, there is no distinction between the two reference groups identified for France considered in the assessment of aerial discharges under normal conditions. Therefore, a single reference group for France has been included in the assessment of unplanned releases occurring over the short term. Parameters used in the assessment are detailed in Table 6-14, taken from NRPB-R124 [3].

Table 6-14 Long range atmospheric dispersion modelling parameters

Parameter/description	Value
Mixing layer depth	1000m
Wind speed	8 m s ⁻¹

747. Depletion of the plume by radioactive decay and deposition (wet and dry) were included, based on the approach presented in NRPB-R122 [6]. The parameter values are the same as those used in the long range routine release model described in Section 3.4.1.5.

748. The output of the model is time integrated air concentration (in Bq s m⁻³) and for depositing radionuclides, surface deposition density on the ground (in Bq m⁻²).

Exposure pathways

749. The exposure pathways for the reference groups for other Member States are the same as those listed for the local reference group in Section 6.3.1.4.1.

750. A simplified approach was taken in determining ingestion doses in the nearest Member States. The dose from the ingestion of contaminated foods was determined by taking the ratio of the surface concentration value in the Member State, to the surface concentration value in the vicinity of the facility, multiplied by the local ingestion dose. Surface concentration values are presented below in Table 6-16 and the local ingestion doses per unit deposition are presented above in Table 6-13.

Occupancy data

751. The long range model uses the same Member State reference groups as defined in Section 3.4. The same food intake rates, breathing rates and fraction of time indoors have been applied to these reference groups. However, 100% occupancy in the affected area has been pessimistically assessed.

Dose coefficients

752. The inhalation and ingestion dose coefficients are taken from ICRP publication 119 [5]. Since it is uncertain as to the physical and chemical form of the radionuclides released under each scenario, the dose coefficients have been chosen by selecting the most conservative values. External dose per unit exposure factors are derived from US EPA Federal Guidance Report 12 [7], as described in Section 3.4.1.6. The gamma dose from deposited radionuclides are taken from NRPB-W19 [8] as the values after 1 year.

6.3.1.5 Expected levels of radioactive contamination of foodstuffs which might be exported to other affected Member States

753. The assessment of food doses is based on the GDA approach for the local reference group. Calculations for the local reference group have conservatively assumed that all the food consumed by the reference group is sourced locally. Data presented in Chapter 3 indicates that the majority of foodstuffs are distributed locally and that there are no foodstuffs produced in the vicinity of Sizewell C that are exclusively for export to other Member States and not consumed by the local reference group.

6.3.1.6 Maximum time integrated air concentrations and total surface concentrations

754. The maximum time integrated air concentrations and the total surface concentrations resulting from the four scenarios across five locations are presented in Table 6-15 and Table 6-16 respectively.

Table 6-15 Maximum time integrated air concentrations

Location	Maximum time integrated air concentrations (Bq s m ⁻³)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B core melt
Local area (at 2km)	3.2E+11	7.2E+09	5.6E+09	1.8E+12
France	6.9E+06	6.8E+05	1.2E+05	2.3E+08
Belgium	6.5E+06	6.4E+05	1.1E+05	2.2E+08
Netherlands	5.7E+06	5.6E+05	1.0E+05	1.9E+08
Ireland	1.3E+06	1.2E+05	2.2E+04	4.4E+07

Table 6-16 Total surface concentrations

Location	Total surface concentrations (Bq m ⁻²)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B core melt
Local area (at 2km)	1.8E+03	1.5E+05	1.1E+04	9.7E+04
France	1.8E+00	7.1E+02	1.1E+01	1.1E+03
Belgium	1.7E+00	6.8E+02	1.1E+01	1.1E+03
Netherlands	1.5E+00	6.1E+02	9.8E+00	9.5E+02
Ireland	5.0E-01	2.0E+02	3.4E+00	3.1E+02

6.3.1.7 Corresponding maximum doses

755. The corresponding maximum committed effective doses in microsieverts, to the local reference group and reference groups in other Member States, resulting from the four scenarios, are presented below in Table 6-17 to Table 6-21⁷.

756. The results provide a breakdown in terms of pathway (inhalation including inhalation of re-suspended materials, external irradiation from immersion in the plume, external irradiation from material deposited on the ground and ingestion of contaminated foodstuffs).

757. The results include the impacts from the initial passage of the plume and accrued during the first pass of the plume, which includes the inhalation and immersion pathways. The longer term dose

⁷ The figures presented in Table 6-17 to Table 6-21 have been rounded to 2 significant figures.

is the summation of re-suspension, external and ingestion pathways. The assessment also includes an assessment of thyroid dose from the inhalation of radioiodine.

Table 6-17 Maximum committed effective doses to an adult member of the local reference group by pathway

Location	Maximum committed effective dose (μSv)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B core melt
Inhalation	1.1E+00	2.4E+01	1.2E+01	1.3E+02
Immersion	5.8E+02	1.0E+02	1.4E+01	2.3E+03
External	1.5E+01	1.3E+03	6.7E+01	2.9E+02
Ingestion	1.8E+01	7.2E+02	4.4E+01	3.5E+02
Total	6.1E+02	2.1E+03	1.4E+02	3.1E+03
First Pass	5.8E+02	1.2E+02	2.7E+01	2.4E+03
Longer Term	3.2E+01	2.0E+03	1.1E+02	6.4E+02
Short term thyroid dose	2.0E+01	3.7E+02	1.9E+01	2.4E+03

Table 6-18 Maximum committed effective doses to an adult member of the reference group for France by pathway

Location	Maximum committed effective dose (μSv)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B core melt
Inhalation	6.9E-05	2.7E-02	1.3E-02	6.2E-02
Immersion	6.3E-03	1.2E-03	1.2E-04	1.5E-01
External	1.2E-03	1.0E+00	5.1E-02	1.2E+00
Ingestion	1.7E-02	3.4E+00	4.6E-02	4.0E+00
Total	2.5E-02	4.5E+00	1.1E-01	5.4E+00
First Pass	6.3E-03	2.7E-02	1.3E-02	2.1E-01
Longer Term	1.8E-02	4.5E+00	9.8E-02	5.2E+00
Short term thyroid dose	1.1E-03	2.8E-01	1.7E-03	5.3E-01

