



The Sizewell C Project

9.14 National Policy Statement Tracker - Clean Version

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1 NPS ACCORDANCE TABLE

Table 1.1: EN-1 NPS Accordance Table

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EN-1 Part 4: Assessment Principles			
General points	EN-1 4.1.2	<i>Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the IPC should start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. The presumption is also subject to the provisions of the Planning Act 2008 referred to at paragraph 1.1.2 of this NPS.</i>	<p>The policy presumption is relevant to the application proposals. The level and urgency of the need which justify the presumption continue to exist. There are no more specific or relevant policies which indicate that consent should be refused.</p> <p>Section 3.9 of the Planning Statement [APP-590] considers the policy presumption and should be read together with Sections 2-4 of the Planning Statement Update [REP2-043]. Section 8 of the Planning Statement [APP-590], together with this Accordance Table demonstrate that there is no conflict with NPS policies</p>

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			which would indicate that consent should be refused.
	EN-1 4.1.3	<p><i>In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:</i></p> <ul style="list-style-type: none"> <i>its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and</i> <i>its 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.</i> 	Section 11 of the Planning Statement [APP-590] sets out the planning balance for the Sizewell C Project, drawing together the benefits of the scheme and the assessment of potential adverse effects.
	EN-1 4.1.7	<i>The IPC should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. The IPC should take into account the guidance in Circular 11/95, as revised, on “The Use of Conditions in Planning Permissions” or any successor to it.</i>	The Development Consent Order (DCO) application is accompanied by a draft DCO which will be revised during the course of the Examination, with a final DCO to be submitted at Deadline 9.

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			The Draft DCO (Doc Ref. 3.1(E)) sets out all of the Requirements that SZC Co. must comply with during the construction, operation and maintenance phases of the Sizewell C Project. The Requirements are explained in the Draft DCO Explanatory Memorandum (Doc Ref. 3.2(D)) including an explanation of the purpose and effect of each Requirement and the reasons why the Requirement is relevant to the Sizewell C Project and considered to be necessary, reasonable and relevant to planning.
	EN-1 4.1.8	<i>The IPC may take into account any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.</i>	A number of measures are to be secured through a planning obligation under section 106 of the Town and Country Planning Act 1990 in order to make the development acceptable in planning terms. These have been informed through discussions with stakeholders, including the local

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			<p>authorities, through the stakeholder engagement process.</p> <p>SZC Co. continues to work constructively with the local authorities and other relevant stakeholders to develop each development consent obligation. A Draft Deed of Obligation [REP5-082] is submitted to the Examination that reflects these ongoing discussions on the proposed drafting. The Deed of Obligation Explanatory Memorandum [REP5-085] considers the obligations against the tests set out in paragraph 4.1.8 namely that the obligations must be:</p> <ul style="list-style-type: none"> • relevant to planning; • necessary to make the proposed development acceptable in planning terms; • directly related to the proposed development;

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			<ul style="list-style-type: none"> • fairly and reasonable related in scale and kind to the proposed development; and • reasonable in all other respects. <p>The responses to ExQ1 on the Draft DCO and Section 106 Agreements [REP2-100 to REP2-114] provide further explanation on the development consent obligations, which should be read together with SZC Co. Comments on Responses to ExQ1 submitted at Deadline 3 [REP5-121].</p>
	EN-1 4.1.9	<i>In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of Government interventions. Where the IPC considers, on information provided in an application, that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant it is unlikely to be of relevance in IPC decision making (any exceptions to this principle are dealt with where they arise in this</i>	Section 7.3, part a) of the Planning Statement [APP-590] addresses EN-1 paragraph 4.1.9 to the extent to which the decision-maker needs to consider issues of financial viability and technical feasibility in examining applications for infrastructure development. As set out in paragraph 4.1.9, the task of the decision-maker is to form a judgement, based on the information provided in the DCO application, as to whether “the

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		<i>or other energy NPSs and the reasons why financial viability or technical feasibility is likely to be of relevance explained).</i>	<p><i>financial viability and technical feasibility of the proposal has been properly assessed by the applicant”.</i></p> <p>Paragraph 7.3.6 of the Planning Statement [APP-590] confirms that the design of the power station has passed the GDA process undertaken by the Office for Nuclear Regulation and the Environment Agency. It is therefore technically feasible.</p> <p>Paragraphs 7.3.7 to 7.3.10 of the Planning Statement [APP-590] explains that SZC Co. has undertaken careful analysis to satisfy itself of the viability of the Sizewell C Project. Sufficient information is provided in the Funding Statement [APP-066], Funding Statement Addendum [AS-011], the Funding Statement Second Addendum [AS-150] and in response to the Examining Authority’s First Written Questions [REP2-100 to REP2-114] to demonstrate that this</p>

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			<p>issue has been properly assessed. These documents also demonstrate that adequate funding is likely to be available to enable the compulsory acquisition within the statutory period following the order being made and the information demonstrates that if the Secretary of State were to grant the compulsory acquisition request, the Sizewell C Project is likely to be undertaken and not prevented due to difficulties in sourcing and securing the necessary funding.</p> <p>Paragraph 7.3.10 of the Planning Statement [APP-590] concludes that the information provided means that the decision-maker can be satisfied in relation to the financial viability of the Sizewell C Project.</p>
Environmental Statement	EN-1 4.2.1	<i>All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely</i>	Schedule 1 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572) (as amended) lists

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		<i>to be significantly affected by the project. The Directive specifically refers to effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.</i>	<p>developments for which an EIA is mandatory. Nuclear power stations are listed as Schedule 1 development, and consequently EIA is required for the Sizewell C Project.</p> <p>The original DCO application was accompanied by an Environmental Statement [APP-159 to APP-582], submitted on 27 May 2020. An Environmental Statement Addendum [AS-179 to AS-260] was submitted as part of the Change application on 12 January 2021.</p> <p>The ES Signposting Document [REP2-025] identifies the environmental information submitted to the Examining Authority since the submission of the original Environmental Statement and explains how that information supplements or changes the Environmental Statement on a chapter by chapter basis.</p>

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	EN-1 4.2.2	<i>To consider the potential effects, including benefits, of a proposal for a project, the IPC will find it helpful if the applicant sets out information on the likely significant social and economic effects of the development, and shows how any likely significant negative effects would be avoided or mitigated. This information could include matters such as employment, equality, community cohesion and well-being.</i>	The socio-economic assessment provided in Volume 2, Chapter 9 of the ES [APP-195], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] has been developed in order to set out information on the likely significant social and economic effects of the development, and sets out how any likely significant negative effects would be avoided or mitigated. This includes any effects on the labour market, housing market and public services, as well as on community cohesion. Additional information related to wellbeing is included in Volume 2, Chapter 28, Health and Wellbeing [APP-346], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181].
	EN-1 4.2.3	<i>For the purposes of this NPS and the technology-specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and</i>	The ES [APP-159 to APP-582] and ES Addendum [AS-179 to AS-260] present the assessment of likely environmental, social and economic effects that may

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		<i>decommissioning of the project. In some circumstances (for example, gas pipe-lines) it may be appropriate to assess effects arising from commissioning infrastructure once it is completed but before it comes into operation. Details of this and any other additional assessments are set out where necessary in sections on individual impacts in this NPS and in the technology-specific NPSs. In the absence of any additional information on additional assessments, the principles set out in this Section will apply to all assessments.</i>	<p>occur as a result of the proposed Sizewell C Project, including the construction and operational phases of the Sizewell C nuclear power station and the associated developments, including the removal and reinstatement phase of the temporary associated developments and temporary construction areas. The assessment of operations for the Sizewell C Project also includes the assessment of commissioning as well as re-fuelling and maintenance outages.</p> <p>A qualitative assessment of the decommissioning of the Sizewell C nuclear power station is also provided within Volume 2, Chapter 5 of the ES [APP-189], although a separate application for decommissioning would need to be submitted at the end of generation and a new ES prepared under the Nuclear Reactors (Environmental Impact Assessment for</p>

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			Decommissioning) Regulations 1999 (as amended).
	EN-1 4.2.4	<i>When considering a proposal the IPC should satisfy itself that likely significant effects, including any significant residual effects taking account of any proposed mitigation measures or any adverse effects of those measures, have been adequately assessed. In doing so the IPC should also examine whether the assessment distinguishes between the project stages and identifies any mitigation measures at those stages. The IPC should request further information where necessary to ensure compliance with the EIA Directive.</i>	<p>The ES [APP-159 to APP-582] and ES Addendum [AS-179 to AS-260] present the assessment of likely significant effects predicted to occur within each phase of the Sizewell C Project, including an assessment of the resulting residual effects taking account of the proposed mitigation measures.</p> <p>The ‘Assessment’ and tables in the ‘Residual Effects’ sections within the receptor chapters in the ES (Volumes 2 to 9) is structured to distinguish between the construction, operation, removal and reinstatement (where relevant) phases of the Sizewell C Project. The ‘Residual Effects’ tables set out the primary, tertiary or additional mitigation that is proposed based on the identified effect for the receptor(s) within the construction, operation, removal and reinstatement phases</p>

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			(where relevant). The same approach is followed in each section on the 'Assessment of effects' and 'Updated assessment' in the ES Addendum (Volume 1) (where relevant).
	EN-1 4.2.5	<i>When considering cumulative effects, the ES should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence). The IPC may also have other evidence before it, for example from appraisals of sustainability of relevant NPSs or development plans, on such effects and potential interactions. Any such information may assist the IPC in reaching decisions on proposals and on mitigation measures that may be required.</i>	Chapter 1 of Volume 10 of the ES [APP-572] provides the introduction, legislation, guidance and methodology to the assessment of cumulative effects with other plans and projects. Volume 10, Chapter 4 of the ES [APP-578], and updated by Volume 1 Chapter 10 of the ES Addendum [AS-189], considered the potential impact of the Sizewell C proposals in-combination with other schemes within the zone of influence.
	EN-1 4.2.6	<i>The IPC should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even</i>	As described in Chapter 1 of Volume 10 of the ES [APP-572] there is no established methodology for assessing the effects on sensitive receptors or resources resulting from the interaction

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		<i>though they may be acceptable when considered on an individual basis with mitigation measures in place.</i>	<p>or inter-relationship of different effects. The following process was therefore undertaken to assess interrelationship effects.</p> <p>A two stage screening exercise was undertaken to identify the environmental receptors considered within the ES to consider if they could experience a combination of adverse or beneficial effects (inter-relationship effects) as a result of the proposed development. The screening exercise concluded that the majority of potential inter-relationship effects associated with the proposed development are either inherently considered or clearly identified and assessed within the technical assessments in Volumes 2 to 9 of the ES [APP-159 to APP-582]. For example, where there is the potential for a receptor to be impacted by an effect reported in another technical chapter, this is identified and assessed</p>

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			<p>as appropriate in the receptor chapter, for example the Terrestrial Ecology and Ornithology assessment presented in Chapter 14 of Volume 2 of the ES [APP-224] considers how impacts associated with construction works on groundwater and surface water described in Volume 2, Chapter 19 of the ES [APP-297] affect ecological resources and receptors.</p> <p>However, the screening exercise identified that potential inter-relationship effects on residential receptors, commercial facilities and schools are not considered within Volumes 2 to 9 of the ES and require further assessment. These receptors could experience a combination of one or more of the following topic effects:</p> <ul style="list-style-type: none"> • noise and vibration; • air quality; and • landscape and visual effects.

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			<p>Chapter 2 of Volume 10 of the ES [APP-575], updated by the ES Addendum Volume 1, Chapter 10 [AS-189] provides the inter-relationship effects assessment.</p> <p>As set out below, this includes further detail on the screening exercise and the assessment of the inter-relationship effects on residential receptors, commercial facilities and schools.</p>
	EN-1 4.2.7	<i>In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.</i>	<p>Section 4.6 of the Planning Statement [APP-590] sets out the approach to flexibility within the Sizewell C Project's DCO application. Section 4.7 of the Planning Statement explains the content and function of the submitted application plans. The approach to flexibility is based on the specific proposals within the Project, their nature, scale and timescales.</p>
	EN-1 4.2.8	<i>Where some details are still to be finalised the ES should set out, to the best of the applicant's</i>	<p>Volume 2, Chapters 2 to 5 of the ES [APP-180 to APP-189], updated by</p>

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		<i>knowledge, what the maximum extent of the proposed development may be in terms of site and plant specifications, and assess, on that basis, the effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.</i>	<p>Volume 3, Appendices 2.2.A and 2.2B of the ES Addendum [AS-202], sets out the parameters for the phases of the main development site, including the construction, permanent development, operation and decommissioning.</p> <p>Volumes 3 to 9, Chapter 2 of the ES [APP-350, APP-380, APP-411, APP-446, APP-480, APP-511 and APP-541], updated by Volume 3, Appendices 3.2.A, 4.2.A, 5.2.A, 6.2.A and 9.2.A of the ES Addendum [AS-240, AS-242, AS-244, AS-248 and AS-256], sets out the parameters for the associated development sites. The parameters formed the basis of the environmental impact assessment to identify the likely effects arising from the Sizewell C Project.</p>
	EN-1 4.2.9	<i>Should the IPC determine to grant development consent for an application where details are still to be finalised, it will need to reflect this in appropriate</i>	Section 4.8 of the Planning Statement [APP-590] explains the approach to subsequent approvals for the main

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		<i>development consent requirements. Clearly, if development consent is granted for a proposal and at a later stage the developer wishes for technical or commercial reasons to construct it in such a way that its extent will be greater than has been provided for in the terms of the consent, it may be necessary to apply for a change to be made to the development consent, and the application to change the consent may need to be accompanied by further environmental information to supplement the original ES.</i>	development site and associated development sites, with reference to the Draft DCO (Doc Ref. 3.1(E)).
Habitats and Species Regulations	EN-1 4.3.1	<i>Prior to granting a development consent order, the IPC must, under the Habitats and Species Regulations, (which implement the relevant parts of the Habitats Directive and the Birds Directive in England and Wales) consider whether the project may have a significant effect on a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. Further information on the requirements of the Habitats and Species Regulations can be found in a Government Circular. Applicants should also refer to Section 5.3 of this NPS on biodiversity and geological conservation. The applicant should seek the advice of</i>	The Sizewell C Project has been considered against the four-staged approach to the Habitats Regulation Assessment (HRA) process, in line with PINS Advice Note 10: Habitats Regulations Assessment relevant to Nationally Significant Infrastructure Projects (2017). As explained in the Shadow HRA Report [APP-145 to APP-152], the Stage 1 Screening assessment concluded that “ <i>likely significant effects could not be excluded for at least one screening category for</i>

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		<i>Natural England and/or the Countryside Council for Wales, and provide the IPC with such information as it may reasonably require to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment is required, the applicant must provide the IPC with such information as may reasonably be required to enable it to conduct the Appropriate Assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.</i>	<p>29 European sites”. The in-combination screening exercise identified a total of 29 other plans and projects that could have likely significant in-combination effect with the Sizewell C Project.</p> <p>SZC Co. has therefore prepared a Shadow HRA Report [APP-145 to APP-152], Shadow HRA Addendum [AS-173 to AS-178] and Shadow HRA Second Addendum [REP2-032] in accordance with the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017. These reports provide the information required for a HRA to be undertaken, by the ‘competent authorities’ in support of its Development Consent Order (DCO) and Environmental Permit applications for the Sizewell C Project.</p> <p>Separate, stand-alone Shadow HRAs have been provided in support of the</p>

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			Environmental Permit applications for the operational phase and will be provided in due course for the construction phase.
Alternatives	EN-1 4.4.2	<p><i>However:</i></p> <ul style="list-style-type: none"> <i>applicants are obliged to include in their ES, as a matter of fact, information about the main alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility;</i> <i>in some circumstances there are specific legislative requirements, notably under the Habitats Directive, for the IPC to consider alternatives. These should also be identified in the ES by the applicant; and</i> <i>in some circumstances, the relevant energy NPSs may impose a policy requirement to</i> 	Appropriate alternatives have been considered for the components which comprise the main development sites and suitable options have been assessed within scheme development, having regard to operational requirements, the planning policy context, consideration of the site constraints and development constraints and the outcomes of the environmental assessment process to avoid likely significant environmental effects where possible and, where this is not possible, to mitigate and manage any remaining effects.

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		<i>consider alternatives (as this NPS does in Sections 5.3, 5.7 and 5.9).</i>	The Site Selection Report found in Appendix A to the Planning Statement [APP-598], sets out SZC Co.'s approach to site selection, and its consideration of alternatives for the proposals - from initial conception, through the various consultation stages, to the final proposals included within the DCO application.
	EN-1 4.4.3	<p><i>Where there is a policy or legal requirement to consider alternatives the applicant should describe the alternatives considered in compliance with these requirements. Given the level and urgency of need for new energy infrastructure, the IPC should, subject to any relevant legal requirements (e.g. under the Habitats Directive) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:</i></p> <ul style="list-style-type: none"> <i>the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner;</i> <i>the IPC should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale as the proposed development;</i> 	<p>The Site Selection Report is complemented by the alternatives chapters contained within the ES, these can be found in Chapter 4 of Volume 1 [APP-175], Chapter 6 of Volume 2 [APP-190] and Chapter 3 of Volumes 3 – 9 [APP-353, APP-383, APP-414, APP-450, APP-483, APP-514 and APP-544], and ES Addendum Volume 1, Chapter 2 [AS-181], which draw on the report to specifically address the requirements of the EIA Regulations. The Environmental Statement chapters focus on the comparative potential</p>

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		<ul style="list-style-type: none"> • <i>where (as in the case of renewables) legislation imposes a specific quantitative target for particular technologies or (as in the case of nuclear) there is reason to suppose that the number of sites suitable for deployment of a technology on the scale and within the period of time envisaged by the relevant NPSs is constrained, the IPC should not reject an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals;</i> • <i>alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the IPC thinks they are both important and relevant to its decision;</i> • <i>as the IPC must decide an application in accordance with the relevant NPS (subject to the exceptions set out in the Planning Act</i> 	<p>environmental effects of the alternatives studied by SZC Co., which are explained in the Site Selection Report.</p> <p>Please refer to response to EN-1 paragraph 5.3.7, 5.7.16 and 5.9.10 on the consideration of alternatives, as well as the responses to ExQ1 on Alternatives [REP2-100 to REP2-114] for further commentary.</p>

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		<p>2008), if the IPC concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the IPC's decision;</p> <ul style="list-style-type: none"> • alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the IPC's decision; • alternative proposals which are vague or inchoate can be excluded on the grounds that they are not important and relevant to the IPC's decision; and • it is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the IPC in respect of it (so as to allow appropriate consultation and the development 	

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		<i>of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore where an alternative is first put forward by a third party after an application has been made, the IPC may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the IPC should not necessarily expect the applicant to have assessed it.</i>	
Criteria for “good design” for energy infrastructure	EN-1 4.5.3	<i>In the light of the above, and given the importance which the Planning Act 2008 places on good design and sustainability, the IPC needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In so doing, the IPC should satisfy itself that the applicant has taken into account both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located) as far as possible. Whilst the applicant may not have any or very limited choice in the physical appearance</i>	<p>The design approach for the Main Development Site (permanent operational development) is outlined in the Main Development Site Design and Access Statement [REP5-070 to REP5-075] for buildings, structures and landscape design.</p> <p>The design approach for the Temporary Accommodation Campus is outlined in Appendix A of the Design and Access Statement [REP5-075].</p> <p>The design approach for the permanent associated development sites is</p>