Table 6-19 Maximum committed effective doses to an adult member of the reference group for Belgium by pathway

Location	Maximum committed effective dose (μSv)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B core melt
Inhalation	6.5E-05	2.6E-02	1.3E-02	5.8E-02
Immersion	5.9E-03	1.1E-03	1.1E-04	1.4E-01
External	1.2E-03	9.7E-01	4.9E-02	1.2E+00
Ingestion	1.6E-02	3.3E+00	4.4E-02	3.8E+00
Total	2.3E-02	4.3E+00	1.1E-01	5.2E+00
First Pass	6.0E-03	2.6E-02	1.2E-02	1.9E-01

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Longer Term	1.8E-02	4.3E+00	9.4E-02	5.0E+00
Short term thyroid dose	9.9E-04	2.7E-01	1.6E-03	5.0E-01

Table 6-20 Maximum committed effective doses to an adult member of the reference group for the Netherlands by pathway

Location	Maximum committed effective dose (μSv)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B core melt
Inhalation	5.7E-05	2.3E-02	1.1E-02	5.1E-02
Immersion	5.1E-03	9.8E-04	9.8E-05	1.2E-01
External	1.1E-03	8.8E-01	4.4E-02	1.0E+00
Ingestion	1.5E-02	3.0E+00	4.0E-02	3.4E+00
Total	2.1E-02	3.9E+00	9.5E-02	4.7E+00
First Pass	5.2E-03	2.3E-02	1.1E-02	1.7E-01
Longer Term	1.6E-02	3.8E+00	8.4E-02	4.5E+00
Short term thyroid dose	8.7E-04	2.3E-01	1.4E-03	4.4E-01

Table 6-21 Maximum committed effective doses to an adult member of the reference group for Ireland by pathway

Location	Maximum committed effective dose (μSv)			
	Fuel handling accident	Steam generator tube rupture	LOCA	DEC-B core melt
Inhalation	1.4E-05	5.6E-03	2.8E-03	1.2E-02
Immersion	1.1E-03	1.5E-04	1.9E-05	2.7E-02
External	3.7E-04	3.2E-01	1.6E-02	3.7E-01
Ingestion	4.8E-03	9.6E-01	1.4E-02	1.1E+00
Total	6.3E-03	1.3E+00	3.2E-02	1.5E+00
First Pass	1.1E-03	5.4E-03	2.6E-03	3.9E-02
Longer Term	5.2E-03	1.3E+00	3.0E-02	1.5E+00
Short term thyroid dose	2.0E-04	5.5E-02	3.2E-04	1.0E-01

758. Figure 6-1 to Figure 6-4 show a summary of the doses for each age group and accident scenario for the reference groups in France, Belgium, the Netherlands and Ireland.

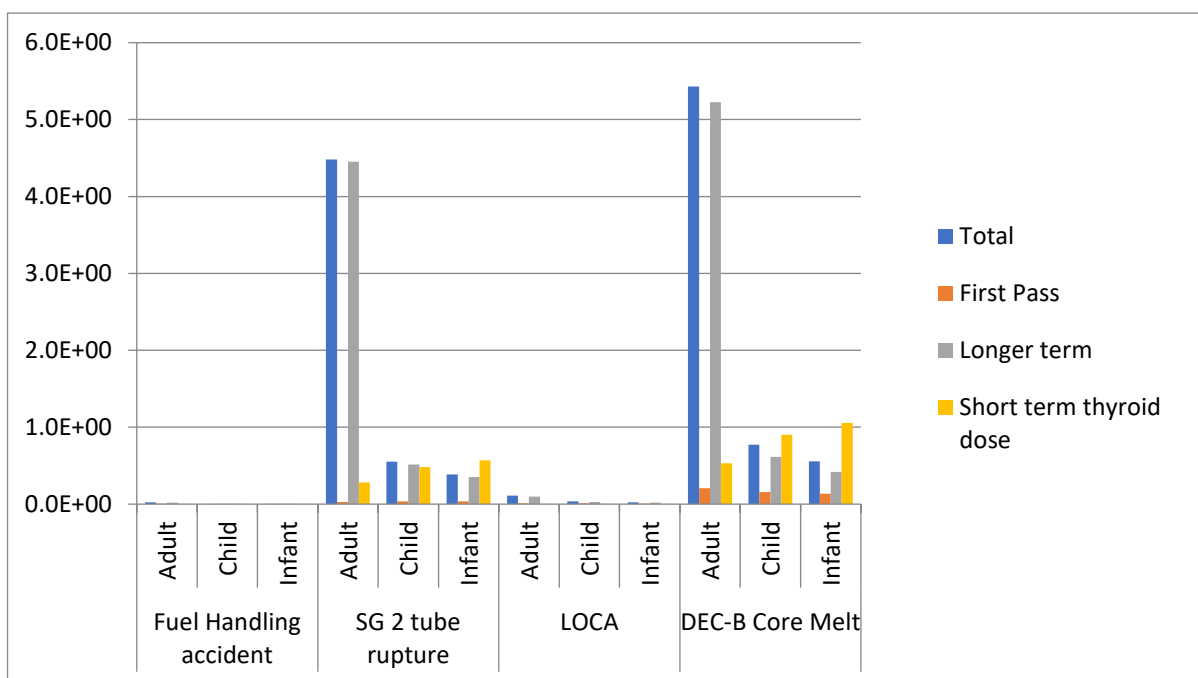


Figure 6-1 Summary of doses by age group and accident scenario for reference group (France)