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		<i>of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area.</i>	outlined in the Associated Development Design Principles [REP2-041] . The assessment and design of the Proposed Development has been an iterative process. The application of design principles (as set out in the Main Development Site Design and Access Statement [REP5-070 to REP5-075] and the Associated Development Design Principles document [REP2-041] and measures adopted to deliver good design are recorded in the Landscape and Visual Assessment chapters of Volumes 2 to 9 of the ES [APP-216, APP-360, APP-390, APP-421, APP-457, APP-490, APP-520 and APP-551] , updated by the ES Addendum Volume 1, Chapters 2, 4, 5 and 6 [AS-181, AS-183, AS-184 and AS-185] .
	EN-1 4.5.4	<i>For the IPC to consider the proposal for a project, applicants should be able to demonstrate in their</i>	Details of the design process and how the design evolved are provided within

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		<i>application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. In considering applications the IPC should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy.</i>	the ES, Chapter 6 of Volume 2 [APP-190] and Chapter 3 of Volumes 3 – 9 [APP-353 , APP-383 , APP-414 , APP-450 , APP-483 , APP-514 and APP-544], and ES Addendum Volume 1, Chapter 2 [AS-181].
	EN-1 4.5.5	<i>Applicants and the IPC should consider taking independent professional advice on the design aspects of a proposal. In particular, Design Council CABE can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service.</i>	SZC Co. has engaged in design-specific pre-application consultation with the local authorities and key stakeholders. This has included design reviews by the Design Council CABE undertaken in March 2014 and November 2019. The Design Council CABE noted that “the extension of the Sizewell Nuclear Facility to create Sizewell C is a significant intervention in a sensitive and remarkable landscape. Extensive steps are being taken by the project team to carefully integrate the Sizewell

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			<p><i>C site into its historic, coastal setting. Overall, we think the proposal is being approached with great care and attention across architecture, engineering, landscape design and ecology”</i></p> <p>This is provided at Appendix B of Main Development Site Design and Access Statement [REP5-075].</p>
Consideration of Combined Heat and Power	EN-1 4.6.6	Under guidelines issued by DECC (then DTI) in 2006, any application to develop a thermal generating station under Section 36 of the Electricity Act 1989 must either include CHP or contain evidence that the possibilities for CHP have been fully explored to inform the IPC’s consideration of the application. This should be through an audit trail of dialogue between the applicant and prospective customers. The same principle applies to any thermal power station which is the subject of an application for development consent under the Planning Act 2008. The IPC should have regard to DECC’s guidance, or any successor to it,	<p>A Combined Heat and Power (CHP) Feasibility Study [APP-634] has been prepared by SZC Co. A detailed study was previously commissioned by SZC Co. to evaluate the practical feasibility and economic viability for inclusion of CHP at the Hinkley Point C project in Somerset. This study was included within the Hinkley Point C application for development consent, where it was concluded that CHP would be impractical and uneconomic. Similar to</p>

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		when considering the CHP aspects of applications for thermal generating stations.	<p>the findings for Hinkley Point C and indeed any thermal generating station, operating Sizewell C as a CHP plant is technically feasible. Notwithstanding this, various constraints exist which mean that such a solution is not practical nor currently expected to be commercially viable.</p> <p>The CHP Feasibility Study [APP-634] draws from the in depth findings at Hinkley Point C, and other CHP assessments produced for thermal generating stations, and addresses the technical justifications in NPS EN-1 paragraph 4.6.8. Key findings include:</p> <ul style="list-style-type: none"> The Sizewell C main development site is located within a relatively remote location, over 30 km from the nearest city of Ipswich. Guidance suggests that a distance
	EN-1 4.6.7	In developing proposals for new thermal generating stations, developers should consider the opportunities for CHP from the very earliest point and it should be adopted as a criterion when considering locations for a project. Given how important liaison with potential customers for heat is, applicants should not only consult those potential customers they have identified themselves but also bodies such as the Homes and Communities Agency (HCA), Local Enterprise Partnerships (LEPs) and Local Authorities and obtain their advice on opportunities for CHP. Further advice is contained in the 2006 DECC guidelines and applicants should also consider relevant information in regional and local energy and heat demand mapping.	
	EN-1 4.6.8	Utilisation of useful heat that displaces conventional heat generation from fossil fuel sources is to be encouraged where, as will often be the case, it is more efficient than the alternative electricity/heat generation mix. To encourage proper consideration of CHP, substantial additional positive weight should therefore	

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		<p>be given by the IPC to applications incorporating CHP. If the proposal is for thermal generation without CHP, the applicant should:</p> <ul style="list-style-type: none"> • explain why CHP is not economically or practically feasible for example if there is a more energy efficient means of satisfying a nearby domestic heat demand; • provide details of any potential future heat requirements in the area that the station could meet; and • detail the provisions in the proposed scheme for ensuring any potential heat demand in the future can be exploited. 	<p>of 15 km may be viable for decentralised energy.</p> <ul style="list-style-type: none"> • The settlements that do currently exist within a 15 km radius of the site have relatively limited heat demands. The Government's CHP Heat Map has identified that the surrounding heat demands are significantly lower for Sizewell than for a similar area surrounding Hinkley Point. • According to the CHP Development Map, there are no large heat load sites identified within the 15 km search area. These are defined as sites with a point heat demand of greater than 5 MWth. which could act as potential anchor load for heat network development. • The principal existing demand is from the domestic sector, which

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			<p>would be space heating, mainly of existing properties, both residential and commercial. These are generally expected to be individual houses, rather than larger estates and blocks of flats. The heat demand within the domestic sector is only high for around 4 months during the winter and very low for 4 months during summer months (winter / summer seasonal variation). This means that the cost of the system has to be borne by relatively small heat sales. The infrastructure cost is very high compared to the heat supplied.</p> <ul style="list-style-type: none"> It is envisaged that any decentralised heat network supplied by Sizewell C would take many years to complete and require a very large investment in administration and development costs as well as the plant. The

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			<p>high capital cost would then need to be financed over a very long period. Thus, there is considerable capital outlay, with no return until the Sizewell C Project is commissioned.</p> <ul style="list-style-type: none"> • The viability of the Sizewell C Project would be dependent on the number of connections made. As the predominant heat demand is for existing residential users, this cannot be accurately predicted. Thus, there would always be a substantial commercial risk which will compound the difficulty in obtaining funding. • As with Hinkley Point C, it would be reasonable to expect that any CHP scheme would have relatively poor performance in abating carbon dioxide, principally because the use of the heat would reduce the output of the nuclear

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			<p>power station requiring replacement of the power from fossil fuelled sources.</p> <p>For the above reasons it is concluded that using the power station as a source of energy for CHP would not be economically viable or practical for Sizewell C. This conclusion is consistent with NPS EN-6 paragraph 2.9.3.</p>
Climate change adaptation	EN-1 4.8.5	<p><i>New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change. While not required by the EIA Directive, this information will be needed by the IPC.</i></p>	<p>Volume 2, Chapter 26 of the ES [APP-342], updated by the ES Addendum Volume 1, Chapter 2 [AS-181], presents an assessment of climate related impacts and explains how climate change has been considered with regard to design resilience and the effects of climate change on the Sizewell C Project. The ES chapters also provides the outputs of a climate change risk assessment undertaken</p>

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	EN-1 4.8.6	<i>The IPC should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of the ES, the IPC should consider whether they need to request further information from the applicant.</i>	using UK Climate Projections 2018 (UKCP18). The Sizewell C Project has been developed with a full understanding of the potential consequences of climate change and has incorporated mitigation measures embedded in the design.
	EN-1 4.8.7	<i>Applicants should apply as a minimum, the emissions scenario that the Independent Committee on Climate Change suggests the world is currently most closely following – and the 10%, 50% and 90% estimate ranges. These results should be considered alongside relevant research which is based on the climate change projections.</i>	Emissions scenarios for 10%, 50% and 90% have been applied. See Sections 26.5 and 26.6 , provided in Volume 2, Chapter 26 of the ES [APP-342] for further details of the methodology used for the assessment of Climate Change risk.
	EN-1 4.8.8	<i>The IPC should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in</i>	The critical features of the scheme referred to in paragraph 4.8.8 would be located on the main platform within the main development site. As described in

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		<i>the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.</i>	<p>Volume 3, Appendix 2.2.A of the ES Addendum [AS-202], the proposed level of the platform has been set to ensure that it would be raised above extreme sea levels, considering sea level rise for the reasonably foreseeable climate change scenarios.</p> <p>The risk of flood on the main platform has been assessed for a range of return period events and climate change scenarios considering all sources of flooding, as reported in the Main Development Site Flood Risk Assessment (MDS FRA) [AS-018] and the MDS FRA Addendum [AS-157]. It was concluded that the main platform would not be at risk of fluvial flooding, taking in account the credible maximum climate change scenario for increases in fluvial flows.</p> <p>With respect to coastal flood risk, as stated in the MDS FRA Addendum [AS-157], the updated design (in the</p>

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			<p>Accepted Changes, April 2021) of the hard coastal defence feature would protect the platform from wave overtopping (considering UKCP18 climate projections) until the end of the interim spent fuel store decommissioning phase and would have future adaptability to be raised to account for any change in risk beyond that identified within the UKCP18 projections.</p> <p>The impacts of climate change will be monitored and assessed at set intervals to determine whether the projections follow the currently predicted trajectory, i.e. if there is any change from either the currently considered projections or the climate change guidance, as applied within the DCO Application.</p> <p>Beyond the operational phase (i.e. 2090 onwards), there is likely to be a residual risk of platform inundation during extreme surge events considering the</p>

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			<p>credible maximum climate change allowances. However, by this point in time the activities on site would be limited by removal of buildings and storage within the spent fuel store.</p> <p>As required by the Office for Nuclear Regulation, a separate Safety Case Assessment is being prepared to provide further details on how the safe operation of the site would be managed during extreme events.</p> <p>Please refer to the responses to ExQ1 on Climate Change and Resilience [REP2-100 to REP2-114] for further commentary.</p>
	EN-1 4.8.10	<i>If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the IPC should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.</i>	<p>Volume 2, Chapter 26 of the ES [APP-342], paragraphs 26.5.21 to 26.5.29 summarise measures embedded within the design proposals of the Sizewell C Project which mitigate the effects of climate change on the Proposed Development. Out of these measures,</p>

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			<p>the following have been identified and assessed with regards to their potential to give rise to consequential impacts:</p> <ul style="list-style-type: none"> the assessment of flood risk to on-site and off-site receptors as a result of the main development site parameters (including the main development site, SSSI crossing and sea defence crest heights) – refer to the MDS FRA [AS-018] and the MDS FRA Addendum [AS-157]; the assessment of flood risk to on-site and off-site receptors as a result of the design principles set out within the Outline Drainage Strategy [REP2-033] for the main development site and associated developments – refer to the main development site and associated developments FRAs [APP-093 to APP-144] and FRA Addendums

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			<p>[AS-018, AS-157 to AS-172 and REP2-026 to REP2-031];</p> <ul style="list-style-type: none"> the assessment of impacts on coastal processes receptors as a result of the hard coastal defence feature and soft coastal defence feature, which protect the site from coastal flooding and erosion – refer to Volume 2, Chapter 20 of the ES [APP-311] and Volume 1, Chapter 2 of the ES Addendum [AS-181]; and the assessment of impacts on landscape and visual and amenity and recreation receptors as a result of the hard coastal defence feature and soft coastal defence feature and the SSSI crossing – refer to Volume 2, Chapters 13 and 15 of the ES [APP-216 and APP-267] and Volume 1, Chapter 2 of the ES Addendum [AS-181].

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			Impacts associated with the construction of the above design elements have also been considered as a part of the noise and vibration, air quality and terrestrial ecology and ornithology assessments of the ES within the relevant site volumes.
	EN-1 4.8.11	<i>Any adaptation measures should be based on the latest set of UK Climate Projections, the Government's latest UK Climate Change Risk Assessment, when available and in consultation with the EA.</i>	Measures to adapt the Sizewell C Project to the impacts of future Climate Change are set out in Section 26.5 provided in Volume 2, Chapter 26 of the ES [APP-342] , including engagement with the Environment Agency and other key stakeholders.
	EN-1 4.8.12	<i>Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the IPC may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at</i>	

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		<i>the outset of the development (for example increasing height of existing, or requiring new, sea walls).</i>	
Grid connection	EN-1 4.9.2	<i>The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together. The Government therefore envisages that wherever possible, applications for new generating stations and related infrastructure should be contained in a single application to the IPC or in separate applications submitted in tandem which have been prepared in an integrated way. However this may not always be possible, nor the best course in terms of delivery of the project in a timely way, as different aspects may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls). So the level of information available on the different elements may vary. In some cases applicant(s) may therefore decide to put in an application that seeks consent only for one element but contains some information on the second. Where</i>	<p>This DCO application includes infrastructure required to connect the new power station to the National Grid. A new 400kV substation is proposed along with connections lines and pylons. Details of this element of the proposals can be found in Section 3.3 of the Main Development Site Design and Access Statement [REP5-070].</p> <p>National Grid and SZC Co. have entered into contractual arrangements which provide for connection of Sizewell C to the National Electricity Transmission System. These contractual arrangements set out in principle the works that would need to be carried out to provide the grid connection and enable the National Electricity Transmission System to</p>

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		<i>this is the case, the applicant should explain the reasons for the separate application.</i>	accommodate the output from Sizewell C.
	EN-1 4.9.3	<i>If this option is pursued, the applicant(s) accept the implicit risks involved in doing so, and must ensure they provide sufficient information to comply with the EIA Directive including the indirect, secondary and cumulative effects, which will encompass information on grid connections. The IPC must be satisfied that there are no obvious reasons why the necessary approvals for the other element are likely to be refused. The fact that the IPC has decided to consent one project should not in any way fetter its subsequent decisions on any related projects.</i>	<p>The contractual arrangements divide responsibility for designing and building the grid connection between National Grid and SZC Co.. Under the arrangements, National Grid is responsible for designing and building most of the connection and reinforcement works, with SZC Co. having responsibility for the connection between Sizewell C and the National Grid substation. These contractual arrangements provide the contractual basis for, and clearly establish as a principle, the connection of Sizewell C to the National Electricity Transmission System.</p> <p>The Grid Connection Statement [APP-583] provides further details</p>

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Pollution control and other environmental regulatory regimes	EN-1 4.10.4	<i>Applicants should consult the Marine Management Organisation (MMO) on nationally significant projects which would affect, or would be likely to affect, any relevant marine areas as defined in the Planning Act 2008 (as amended by s.23 of the Marine and Coastal Access Act 2009). The IPC consent may include a deemed marine licence and the MMO will advise on what conditions should apply to the deemed marine licence. The IPC and MMO should cooperate closely to ensure that energy NSIPs are licensed in accordance with environmental legislation, including European directives.</i>	<p>The scope of the EIA has also been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process.</p> <p>To facilitate engagement with statutory stakeholders on the marine assessments, the Sizewell C Marine Technical Forum was established on 26 March 2014. The Marine Technical Forum has an independent chair, supported by a technical secretariat supplied by SZC Co. together with nominated technical representatives from relevant statutory stakeholders: Natural England, the Environment Agency, East Suffolk Council and the Marine Management Organisation (MMO), together with consultants working on their behalf.</p>
	EN-1 4.10.6	<i>Applicants are advised to make early contact with relevant regulators, including EA and the MMO, to discuss their requirements for environmental permits and other consents. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the IPC. Wherever possible, applicants are encouraged to submit applications for Environmental Permits and</i>	

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		<i>other necessary consents at the same time as applying to the IPC for development consent.</i>	Additional participation by non-statutory stakeholders (for example, Royal Society for the Protection of Birds and the Eastern Inshore Fisheries Conservation Authority) is encouraged with the agreement of Marine Technical Forum members when specific issues are being discussed.
	EN-1 4.10.7	<p><i>The IPC should be satisfied that development consent can be granted taking full account of environmental impacts. Working in close cooperation with EA and/or the pollution control authority, and other relevant bodies, such as the MMO, Natural England, the Countryside Council for Wales, Drainage Boards, and water and sewerage undertakers, the IPC should be satisfied, before consenting any potentially polluting developments, that:</i></p> <ul style="list-style-type: none"> <i>the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and</i> <i>the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make</i> 	<p>The key aim of the Marine Technical Forum is to provide a means whereby the nature of the marine monitoring at Sizewell and the results and their outcomes can be readily discussed. Agreement or consensus between SZC Co. and the statutory environmental bodies, and clarity on any points of difference, is sought. The Marine Technical Forum aims to seek a common view whilst respecting the independence of the statutory environmental bodies so that relevant advice to SZC Co. may be distilled and that statutory environmental bodies'</p>

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		<i>that development unacceptable, particularly in relation to statutory environmental quality limits.</i>	<p>consultations and decision making may be best informed.</p> <p>The Schedule of Other Consents, Licences, and Agreements [REP3-011] identifies the other consents, licences and agreements that are required to allow the construction, operation and maintenance of the Sizewell C Project. This includes, amongst other things, Prior Consent(s) pursuant to Section 61 of the Control of Pollution Act 1974.</p> <p>The Schedule of Other Consents, Licences and Agreements [REP3-011] confirms that the deemed marine licence was submitted as part of the DCO Application, under s149A of the Planning Act 2008. This is addressed through Schedule 20 of the Draft DCO (Doc Ref. 3.1(E)).</p>
	EN-1 4.10.8	<i>The IPC should not refuse consent on the basis of pollution impacts unless it has good reason to believe</i>	The consents, licences and agreements identified in the Schedule of Other

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		<i>that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.</i>	Consents, Licences, and Agreements [REP3-011] have either already been obtained or would be sought separately from the DCO. SZC Co. sees no impediment to obtaining any of these consents, licences or agreements and is not aware of any reason why these consents should not be forthcoming.
Safety	EN-1 4.11.4	<i>Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority. If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents. The IPC should be satisfied that an assessment has been done where required and that</i>	The proposed Sizewell C power station would comprise two UK European Pressurised Reactor (UK EPRTM) units. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (ONR and Environment Agency).