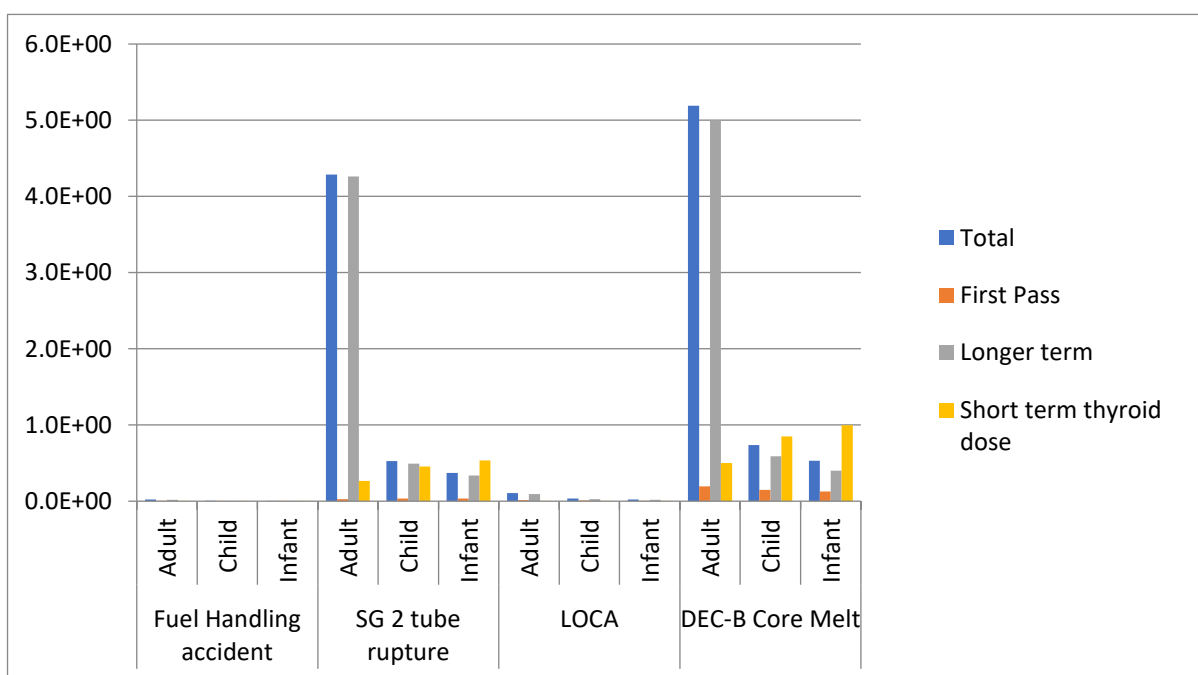


Figure 6-2 Summary of doses by age group and accident scenario for reference group (Belgium)

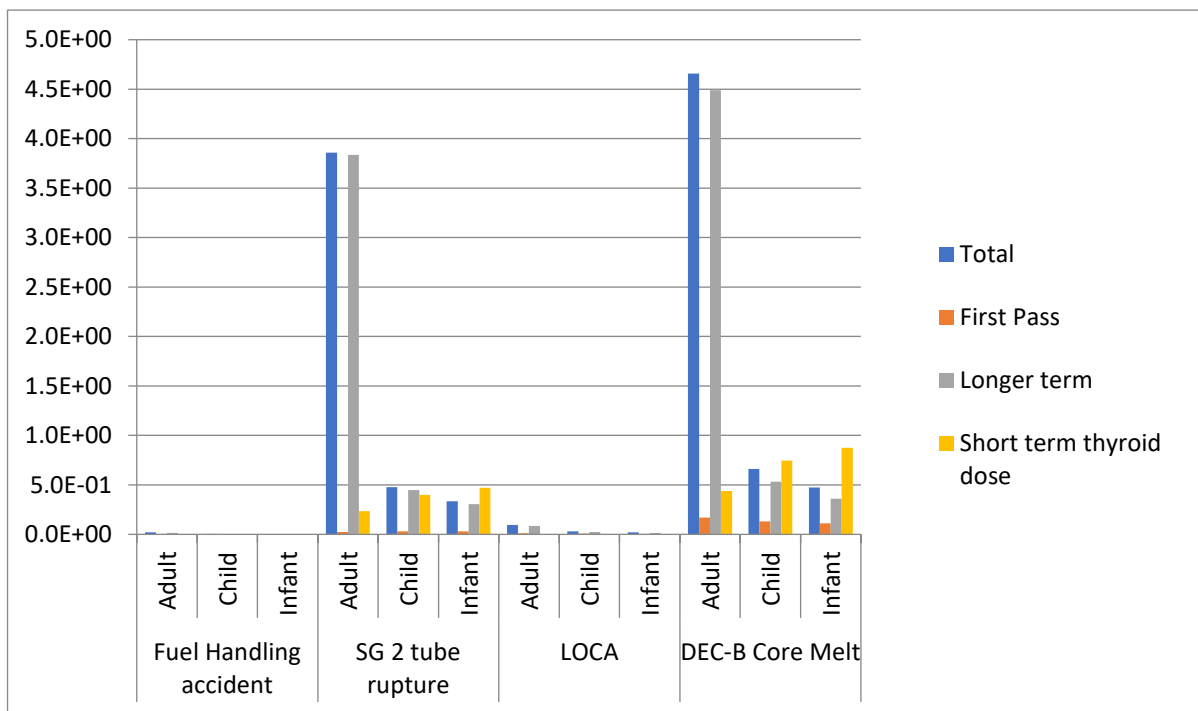


Figure 6-3 Summary of doses by age group and accident scenario for reference (Netherlands)