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		<i>the Competent Authority has assessed that it meets the safety objectives described above.</i>	<p>The GDA process allows the ONR and Environment Agency to assess the safety, security and environmental implications of new reactor designs. Assessment at the design stage enables identification of any potential issues so that they can be addressed by the requesting party (the company who has submitted a design for assessment) before commitments are made to construct the reactors.</p> <p>The design of the power station, buildings and systems subject to the GDA process are required to meet the highest standards of public and environmental protection and withstand a range of defined natural and human hazards, to ensure protection over the lifetime of the power station. Through the GDA process, SZC Co. submitted detailed information on the design of the UK EPR™. A rigorous and structured examination was undertaken</p>

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			<p>to facilitate the involvement of the public who were able to view and comment on design information.</p> <p>In December 2012, the ONR issued a Design Acceptance Confirmation and the Environment Agency issued a Statement of Design Acceptability (Ref. 1.60) for the UK EPR™ design, which concluded the GDA process.</p> <p>The design of the Hinkley Point C power station, which is under construction, is the reference plant design for the UK EPR™, and Sizewell C has drawn on the learning and experience of this construction project. The learning and experience from Hinkley Point C power station construction process has led to enhanced safety, contractibility and operational effectiveness.</p> <p>Volume 2, Chapter 27 of the ES [APP-344] presents an assessment of the risk of major accidents and disasters that</p>

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			have the potential to arise during the construction and operation of the Sizewell C Project.
Hazardous Substances	EN-1 4.12.1	<i>All establishments wishing to hold stocks of certain hazardous substances above a threshold need Hazardous Substances consent. Applicants should consult the HSE at pre-application stage if the project is likely to need hazardous substances consent. Where hazardous substances consent is applied for, the IPC will consider whether to make an order directing that hazardous substances consent shall be deemed to be granted alongside making an order granting development consent. The IPC should consult HSE about this.</i>	<p>As set out in Section 7.3 of the Planning Statement [APP-590], Section 2.11 of EN-6 confirms that the Government is satisfied that effective arrangements will exist for the management and disposal of the wastes produced by new nuclear power stations. Section 2.11 further directs that the decision maker for a DCO application need not consider the issue of whether effective management and disposal arrangements exist for waste (radioactive or non-radioactive) produced by nuclear power stations.</p> <p>Details on the Sizewell C Project's arrangements for spent radioactive fuel waste are set out in Volume 2, Chapter 7 of the ES [APP-192].</p>

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Health	EN-1 4.13.2	<i>As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on human beings, the ES should assess these effects for each element of the project, identifying any adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. The impacts of more than one development may affect people simultaneously, so the applicant and the IPC should consider the cumulative impact on health.</i>	Potential risks to human health which may arise during the construction, operation and removal and reinstatement (where applicable) phases of the Sizewell C Project are considered and addressed as part of the assessment section in the relevant topic chapters in Volumes 2 to 9 of this ES [APP-178 to APP-571].
	EN-1 4.13.5	<i>Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either constitute a reason to refused consents or require specific mitigation under the Planning Act 2008. However, the IPC will want to take account of health concerns when setting requirements relating to a range of impacts such as noise.</i>	

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Common law nuisance and statutory nuisance	EN-1 4.14.2	<i>It is very important that, at the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the 1990 Act and how they may be mitigated or limited are considered by the IPC so that appropriate requirements can be included in any subsequent order granting development consent. (See Section 5.6 on Dust, odour, artificial light etc. And Section 5.11 on Noise and vibration.)</i>	As set out in Section 7.3 of the Planning Statement [APP-590], the DCO application is accompanied by a Statement of Statutory Nuisances [APP-155] which details the possible sources of statutory nuisances and how they may be mitigated or limited.
Security considerations	EN-1 4.15.3	<i>DECC will be notified at pre-application stage about every likely future application for energy NSIPs, so that any national security implications can be identified. Where national security implications have been identified, the applicant should consult with relevant security experts from CPNI, OCNS and DECC to ensure that physical, procedural and personnel security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. If CPNI, OCNS and/or DECC are satisfied that security issues have been adequately addressed in the project when the application is submitted to the IPC, it will provide confirmation of this to the IPC. The IPC should not need to give any</i>	<p>The agencies involved in the security of national infrastructure include the Centre for the Protection of National Infrastructure and, in the case of nuclear establishments, the Office for Nuclear Regulation, being the security regulator for the UK's civil nuclear industry. Overall responsibility for energy infrastructure lies with BEIS.</p> <p>The application is subject to the requirements of the Nuclear Industries Security Regulations (2003) Ionising Radiation Regulations and Security Assessment Principles (SyAPS), 2017</p>

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		<i>further consideration to the details of the security measures in its examination.</i>	and will be assessed by the Office for Nuclear Regulation Civil Nuclear Security and Safeguards. SZC will need to satisfy the requirements of the SyAPS to allow construction, operation and decommissioning.
	EN-1 4.15.4	<i>The applicant should only include sufficient information in the application as is necessary to enable the IPC to examine the development consent issues and make a properly informed decision on the application.</i>	<p>As explained in Section 7.3 of the Planning Statement [APP-590], the security arrangements at the main development site must be approved by the Office for Nuclear Regulation, and must include physical security protection features such as fencing, CCTV, access controls and intruder alarms as well as a security presence.</p> <p>The Generic Design Principles set out in the Main Development Site Design and Access Statement [REP5-070 to REP5-075] include site management, security and access principles. These establish a framework for security measures to be implemented in accordance with SZC Co.'s standards</p>

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			<p>and the Office for Nuclear Regulation's requirements.</p> <p>This information is considered sufficient to enable an informed decision to be made on the DCO application.</p> <p>Please refer to the responses to ExQ1 on General and Cross topic questions [REP2-100 to REP2-114] for further commentary.</p>
EN-1 Part 5: Generic Impacts			
Air Quality	EN-1 5.2.2	<p><i>CO₂ emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). However, given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies aimed at decarbonising electricity generation such as EU ETS (see Section 2.2 above), Government has determined that CO₂ emissions are not reasons to prohibit the consenting of projects which use these technologies or to impose more restrictions on them in the planning</i></p>	<p>Please refer to the response to the ExQ1 on Climate Change [REP2-100 to REP2-114], namely CC.1.3, including the appended Life Cycle Carbon assessment.</p>

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		<i>policy framework than are set out in the energy NPSs (e.g. the CCR and, for coal, CCS requirements). Any ES on air emissions will include an assessment of CO₂ emissions, but the policies set out in Section 2, including the EU ETS, apply to these emissions. The IPC does not, therefore need to assess individual applications in terms of carbon emissions against carbon budgets and this section does not address CO₂ emissions or any Emissions Performance Standard that may apply to plant.</i>	
	EN-1 5.2.4	<i>Emissions from combustion plants are generally released through exhaust stacks. <u>Design of exhaust stacks, particularly height, is the primary driver for the delivery of optimal dispersion of emissions and is often determined by statutory requirements.</u> The optimal stack height is dependent upon the local terrain and meteorological conditions, in combination with the emission characteristics of the plant. The EA will require the exhaust stack height of a thermal combustion generating plant, including fossil fuel generating stations and waste or biomass plant, to be optimised in relation to impact on air quality. The IPC need not, therefore, be concerned with the exhaust</i>	Stack height evaluation for the emergency power generation plant that would serve the nuclear power station has been made and is described in Volume 2, Appendix 12C of the ES [APP-214].

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		<i>stack height optimisation process in relation to air emissions, though the impact of stack heights on landscape and visual amenity will be a consideration (see Section 5.9).</i>	
	EN-1 5.2.6	<i>Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the Environmental Statement (ES).</i>	The air quality effects of the proposed development are assessed in Volume 2, Chapter 12 , [APP-212] and Chapter 5 of each of Volumes 3 to 9 of the ES [APP-357, APP-387, APP-418, APP-454, APP-487, APP-517 and APP-548]. The assessment was updated in the ES Addendum, Volume 1, Chapters 2 to 9 [AS-181 to AS-188].
	EN-1 5.2.7	<i>The ES should describe:</i> <ul style="list-style-type: none"> <i>any significant air emissions, their mitigation and any residual effects distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project;</i> 	The significance of air quality effects for the construction phase and operational phase of the proposed development are presented Volume 2, Chapter 12 , [APP-212] and Chapter 5 of each of Volumes 3 to 9 of the ES [APP-357, APP-387, APP-418, APP-454, APP-487, APP-517, and APP-548] updated by ES Addendum, Volume 1, Chapters 2 to 9

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<ul style="list-style-type: none"> the predicted absolute emission levels of the proposed project, after mitigation methods have been applied; existing air quality levels and the relative change in air quality from existing levels; and any potential eutrophication impacts. 	<p>[AS-181 to AS-188]. The assessment of air quality considers the existing baseline levels of pollutants, the absolute emission levels and the relative change in air quality resulting from the proposed development.</p> <p>Significant air emissions are identified together with mitigation and residual effects.</p> <p>Road traffic emissions are considered for the construction and operation of the proposed development.</p> <p>The assessment considers the air quality effects of the removal of temporary facilities and reinstatement of land, within the construction phase.</p> <p>Eutrophication impacts are considered for sites of nature conservation interest (i.e. international, European and nationally designated ecosystem sites) within the agreed study area and are presented in Chapter 12 of Volume 2</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			of the ES [APP-212], and Chapter 5 of Volumes 3 to 9 of the ES [APP-357, APP-387, APP-418, APP-454, APP-487, APP-517 and APP-548].
	EN-1 5.2.9	<i>The IPC should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. However air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits.</i>	The proposals would not lead to a breach in national air quality limits at construction, operation or decommissioning. Adverse effects on air quality are not significant and there would be no “substantial changes in air quality levels”.
	EN-1 5.2.10	<i>In all cases the IPC must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the developers should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed. In the event that a project will lead to non-compliance with a statutory limit the IPC should refuse consent.</i>	The proposals would not lead to a breach in national air quality limits at construction, operation or decommissioning.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
	EN-1 5.2.11 – 5.2.12	<p><i>The IPC should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage.</i></p> <p><i>In doing so the IPC may refer to the conditions and advice in the Air Quality Strategy or any successor to it.</i></p>	<p>The significance of air quality effects for the construction phase and operational phase of the proposed development are presented Volume 2, Chapter 12, [APP-212] and Chapter 5 of each of Volumes 3 to 9 of the ES [APP-357], APP-387, APP-418, APP-454, APP-487, APP-517, and APP-548], updated by ES Addendum, Volume 1, Chapters 2 to 9 [AS-181 to AS-188]. The assessment of air quality considers the existing baseline levels of pollutants, the absolute emission levels and the relative change in air quality resulting from the proposed development. Significant air emissions are identified together with mitigation and residual effects.</p> <p>Section 4 of the Code of Construction Practice [REP5-078] sets out the proposed measures to mitigate air quality impacts at the main development site alongside activities to monitor and</p>

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			inspect the main development site during construction.
	EN-1 5.2.13	<i>The mitigations identified in Section 5.13 on traffic and transport impacts will help mitigate the effects of air emissions from transport.</i>	Management procedures and mitigation are contained within the draft Construction Traffic Management Plan [REP2-054], draft Construction Worker Travel Plan [REP2-055] and the draft Traffic Incident Management Plan [REP2-054] prepared to support the application.
Biodiversity and geological conservation	EN-1 5.3.3	<i>Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the IPC consider thoroughly the potential effects of a proposed project.</i>	Internationally, nationally and locally designated sites, as well as their associated habitats and species, have been considered within the assessments presented in: <ul style="list-style-type: none"> • Volume 2, Chapter 14 of the ES [APP-224] and supporting technical appendices in relation to the main development site. • Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394,

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>APP-425, APP-461, APP-494, APP-523 and APP-555] and supporting technical appendices in relation to the associated developments.</p> <ul style="list-style-type: none"> Volume 1, Chapters 2 to 6 and 9 of the ES Addendum [AS-181, AS-182, AS-183, AS-184, AS-185 and AS-188] <p>Where relevant, these have been either scoped in or out of the detailed assessment, with full justification provided. If taken forward for assessment, the effects have been described.</p> <p>Effects on designated sites arising from changes to coastal geomorphology and hydrodynamics as a result of the proposed development are identified in Volume 2, Chapter 20 of the ES [APP-311] and further assessed in Volume 2, Chapter 22 of the ES [APP-317],</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			updated by Volume 1, Chapter 2 of the ES Addendum [AS-181].
	EN-1 5.3.4	<i>The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.</i>	<p>The primary and tertiary mitigation represent the mitigation measures embedded into the design of the Sizewell C Project. These are detailed in:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 14 of the ES [APP-224] and supporting technical appendices. • Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523 and APP-555] and supporting technical appendices. • Volume 1 of the ES Addendum (Chapters 2 [AS-181], 3 [AS-182], 4 [AS-183], 5 [AS-184], 6 [AS-185] and 9 [AS-188])

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<ul style="list-style-type: none"> • Main Development Site Design and Access Statement [REP5-070 to REP5-075]. <p>These design measures have been taken into consideration when conducting the impact assessment.</p> <p>The ES and ES Addendum, as well as the TEMP [REP5-088], oLEMP [REP1-010] and LEMPs [REP5-076 and REP5-077] describe the mitigation measures as well as the enhancement measures which will increase the sites overall value for local biodiversity. Biodiversity Net Gain (BNG) is addressed in the appropriate BNG reports [REP1-004, REP1-017 to REP1-019] which demonstrate net gain across the Sizewell C Project as a result of the habitat proposals associated with the Project.</p> <p>Opportunities to conserve and enhance biodiversity conservation interests</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			associated with the marine environment are described in Volume 2, Chapter 22 of the ES [APP-317] , updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] . These include embedded mitigation, such as the Soft Coastal Defence Feature (SCDF) and Hard Coastal Defence Feature (HCDF).
	EN-1 5.3.6	<i>In having regard to the aim of the Government's biodiversity strategy the IPC should take account of the context of the challenge of climate change: failure to address this challenge will result in significant adverse impacts to biodiversity. The policy set out in the following sections recognises the need to protect the most important biodiversity and geological conservation interests. The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The IPC may take account of any such net benefit in cases where it can be demonstrated.</i>	An Outline Landscape and Ecological management plan (oLEMP) has been prepared for the main development site [REP1-010] and Landscape and Ecological management plans (LEMP) have been prepared for the Two Village Bypass [REP5-077] and Sizewell Link Road [REP5-076] and set out the objectives and general principles for the establishment and longer-term management of the landscape and ecological mitigation proposals identified for the main development site in order to mitigate adverse ecological effects identified in the ES. Consideration will

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			<p>be given to the potential effects of climate change on the selection of species for proposed planting and the management of new and existing planting, and the landscaping/ species choice should be tolerant to climate change.</p> <p>In addition, BNG assessments have been undertaken for the main development site, two village bypass, Sizewell Link Road and Yoxford roundabout (refer to REP1-017 and REP1-019 respectively), to evaluate the potential of the proposed development to achieve biodiversity net gain.</p>
	EN-1 5.3.7	<i>As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4. above); where significant harm cannot be</i>	<p>As set out in Section 8.3 of the Planning Statement [APP-590], mitigation measures have been designed to conserve and, wherever practicable, enhance biodiversity. The design of the main development site has been carefully planned to reduce effects on ecology, as much as reasonably</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>avoided, then appropriate compensation measures should be sought.</i>	<p>practicable. The amount of habitat lost has been minimised, where possible, and replacement habitats are proposed on-site and off-site.</p> <p>A full summary of the ecological mitigation is set out at Section 14.12 of Volume 2, Chapter 14 of the ES [APP-224].</p>
	EN-1 5.3.8	<i>In taking decisions, the IPC should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment.</i>	<p>Designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity have been assessed within:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 14 of the ES [APP-224] and supporting technical appendices. • Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394, APP-425, APP-461, APP-494,

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			<p>APP-523 and APP-555] and supporting technical appendices.</p> <ul style="list-style-type: none"> • Volume 1 of the ES Addendum (Chapters 2 [AS-181], 3 [AS-182], 4 [AS-183], 5 [AS-184], 6 [AS-185] and 9 [AS-188]). <p>Where relevant, these have been either scoped in or out of the detailed assessment, with full justification provided.</p> <p>Section 8.3 of the Planning Statement [APP-590] considers the weight to be attached to the designated sites, as required by paragraph 5.3.8.</p>
	EN-1 5.3.9	<p>International Sites</p> <p><i>The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for these sites but do not provide statutory protection for potential Special Protection Areas (pSPAs) before they have been classified as a</i></p>	<p>Given the proximity of the Sizewell C Project to sites of European and international importance for nature conservation, it has been determined that it has the potential to affect one or more such sites. SZC Co. has therefore prepared a shadow Habitats Regulation Assessment (HRA) and</p>

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		<i>Special Protection Area. For the purposes of considering development proposals affecting them, as a matter of policy the Government wishes pSPAs to be considered in the same way as if they had already been classified. Listed Ramsar sites should, also as a matter of policy, receive the same protection.</i>	<p>shadow HRA Addendum [APP-145 to APP-152, AS-173 to AS-178] in accordance with the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017. These reports provide the information required for a HRA to be undertaken, by the ‘competent authorities’ in support of its Development Consent Order and Environmental Permit applications for the Sizewell C Project.</p> <p>Separate, stand-alone Shadow HRAs have been provided in support of the Environmental Permit applications for the operational phase and will be provided in due course for the construction phase.</p>
	EN-1 5.3.11	<p>Sites of Special Scientific Interest (SSSIs)</p> <p><i>Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on</i></p>	<p>Volume 2, Chapter 14 of the ES [AS-033] concludes that with successful mitigation in place there would be minor adverse (not significant) residual effects</p>

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		<i>an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The IPC should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.</i>	<p>on Sizewell Marshes SSSI during construction in relation to direct land take resulting in loss and fragmentation, hydrological change, and certain changes in air quality. The former is dependent on successful habitat compensation.</p> <p>The ES also concludes other minor adverse residual effects on Orfordness to Shingle Street SAC and SSSI, Minsmere to Walberswick Heaths and Marshes SSSI and the SSSIs underpinning the Sandlings SPA during construction as well as other negligible adverse effects in relation to SSSI.</p> <p>The ES therefore identifies post mitigation adverse effects though none that are significant. The balancing exercise of paragraph 5.3.11 is engaged insofar as the post mitigation adverse effects relate to the SSSI's notified special interest features.</p>

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			As stated at paragraph 8.3.39 of the Planning Statement [APP-590], the overall planning balance set out in Section 11 of the Planning Statement concludes that the benefits of the development would clearly outweigh the not significant harm to the SSSI. The Planning Statement Update [REP2-043] further supports this conclusion by highlighting the updated policy recognition of the need for nuclear in meeting net carbon commitments.
	EN-1 5.3.13	<p>Regional and Local Sites</p> <p><i>Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education. The IPC should give due consideration to such regional or local designations. However, given the need for new infrastructure, these</i></p>	<p>Designated sites of regional and local importance; protected species have been considered within:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 14 of the ES [APP-224] and supporting technical appendices. • Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394, APP-425, APP-461, APP-494,

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		<i>designations should not be used in themselves to refuse development consent.</i>	<p>APP-523 and APP-555 and supporting technical appendices.</p> <ul style="list-style-type: none"> Volume 1 of the ES Addendum (Chapters 2 [AS-181], 3 [AS-182], 4 [AS-183], 5 [AS-184], 6 [AS-185] and 9 [AS-188]) <p>Where relevant, these have been either scoped in or out of the detailed assessment, with full justification provided. If taken forward for assessment, the effects have been described in the chapters.</p> <p>Section 8.3 of the Planning Statement [APP-590] considers the weight to be attached to the designated sites, as required by paragraph 5.3.8.</p>
	EN-1 5.3.14	<p><i>Ancient Woodland and Veteran Trees</i></p> <p><i>Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any</i></p>	<p>The proposed development has sought to avoid direct landtake from ancient woodland. The two village bypass and the green rail route are located close to two ancient woodland (Foxburrow Wood</p>

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		<i>development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or ‘veteran’ trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.</i>	and Buckle’s Wood); however both would be retained in their entirety. The Proposed Development will result in the unavoidable loss of four veteran trees, two removed as a result of the Sizewell Link Road and two as a result of the Two Village Bypass. Further detail and supporting figures are set out in the Applicant’s Response to the ExA’s Request for Further Information at Deadline 4 [REP4-006].
	EN-1 5.3.15	<i>Biodiversity within Developments</i> <i>Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, the IPC should maximise such opportunities in and around developments, using requirements or planning obligations where appropriate.</i>	See responses to EN-1 paragraph 4.5.3 on the design approach for the main development site and associated development sites, which includes the primary and tertiary mitigation measures embedded into the design of the Sizewell C Project.
	EN-1 5.3.17	<i>Protection of Habitats and Other Species</i>	Key protected species (other than SPA species) at Sizewell C include bats, water voles, otters, badgers, reptiles,

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		<p><i>Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action106. The IPC should ensure that these species and habitats are protected from the adverse effects of development by using requirements or planning obligations. The IPC should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. In this context the IPC should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development.</i></p>	<p>natterjack toads (all Main Development Site) and great crested newts (Sizewell Link Road and Northern Park and Ride only). The significant adverse effects defined in Volume 2, Chapter 14 of the ES [AS-033] (as identified in Table 14.66) relate to Barbastelle bats (from habitat fragmentation) and the Deptford Pink (a nationally scarce plant species) due to direct land take.</p> <p>The balancing exercise of paragraph 5.3.17 is therefore engaged. As set out at paragraph 8.3.39 of the Planning Statement [APP-590], the benefits set out in Section 11 of the Planning Statement are such that they clearly outweigh the identified harm to protected species. The Planning Statement Update [REP2-043] further supports this conclusion by highlighting the updated policy recognition of the need for nuclear in meeting net carbon commitments.</p>

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	EN-1 5.3.18	<p>Mitigation</p> <p><i>The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:</i></p> <ul style="list-style-type: none"> <i>during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;</i> <i>during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements;</i> <i>habitats will, where practicable, be restored after construction works have finished; and</i> <p><i>opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.</i></p>	See response to EN-1 5.3.4 above.
	EN-1 5.3.19	<p><i>Where the applicant cannot demonstrate that appropriate mitigation measures will be put in place the</i></p>	Mitigation measures have been designed to conserve and, wherever

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		<i>IPC should consider what appropriate requirements should be attached to any consent and/or planning obligations entered into.</i>	<p>practicable, enhance biodiversity (in accordance with paragraph 5.3.4 of EN-1). The design of the main development site and associated development sites has been carefully planned to reduce effects on biodiversity, as much as reasonably practicable. The amount of habitat lost has been minimised, and replacement habitats are proposed on-site and off-site.</p> <p>The primary and tertiary mitigation details the mitigation measures embedded into the design of the Sizewell C Project are detailed in:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 14 of the ES [APP-224]. • Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523 and APP-555].

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			<ul style="list-style-type: none"> Volume 1, Chapters 2 and 5 of the ES Addendum [AS-181] and [AS-184]
	EN-1 5.3.20	<i>The IPC will need to take account of what mitigation measures may have been agreed between the applicant and Natural England (or the Countryside Council for Wales) or the Marine Management Organisation (MMO), and whether Natural England (or the Countryside Council for Wales) or the MMO has granted or refused or intends to grant or refuse, any relevant licences, including protected species mitigation licences.</i>	<p>The design of the proposed development and scope of the assessment has also been informed by ongoing consultation and engagement with statutory and non-statutory consultees throughout the design and assessment process. A large number of workshops and other meetings have been held since 2013 with ecological consultees, including Natural England, the Environment Agency, Suffolk County Council, ESC (formerly SCDC), Marine Management Organisation, the RSPB and the SWT.</p> <p>The Schedule of Other Consents, Licences, and Agreements [REP3-011] lists the licences, consents and agreements required for the Sizewell C</p>

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			<p>Project and the status of their application.</p> <p>Statements of Common Ground will explain the evolving extent of agreement reached in relation to mitigation and the continuing nature of the discussions which are continuing on the detail.</p>
Coastal change	EN-1 5.5.6	<i>Where relevant, applicants should undertake coastal geomorphological and sediment transfer modelling to predict and understand impacts and help identify relevant mitigating or compensatory measures.</i>	<p>Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181], identifies potential impacts on coastal change.</p> <p>The assessment included computational modelling to establish representative regional forcing and environmental responses using established modelling platforms – of marine hydrodynamics and sediment transport (using ELEMAC, TOMAWAC, ARTEMIS and SISYPHE platforms), and beach profile change and shoreline evolution (using X-beach and UNIBEST).</p>

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			Impacts would be minimised through the proposed design of coastal defences (embedded mitigation) and, if required, beach management activities.
	EN-1 5.5.7	<p><i>The ES (see Section 4.2) should include an assessment of the effects on the coast. In particular, applicants should assess:</i></p> <ul style="list-style-type: none"> <i>the impact of the proposed project on coastal processes and geomorphology, including by taking account of potential impacts from climate change. If the development will have an impact on coastal processes the applicant must demonstrate how the impacts will be managed to minimise adverse impacts on other parts of the coast;</i> <i>the implications of the proposed project on strategies for managing the coast as set out in Shoreline Management Plans (SMPs) (which provide a large-scale assessment of the physical risks associated with coastal processes and present a long term policy framework to reduce these risks to people and the developed,</i> 	<p>In accordance with paragraph 5.5.7 of EN-1 and paragraph 2.10.3 of EN-6, Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181], identifies potential impacts on coastal change. Impacts are minimised through the proposed design of coastal defences (embedded mitigation) and, if required, beach management activities.</p> <p>There are no implications for the Suffolk SMP, as the frontage of the existing Sizewell power station complex is already designated as ‘Hold The Line’, which allows management activities for the prevention of coastal erosion. Combined hard and soft coastal defence measures embedded within the proposed development are in line with</p>

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		<p><i>historic and natural environment in a sustainable manner), any relevant Marine Plans, River Basin Management Plans and capital programmes for maintaining flood and coastal defences;</i></p> <ul style="list-style-type: none"> <i>the effects of the proposed project on marine ecology, biodiversity and protected sites;</i> <i>the effects of the proposed project on maintaining coastal recreation sites and features; and</i> <i>the vulnerability of the proposed development to coastal change, taking account of climate change, during the project's operational life and any decommissioning period.</i> 	the SMP. Impacts are considered against the different SMP designations along the Suffolk coastline.
	EN-1 5.5.9	<p><i>The applicant should be particularly careful to identify any effects of physical changes on the integrity and special features of Marine Conservation Zones, candidate marine Special Areas of Conservation (SACs), coastal SACs and candidate coastal SACs, coastal Special Protection Areas (SPAs) and potential coastal SPAs, Ramsar sites, Sites of Community</i></p>	<p>Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181], considers whether any Sizewell C impacts (e.g. unnatural erosion), could change features of statutory and non-</p>

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		<i>Importance (SCIs) and potential SCIs and Sites of Special Scientific Interest.</i>	statutory designated sites – specifically in Sections 20.8, 20.13 and 20.14 . See Figure 1 of Appendix 20A of Volume 2 of the ES [APP-312] for a detailed map of statutory coastal and marine designated sites.
	EN-1 5.5.10	<i>The IPC should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and any decommissioning period.</i>	Volume 2, Chapter 20 of the ES [APP-311] , updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] , identifies potential impacts on coastal change. Impacts are minimised through the proposed design of coastal defences (embedded mitigation) and, if required, beach management activities.
	EN-1 5.5.11	<i>The IPC should not normally consent new development in areas of dynamic shorelines where the proposal could inhibit sediment flow or have an adverse impact on coastal processes at other locations. Impacts on coastal processes must be managed to minimise adverse impacts on other parts of the coast. Where such proposals are brought forward consent should only be granted where the IPC</i>	Volume 2, Chapter 20 of the ES [APP-311] , updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] , identifies potential impacts on coastal change. Impacts are minimised through the proposed design of coastal defences

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		<i>is satisfied that the benefits (including need) of the development outweigh the adverse impacts.</i>	(embedded mitigation) and, if required, beach management activities. The Coastal Processes Monitoring and Mitigation Plan [REP5-059] sets out how the Soft Coastal Defence Feature will be monitored and positively managed to ensure the continued transfer of coastal sediment.
	EN-1 5.5.12	<i>The IPC should ensure that applicants have restoration plans for areas of foreshore disturbed by direct works and will undertake pre- and postconstruction coastal monitoring arrangements with defined triggers for intervention and restoration.</i>	In accordance with paragraph 5.5.12 of EN-1, in Chapter 20 of Volume 2 of the ES [APP-311] , updated by Volume 1 of the ES Addendum (Chapter 2 [AS-181]), a series of monitoring specifications are proposed for coastal geomorphology receptors, with details on the recommended monitoring techniques, frequency and extent.
	EN-1 5.5.13	<i>The IPC should examine the broader context of coastal protection around the proposed site, and the influence in both directions, i.e. coast on site, and site on coast.</i>	Volume 2, Chapter 20 of the ES [APP-311] , updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] , identifies potential impacts of the coast

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			on the site as well as the site of the coast.
	EN-1 5.5.14	<i>The IPC should consult the MMO on projects which could impact on coastal change, since the MMO may also be involved in considering other projects which may have related coastal impacts.</i>	To facilitate engagement with statutory (and, with the agreement of core members, non-statutory) stakeholders on the marine assessments, the Sizewell C Marine Technical Forum was established on 26 March 2014. The Marine Technical Forum comprises an independent chair, supported by a technical secretariat supplied by SZC Co., and nominated technical representatives from Natural England, Environment Agency, Marine Management Organisation (MMO), and the Coastal Authority (East Suffolk Council), together with consultants working on their behalf. The MMO has made its views known to the examination.
	EN-1 5.5.15	<i>In addition to this NPS the IPC must have regard to the appropriate marine policy documents, as provided for</i>	Volume 1, Appendix 6P [APP-171] and Volume 2, Chapter 20 of the ES [APP-

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>in the Marine and Coastal Access Act 2009. The IPC may also have regard to any relevant SMPs.</i>	<p>311] provides a summary of marine legislation and policy documents relevant to the coastal geomorphology and hydrodynamics assessment.</p> <p>The Planning Statement [APP-590] also considers the relevant marine policy documents and shoreline management plans.</p>
	EN-1 5.5.16	<i>Substantial weight should be attached to the risks of flooding and coastal erosion. The applicant must demonstrate that full account has been taken of the policy on assessment and mitigation in Section 4.22 of this NPS, taking account of the potential effects of climate change on these risks as discussed above.</i>	<p>Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181], takes full account of potential impacts from climate change and the assessment of the marine components of the Sizewell C Proposals includes:</p> <ul style="list-style-type: none"> • hard and soft coastal defence features; • beach landing facility;

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<ul style="list-style-type: none"> • offshore cooling water intakes and outfall heads; • nearshore fish recovery and return outfalls; and a • nearshore combined drainage outfall. <p>The design of the proposed Sizewell C nuclear power station at the main development site includes a series of mitigation measures, and these are described in Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181]. These include the location and design of the hard and soft coastal defence features, the use of a small number of slender piles for the beach landing facility, the use of shallow draft vessels and a plough dredger to minimise dredging and retain sediment in the system and the use of</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			subterranean tunnels connecting the outfalls to the Sizewell C power station.
	EN-1 5.5.17	<i>Applicants should propose appropriate mitigation measures to address adverse physical changes to the coast, in consultation with the MMO, the EA, LPAs, other statutory consultees, Coastal Partnerships and other coastal groups, as it considers appropriate. Where this is not the case the IPC should consider what appropriate mitigation requirements might be attached to any grant of development consent.</i>	<p>The mitigation measures to address physical coastal changes are explained in Sections 20.5 and 20.12 of Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181]. Several primary mitigation measures have been identified through the iterative EIA process and have been incorporated into the design and construction of the proposed development. The mitigation measures are supported by the Coastal Processes Monitoring and Mitigation Plan [REP5-059] to maintain the longshore shingle transport corridor.</p> <p>To facilitate engagement with statutory (and, with the agreement of core members, non-statutory) stakeholders on the marine assessments, the Sizewell C Marine Technical Forum was established on 26 March 2014. The</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>Marine Technical Forum comprises an independent chair, supported by a technical secretariat supplied by SZC Co., and nominated technical representatives from Natural England, Environment Agency, Marine Management Organisation (MMO), and the Coastal Authority (East Suffolk Council), together with consultants working on their behalf.</p> <p>The Sizewell C Marine Technical Forum has sought to develop a shared understanding of the status and sufficiency of the marine studies advanced by SZC Co., the assessments of project impact based upon these studies and the proposed means of mitigation, in order both to facilitate advice given by its members to the Planning Inspectorate and inform their own procedures.</p>
Dust, odour, artificial light,	EN-1 5.6.4	<i>The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke</i>	The potential for emissions of dust from the construction phase of the proposed

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
smoke, steam and insect infestation		<i>and artificial light to have a detrimental impact on amenity, as part of the Environmental Statement.</i>	<p>development (including removal of temporary facilities and reinstatement of the land) are presented in Chapter 12 of Volume 2 of the ES [APP-212], and Chapter 5 of Volumes 3 to 9 of the ES [APP-357, APP-387, APP-418, APP-454, APP-487, APP-517 and APP-548].</p> <p>The amenity and recreation chapters (Volumes 2 to 9) have considered the effects of proposed artificial light within the assessment.</p> <p>The proposed development would not give rise to emissions of odour, steam or smoke or have the potential for insect infestation during any aspect of development that could have a detrimental impact on amenity. Further consideration of these is presented in the Statement of Statutory Nuisance [APP-155].</p>
	EN-1 5.6.5	<i>In particular, the assessment provided by the applicant should describe:</i>	The potential for emissions of dust from the construction phase of the proposed

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		<ul style="list-style-type: none"> <i>the type, quantity and timing of emissions;</i> <i>aspects of the development which may give rise to emissions;</i> <i>premises or locations that may be affected by the emissions;</i> <i>effects of the emission on identified premises or locations; and</i> <i>measures to be employed in preventing or mitigating the emissions.</i> 	<p>development (including removal of temporary facilities and reinstatement of the land) are presented in Chapter 12 of Volume 2 of the ES [APP-212], and Chapter 5 of Volumes 3 to 9 of the ES [APP-357, APP-387, APP-418, APP-454, APP-487, APP-517 and APP-548].</p> <p>The assessment of dust emissions considers the risk of emissions based on the nature and magnitude of construction activities, the proximity to receptors and their sensitivity, existing baseline levels of dust and the mitigation measures required to limit residual effects to be not significant.</p> <p>The proposed development would not give rise to emissions of odour, steam or smoke or have the potential for insect infestation during any aspect of development that could have a detrimental impact on amenity. Further consideration of these is presented in</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			the Statement of Statutory Nuisance [APP-155]. Volume 2, Chapter 13 of the ES [APP-216] provides a detailed assessment of the landscape and visual effects, including the appraisal of impacts from artificial light at night. The Statement of Statutory Nuisances [APP-155] also draws upon the ES to consider artificial light impacts and set out in Section 8.5 of the Planning Statement [APP-590].
	EN-1 5.6.6	<i>The applicant is advised to consult the relevant local planning authority and, where appropriate, the EA about the scope and methodology of the assessment.</i>	Consultation with the East Suffolk Council and the EA on the scope and methodology of the air quality assessment has been undertaken prior to the submission of the ES , and summarised in Volume 1, Appendix 6H of the ES [APP-171].
	EN-1 5.6.7	<i>The IPC should satisfy itself that:</i>	The Statement of Statutory Nuisance [APP-155] provides a summary of the assessment of whether the Sizewell C Project engages one or more of

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		<ul style="list-style-type: none"> <i>an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out; and</i> <i>that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts.</i> 	<p>“statutory nuisances” set out in section 79(1) of the Environmental Protection Act 1990 (EPA). The list of “statutory nuisances” in the EPA includes noise, artificial light, smoke, fumes or gases, dust, steam, smell or other effluvia or insects emanating from relevant premises.</p> <p>The assessment draws upon the ES, including any relevant mitigation measures, whether embedded within the design of the power station or secured through requirements or obligations, or other means within the DCO Such as the Code of Construction Practice [REP5-078].</p>
	EN-1 5.6.8	<p><i>If the IPC does grant development consent for a project, it should consider whether there is a justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If it cannot conclude that this is justified, it should</i></p>	<p>The DCO application is accompanied by a Statement of Statutory Nuisance [APP-155] which details the possible sources of statutory nuisances and how they may be mitigated or limited,</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>disapply in whole or in part the defence through a provision in the development consent order.</i>	through embedded design or management measures. With appropriate measures in place, it is considered that all reasonable steps have been taken to minimise potential impacts of dust, odour, artificial light, smoke, steam or insect infestation, through implementation of the Code of Construction Practice [REP5-078] and other relevant management plans. As acknowledged at paragraph 5.6.3 of EN-1, some impact on amenity for local communities are unavoidable, however, mitigation is proposed to keep any impacts to a minimum.
	EN-1 5.6.9	<i>Where it believes it appropriate, the IPC may consider attaching requirements to the development consent, in order to secure certain mitigation measures.</i>	See response to EN-1 para 5.6.7.
	EN-1 5.6.10	<i>In particular, the IPC should consider whether to require the applicant to abide by a scheme of management and mitigation concerning insect infestation and emissions of odour, dust, steam, smoke</i>	The DCO application is accompanied by a Statement of Statutory Nuisance [APP-155] which details the possible sources of statutory nuisances and how

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		<i>and artificial light from the development. The IPC should consider the need for such a scheme to reduce any loss to amenity which might arise during the construction, operation and decommissioning of the development. A construction management plan may help codify mitigation at that stage.</i>	<p>they may be mitigated or limited, through embedded design or management measures.</p> <p>With appropriate measures in place, it is considered that all reasonable steps have been taken to minimise potential impacts of dust, odour, artificial light, smoke, steam or insect infestation, through implementation of the Code of Construction Practice [REP5-078] and other relevant management plans. As acknowledged at paragraph 5.6.3 of EN-1, some impact on amenity for local communities are unavoidable, however, mitigation is proposed to keep any impacts to a minimum. It is therefore considered that the proposed development is in accordance with paragraphs 5.6.3 and 5.6.7 of EN-1.</p>
	EN-1 5.6.11	<p><i>Mitigation measures may include one or more of the following:</i></p> <ul style="list-style-type: none"> • engineering: <i>prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated;</i> • lay-out: <i>adequate distance between source and sensitive receptors; reduced transport or handling of material; and</i> • administrative: <i>limiting operating times; restricting activities allowed on the site; implementing management plans.</i> 	
Flood risk	EN-1 5.7.5	The minimum requirements for FRAs are that they should:	The submitted Flood Risk Assessments satisfies the requirements for an FRA set out by paragraph 5.7.5 as follows:

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		<ul style="list-style-type: none"> • be proportionate to the risk and appropriate to the scale, nature and location of the project; • consider the risk of flooding arising from the project in addition to the risk of flooding to the project; • take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made; • be undertaken by competent people, as early as possible in the process of preparing the proposal; • consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure; • consider the vulnerability of those using the site, including arrangements for safe access; • consider and quantify the different types of flooding (whether from natural and human 	<ul style="list-style-type: none"> • The Main Development Site Flood Risk Assessment (MDS FRA) [APP-093 to APP-114] and Main Development Site Flood Risk Assessment Addendum (MDS FRA Addendum) [AS-157 to AS-170]. • Northern Park and Ride Flood Risk Assessment [APP-115 and APP-116]. • Southern Park and Ride Flood Risk Assessment [APP-117 and APP-118]. • Two Village Bypass [APP-119 to APP-135]. • Sizewell Link Road [APP-136 to APP-138] and Addendum [REP5-045 and REP5-046]. • Yoxford Roundabout and other highway improvements Flood

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<p>sources and including joint and cumulative effects) and identify flood risk reduction measures, so that assessments are fit for the purpose of the decisions being made;</p> <ul style="list-style-type: none"> consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; include the assessment of the remaining (known as ‘residual’) risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project; consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems; consider if there is a need to be safe and remain operational during a worst case flood event over the development’s lifetime; and 	<p>Risk Assessment [APP-139 and APP-140].</p> <ul style="list-style-type: none"> Freight Management Facility Flood Risk Assessment [APP-141 and APP-142]. Rail Flood Risk Assessment [APP-143 and APP-144].