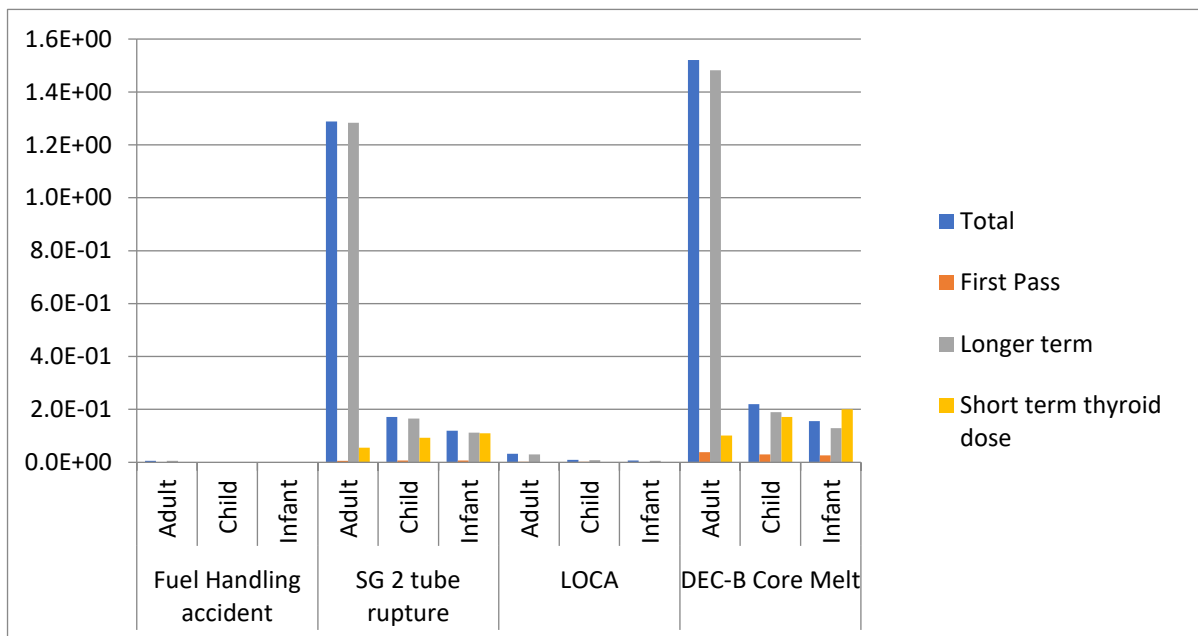


Figure 6-4 Summary of doses by age group and accident scenario for reference (Ireland)

6.3.1.7.1 Results

759. The maximum effective doses arising from a single initiating event from a design basis accident, arises from the rupture of steam generator tube accident scenario. This results in total effective doses of 4.5 μSv , 4.3 μSv , 3.9 μSv and 1.3 μSv for adult members of the reference groups in France, Belgium, the Netherlands and Ireland, respectively. The same scenario results in the highest thyroid doses of 5.7E-01 μSv , 5.4E-01 μSv , 4.7E-01 μSv and 1.1E-01 μSv to an infant member of the reference groups in France, Belgium, the Netherlands and Ireland, respectively.
760. The total effective doses from the severe accident scenario (DEC-B) are 5.4 μSv , 5.2 μSv , 4.7 μSv and 1.5 μSv for adult members of the reference groups in France, Belgium, the Netherlands and Ireland, respectively. The highest thyroid doses for this scenario are 1.1 μSv , 1.0 μSv , 8.7E-01 μSv and 2.0E-01 μSv to an infant member of the reference groups in France, Belgium, the Netherlands and Ireland, respectively.
761. The maximum effective doses arising in the period after the reactors have ceased operation is bounded by the maximum effective doses associated with the reactor operational phase.

6.3.2 Release into an aquatic environment

762. Given the precautions taken to ensure total containment in the event of an accident, as described in Section 2.5, no design basis accident has been identified that would cause the continuous discharge of radioactive material into the aquatic environment.
763. The base mats of the lower part of the nuclear buildings provide a barrier to protect the environment from contamination due to radioactive liquid spills or leaks. In the event of liquid leaks in the nuclear island buildings, the radioactive effluent is recovered by sumps, retention pits and retention tanks. With regard to the reactor building the base mats are sealed by specific measures, which are a membrane below the base mat, a coating on the lowest floors, a sealed lining in the fuel pool and the sealing of the molten core spreading area. All of these measures protect the containment function of the base mat, even in a severe accident situation. Molten core cooling is also monitored to follow up the impacts on the containment.
764. Finally, the reactor building annulus is kept at a lower pressure to collect any leaks from inside the containment, the leaks are discharged to the vent stack after HEPA and iodine filtering.
765. On the basis of the above, and taking into account the considerations of ONRs Report on Fukushima, accidental releases of radioactive liquid waste into aquatic environments are therefore excluded from any further assessment.

6.4 References

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- [7] U.S. Environmental Protection Agency, External Exposure to Radionuclides in Air, Water, and Soil. Federal Guidance Report No. 12, EPA-402-R-93-081, Washington: US EPA, 1993.
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7 EMERGENCY PLANS AND AGREEMENTS WITH OTHER MEMBER STATES

7.1 Intervention Levels Established for Different Types of Countermeasures

766.Actions in an emergency situation will be based on well considered pre-determined and accepted principles. A key element of the response is the approach to mitigating exposure of members of the public off-site to any radioactive materials that may be released. In the UK Public Health England (PHE), an executive agency of the UK Government, which is the independent body with the responsibility for specifying and giving advice on emergency reference levels for the public. PHE also gives guidance on other aspects of the phases of an emergency such as return and relocation.

767.The Emergency Reference Levels (ERLs) [1] are based on the concept of 'dose averted' to justify introduction of countermeasures. In recommending any ERL, PHE balances the benefits from the countermeasure (in terms of the dose averted), against the other consequences of implementing the early protective action (e.g. cost, disruption). The ERLs are formulated in a two-tier system of dose levels of dose averted for the public. The lower levels of dose averted have been recommended as being, levels below which countermeasures should not, in general, be taken because the conventional risks and social disruption resulting from the countermeasures are likely to outweigh the benefits. The upper levels of dose averted have been recommended as being those at which action should almost certainly be taken.

768.At values between these upper and lower bounds of ERL, the implementation of countermeasures must be considered in the light of the situation at the time. The application of the ERL is based on 3 principles: i) avoiding any serious direct injury; ii) doing more good than harm; and iii) maximising the benefit achieved. The ERLs are subject to a continuing review to reflect developments in the understanding of radiation risks.

769.In developing emergency plans, the ERLs are considered in conjunction with the residual risk, once all preventative and restrictive actions have been implemented in the design and construction of the site, with the predictions of the course of the accident and the likely effectiveness of the countermeasures, and used to define site-specific intervention levels of dose averted. The intervention levels of dose averted, expressed in directly measurable quantities or symptoms (e.g. plant condition or measured Off-Site activity), are used to provide advice on possible protective actions. Radiation protection advice from PHE can be provided to those charged with local executive actions to protect the public. Nuclear operators are required to advise local authorities where protective actions (based on the ERLs) may be necessary around their site.