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<ul style="list-style-type: none"> be supported by appropriate data and information, including historical information on previous events. 	
	EN-1 5.7.9	<p><i>In determining an application for development consent, the IPC should be satisfied that where relevant:</i></p> <ul style="list-style-type: none"> <i>the application is supported by an appropriate FRA;</i> <i>the Sequential Test has been applied as part of site selection;</i> <i>a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk;</i> <i>the proposal is in line with any relevant national and local flood risk management strategy;</i> <i>priority has been given to the use of sustainable drainage systems (SuDs) (as required in the next paragraph on National Standards); and</i> <i>in flood risk areas the project is appropriately flood resilient and resistant, including safe access and escape routes where required, and</i> 	<p><u>Bullet 1</u></p> <p>See response to EN-1 5.7.5.</p> <p><u>Bullet 2</u></p> <p>NPS EN-6 (paragraph 3.6.9) confirms that the Sequential Test has been undertaken as part of the SSA process and the decision maker should not conduct the Sequential Test for any of the sites listed in EN-6. In doing so Government concluded that “sites within this NPS in lower flood risk zones were not reasonably available alternatives to those in higher flood risk zones” (paragraph 3.6.10). With regard to Sizewell, the NPS confirmed that the location of part of the site within Flood Zone 3 would not preclude it from being identified in the NPS where the regulator</p>

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		<i>that any residual risk can be safely managed over the lifetime of the development.</i>	<p>advised it could potentially be protected – which is confirmed at C.8.19.</p> <p>The Sizewell C site therefore passed that criterion and was included as a potentially suitable site in EN-6 – in recognition of flood risk but concluding there were no reasonable alternatives and that the site could be protected.</p> <p>The application site boundary for the main development site extends beyond the land identified in EN-6 (i.e. the area of land nominated in 2009) to accommodate the full extent of the temporary construction works areas. The possibility that the boundary of the main development site may not be identical to the nominated site area assessed in the SSA was anticipated by the NPS – as recognised at paragraphs 2.3.3 and 2.3.4 of EN-6.</p> <p>The NPS confirms that the Sequential Test has already been applied at the strategic level as there are no suitable</p>

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			<p>alternative sites where flood risk is lower. This is not a conclusion that is affected by a change in the boundary of the main development site to include the full extent of the temporary construction area.</p> <p>The majority of the extended site area beyond the NPS boundary is in Flood Zone 1.</p> <p><u>Bullet 3</u></p> <p>Section 6 of the MDS FRA [APP-093] explains that the site suitability assessments were undertaken using the Strategic Siting Assessment (SSA) criteria and that as part of the assessment the Sequential Test has been undertaken. Similarly, the layout of the components within the main development site that are not within the NPS boundary, have been considered by using a sequential approach within each of the four development areas, with the aim of ensuring that the most</p>

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			<p>vulnerable classifications are sited in locations at lowest risk of flooding.</p> <p><u>Bullet 4</u></p> <p>As set out in Section 2.4 of the MDS FRA [APP-093], the Suffolk Flood Risk Management Partnership produced the Local Flood Risk Management Strategy (LFRMS) in March 2016. This identifies seven objectives, three of which are relevant to the main development site, i.e. objective 3, 4 and 5.</p> <p>Objective 3 is to 'prevent an increase in flood risk as a result of development by preventing additional water entering existing drainage systems wherever possible'. In relation to the proposed development, this objective is met by the mitigation measures embedded into the design of the development (e.g. the flood mitigation area) and the surface water drainage strategy which adopts the principle to mimic the existing environmental runoff patterns, where</p>

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			<p>possible, and reduce the rate of run-off to greenfield rates.</p> <p>Objective 4 of the LFRMS is to ‘take a sustainable and holistic approach to flood and coastal management, seeking to deliver wider economic, environmental and social benefits, climate change mitigation and improvements under the Water Framework Directive.’ Although SZC Co. does not own or maintain a number of the existing flood defences or water control structures, the proposed development contributes to meeting this objective by refurbishing some of the existing structures (i.e. Leiston Drain culvert underneath Lover’s Lane) and developing a Coastal Processes Monitoring and Management Plan, where (if /when required) mitigation measures would be implemented to reduce future erosion rates and to maintain a continuous shingle beach</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>frontage and longshore shingle transport corridor. This would provide an additional source of sediment to the coast and therefore is likely to not only benefit the coastal defence in front of the development but also the wider coastal frontage.</p> <p>Objective 5 for LFRMS is to ‘encourage maintenance of privately-owned flood defences and ordinary watercourses and minimise unnecessary constrictions in watercourses.’ SZC Co. is committed to and responsible for the monitoring and maintenance of the HCDF and any of the ordinary watercourses i.e. the Sizewell Drain adjacent to the main development platform and structures that are located within the site boundary, i.e. the SSSI crossing bridge.</p> <p>Bullet 5</p> <p>Paragraph 5.7.9 bullet 5 of the EN-1 states that priority should be given to the use of SuDS. Section 2 of Appendix</p>

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			<p>2A, Volume 2, Chapter 2 of the ES [APP-181] outlines the overarching surface water drainage philosophy which is based on the use of SuDS and the SuDS steps or hierarchy (moving from each stage to the next only when the current stage is deemed not to be practicable within the project). It prioritises rainwater storage and infiltration techniques over the attenuation and discharge of surface water into watercourses.</p> <p>The surface water drainage strategy demonstrates that a variety of SuDS components and design options have been considered taking into account local land use, land take and future management. See the Outline Drainage Strategy [REP2-033] for further detail.</p> <p><u>Bullet 6</u></p> <p>The flood resilience and resistance of the proposed development is</p>

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			<p>demonstrated in the MDS FRA [APP-093] and supplemented in the MDS FRA Addendum [AS-157]. The assessment was undertaken considering all sources of flooding and all phases of the development.</p> <p>Both documents conclude that the permanent features of the main development site, i.e. main platform and the SSSI crossing are not at risk of flooding from extreme fluvial events including climate change allowances throughout the development lifetime. Any residual flood risk is addressed in the Flood Risk Emergency Plan (FREP) [AS-170].</p>
	EN-1 5.7.10	<p><i>For construction work which has drainage implications, approval for the project's drainage system will form part of the development consent issued by the IPC. The IPC will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water</i></p>	<p>The Outline Drainage Strategy [REP2-033] states that SuDS will be designed in accordance with the CIRIA SuDS Manual (C753). It notes that an appropriate factor of safety will be applied and that a SuDS Maintenance Plan will be compiled and completed in</p>

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		<i>Management Act 2010. In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any SuDS, including any necessary access rights to property. The IPC should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body, such as an Internal Drainage Board.</i>	accordance with the guidance set out in the SuDS Manual C753.
	EN-1 5.7.11	<i>If the EA continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the IPC can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the EA to try to resolve the concerns.</i>	The MDS FRA Addendum [AS-157] specifically addresses matters raised by the Environment Agency through the Relevant Representations and dialogue will continue to progress through the Statement of Common Ground process to ensure that all reasonable steps have or are being taken to address the Environment Agency concerns.

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	EN-1 5.7.13	Preference should be given to locating projects in Flood Zone 1 in England or Zone A in Wales. If there is no reasonably available site in Flood Zone 1 or Zone A, then projects can be located in Flood Zone 2 or Zone B. If there is no reasonably available site in Flood Zones 1 or 2 or Zones A & B, then nationally significant energy infrastructure projects can be located in Flood Zone 3 or Zone C subject to the Exception Test. Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.4 above.	See response to EN-1 5.7.9, bullet 2.
	EN-1 5.7.16	<p><i>All three elements of the test will have to be passed for development to be consented. For the Exception Test to be passed:</i></p> <ul style="list-style-type: none"> <i>it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk;</i> <i>the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable</i> 	In applying the Exception Test it is necessary to consider the flood risk vulnerability classification (as defined in the NPPG) of the infrastructure that would be located within Flood Zone 3. A review of the main development site boundary and the elements of the project that are contained within it shows that all development located within Flood Zone 3a, within the main development site, is classed as 'Water

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		<i>alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs; and a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere subject to the exception below and, where possible, will reduce flood risk overall.</i>	Compatible Development' (which table 3 of the NPPG confirms is appropriate development) or 'Essential Development' (where the NPPG confirms the requirement to satisfy the Exception Test) and the single area within Flood Zone 3b which is classed as 'Water Compatible Development' (which the NPPG confirms is appropriate development).
	EN-1 5.7.17	Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the IPC may grant consent if it is satisfied that the increase in present and future flood risk can be mitigated to an acceptable level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the IPC should make clear how, in reaching its decision, it has weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA and other relevant bodies.	

Bullet 1

The Sizewell C Project will provide substantial national and local scale benefits. Section 7.2 of the Planning Statement [\[APP-590\]](#) demonstrates the urgent need for nuclear power, significant economic benefits, infrastructure improvements, substantial skills, employment, and labour market and supply chain benefits, tourism and health and well-being benefits which would be delivered by the development as a whole. The **Planning Statement**

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			<p>Update [REP2-043] demonstrates that the urgent need for nuclear power is confirmed and further emphasised by the Energy White Paper and other policy and publications since the submission of the application.</p> <p>In order to deliver these benefits and the major contribution the project will have in meeting future low carbon energy needs, it is necessary to undertake some development in Flood Zone 3. Without this the project would not be delivered. However, in any event the mitigated flood risk associated with the main development site (as demonstrated in Table 0.1 of the MDS FRA [APP-093]) is predominantly ‘low’ with some medium levels of risk associated with the main platform, the SSSI crossing and Fen meadows. The justification for this level of flood risk is provided at section 12 of the MDS FRA [APP-093] and is supported through</p>

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			<p>further individual investigations within the MDS FRA Addendum [AS-157].</p> <p><u>Bullet 3</u></p> <p>The MDS FRA [APP-093] and MDS FRA Addendum [AS-157] demonstrate that the project will be safe as follows:</p> <ul style="list-style-type: none"> • The MDS FRA (and Addendum) assesses the risk from all sources of flooding up to 1 in 1,000-year return period event. More extreme events, such as the 1 in 10,000-year and 1 in 100,000-year events are considered in the safety case assessment as set out by the Office for Nuclear Regulation (ONR). • The main platform and access via the SSSI crossing are designed for a safety case of a 1 in 10,000-year storm event including the reasonably foreseeable climate change allowance.

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			<ul style="list-style-type: none"> • The MDS FRA (and Addendum) concludes that measures embedded into the design, e.g. the platform height and HCDF, would sufficiently mitigate fluvial and coastal flood risk throughout the operational and decommissioning phases of the development. • To mitigate the remaining residual risk, a FREP in accordance with the standards set out in Appendix D of the Environment Agency and ONR Joint Advice has been developed to ensure people on site are safe in the event of a flood. • During the early construction phase, there is a risk of coastal flooding to both the main platform and SSSI crossing areas for a short period while the new HCDF is still under construction. To mitigate that risk, a temporary coastal flood wall (sheet

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>pile wall) would be in place. (see MDS FRA Addendum section 4.3).</p> <ul style="list-style-type: none"> Surface water, groundwater, reservoir and sewer flood risk to site is considered as low (see MDS FRA section 7). <p>Off-site impacts and mitigation are addressed at section 12.7 of the MDS FRA [APP-093] and in the MDS FRA Addendum [AS-157]. The residual flood risk is summarised below.</p> <p><i>Fluvial flood risk</i></p> <p>The maximum increase in flood levels as a result of the scheme is up to 0.01m (affecting 6 properties) and there is no significant change in flood velocity or hazard rating when compared to the baseline scenario. MDS FRA Addendum [AS-157].</p> <p><i>Coastal inundation flood risk</i></p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>There are a limited number of residential and non-residential properties affected with an increase in flood depth as a result of the scheme on coastal inundation up to 0.06m (with overall flood depth around 0.5m for the 200-year event at 2090 epoch) and no significant change in flood velocity or hazard rating when compared with the results of the baseline modelling, undertaken to understand the relative potential impact of the Sizewell C Project. For further details see section 3.4c of the MDS FRA Addendum [AS-157].</p> <p><i>Tidal breach flood risk</i></p> <p>There are no additional properties at risk of being flooded as a result of the proposed development. There are a limited number of residential and non-residential properties affected with an increase in flood depth as a result of the scheme on tidal breach up to 0.08m</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>(with overall flood depth around 0.8m for the 1000-year event at 2030 epoch) and no significant change in flood velocity or hazard rating when compared with the results of the baseline modelling. For further details see section 3.4c of the MDS FRA Addendum [AS-157].</p> <p>Whilst the increases in flood risk cannot be avoided or mitigated entirely, they have been mitigated through design to an acceptable level.</p> <p>These unavoidable minor increases in flood risk elsewhere are essential in order to deliver the Sizewell C Project and the substantial benefits that it will deliver.</p>
	EN-1 5.7.24	<i>Essential energy infrastructure which has to be located in flood risk areas should be designed to remain operational when floods occur. In addition, any energy projects proposed in Flood Zone 3b the Functional Floodplain (where water has to flow or be stored in times of flood), or Zone C2 in Wales, should only be</i>	EN-1 paragraph 5.7.24 is applicable to the main development site only as they comprise the safety and operational critical installation. The associated development sites are not classified as

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>permitted if the development will not result in a net loss of floodplain storage, and will not impede water flows.</i>	<p>safety or operational critical infrastructure.</p> <p>The MDS FRA [APP-093] and the MDS FRA Addendum [AS-157] set out the flood risk to the main development site throughout the operational phase concluding that the site would not be at significant fluvial or coastal flood risk and that surface water flooding would be managed by an appropriate drainage design as set out in the Outline Drainage Strategy [REP2-033].</p> <p>The provision of the flood mitigation area as part of the embedded measures within the design provides flood storage during an event to offset the reduction in floodplain.</p>
Historic environment	EN-1 5.8.8	<i>As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the</i>	The impact of the Sizewell C Project on the significance of heritage assets has been assessed according to relevant Historic England guidance and is set out within the respective chapters in

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		<i>importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.</i>	Volumes 2 to 9 of this ES [APP-272 , APP-334 , APP-368 , APP-399 , APP-432 , APP-467 , APP-499 , APP-528 and APP-560], and updated by Volume 1 , Chapters 2, 4, 5, 6, 7, 8 and 9 of the ES Addendum [AS-181 , AS-183 , AS-184 , AS-185 , AS-186 , AS-187 and AS-188].
	EN-1 5.8.9	<i>Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.</i>	Archaeological DBAs have been carried out for the main development site and associated development sites where it was considered that potential significant adverse effects might arise through direct disturbance and are included within the appendices for the individual chapters. Further evaluation, in the form of geophysical survey and intrusive evaluation trenching has also been undertaken at a number of locations. Details of and results of surveys undertaken are discussed within the

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			<p>relevant terrestrial historic environment chapters in Volumes 2 to 9 of the ES. Volumes 2 to 9 of this ES [APP-272, APP-334, APP-368, APP-399, APP-432, APP-467, APP-499, APP-528 and APP-560], and updated by Volume 1, Chapters 2, 4, 5, 6, 7, 8 and 9 of the ES Addendum [AS-181, AS-183, AS-184, AS-185, AS-186, AS-187 and AS-188], together with updated and additional fieldwork reports submitted at Deadline 3 (Doc Refs. 6.3 16DAd, 6.6 9C (A) and 6.7 9D (A)).</p> <p>Visualisations have been provided, and cross reference has been made to landscape and visual assessment chapters where appropriate.</p>
	EN-1 5.8.10	<i>The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be</i>	The impact of the Sizewell C Project on the significance of heritage assets has been assessed according to relevant

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		<i>adequately understood from the application and supporting documents.</i>	Historic England guidance and is set out within the respective chapters in Volumes 2 to 9 of this ES [APP-272 , APP-334 , APP-368 , APP-399 , APP-432 , APP-467 , APP-499 , APP-528 and APP-560], and updated by Volume 1 , Chapters 2, 4, 5, 6, 7, 8 and 9 of the ES Addendum [AS-181 , AS-183 , AS-184 , AS-185 , AS-186 , AS-187 and AS-188].
	EN-1 5.8.11	<p><i>In considering applications, the IPC should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset, taking account of:</i></p> <ul style="list-style-type: none"> <i>evidence provided with the application;</i> <i>any designation records;</i> <i>the Historic Environment Record, and similar sources of information;</i> <i>the heritage assets themselves;</i> <i>the outcome of consultations with interested parties; and</i> <i>where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice.</i> 	<p>Sources of information for the assessments presented in the ES, are summarised within the technical chapters, and include:</p> <ul style="list-style-type: none"> a search of the records held at the National Monuments Record and the SCC HER; a search of the National Heritage List for England, which contains designated data for the whole of the UK; analysis of the Historic Landscape Characterisation data for Suffolk;

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			<ul style="list-style-type: none"> • a review of available Suffolk National Mapping Programme data sets; • a review of the available Light Detecting and Ranging data from Environment Agency Geomatics; • a search of historical maps and documentation at the Ipswich branch of the Suffolk Record Office; • aerial photography; • a search of the Cambridge University Collection of Aerial Photography; and • consultation with SCCAS and English Heritage/ Historic England. <p>A programme of non-intrusive (e.g. geophysical surveys and site visits) and intrusive site investigations (evaluation trenching) were carried out, where</p>

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			practicable, at locations across the main development site and associated development sites in order to identify both known and previously unrecorded heritage assets (e.g. historic landscape features, extant earthworks).
	EN-1 5.8.12	<i>In considering the impact of a proposed development on any heritage assets, the IPC should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between conservation of that significance and proposals for development.</i>	<p>Paragraph 1.3.12 of the ES methodology (Volume 1, Appendices 6L and 6S) recognises the sensitivity of a heritage asset in that “the significance of a heritage asset is a product of the value which it holds to this and future generations as a result of its historic, archaeological, architectural or artistic interests, and these provide the basis for considering the significance of each heritage asset (including the contribution of its setting to those interests)”.</p> <p>Each relevant chapter of the ES [APP-272, APP-334, APP-368, APP-399, APP-432, APP-467, APP-499, APP-528 and APP-560], updated by the ES Addendum [AS-181, AS-183, AS-184,</p>

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			AS-185 , AS-186 , AS-187 and AS-188], has considered the sensitivity of the heritage significance of an asset to develop an understanding of the potential effects of the Proposed Development.
	EN-1 5.8.13	<i>The IPC should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution they can make to sustainable communities and economic vitality. The IPC should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use. The IPC should have regard to any relevant local authority development plans or local impact report on the proposed development in respect of the factors set out in footnote 122.</i>	A number of primary mitigation measures have been identified through the iterative EIA process and have been incorporated into the design and construction planning of the proposed development. Changes to setting arising from visibility of the proposed development can give rise to loss of or harm to historic and architectural interests, and perceptual change to existing field boundaries and land use can give rise to harm to historic landscape character. Each relevant section of the ES chapters and ES Addendum explains the design principles and proposed measures for the main development site and

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			<p>associated developments to specifically minimise potential effects on the ecological and landscape and visual receptors.</p> <p>Section 8.7 of the Planning Statement [APP-590] summarises these mitigation measures further and also has regard to the funding to be made available through the Draft Deed of Obligation [REP5-082] for localised enhancement to heritage assets at the two Leiston Abbey sites and enhancing the visitor experience of these sites, together with works to ensure the conservation of the listed structures at Upper Abbey Farm.</p>
	EN-1 5.8.14	<p><i>There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the</i></p>	<p>As set out in Section 8.7 of the Planning Statement [APP-590], the proposed development would not lead to substantial harm to or total loss of significance of any designated asset. Three terrestrial heritage assets would suffer temporary but less than substantial harm through the</p>

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		<i>heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.</i>	construction phase only (and no substantial harm to or total loss of significance), being: <ul style="list-style-type: none"> • Leiston Abbey (first site) with later chapel and pillbox; • Cottage 450m west of Upper Abbey Farmhouse; and • Historic landscape character.
	EN-1 5.8.15	<i>Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.</i>	This harm is to be weighed against the public benefits of the proposed development, which are summarised in Section 7 of the Planning Statement [APP-590]. The planning balance is struck in Section 11 of the Planning Statement [APP-590]. For the reasons set out in that section, the benefits of the scheme are overwhelmingly greater than the residual adverse effects, including the less than substantial harm identified to the significance of heritage assets.