770.The recommendations and advice provided by PHE cover the following urgent countermeasures and actions (usually during the duration of the plume):

- a) Sheltering - the public would be advised to stay indoors, close doors and windows and follow advice given by local radio and television stations. Sheltering reduces the risk of exposure to direct radiation and the inhalation of radioactive material. PHE has specified the radiation effective dose levels of dose averted for this counter measure as per Table 7-1 below.
- b) Taking stable iodine tablets - knowledge from post irradiated fuel examination and the experience from previous accidents involving operating reactors (e.g. Windscale, Chernobyl and Fukushima) shows that radioactive iodine is a particularly important contributor to short term exposure. Taking stable iodine tablets in a timely manner can significantly reduce the

iodine uptake by the thyroid and thus reduce the effective dose to the whole body. PHE has specified the radiation equivalent dose levels of dose averted to the thyroid for the introduction of this countermeasure (as per Table 7-1 below) which is usually introduced in combination with sheltering and evacuation. This countermeasure is effective only where radioactive iodine is a potential source of hazard.

- c) Evacuation - this is an important countermeasure as it removes the person from further exposure or if activated ahead of a release (on a precautionary basis) can also be used to prevent any exposure. It is however socially disruptive and incurs other risks, for instance if initiated after the release has begun it needs to be implemented carefully so as not to result in additional exposure (e.g. by evacuating people through the plume). PHE have specified the radiation dose levels of dose averted as per Table 7-1 below.

Table 7-1 Recommended ERLs for early countermeasures, PHE [1]

Protective Action	Effective Dose or Organ Dose	Averted Dose (mSv) ^a	
		Lower	Upper
Sheltering	Effective	3	30
Evacuation	Effective	30	300
Stable Iodine	Thyroid ^b	30	100

^a In recognition of their higher cancer risk, the doses are those potentially averted in young children

^b mSv equivalent dose to the thyroid

7.1.1 Control of contaminated or potentially contaminated food supplies

771. The limits taken into account for judging the possibility of foodstuffs restrictions are taken from Regulations from the Council of the European Communities which specify intervention levels for radioactive contamination in marketed foods and animal feeds following a nuclear accident or any other case of radiological emergency (the Council Food Intervention Levels) [2]. These Council Food Intervention Levels are legally binding in the UK in the event of an accident. The timeframe for introduction is relative to the likelihood of contaminated food entering the food chain. Public and government agencies have statutory duties for quality and control of food. The UK's Food Standards Agency issues advice and implements food restrictions orders.

7.1.2 Relocation

772. Longer term protective actions such as temporary or permanent relocation can also be considered in the response to a radiation emergency, depending on the nature and scale of the emergency. The physical risks associated with temporary relocation are relatively small compared with those for evacuation. However temporary relocation is associated with psychological effects and these should therefore be considered along with social, economic and public health (such as exposure) factors in considering whether this is an appropriate protective action to use in optimising protection.

773. The decision to permanently relocate people will be based on radiological, public health, social and economic considerations with due recognition of the gravity and irreversibility of such a difficult decision. The decision on permanent relocation must be taken on a case by case basis taking into account the prevailing circumstances including, the current level of exposure and the

level foreseen following the implementation of recovery actions (for example, decontamination), and the conditions and means to maintain sustainable societal and economic living conditions. It is therefore only likely to be used in the most unlikely and severe scenarios.

7.1.3 Reference levels

774. PHE advice [1] also covers reference levels as a guideline for informing the extent of emergency planning and protective actions, these are separate from the ERLs defined earlier. Reference levels, are not dose limits. A reference level covers all exposure pathways from the onset of the radiation emergency, taking account of the protective actions implemented. A national 100mSv reference level is set out in UK law. Reference levels are also used in planning for emergency worker exposures in emergency response plans during emergency exposure situations. The 100mSv level may be disapplied, in advance, and in accordance with the emergency plan, up to a maximum of 500mSv for emergency workers with a role in the emergency response plan. The Secretary of State or Local Authority may also set a reference level of between 20mSv and 100mSv to inform protective action and emergency arrangements.

7.2 UK Emergency Planning

775. The UK has a mature nuclear industry with well-developed regulatory arrangements. This covers the full nuclear life cycle of design, construction, fuel production, generation, decommissioning, waste management and research. Safety is the Government's overriding priority and their robust emergency arrangements and capabilities, overseen and enforced by their independent nuclear regulator Office for Nuclear Regulation (ONR), have helped to ensure over 60 years of safe nuclear power in the UK. However, the Government are committed to continuous improvement. Therefore they have delivered updated emergency preparedness and response requirements for the civil nuclear sector through the Radiation (Emergency Preparedness and Public Information) Regulations 2019 ('REPPIR 2019') [3]. These updates reflect the Emergency Preparedness and Response (EP&R) parts of the Euratom Basic Safety Standards Directive 2013 [4] and the latest international best practice set out in GSR 7 [5], to apply the lessons from Fukushima. The comprehensive approach to EP&R, which includes the new REPPIR 2019 approach, is set out below.

7.2.1 The UK response framework

776. In the event of a radiation emergency in the UK there are four tiers which work together under the UK Government's Concept of Operations [6] to deliver an effective response:

- a) Site: Operators play a fundamental role in the mitigation of risk and provide the focus for the initial on-site management of the response to a radiation emergency.
- b) Local: The local multi-agency response is coordinated through a Strategic Co-ordinating Group (SCG) located in the Strategic Coordination Centre (SCC). The SCG consults with radiation protection and emergency response experts, typically in a group known as the Scientific and Technical Advice Cell (STAC), to advise the local authority as appropriate. Strategic decisions taken at the SCG are developed into collective response activities by the multi-agency Tactical Co-ordinating Group.
- c) National: Local decision making is supported, where appropriate, by central Government. There are three broad levels of emergency which are likely to require direct central Government engagement:

- **Level 1 Significant Emergency:** Support provided primarily by the lead Government department.
 - **Level 2 Serious Emergency:** An emergency which threatens a wider/prolonged impact. The central Government response would be coordinated from the Cabinet Office Briefing Rooms (COBR), under the leadership of the lead Government department.
 - **Level 3 Catastrophic emergency:** An emergency with a high and potentially widespread impact. The Prime Minister would lead the coordination of national response via COBR.
- d) International: In the event of a radiation emergency the BEIS, as the designated competent authority, would lead on engagement with multi-national organisations such as the IAEA and the EU, and countries with which we have bi-lateral notification agreements. The UK is part of the IAEA Early Notification Convention, which obliges the UK to target a 2-hour deadline for informing the IAEA of a general emergency at a UK plant that has the potential for trans-boundary consequences.

7.2.2 The Civil Contingencies Act 2004

777. The Civil Contingencies Act 2004 [7] is the overarching piece of EP&R legislation in the UK. It delivers a single framework for civil protection in the UK and is supported by two key sets of guidance;

- Emergency Preparedness; and,
- Emergency Response and Recovery.

778. The Act sets out clear roles and responsibilities for those involved in EP&R at a local level. Emergency responders must prepare for and minimise the impact of all hazards, including those that may give rise to radiation emergencies.

779. The Act also allows special temporary legislation to be made to help deal with the most serious emergencies. These powers are a last resort option and planning arrangements at the local level do not assume these powers will be made available.

7.2.3 The Energy Act 2013

780. Part 3 of the Energy Act 2013 establishes ONR and provides them with a framework of powers and responsibilities.

7.2.4 Nuclear Site Licensing

781. Civil nuclear sites in the UK are licensed by ONR under the Nuclear Installations Act 1965. Nuclear site licences issued by ONR are provided for the full life cycle of facilities. Licences are unique to each nuclear site and contain site specific information such as the location of the site and activities undertaken on the licensed site. As such, licences are not transferable. Licences come with a set of 36 standard Licence Conditions covering the plants life cycle; from design and construction to operation and decommissioning. A licence may be revoked by ONR or surrendered by the licensee. However, depending on the circumstances, the licensee may still be required to retain certain responsibilities for the site.

7.2.5 The Radiation (Emergency Preparedness and Public Information) Regulations 2019

782. Specific EP&R arrangements for radiological sites in Great Britain are set out in REPIR 2019; arrangements in Northern Ireland are devolved but equivalent. These regulations were introduced following public consultation. REPIR 2019 ensures that our emergency preparedness and response arrangements remain in step with the latest international best practice. REPIR 2019 covers the civil nuclear sector, defence licensed and authorised nuclear sites, and the radiological sector.

783. A summary of REPIR 2019 is set out in the Explanatory Memorandum. It is supported by an Approved Code of Practice and guidance [8]. In short, the approach requires:

- all hazards capable of resulting in a radiation emergency to be identified and their consequences consistently assessed;
- planning effort to be commensurate to that assessment, having considered local needs and where protective actions may be justified, i.e. through:
 - i. on-site emergency plans;
 - ii. off-site Detailed Emergency Planning Zones (DEPZs) where appropriate; and,
 - iii. off-site Outline Planning Zones where appropriate;
- developing intervention actions which will mitigate the event and reduce the harmful exposure to persons and the environment;
- ensuring personnel assigned roles in the emergency response (defined emergency workers), and facilities and equipment used to support the response, are developed, trained and managed effectively to fulfil their assigned function;
- ensuring that all parts of the arrangements, whether the responsibility of operator, local authority, emergency services or others, are fully integrated as a result of consultation so that together they fulfil all relevant statutory obligations;
- developing and evolving the current emergency response framework which would provide the model for SZC to include utilising experience from past events, national and international guidance through a live continuous improvement plan based on compliance with internal and external regulator expectations requirement and performance of emergency exercises and broader EP&R learning; and
- independent oversight and enforcement from the UK nuclear regulator, ONR, throughout the process, including observing the effectiveness of the arrangements through its programme of regular exercises.

7.2.6 PHE guidance

784. PHE have produced a number of accompanying sets guidance and information for duty-holders under REPIR 2019 [9]. These are:

- a) Radiation Reference Values for Schedule 1: This document sets out how the quantities of radionuclides set out in schedule 1 of REPIR (which determine if the regulations apply or not) were arrived at.

- b) Public Health Protection in Radiation Emergencies: This sets out PHE radiation protection advice to reflect international lessons learned from the Fukushima Daiichi accident, and is intended to be applied pragmatically during preparedness, response and recovery phases. It includes information on Emergency Reference Levels, which the UK has in place of Operational Intervention Levels.
- c) Radiation: Consequence assessment methodology for REPIR 2019. This report sets out PHEs recommended methodology for operators in assessing the potential consequences of a radiation emergency at sites.
- d) PHE have also produced look up reference tables for a range of radionuclides which provide a consequences assessment for radiation emergencies out to 5km using their recommended methodology. This is to assist lower hazard sites.

7.2.7 The National Nuclear Emergency Planning and Response Guidance

785.Consolidated National Nuclear Emergency Planning and Response Guidance [10] was published in 2015 by HM Government and the Scottish Government. The purpose of the guidance is to bring together practices into one document for general reference by planners and practitioners concerned with emergency response at nuclear sites. This national guidance will be followed where applicable, when putting together the emergency plan for SZC. In doing this, the emergency response plan when developed will align with the UK EP&R arrangements set out in this chapter.

786.As required by UK regulations, SZC will work with and exchange information with the local authority, other local agencies and emergency response organisations, and all relevant national agencies and government departments to enable the creation of effective overall emergency arrangements. The agencies and organisations can use the consolidated guidance to produce their emergency plan.

7.2.8 Detailed Emergency Planning Zones (DEPZs) and Sizewell C

787.Detailed planning arrangements for DEPZs are focused on having capabilities in place, maintained and ready to implement very quickly and as precautionary measures following declaration of an emergency. REPIR 2019 strengthens the role of the lead local authority and places a requirement on other relevant local authorities and duty holders to coordinate their planning with the lead local authority to develop Off-Site emergency planning.

788.REPIR 2019 requires operators to identify all hazards that have the potential to cause a radiation emergency, and then evaluate the range of possible On and Off-Site consequences for the range of hazards identified. The key output provided by the operator, is a “Consequences Report” to the local authority, with a recommended technical distance for a DEPZ. The local authority will be able to use this information to be better able to develop and implement an effective and proportionate emergency response plan (Off-Site Emergency Plan) specific to the site recognising the local geographical limitations and demographics.