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	EN-1 5.8.16	<i>Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The policies set out in paragraphs 5.8.11 to 5.8.15 above apply to those elements that do contribute to the significance. When considering proposals the IPC should take into account the relative significance of the element affected and its contribution to the significance of the World Heritage Site or Conservation Area as a whole.</i>	<p>Conservation areas are considered within the relevant terrestrial historic environment chapters in Volumes 2 to 9 of this ES.</p> <p>Please refer to the response to ExQ1 HE.1.11 [REP2-100 to REP2-114] for further detail on Conservation Areas.</p>
	EN-1 5.8.18	<i>When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.</i>	<p>The design of the proposed development includes a series of mitigation measures. This includes seeking to retain and strengthen, where possible, hedgerows to the site boundary and the installation of planting, bunding, and acoustic fencing to screen views of the proposed development, and minimise visibility of, and noise from, the proposed construction works and development.</p> <p>Also, detailed design and landscaping would seek to minimise perceptual</p>

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			change to setting, wherever practicable, for example, construction and operational site lighting would be designed to minimise light spill.
	EN-1 5.8.21	<i>Where appropriate, the IPC should impose requirements on a consent that such work is carried out in a timely manner in accordance with a written scheme of investigation that meets the requirements of this Section and has been agreed in writing with the relevant Local Authority (where the development is in English waters, the Marine Management Organisation and English Heritage, or where it is in Welsh waters, the MMO and Cadw)) and that the completion of the exercise is properly secured.</i>	Outline proposals for archaeological mitigation are set out in an overarching written scheme of investigation (WSI) [REP3-022] to be agreed with Suffolk County Council Archaeological Service (SCCAS), with WSIs to be produced for each site where required.
Landscape and visual impacts	EN-1 5.9.5	<i>The applicant should carry out a landscape and visual assessment and report it in the ES. (See Section 4.2) A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's</i>	The assessment of the potential landscape and visual impacts of the Sizewell C Project has been based upon the Guidelines for Landscape and Visual Impact Assessment (GLVIA) and the scope of the assessment has also been informed by ongoing consultation and engagement with statutory consultees

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		<i>assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.</i>	throughout the design and assessment process. Full details of the consultation undertaken in relation to landscape and visual matters is provided within Volume 2, Appendix 13H of the ES [APP-217].
	EN-1 5.9.6	<i>The applicant's assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character.</i>	The Landscape and Visual Assessment chapters of Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185] assess landscape and visual effects during construction and operation. They refer to published character assessments and associated studies/policies.
	EN-1 5.9.7	<i>The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This</i>	The Landscape and Visual Assessment chapters of Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and

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		<i>should include light pollution effects, including on local amenity, and nature conservation.</i>	APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185] considered the visibility of the proposed development in views and impacts on visual amenity. The assessment includes a night-time appraisal as an appendix, where relevant, to consider the effects of proposed artificial light during both construction and operation.
	EN-1 5.9.8	<i>“Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.”</i>	The assessment and design of the Sizewell C Project has been an iterative process. The application of design principles set out in the Main Development Site Design and Access Statement [REP5-070 to REP5-075] and the Associated Development Design Principles document [REP2-041] and measures adopted to deliver good design are recorded in the Landscape and Visual Assessment chapters in Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-

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			421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185].
	EN-1 5.9.9	<i>National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.</i>	The Suffolk Coast and Heaths AONB has been an important consideration throughout the assessment and design process. SZC Co. has liaised with the AONB Partnership to agree the AONB's natural beauty and special qualities, as set out in the Natural Beauty and Special Quality Indicators document available through the Suffolk Coast and Heaths website, which form the basis of the assessment of effects on the AONB within the Landscape and Visual Assessment chapters of Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185].

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			Section 8.8 of the Planning Statement [APP-590] considers the weight to be attached.
	EN-1 5.9.10	<p><i>Nevertheless, the IPC may grant development consent in these areas in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:</i></p> <ul style="list-style-type: none"> <i>the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;</i> <i>the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.4; and</i> <i>any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</i> 	<p>The majority of the onshore portion of the main development site is located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).</p> <p>Volume 2, Chapter 13 of the ES [APP-216] (Table 13.1) states that “<i>the Suffolk Coast and Heaths AONB and the purpose of conserving and enhancing it has been an important consideration throughout the assessment and design process. EDF Energy has liaised with the AONB Partnership to agree the indicators of the AONBs natural beauty and its special qualities, which form the basis of the assessment of effects on the AONB within the landscape and visual assessment chapters</i>”.</p>

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			As noted at paragraph 8.8.37 of the Planning Statement [APP-590], “the need for the development and the potential impact upon the local economy is outlined at Sections 3 and 7.2 of this Statement and the Economic Statement”. The Planning Statement [APP-590] explains how the national importance of the Project and the established absence of alternative locations represent exceptional circumstances and how the substantial benefits of the Project mean that its development is in the public interest. That assessment takes account of all relevant considerations, including the design and mitigation of the development and the extent of any residual effects on the environment, the landscape and recreational opportunities.
	EN-1 5.9.11	<i>The IPC should ensure that any projects consented in these designated areas should be carried out to high</i>	The layout of the site, landscape design and the form and design of the

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		<i>environmental standards, including through the application of appropriate requirements where necessary.</i>	<p>proposed structures have been guided by a series of Overarching Design Principles and Detailed Landscape and Built Development Design Principles, which are outlined in the Main Development Site Design and Access Statement [REP5-070 to REP5-075].</p> <p>Schedule 2 of the Draft DCO (Doc Ref. 3.1(E)) sets out the Requirement for the Sizewell C Project (including the mitigation measures), which will be secured together with the documents in Schedule 22 including the Outline Landscape and Ecological Management Plan for the Main Development Site [REP1-010] and the Main Development Site Design and Access Statement [REP5-070 to REP5-075].</p> <p>The combined effect of these measures will be effective to ensure that the project is carried out to high environmental standards.</p>

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	EN-1 5.9.15	<i>The scale of such projects means that they will often be visible within many miles of the site of the proposed infrastructure. The IPC should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.</i>	The visual effects of the Sizewell C Project are considered as part of the Landscape and Visual Assessment chapters in Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185]. Section 8.8 of the Planning Statement [APP-590] considers the planning balance required by paragraph 5.9.16.
	EN-1 5.9.16	<i>In reaching a judgment, the IPC should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the IPC considers reasonable.</i>	
	EN-1 5.9.17	<i>The IPC should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation.</i>	Effects on landscape character are considered as part of the Landscape and Visual Assessment chapters in Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185].

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			Please refer to the responses to ExQ1 on Landscape Impact, Visual Effects and Design [REP2-100 to REP2-114] for further commentary.
	EN-1 5.9.18	<i>All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast.</i>	The visual effects of the Sizewell C Project are considered as part of the Landscape and Visual Assessment chapters in Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185]. Section 8.8 of the Planning Statement [APP-590] considers the planning balance required by paragraph 5.9.18.
	EN-1 5.9.19	<i>It may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on sensitive receptors. This may assist the IPC in judging</i>	The application recognises and addresses the particular characteristics of the Sizewell C site. The Examining Authority and the Secretary of State will be assisted by understanding the scale and nature of the Sizewell B power

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		<i>the weight it should give to the assessed visual impacts of the proposed development.</i>	station and by the construction activities at Hinkley Point C but the differences between sites and projects mean that it is the circumstances of this Project, its design and its proposals for mitigation which will be most important.
	EN-1 5.9.20	<i>The IPC should ensure applicants have taken into account the landscape and visual impacts of visible plumes from chimney stacks and/or the cooling assembly. It may need to attach requirements to the consent requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements.</i>	The visual effects of the Sizewell C Project are considered as part of the Landscape and Visual Assessment chapters in Volumes 2 to 9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185].
	EN-1 5.9.21	<i>Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional</i>	The assessment and design of the Sizewell C Project has been an iterative process. Measures to mitigate landscape and visual effects are presented in the Landscape and Visual Assessment chapters in Volumes 2 to

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		<i>circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.</i>	9 of the ES [APP-216 , APP-360 , APP-390 , APP-421 , APP-457 , APP-490 , APP-520 and APP-551], updated by the ES Addendum [AS-181 , AS-184 and AS-185]. The Project is an integrated development with no opportunity for incremental change.
Land use including open space, green infrastructure and green belt	EN-1 5.10.5	<i>The ES (see Section 4.2) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan.</i>	Sections 2.2 and 2.3 of the Planning Statement [APP-590] describes the existing surrounding land uses of the main development site and each associated development site. Section 1.4 of the Planning Statement [APP-590] identifies planning and environmental designations within the main development site and in close proximity. Section 2.2 of the site-specific Planning Statements appended to Appendix B-H of the Planning Statement [APP-590] considers the planning and environmental

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			<p>designations within each associated development site and in close proximity.</p> <p>The individual statutory environmental designations affecting the main development site and off-site associated development sites are provided in Chapter 1 of Volumes 2 to 9 of the ES [APP-178, APP-348, APP-378, APP-409, APP-444, APP-478, APP-509 and APP-538].</p>
	EN-1 5.10.6	<p><i>Applicants will need to consult the local community on their proposals to build on open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements.</i></p>	<p>The proposals do not build on formal sports or open space although their impact on public rights of way is addressed in the response to paragraph 5.10.14. The application includes proposals for Leiston off-site sports facilities, to be left a legacy for Alde Valley School and the local community.</p> <p>Pre-application engagement on the Sizewell C Project is set out in the Consultation Report [APP-068] and Consultation Report Addendum [AS-</p>

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			<p>153], including engagement with local community organisations, resident and representatives. This engagement included discussions on the development of the main development site and associated development site, as well as off-site sport facilities proposals.</p> <p>Appendix 9E of ES, Volume 2 [APP-196] provides an assessment of existing sports provisions together with a review of published technical assessments to assess the likely impacts of the Sizewell C Project.</p>
	EN-1 5.10.7	<p><i>During any pre-application discussions with the applicant the LPA should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements.</i></p>	

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	EN-1 5.10.8	<i>Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination.</i>	<p>A full assessment of the potential effects of the Sizewell C Project on best and most versatile land have been set out in relevant soils and agricultural chapters in Volumes 2 to 9 of the ES [APP-277, APP-371, APP-402, APP-435, APP-470, APP-502, APP-531 and APP-563].</p> <p>A risk assessment and an impact assessment has been undertaken in the relevant topic chapters in Volumes 2 to 9 of the ES [APP-277, APP-371, APP-402, APP-435, APP-470, APP-502, APP-531 and APP-563] to assess the risk posed by current and historical potentially contaminative land uses on and surrounding the site.</p>
	EN-1 5.10.9	<i>Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.</i>	The proposed main development site and proposed associated developments are unlikely to impact on important geology sites as no geological SSSIs or

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			Local Geological Sites have been identified within the study areas.
	EN-1 5.10.13	<i>Where the project conflicts with a proposal in a development plan, the IPC should take account of the stage which the development plan document in England or local development plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented or precluded. The closer the development plan document in England or local development plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.</i>	The Sizewell C Project does not conflict with the local development plan. Appendix B of the Planning Statement Update [REP2-043] provides an update to the status of the local planning policy following the adoption of the East Suffolk Council's Suffolk Coastal Local Plan on 23 September 2020. It is demonstrated that the newly adopted Local plan policies do not alter the assessment in the Planning Statement [APP-590] .
	EN-1 5.10.14	<i>The IPC should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the IPC determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account</i>	The amenity and recreation impact assessment set out at Volume 2, Chapter 15 of the ES [APP-267] considers likely amenity and recreation effects arising from the main development site. For the associated development sites, this is set out in the relevant chapter in Volumes 3 to 9 of

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		<i>any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. The loss of playing fields should only be allowed where applicants can demonstrate that they will be replaced with facilities of equivalent or better quantity or quality in a suitable location.</i>	the ES [APP-366 , APP-397 , APP-429 , APP-464 , APP-497 , APP-526 and APP-558].
	EN-1 5.10.15	<i>The IPC should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. It should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.</i>	The Site Selection Report found in Appendix A to the Planning Statement [APP-598], sets out SZC Co.'s approach to site selection, and its consideration of alternatives for the proposals - from initial conception, through the various consultation stages, to the final proposals included within the DCO application.
	EN-1 5.10.16	<i>In considering the impact on maintaining coastal recreation sites and features, the IPC should expect applicants to have taken advantage of opportunities to maintain and enhance access to the coast. In doing so the IPC should consider the implications for development of the creation of a continuous signed</i>	Proposals for the future England Coast Path during the construction and operation of the Sizewell C Project are described in the Rights of Way and Access Strategy [REP2-035]. The amenity and recreation chapter of the main development site (Chapter 15

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		<i>and managed route around the coast, as provided for in the Marine and Coastal Access Act 2009.</i>	of Volume 2 of the ES) has assessed the effects on potential future users of the England Coast Path.
	EN-1 5.10.19	<i>Although in the case of much energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some at least of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project.</i>	<p>Section 5.3 of the Planning Statement [APP-590] explains the role and application of the overarching and detailed design principles, which have been subject to consultation, to ensure good design is achieved.</p> <p>Further detail is also set out in:</p> <ul style="list-style-type: none"> The design of the Main Development Site (permanent operational development) in the Design and Access Statement [REP5-070 To REP5-075] for buildings, structures and landscape design. The design approach for the Temporary Accommodation Campus is outlined in Appendix A

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			<p>of the Design and Access Statement [REP5-075].</p> <ul style="list-style-type: none"> The design approach for the permanent associated development sites is outlined in the Associated Development Design Principles [REP2-041]. Site Selection Report in Appendix A to the Planning Statement [APP-598].
	EN-1 5.10.20	<p><i>Where green infrastructure is affected, the IPC should consider imposing requirements to ensure the connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to new coastal access routes.</i></p>	<p>The Main Development Site Design and Access Statement [REP5-070 to REP5-075] sets out design principles and measures to create and maintain safe public access through the EDF Energy state, integrated with existing networks where reasonable practicable. Similarly, the Associated Development Design Principles document [REP2-041] provides measures to secure safe pedestrian routes for the associated development sites.</p>

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			Both documents are to be secured through the Draft DCO (Doc Ref. 3.1(E)).
	EN-1 5.10.21	<i>The IPC should also consider whether mitigation of any adverse effects on green infrastructure and other forms of open space is adequately provided for by means of any planning obligations, for example exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness and quality and, where possible, at least as accessible. Alternatively, where Sections 131 and 132 of the Planning Act 2008 apply, replacement land provided under those sections will need to conform to the requirements of those sections.</i>	Schedule 11 of the Draft Deed of Obligation [REP5-082] sets out obligations in relation to the natural environment, including means of reviewing the monitoring to be undertaken. No land is put forward to be transferred or exchanged under the Draft Deed of Obligation [REP5-085] .
	EN-1 5.10.24	<i>Rights of way, National Trails and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The IPC should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other rights of way. Where this is not the case the IPC should consider what</i>	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 [REP2-035] .

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		<i>appropriate mitigation requirements might be attached to any grant of development consent.</i>	<p>Temporary and permanent closures, diversions and creation of new PRoW for all sites are set out in the detailed Rights of Way plans [REP2-007] and in Schedule 10, 11 and 13 of the Draft DCO (Doc Ref. 3.1(E)).</p> <p>The amenity and recreation chapters assess effects on users of these recreational resources (Volumes 2 to 9 of the ES).</p>
Noise and Vibration	EN-1 5.11.4	<p><i>Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:</i></p> <ul style="list-style-type: none"> • <i>a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise;</i> • <i>identification of noise sensitive premises and noise sensitive areas that may be affected;</i> • <i>the characteristics of the existing noise environment;</i> 	<p>Each of these matters have been included in the noise assessment and detailed in the ES noise and vibration chapters for the Sizewell C main development site in Volume 2, Chapter 11 of the ES [APP-202] and associated developments in Volumes 3 to 9, Chapters 4 of the ES [APP-354, APP-384, APP-415, APP-451, APP-484, APP-515 and APP-545].</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<ul style="list-style-type: none"> • a prediction of how the noise environment will change with the proposed development; • in the shorter term such as during the construction period; • in the longer term during the operating life of the infrastructure; • at particular times of the day, evening and night as appropriate. • an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas; and • measures to be employed in mitigating noise. <p>The nature and extent of the noise assessment should be proportionate to the likely noise impact.</p>	
	EN-1 5.11.5	<p>The noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation, should also be considered.</p>	<p>The effects of changes to road traffic are assessed and presented in Volume 2, Chapter 11 of the ES [APP-202] and where relevant in the associated development assessment chapters in Volumes 3 to 9, Chapter 4 of the ES</p>

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			<p>[APP-354, APP-384, APP-415, APP-451, APP-484, APP-515 and APP-545].</p> <p>The effects of noise impacts from changes in rail traffic movements is assessed and presented in Volume 9, Chapter 4 of the ES [APP-545].</p>
	EN-1 5.11.6	<p><i>Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology-specific NPSs. In particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies.</i></p>	<p>Operational noise and vibration has been assessed in accordance with the standards and guidance referred to, which is BS 4142, BS 6472 and BS 8233 as appropriate.</p> <p>Construction noise and vibration has been assessed in accordance with the standard referred to BS 5228.</p> <p>Further details on the approach to the noise and vibration assessments, and relevant British Standards and guidance used is detailed in Volume 1, Appendix 6G of the ES [APP-171] and supporting annexes.</p>

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	EN-1 5.11.7	<i>The applicant should consult EA and Natural England (NE), or the Countryside Council for Wales (CCW), as necessary and in particular with regard to assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.</i>	The effects of noise and vibration on protected species and other wildlife are assessed in the terrestrial ecology and ornithology chapters of the ES (Volume 2, Chapter 14 [APP-224] and Volumes 3 to 9, Chapter 7 [APP-363] , APP-394 , APP-425 , APP-461 , APP-494 , APP-523 and APP-555). Consultation on the assessment methods, outcomes and mitigation requirements has been undertaken with various consultees, including the Environment Agency and Natural England as part of the consultation on the Environmental Impact Assessment (EIA) and the shadow Habitats Regulations Assessment (HRA).
	EN-1 5.11.8	<i>The project should demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of</i>	With regards to on-site mitigation (i.e. embedded mitigation), this has been included within the design of landscape bunds, acoustic screens or a combination to contain construction noise as much as possible and minimise