789. Under the previous REPIR 2001 regulations, the ONR undertook a determination of the DEPZ for Sizewell. The DEPZ and Sizewell Off-Site Emergency Plan was set taking account of Sizewell A and Sizewell B, but not including Sizewell C. Sizewell A (a Magnox Reactor) is no longer operational, is defueled, and is being decommissioned, whilst Sizewell B is an operating Pressurised Water Reactor.

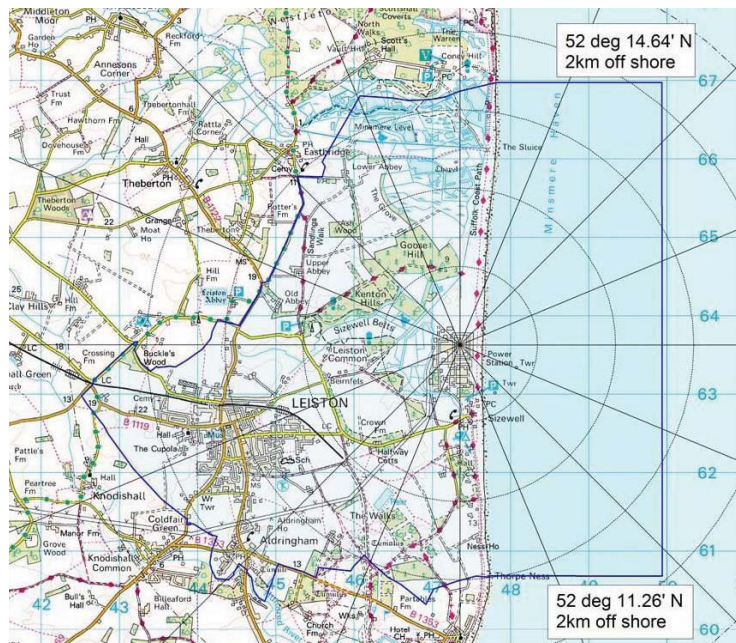


Figure 7-1 Overview of Sizewell Emergency Planning Zones

790. The determined DEPZ for Sizewell is presented in Figure 7-1.

791. A region denoted by a circle of radius 1 km from the centre of the Sizewell site is identified within the DEPZ as a zone within which urgent countermeasures (sheltering and potassium iodate tablets) could be justified in the event of the worst reasonably foreseeable radiation emergency.

792. The Sizewell Off-Site Emergency Plan additionally defines a Food Restriction Area, denoted by a circle of radius 35 km from the centre of the Sizewell site within which restrictions on food might be applied for a reasonably foreseeable accident.

793. In compliance with REPIR 2019, the range of possible On and Off-Site consequences for the range of hazards identified for Sizewell A (SZA) and SZB will be presented to the local authority in a consequence report, which will inform a review of the DEPZ by the local authority to be implemented in 2020. Prior to the start of operation, SZC will be required to carry out a similar Hazard Evaluation and Consequence Assessment, and provide a Consequence Report to the local authority and to the ONR, recommending a minimum technical distance for a DEPZ. The local authority will, on the basis of this material and having considered local factors, determine whether there needs to be any alteration to the DEPZ and Off-Site Plan prior to commencing operation of the plant. ONR will provide independent oversight to this.

7.2.9 Outline Planning Zone (OPZ) and Sizewell C

794. REPIR 2019 introduces OPZs to plan for less likely more severe emergencies up to and including unforeseen events as required by the Basic Safety Standards Directive (BSSD). This approach reflects the commensurate and graded approach to planning required by the BSSD. This builds on the previous concept of extendibility adopted on a voluntary basis in the UK after Fukushima.

795. Schedule 5 of REPIR 2019 sets out default OPZ distances for civil nuclear sector sites, including operating nuclear power plants and decommissioning nuclear power plants with a presence of irradiated fuels.

796. The default distances were set by modelling an IAEA best practice release scenario for unforeseen events (a 10% release of inventory) for civil nuclear sites. The modelling applied the PHE recommended schedule 3 (consequences assessment) methodology for REPIR 2019 to the source terms. Source terms were provided by operators from across the sector, including PWR reactors. The modelling has security implications, and as such cannot be shared under UK classification.

797. The consequences assessment of the source term considers:

- a range of weather (as emergencies can happen in any condition) and how that would affect the impact of the radiation emergency. This should include plume modelling for example;
- the impact of radiation emergencies on the population, taking account of age and other characteristics that could make certain members of the public vulnerable;
- the effective doses and, where necessary, thyroid doses;
- all relevant exposure pathways;
- any relevant protective actions and the distances out to which they may be required;
- the quantity of each radionuclide released and their likely chemical and physical form;
- the timeframe for release; and
- the energy associated with atmospheric release.

798. BEIS then considered practicability for the local authority to respond as owners of the offsite plan, international best practice comparisons (Appendix II in IAEA GSG 2.1 - Arrangements for Preparedness for a Nuclear or Radiological Emergency), cost / benefit and the overriding need for commensurate planning effort given the extreme unlikelihood of an unforeseen event.

799. Schedule 5 of REPIR 2019 sets a default OPZ distance of 30km for operating nuclear power plants and decommissioning nuclear power plants with a presence of irradiated fuels. This work was independently agreed and verified by the ONR. This OPZ would not cross any international borders when applied to SZC.

7.2.10 Site operator information exchange arrangements

800. The operator of the Nuclear Licensed Site is responsible for providing expert advice to those responsible for determining protective actions for the public from the potential radiological hazard Off-Site and making recommendations on the countermeasures which could be implemented. This advice is prepared by the affected site until the operators' Off-Site support facility (Central Emergency Support Centre (CESC)) is fully operational. Once operational, the CESC will take on these responsibilities, assessing all necessary technical data that has a bearing upon the radiological hazard to the public and giving the expert advice based upon that technical assessment to enable informed and timely decisions on the need to take action to protect the public [10].

801. The CESC will provide a technical support service to the affected site and act as the focal point for routing advice and material assistance to the site. It will be responsible for the onward transmission of relevant plant data, monitoring results and the outcome of radiological assessments to external government departments and agencies such as the PHE and the FSA, and for the supply of information to the Senior Company Management with regard to the continued operation of unaffected nuclear sites. Site data will be used for initial notification as set out below, scrutinised by ONR, and feed into the UK's Joint Agency Modelling group. The UK's 'Joint Agency Modelling' group provides a national capability for estimating and forecasting the scale and impacts of a radiological release from a nuclear site. It draws on expertise and modelling capabilities from a range of expert bodies including ONR, PHE, the UK Meteorological Office and the Radioactive Incident Monitoring Network (RIMNET) – which will soon be known as the 'Radiological Response Emergency Management System (RREMS).

802. The CESC interfaces with the Local Off-Site support facility for the affected site, the SCC and Media Briefing Centre. The SCC provides a location for public services and government agencies to determine the appropriate measures to implement for protection and to reassure the public regarding the harm from exposure to radiation. An appointed Government Liaison Officer will attend the designated SCC and will provide a communication channel between the facility and BEIS. A STAC will be established by BEIS as the decision making body on public protection.

803. BEIS is the Lead Government Department for preparation and coordination of the response to an emergency at a civil nuclear site in England, Scotland and Wales. BEIS has an Emergency Operations Centre in its London office, which would be activated in the event of a nuclear emergency.

7.3 Arrangements for the Exchange of Information with Other Member States

7.3.1 Cross-border communications and agreements with other member states

804. Several agreements and international conventions have been signed by the UK with regard to cross-border communication and mutual assistance.

7.3.2 International Atomic Energy Agency

805. Convention of 26 September 1986 on the early notification of a nuclear accident

806. This convention establishes a notification system for nuclear accidents that have the potential for international trans-boundary release and could be of radiological safety significance for another State. It requires States to report the accident's time, location, radionuclide releases and other data essential for assessing the situation. Notification is to be made to affected States directly or through the IAEA and to the IAEA itself. SZC will use this formal notification system to inform other Member States of an accident.

807. Convention of 26 September 1986 relating to assistance in the event of a nuclear accident or emergency radiological situation [11]

808. This Convention requires that State Parties cooperate between themselves and with the IAEA to facilitate prompt assistance in the event of a radiation emergency, to minimise its consequences and to protect life, property and the environment from the effects of radioactive releases.

7.3.3 European Atomic Energy Community

809. Arrangements to inform other Member States in the event of a radiological emergency exist between UK Government and EU Member States.

810. Council Decision 87/600/EURATOM on Community arrangements for the early exchange of information in the event of a radiological emergency, ensures that the Commission and Member States are promptly informed in the event of a radiological emergency, and sets out the information which is to be provided. The European Community Urgent Radiological Information Exchange (ECURIE) system provides an exchange platform for managing the graded response between Member States [12].

811. These multi-lateral agreements are within the remit of the UK Government. Therefore, it is the responsibility of the BEIS to notify European Union Member States via the notification systems above. Once this notification has taken place, responsibility for all overseas communication, is taken over by the Foreign and Commonwealth Office who are represented in the Emergency Operations Centre.

812. In addition to the IAEA and ECURIE notification systems above, the UK has bilateral agreements with other Member States relating to the early exchanges of information in event of a major nuclear accident. These are:

• Denmark	1987 bilateral agreement
• France	1983 amended 1993
• Netherlands	1988 Memorandum of Understanding
• Norway	1987 bilateral agreement
• Former Soviet Union (now Russia)	1990 bilateral agreement
• Ireland	2004 bilateral agreement

813. In the event of a radiological emergency the RIMNET would be used to collect, collate and communicate data about Off-Site radiation and contamination levels, and fulfil our international notification obligations. We are updating the application platform which fulfils this function, and consequently RIMNET will be known as the RREMS in the near future. RREMS will then fulfil our international notification obligations.

7.4 Emergency Plan Testing Arrangements

814. A programme of regulated emergency exercises is carried out in the UK to test procedures, facilities, systems and equipment and to enable everyone to demonstrate their roles. There are three main types of regulatory exercise within the UK; Levels 1, 2 and 3.

815. **Level 1** exercises mainly concentrate on the operator's actions in the event of an On-Site emergency. These exercises are held at least annually on operational sites. They enable the operator to demonstrate the adequacy of its emergency arrangements to the ONR. The Off-Site support centres, emergency services and other external organisations may be involved.

816. **Level 2** exercise tests the function and arrangements of each Strategic Co-ordination Centre (Off-Site facilities) every three years, under REPPIR. All the key agencies and Government departments that have a role in an emergency are expected to take part.

817. **Level 3** is a national exercise. From the annual programme of local Level 2 Off-Site exercises, one may be chosen as a national exercise to rehearse not only the functioning of the Strategic Co-ordination Centre but also the wider involvement of central Government, including the exercising of the various Government departments and agencies attending BEIS's Emergency Operations Centre in London. The decision on which exercise should be selected as the national exercise, is made jointly between the licensees and the lead government department (BEIS) in consultation with the ONR.
818. These exercises vary in the involvement of organisations locally and nationally. The site may choose to test the emergency arrangements more often than is required by regulation, for their own assurance. The ONR also plays a role in dealing with an emergency, by acting as liaison between the specialists in ONR, BEIS and other Member States.
819. Since 1993, the Organisation for Economic Co-operation/Nuclear Energy Agency, International Nuclear Emergency Exercise series, organised by the Nuclear Energy Agency's Working Party on Nuclear Emergency Matters, has addressed a range of objectives, scenarios and participants in order to facilitate improvements in emergency management systems, nationally and internationally.
820. Recognising the value of International Nuclear Emergency Exercise 3, in terms of the lessons and issues identified, the Working Party on Nuclear Emergency Matters developed International Nuclear Emergency Exercises 4 and 5, to continue the exploration of the post-crisis response to an emergency situation, while addressing areas of current interest in emergency management, in particular the urban environment and the transition to recovery, including testing the value of changes put in place following the Fukushima Daiichi nuclear power plant accident [13].

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