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		<i>landscaping, bunds or noise barriers to reduce noise transmission.</i>	<p>impact on noise-sensitive receptors (NSRs) as set out in Section 11.5 of ES, Volume 2, Chapter 11 [APP-202].</p> <p>In addition, the standard of good practice outlined in BS 5228-1 would be followed and secured through the implementation of measures set out in the Code of Construction Practice [REP5-078], through the Outline Construction Environmental Management Plan.</p>
	EN-1 5.11.9	<p><i>The IPC should not grant development consent unless it is satisfied that the proposals will meet the following aims:</i></p> <ul style="list-style-type: none"> <i>avoid significant adverse impacts on health and quality of life from noise;</i> <i>mitigate and minimise other adverse impacts on health and quality of life from noise; and</i> <i>where possible, contribute to improvements to health and quality of life through the effective management and control of noise.</i> 	<p>The potential health and wellbeing effects from changes in noise exposure are assessed in Volume 2, Chapter 28 of the ES [APP-346]. Human noise sensitive receptors within the study area are shown in Figure 11.1 and Table 11.8 of Volume 2, Chapter 11 of the ES [APP-202]. All human receptors identified around the site were included which have the potential to be affected</p>

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			<p>by noise on account of their proximity to the proposed development.</p> <p>The noise assessments explain how the Applicant has committed to a number of measures to mitigate and minimise noise effects and to avoid significant adverse effects on health and quality of life.</p> <ul style="list-style-type: none"> • ES, Volume 2, Chapter 11 [APP-202] updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] on the Main Development Site; and • Chapter 4 of ES, Volumes 3 to 9 [APP-354, APP-384, APP-415, APP-451, APP-484, APP-515 and APP-545] updated by ES Addendum, Volume 1, Chapters 5 to 9 [AS-184 to AS-188] on the associate development sites. <p>This includes a commitment to the Noise Mitigation Scheme [REP2-034],</p>

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			to be secured as part of the Draft Deed of Obligation [REP5-082] so that noise insulation or temporary rehousing may be provided where specific noise criteria are exceeded.
	EN-1 5.11.10	<i>When preparing the development consent order, the IPC should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent.</i>	Control and measures relating to noise, vibration, dust or lighting are described in the Code of Construction Practice [REP5-078] and other management and method plans, to be secured through the Draft DCO (Doc Ref. 3.1(E)).
	EN-1 5.11.11	<i>The IPC should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the IPC may wish to impose requirements. Any such requirements should take account of the guidance set out in Circular 11/95 (see Section 4.1) or any successor to it.</i>	With regards to on-site mitigation (embedded mitigation) of the main development site, this has been included within the design of landscape bunds, acoustic screens or a combination to contain construction noise as much as possible and minimise impact on noise-sensitive receptors

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	EN-1 5.11.12	<p><i>Mitigation measures may include one or more of the following:</i></p> <ul style="list-style-type: none"> • <i>engineering: reduction of noise at point of generation and containment of noise generated;</i> • <i>lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural barriers, or other buildings; and</i> • <i>administrative: restricting activities allowed on the site; specifying acceptable noise limits; and taking into account seasonality of wildlife in nearby designated sites.</i> 	<p>(NSRs) as set out in Section 11.5 of ES, Volume 2, Chapter 11 [APP-202].</p> <p>In addition, the standard of good practice outlined in BS 5228-1 would be followed and secured through the implementation of measures set out in the Code of Construction Practice [REP5-078], through the Outline Construction Environmental Management Plan.</p> <p>The Noise Mitigation Scheme [REP2-034] is to be secured as part of the Draft Deed of Obligation [REP5-082]. The Draft DCO (Doc Ref. 3.1(E)) also commits the Applicant to the rail noise mitigation strategy.</p>
	EN-1 5.11.13	<p><i>In certain situations, and only when all other forms of noise mitigation have been exhausted, it may be appropriate for the IPC to consider requiring noise mitigation through improved sound insulation to dwellings.</i></p>	<p>The Draft Deed of Obligation [REP5-082] explains that SZC Co. is committed to a Noise Mitigation Scheme to provide an offer of temporary rehousing where receptors are affected by short term peaks in construction noise and funding</p>

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			for noise insulation where longer term impacts are forecast to exceed trigger levels. The need for these measures is assessed by reference to the residual effects.
Socio-economics	EN-1 5.12.2	<i>Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.2).</i>	An assessment of the socio-economic impacts at local and regional levels is provided within Volume 2, Chapter 9 of the ES [APP-195] .
	EN-1 5.12.3	<p><i>This assessment should consider all relevant socio-economic impacts, which may include:</i></p> <ul style="list-style-type: none"> • <i>the creation of jobs and training opportunities;</i> • <i>the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities;</i> • <i>effects on tourism;</i> • <i>the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change</i> 	<p>These paragraphs of the NPS EN-1 set out the requirements for the applicant's assessment which have been adhered to within Volume 2, Chapter 9 of the ES [APP-195] and Volume 10 of the ES [APP-572 to APP-582], Cumulative and transboundary effects. This includes:</p> <ul style="list-style-type: none"> • Assessments at regional and local levels. • Assessments related to: the creation of jobs and training

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		<p><i>the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and</i></p> <ul style="list-style-type: none"> • <i>cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.</i> 	<p>opportunities; the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; effects on tourism; the impact of a changing influx of workers during the different construction and operation phases on the energy infrastructure; effects on social cohesion depending on how populations and service provision change as a result of the development; and cumulative effects.</p> <ul style="list-style-type: none"> • A review of existing baseline socio-economic characteristics, and regard to local policies where relevant. <p>A further response to EN-1 5.12.3 is provided in SZC Co.'s comments in</p>

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			Responses to ExA's First Written Questions (ExQ1) [REP3-046].
	EN-1 5.12.4	<i>Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.</i>	Volume 2, Chapter 9 of the ES [APP-195] includes a review of existing baseline socio-economic characteristics, and regard to local policies where relevant.
	EN-1 5.12.5	<i>Socio-economic impacts may be linked to other impacts, for example the visual impact of a development is considered in Section 5.9 but may also have an impact on tourism and local businesses.</i>	Volume 2, Chapter 9 of the ES [APP-195] includes assessments related to: the creation of jobs and training opportunities; the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; effects on tourism; the impact of a changing influx of workers during the different construction and operation phases on the energy infrastructure; effects on social cohesion depending on how populations and service provision change as a result of the development; and cumulative effects.

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	EN-1 5.12.6	<i>The IPC should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the IPC considers to be both relevant and important to its decision.</i>	<p>The assessment within Volume 2, Chapter 9 of the ES [APP-195] has regard to these paragraphs of the NPS EN-1 in terms of:</p> <p>Its approach to evidence-based effects (as opposed to assertion);</p> <ul style="list-style-type: none"> • The promotion or enhancement of positive aspects of the Sizewell C Project – for example jobs and skills creation; • Its approach to designing effective mitigation to mitigate potential adverse significant effects. <p>The Community Impact Report [APP-156] sets out where receptors will experience one or more significant effects across different environmental topics on a local community basis, and signposts to the full assessment (and subsequent development of mitigation).</p>

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	EN-1 5.12.7	<i>The IPC may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS).</i>	<p>The assessment within Volume 2, Chapter 9 of the ES [APP-195] has regard to these paragraphs of the NPS EN-1 in terms of:</p> <ul style="list-style-type: none"> • Its approach to evidence-based effects (as opposed to assertion); • The promotion or enhancement of positive aspects of the Sizewell C Project – for example jobs and skills creation; • Its approach to designing effective mitigation to mitigate potential adverse significant effects. <p>In terms of evidence, the assessment is supported by substantial evidence including the evidence so far available from the construction of the Hinkley Point C Project. The socio-economics assessment draws on a number of technical documents which are appended to the socio-economics chapter, provided at Volume 2, Chapter</p>
	EN-1 5.12.8	<i>The IPC should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.</i>	
	EN-1 5.12.9	<i>The IPC should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.</i>	

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			9 of the ES [APP-195] that set out key project assumptions and baseline reviews for the assessment. These are provided in Appendices 9A to 9F of Volume 2, Chapter 9 of the ES [APP-196].
Traffic and transport	EN-1 5.13.3	<i>If a project is likely to have significant transport implications, the applicant's ES (see Section 4.2) should include a transport assessment, using the NATA/WebTAG139 methodology stipulated in Department for Transport guidance, or any successor to such methodology. Applicants should consult the Highways Agency and Highways Authorities as appropriate on the assessment and mitigation.</i>	The transport implications of Sizewell C are set out, in the Consolidated Transport Assessment [REP2-045 to REP2-052] following the guidelines contained in New Approach to Appraisal (NATA)/Web-based Transport Analysis Guidance (WebTAG), The Ministry for Housing, Communities and Local Government publications and the National Planning Policy Framework. The Transport Assessment has been prepared in accordance with Planning Practice Guidance on CWTPs, Transport Assessments and Statements and is provided separately from the ES. The local highway authority and Highways England have been consulted

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			on the transport elements of the Sizewell C Project and a summary of stakeholder consultation is provided in section 1.3 of Appendix 6F [APP-171] . Highways England have also been consulted with regards to the effects on the Strategic Road Network. The focus of consultation has been with Suffolk County Council (SCC) as they manage the local highway network that will be most impacted.
	EN-1 5.13.4	<i>Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.</i>	A draft Construction Worker Travel Plan (CWTP) [REP2-055] has been prepared to support the application. The CWTP contains the measures which will be put in place to ensure successful delivery of a bus-based approach to the daily movement of the construction workforce during the Sizewell C construction works. Details of proposed measures with respect to public transport, walking and cycling as well as measures to for

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			reducing car parking requirements and minimising the impact on local roads and communities are provided with the Transport Assessment, Chapter 2 of Volumes 3 to 9 of the ES [APP-350 , APP-380 , APP-411 , APP-446 , APP-480 , APP-511 and APP-541] and Volume 2, Chapter 10 of the ES [APP-198]. The main constituent parts of the transport strategy for the project are to minimise the impact on local roads and communities through a construction workforce strategy and freight management strategy. In addition, the transport strategy seeks to limit the number or car journeys to the main development site by constraining the level of parking and actively managing the on-site parking through a permit system.
	EN-1 5.13.5	<i>If additional transport infrastructure is proposed, applicants should discuss with network providers the possibility of co-funding by Government for any third-</i>	The proposed package of transport mitigation works is identified in the Draft

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		<i>party benefits. Guidance has been issued in England which explains the circumstances where this may be possible, although the Government cannot guarantee in advance that funding will be available for any given uncommitted scheme at any specified time.</i>	Deed of Obligation [REP5-082] and is to be funded by SZC Co.
	EN-1 5.13.6	<i>A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the IPC should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the IPC should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below. Applicants may also be willing to enter into planning obligations for funding infrastructure and otherwise mitigating adverse impacts.</i>	Volume 2, Chapter 10 of the ES [APP-198] presents an assessment of transport effects associated with the Sizewell C Project and Section 10.7 summarises the proposed mitigation and monitoring measures, where it is necessary. Part b) of Section 10.7 sets out the proposed mitigation and monitoring measures during the peak construction phase. As part of the measures, funding for pedestrian, cycle and public realms improvements in Leiston and Wickham market is secured through the Draft Deed of Obligation [REP5-082].
	EN-1 5.13.7	<i>Provided that the applicant is willing to enter into planning obligations or requirements can be imposed to mitigate transport impacts identified in the NATA/WebTAG transport assessment, with attribution</i>	

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		<i>of costs calculated in accordance with the Department for Transport's guidance, then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.</i>	
	EN-1 5.13.8	<i>Where mitigation is needed, possible demand management measures must be considered and if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts.</i>	Management procedures and mitigation are contained within the draft Construction Traffic Management Plan (CTMP) [REP2-054], draft Construction Worker Travel Plan (CWTP) [REP2-055] and the draft Traffic Incident Management Plan [REP2-053] prepared to support the application.
	EN-1 5.13.9	<i>The IPC should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.</i>	
	EN-1 5.13.10	<i>Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective.</i>	
			Volume 1, Chapter 4 of the ES [APP-175] summarises the strategic alternatives considered for freight management, including the consideration of a marine-led strategy.

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			An Integrated Strategy is proposed, which seeks to maximise the use of rail, deliver Abnormal Indivisible Loads (AILs) via a Beach Landing Facility (BLF) and deliver road infrastructure improvements to improve the viability of delivery of construction materials by HGV. Through the Accepted Changes (April 2021), the transport strategy has been enhanced, most notably through the potential increase to the frequency of freight train movements to facilitate bulk material imports by rail and the addition of a temporary Beach Landing Facility to enable the movement of bulk materials by sea, thereby reducing HGV movements.
	EN-1 5.13.11	<p><i>The IPC may attach requirements to a consent where there is likely to be substantial HGV traffic that:</i></p> <ul style="list-style-type: none"> ● <i>control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;</i> 	Construction traffic would be controlled through a CTMP [REP2-054]. A draft CTMP has been prepared to support the application and summarises the proposed measures to manage HGVs during the construction phase including

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		<ul style="list-style-type: none"> • <i>make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid ‘overspill’ parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and</i> • <i>ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.</i> 	<p>the implementation of HGV routes, capping of HGV movements, HGV timing restrictions and delivery management system.</p> <p>HGV parking information is contained in the Consolidated Transport Assessment [REP2-045 to REP2-052].</p> <p>Instances classified as exceptional circumstances will be recorded. A notification procedure will need to be developed in consultation with the TRG to enable SZC Co. to identify exceptional circumstances and notify the TRG when they occur.</p>
	EN-1 5.13.12	<i>If an applicant suggests that the costs of meeting any obligations or requirements would make the proposal economically unviable this should not in itself justify the relaxation by the IPC of any obligations or requirements needed to secure the mitigation.</i>	That suggestion is not being made.
	EN-1 5.14.2	<i>Sustainable waste management is implemented through the “waste hierarchy”, which sets out the</i>	The conventional waste management strategy for the Sizewell C Project,

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Waste management		<i>priorities that must be applied when managing waste: a) prevention; b) preparing for reuse; c) recycling; d) other recovery, including energy recovery; and e) disposal.</i>	provided in Volume 2, Appendix 8A of the ES [APP-194] identifies options for waste management in line with the principles of waste hierarchy. The strategy was unchanged by the Accepted Changes.
	EN-1 5.14.3	<i>Disposal of waste should only be considered where other waste management options are not available or where it is the best overall environmental outcome.</i>	Section 8.13 of the Planning Statement [APP-590] also explains that the waste hierarchy has been applied to minimise disposal and maximise reuse and recycling. It also summarises the mitigation measures that are proposed to provide an efficient use of material resources and reduction of waste arisings, and to reduce the potential impacts.
	EN-1 5.14.4	<i>All large infrastructure projects are likely to generate hazardous and non-hazardous waste. The EA's Environmental Permitting (EP) regime incorporates operational waste management requirements for certain activities. When an applicant applies to the EA for an Environmental Permit, the EA will require the</i>	SZC Co. recognises the requirement for a number of environmental permits and will ensure sufficient information on the processes and plans in place to meeting all relevant EP requirements will be provided as part of the application.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>application to demonstrate that processes are in place to meet all relevant EP requirements.</i>	Information on permits, licenses and consents required for the scheme is provided in Volume 1, Chapter 5 of the ES [APP-176] .
	EN-1 5.14.6	<i>The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. The arrangements described and Management Plan should include information on the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.</i>	An Outline Site Waste Management Plan (SWMP) has been produced and is appended to the Conventional Waste Management Strategy included in Volume 2, Appendix 8A of the ES [APP-194] . The Code of Construction Practice [REP5-078] Part B requires the contractors to produce a SWMP , which would need to specify the information required by the Outline SWMP . This includes the sourcing, transport and use and disposal of waste and material resources, in a sustainable manner. Where waste needs to be taken off-site for re-use, recycling and recovery or disposal the SWMP would also detail information on waste carriers and the

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>waste management facilities that should be used.</p> <p>An assessment of the impact of waste is provided in Volume 2, Chapter 8 of the ES [APP-193], together with amendments in Volume 1, Chapter 2, Section 2.3 of the Environmental Statement Addendum [AS-181]. This includes an assessment of the waste arisings from the Sizewell C Project on waste management facilities. The assessment shows there to be adequate capacity to deal with the various waste stream, as explained in Section 8.13 of the Planning Statement [APP-590].</p> <p>The waste management strategy in Volume 2, Appendix 8A of the ES [APP-194] demonstrates the steps that have been taken to reduce the volume of waste arisings, and the volume of waste arisings sent to disposal, except where that is the best overall environmental outcome. This is also</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			summarised in Section 8.13 of the Planning Statement [APP-590].
	EN-1 5.14.7	<p><i>The IPC should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development. It should be satisfied that:</i></p> <ul style="list-style-type: none"> <i>any such waste will be properly managed, both on-site and off-site;</i> <i>the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and</i> <i>adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where that is the best overall environmental outcome.</i> 	<p>Information relating to the management of conventional hazardous and non-hazardous waste is set out in the Volume 2, Chapter 8 of the ES [APP-193], the amendments in Volume 1, Chapter 2, Section 2.3 of the Environmental Statement Addendum [AS-181] and the Conventional Waste Management Strategy provided in Volume 2, Appendix 8A of the ES [APP-194]. Collectively, these documents set out the strategy for managing waste generation as a result of the Sizewell C Project during its construction and operation.</p> <p>Decommissioning is considered in Volume 2, Chapter 5 of the ES [APP-189]. This explains that arrangements for the decommissioning process would be refined periodically, with a Decommissioning Waste Management</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>Plan developed prior to commencement of decommissioning. This will detail information on decommissioning waste and materials types and quantities and how this would be managed.</p> <p>Volume 2, Chapter 7 of the ES [APP-192] sets out a strategy and assesses the management of spent fuel and radioactive waste.</p>
	EN-1 5.14.8	<p><i>Where necessary, the IPC should use requirements or obligations to ensure that appropriate measures for waste management are applied. The IPC may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent.</i></p>	<p>The Code of Construction Practice [REP5-078] requires the contractors to produce a SWMP, which would need to specify the information required by the Outline SWMP in Volume 2, Appendix 8A of the ES [APP-194]. The SWMP would set out measures for monitoring the generation and management of construction waste.</p> <p>Furthermore, the Code of Construction Practice [REP5-078] and the Materials Management Strategy, as provided in Volume 2, Appendix 3B of the ES</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			<p>[APP-185] set out requirements for the monitoring of material use and management. The Materials Management Strategy requires the preparation of Material Management Plans. This will enable any site-won materials (or identified, imported materials) to be used on site, providing justification and certainty of use and ensuring that the materials comply with an earthworks specification.</p> <p>Furthermore, an Outline Soil Management Plan [REP3-018] has also been produced. This sets out the requirements for the handling and management of soils, so that site-won soils could be reused following the removal and reinstatement of temporary development.</p> <p>The Code of Construction Practice [REP5-078] and Environmental Statement, including the Materials Management Strategy [APP-185] and</p>

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			the Outline Soil Management Plan [REP3-018] are proposed to be certified under the Draft DCO (Doc Ref. 3.1(E)) to secure the above waste management measures.
	EN-1 5.14.9	<i>Where the project will be subject to the EP regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.10 will apply.</i>	SZC Co. recognise the waste permits and exemptions that will be required for a variety of waste treatments, including during operations and will seek the relevant permits when required.
Water quality and resources	EN-1 5.15.2	<i>Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES or equivalent. (See Section 4.2.)</i>	The Applicant has undertaken both qualitative and quantitative assessments in relation to water quality, water resources and physical characteristics of the water environment based on available published and site-specific information. The assessments are presented within the relevant groundwater and surface water chapters, Chapter 19 of Volume 2 of the ES [APP-297] and Chapter 12 of Volumes 3 to 9 of the ES [APP-376,

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			APP-407 , APP-441 , APP-476 , APP-507 , APP-536 and APP-570] as well as Chapters 20 and 21 of Volume 2 [APP-311 and APP-314] which consider Coastal Geomorphology and Hydrodynamics as well as Marine Water Quality and Sediments.
	EN-1 5.15.3	<p><i>The ES should in particular describe:</i></p> <ul style="list-style-type: none"> <i>the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges;</i> <i>existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to</i> 	<p>A qualitative assessment of the existing quality of waters and water resources affected by the Sizewell C Project and the physical characteristics of the water environment are set out in the Baseline Environment section (Section 4) of the relevant groundwater and surface water chapters, as follows:</p> <ul style="list-style-type: none"> Volume 2, Chapter 19 of the ES [APP-297] and Volume 1, Chapter 2, Section 2.14 of the ES Addendum [AS-181] for the main development site; and Chapter 12 of Volumes 3 to 9 of the ES [APP-376, APP-407,

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<p><i>Catchment Abstraction Management Strategies);</i></p> <ul style="list-style-type: none"> <i>existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics; and</i> <i>any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions.</i> 	<p>APP-441, APP-476, APP-507, APP-536 and APP-570] for the associated developments.</p> <p>An assessment of the impacts of the Project on existing water quality, water resources and the physical characteristics of the water environment is provided within Section 6 of the respective Chapters, as listed above, together with the below amendments:</p> <ul style="list-style-type: none"> Volume 1, Chapter 5, Section 5.10 of the ES Addendum [AS-184] on the Two Village Bypass; and Volume 1, Chapter 6, Section 6.10 of the ES Addendum [AS-185] on the Sizewell Link Road. <p>The above Chapters include a consideration and assessment of protected areas under the Water Framework Directive and source protection zones.</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			In addition, a Water Framework Directive Compliance Assessment Report [APP-619 to APP-633] and accompanying Addendum [AS-277 to AS-279] has been prepared and submitted. Collectively, the reports consider impacts of the Sizewell C Project on water bodies and activities, and on protected area located within the water bodies, and explains how the Project adheres to the European Water Framework Directive.
	EN-1 5.15.5	<i>The IPC will generally need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework Directive.</i>	As set out in Section 8.14 of the Planning Statement [APP-590], construction and operational activities of the Sizewell C Project would not lead to a change in the overall status of the water bodies. The Sizewell C Project is therefore deemed compliant with the Water Framework Directive. This is demonstrated through the Water Framework Directive Compliance Assessment Report [APP-619 to APP-

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			633] and accompanying Addendum [AS-277 to AS-279].
	EN-1 5.15.6	<i>The IPC should satisfy itself that a proposal has regard to the River Basin Management Plans and meets the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and groundwater. The specific objectives for particular river basins are set out in River Basin Management Plans. The IPC should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline/Estuary Management Plans.</i>	As above, the Project has had regard to the Water Framework Directive and its daughter directives. This is demonstrated in the Water Framework Directive Compliance Assessment Report [APP-619 to APP-633] and accompanying Addendum [AS-277 to AS-279]. The Compliance Assessment Report and Addendum also consider the mitigation measures identified in the River Basin Management Plan (RBMP) and identify the proposed Sizewell C Project activities (construction and operational activities) would not affect the RBMP delivery.
	EN-1 5.15.7	<i>The IPC should consider whether appropriate requirements should be attached to any development consent and/or planning obligations entered into to mitigate adverse effects on the water environment.</i>	Primary and tertiary mitigation measures are incorporated into the proposed development. Tertiary mitigation measures are legal requirements or are

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
	EN-1 5.15.8	<i>The IPC should consider whether mitigation measures are needed over and above any which may form part of the project application. (See Sections 4.2 and 5.1.) A construction management plan may help codify mitigation at that stage.</i>	<p>standard practices that would be implemented as part of the proposed development. For example, all construction work would be conducted in accordance with the Code of Construction Practice (through the Construction Environmental Management Plan) [REP5-078] and the Outline Drainage Strategy [REP2-033] which sets out measures for pollution prevention, and requirements for the implementation of a Pollution Incident and Control Plan and construction drainage strategy.</p> <p>Where additional secondary mitigation is required to reduce or avoid a significant effect, this is set out in the Code of Construction Statement [REP5-078] and ES [APP-159 to APP-582], including the ES Addendum [AS-179 to AS-260], which is proposed to be certified under the Draft DCO (Doc Ref.</p>
	EN-1 5.15.9	<i>The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be clearly marked.</i>	

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			<p>3.1(E)). Specifically, mitigation measures are set out the ES in:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 19, Section 7 of the ES [APP-297] for the main development site; and • Section 7 of Chapter 12 of Volumes 3 to 6, 8 and 9 and Section 4 of Chapter 12 of Volume 7 of the ES [APP-376, APP-407, APP-441, APP-476, APP-507, APP-536 and APP-570] for the associated developments. <p>The Requirements within the Draft DCO (Doc Ref. 3.1(E)) have resulted from ongoing engagement with the local authorities.</p>
	EN-1 5.15.10	<i>The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling.</i>	<p>The Water Supply Strategy [APP-601] explains how the water requirements of the Sizewell C Project could be met. In the options for water supply options, the use of water recycling and water</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
			efficiency measures to reduce the demand from mains supply (e.g. using water efficient fixtures and fittings, rainwater harvesting and greywater reuse) has been assessed. All of the primary components for the water supply strategy for the main development site are consistent with the assessment of likely significant project effects in the ES.

Table 1.2: EN-6 NPS Accordance Table

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
EN-6 Part 2: Assessment Principles			
Policy on the need for new nuclear power stations and the benefits of early deployment	EN-6 2.2.5	<i>Paragraph 1.1.2 of EN-1 sets out that the IPC must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent it is satisfied that to do so would result in adverse impacts from the development outweighing the benefits. The fact that a site is identified as potentially suitable within this NPS does not prevent the impacts being considered greater than the benefits</i>	Section 3.9 of the Planning Statement [APP-590] considers the application of policies to the Sizewell C Project DCO Application. It recognises that the detailed policies within the NPSs continue to provide the relevant policy tests for the application, which are then considered in turn in Sections 8 and 9 of the Planning Statement [APP-590] with regard to the main development site and associated development sites respectively.
Policy on the siting of new nuclear power stations	EN-6 2.3.2	<i>Having considered all of the sites nominated as well as those identified by the Alternative Sites Study (see Section 2.4 below) the Government believes that only those sites listed in Part 4 of this NPS are potentially suitable for the deployment of new nuclear power stations in England and Wales by the end of 2025. This NPS has therefore been designated for the</i>	Land to the north of Sizewell A and B nuclear power stations (i.e. the Sizewell C Project site) is identified in the Nuclear NPS EN-6 as a potentially suitable site for deployment of a new nuclear power station.

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		<i>purposes of the Planning Act 2008 in relation to applications for development consent at those sites listed in Part 4. The boundaries of each listed site are shown on a series of maps (at 1:10,000 scale) at Annex C of this NPS.</i>	Sections 3.2 and 3.3 of the Planning Statement [APP-590] explain the decision-making framework for the Sizewell C Project and the approach to decision making for the application.
	EN-6 2.3.3	<i>To reduce the likelihood of further land being needed, and to increase the usability of sites, nominators were encouraged to ensure that the area nominated into the SSA included within it all likely site plans, and all reasonable variations to those plans. The boundary of the nominated area may, however, vary from the site boundary that is proposed for development consent. It was not considered reasonable to expect nominators to have established, at the time of requesting nominations, detailed lay-outs for the whole of their proposed developments, including for example any additional land needed for construction or decommissioning.</i>	Section 3.8 of the Planning Statement [APP-590] explains the boundary of the main development site in the DCO Application in comparison to the nominated site area for Sizewell C set out in the SSA. The responses to ExQ1 G.1.1 and G.1.10 [REP2-100 to REP2-114] provide further commentary on the nominated site area in comparison to the application site boundary for the main development site, supported by Figures 2.1 and 2.2 .
	EN-6 2.3.4	<i>The SSA has therefore been carried out on the basis that applications for development consent may also include land additional to the boundary of the listed site for other elements of the power station, such as</i>	Further details on the evolution of the main development site boundary and the alternatives considered by SZC Co.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>car parks, access roads or marine landing facilities, or for the construction and/or decommissioning of the nuclear power station.</i>	are provided in Volume 2, Chapter 6 of the ES [APP-190].
	EN-6 2.3.5	<i>The Government expects the key operational elements of the power station, and in particular the infrastructure that has the potential to directly cause a radiological hazard such as the reactor building (including the associated turbine hall), spent fuel and intermediate level waste stores, to be located within the boundary of the site that was assessed by the SSA. However, the Government recognises that flexibility is required to accommodate detailed local level considerations.</i>	Key operational elements of the proposed nuclear power station are located within the nominated site area for Sizewell C set out in the SSA.
The IPC's assessment of alternatives	EN-6 2.5.1	<i>Section 4.4 of EN-1 sets out the circumstances in which the IPC may be required to consider alternative sites or proposals to an application for development consent. In doing so the IPC should act in accordance with Section 4.4 of EN-1 as well as the additional policy set out in this Section 2.5.</i>	Sizewell C is identified in the Nuclear NPS EN-6 as a potentially suitable site for deployment of a new nuclear power station. See responses to EN-1 paragraph 4.4.2 and 4.4.3 on the consideration of alternatives where there is a policy or legal requirement to do so.

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The Regulatory Justification process and the planning regime	EN-6 2.6.4	<i>Given that Justification is a separate regulatory process a decision regarding the grant of development consent should not be delayed in the event that a Regulatory Justification decision is subject to legal challenge. If there are concerns about a challenge to, or the validity of, a Regulatory Justification decision, the IPC should consider whether requirements should be attached to the Development Consent Order to the effect that the order is conditional on the existence of a valid Regulatory Justification decision.</i>	There are no such concerns and therefore no such requirements in the Draft DCO (Doc Ref. 3.1(E)).
Relationship between the regulatory framework for nuclear power stations and the planning regime	EN-6 2.7.5	<i>Applicants should have involved the Nuclear Regulators early enough during the pre-application stage so that they have had the opportunity to incorporate the relevant regulators' requirements in proposals where appropriate. However, the IPC can still consider and determine an application for development consent where the relevant regulatory licensing, permitting and authorisations process is still in progress, because the IPC can seek and rely on advice from the relevant Nuclear Regulators on whether the necessary licences, authorisations or permits are likely to be issued. Consent should not be refused on the grounds of matters within the remit of</i>	The consents, licences and agreements identified in the Schedule of Other Consents, Licences, and Agreements [REP3-011] have either already been obtained or would be sought separately from the DCO. SZC Co. sees no impediment to obtaining any of these consents, licences or agreements and is not aware of any reason why these consents should not be forthcoming. See responses to EN-1 paragraphs 4.15.3 and 4.15.4 on the involvement of

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		<i>the regulators unless the IPC has good reason to believe that any necessary licence, permit or authorisation will not subsequently be granted.</i>	the Office for Nuclear Regulation's requirements and addressing their requirements for the purposes of the DCO Application.
	EN-6 2.7.6	<i>If the regulatory approvals process is incomplete the IPC should also seek advice from the relevant Nuclear Regulators on any regulatory requirements that are likely to be attached and the anticipated timing of these processes and the IPC should liaise with the Nuclear Regulators over any relevant requirements it is considering attaching to a development consent. This is in order to ensure that where possible the requirements attached to a development consent order are consistent with the regulatory approvals process and vice versa.</i>	
Consideration of good design	EN-6 2.8.3	<i>The IPC should consider how good design can act to mitigate the impacts of new nuclear power stations, such as landscape and visual impacts (see Section 3.10 of this NPS and Section 5.9 of EN-1).</i>	See responses to EN-1 paragraphs 4.5.3 to 4.5.5.
Consideration of combined heat and power	EN-6 2.9.2	<i>In keeping with applications for other thermal generating stations, development consent applications for nuclear power stations should demonstrate that the</i>	See responses to EN-1 paragraphs 4.6.6 to 4.6.8.

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		<i>applicant has fully considered the opportunities for CHP.</i>	
Climate change adaptation	EN-6 2.10.1	<i>Part 2 of EN-1 outlines the policy context for the development of energy NSIPs, including policies for mitigating climate change. Section 4.8 of EN-1 sets out generic considerations that applicants and the IPC should take into account to help ensure that new energy infrastructure is resilient to climate change. Additional information that is specific to applications covered by this NPS is set out below.</i>	See responses to EN-1 paragraphs 4.8.5 to 4.8.12.
	EN-6 2.10.2	<i>Nuclear power stations need access to cooling water. As the sites listed in this NPS indicate, this means that nuclear power stations in the UK are most likely to be developed on coastal or estuarine sites. Without appropriate mitigation measures the potential effects of climate change could mean these sites become at greater risk of flooding than if they were located inland (see Section 3.6 of this NPS). Applicants should therefore provide the IPC with information as to how the development incorporates adaptation measures to take account of the effects of climate change, including:</i>	See responses to EN-1 paragraphs 4.8.5 to 4.8.12.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<ul style="list-style-type: none"> coastal erosion and increased likelihood of storm surge and rising sea levels; effects of higher temperatures; and increased risk of drought, which could lead to a lack of available process water. 	
	EN-6 2.10.3	Section 4.8 of EN-1 sets out that the ES should take into account how the proposal will take account of the projected impacts of climate change. This should include climate change adaptation.	See responses to EN-1 paragraphs 4.8.5 to 4.8.12.
Radioactive waste management	EN-6 2.11.5	Proposals for waste management facilities that either form part of the development of the NSIP or constitute “associated development” for the purposes of the Planning Act 2008 should be considered by the IPC in the same way as the rest of the NSIP using the principles and policies set out in EN-1, this NPS and the provisions of the Planning Act 2008. Annex B sets out that other facilities for the interim storage of waste may come forward. However, in the absence of any proposal the IPC should expect that waste would be on site until the availability of a GDF.	See responses to EN-1 paragraphs 5.14.2 to 5.14.9 on waste management.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
EN-6 Part 3: Impacts and general siting considerations			
Introduction	EN-6 3.1.4	<i>The impacts and siting considerations identified in Part 5 of EN-1 and Part 3 and Annex C of this NPS are not intended to be exhaustive. Applicants are required to assess all likely significant effects of their proposals (see Section 4.2 of EN-1) and the IPC should consider any impacts which it determines are relevant and important to its decision.</i>	See responses to EN-1 paragraphs 4.2.1 to 4.2.9 on the content and scope of the Environmental Statement in assessing all likely significant effects of the Sizewell C Project.
Ownership of sites	EN-1 3.2.2	<i>However, applicants should submit to the IPC up to date information about the ownership and land use of the site, and, where relevant, details of consultation with the owners of the land. Where the land is subject to an alternative use at the time of the application, the IPC should consider that use in conjunction with Section 5.10 (Land Use) of EN-1.</i>	The Book of Reference (Doc Ref. 4.3(D)) describes all the land, and identifies all the interest affected by the proposed Development Consent Order. Consultation with owners of the land is detailed in the Consultation Report [APP-068] and Consultation Report Addendums [AS-153 and REP3-009]. See response to EN-1 paragraph 5.10.5 on the land use of the site.
	EN-6 3.3.1	<i>For the majority of the SSA criteria the number of reactors that may be developed at a site would not</i>	The proposed Sizewell C Project would comprise two UK European Pressurised

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
Impact of multiple reactors		<i>affect the outcome of the SSA. However, for criteria where it was more relevant, the assessment was carried out on the basis of one reactor. The Nuclear AoS also used a base case of one reactor, apart from at Hinkley Point and Sizewell where it assessed twin reactors as a result of nominator proposals.</i>	Reactor (UK EPR™) units). As noted in paragraph 3.3.1 of EN-1, the AoS assessed the Sizewell C site on the basis of two reactors.
	EN-6 3.3.2	<i>This does not mean that more than one reactor could not be built at any site, but the impacts of all of the reactors proposed for a site would need to be considered by the IPC (and/or the relevant Nuclear Regulators – see Section 2.7 of this NPS) should such an application come forward.</i>	
Nuclear Impact: Flood risk	EN-6 3.6.6	<i>In addition to meeting the requirements of Section 5.7 of EN-1, applicants should identify the potential effects of the credible maximum scenario in the most recent projections of marine and coastal flooding and demonstrate that in principle adaptation would be possible.</i>	See responses to EN-1 paragraph 5.7.5 to 5.7.24. The MDS FRA [APP-093] and the MDS FRA Addendum [AS-157] demonstrate that the main development site would not be at risk of flooding from extreme fluvial events considering the credible maximum climate change allowance for river flows.

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			<p>The MDS FRA Addendum [AS-157] also provides assessment of the credible maximum scenarios for coastal flood risk, which shows that for the basis of design event (i.e. 1 in 10,000-year return period event) up to the end of planned operation (2090 epoch) the flood risk would not be significant and, in case of limited wave overtopping, it would not pose a risk to the safety of the site. For epochs beyond the operational phase flood risk would increase, however activity on site would be very limited and therefore the risk would be easier to manage. In addition, the adaptive design of the hard coastal defence feature allows raising of the defence in the future if required, thereby further reducing the risk of wave overtopping, set out in Volume 1, Chapter 2 of the ES Addendum [AS-181] and in Plates 4.3 and 4.4 of the MDS FRA Addendum [AS-157].</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
	EN-6 3.6.7	<i>Applicants must also be able to demonstrate that they could achieve further measures for flood management at the site in the future if future climate change predictions show they are necessary.</i>	<p>See responses to EN-1 paragraph 5.7.5 to 5.7.24.</p> <p>A continual monitoring and review process will be in place throughout the project, as set out in the Coastal Processes Monitoring and Mitigation Plan [REP5-059]. This monitoring, and that required for the safety case under the Nuclear Site License will inform the need for a review of the adaptive management measures. Therefore, this approach inherently allows for the measures to be reviewed and revised throughout the lifetime of the development, as required. Section 2.4 of the Update to the Description of Development [REP2-036] demonstrates the adaptability of the hard coastal defence feature that can be implemented in the future as it is required.</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
	EN-6 3.6.8	<i>Where possible, safety and operational critical installations should be sited in the areas of the site at least risk of flooding.</i>	See responses to EN-1 paragraph 5.7.5 to 5.7.24.
	EN-6 3.6.11	<i>Applicants will still need to submit a flood risk assessment in accordance with Section 5.7 of EN-1. The IPC will need to be satisfied that a sequential approach has been applied at the site level to ensure that, where possible, critical infrastructure is located in the lowest flood risk areas within the site.</i>	See responses to EN-1 paragraph 5.7.5 to 5.7.24.
	EN-6 3.6.12	<i>Subject to paragraph 3.6.13 below, the IPC is still required to consider the Exception Test in accordance with Section 5.7 of EN-1 where the site is located in Flood Zone 3 in England (or Zone C in Wales).</i>	See responses to EN-1 paragraph 5.7.5 to 5.7.24.
	EN-6 3.6.15	<i>Based on the advice of the relevant Nuclear Regulators, the IPC should be satisfied that the applicant is able to demonstrate suitable flood risk mitigation measures. These mitigation measures should take account of the potential effects of the credible maximum scenario in the most recent marine and coastal flood projections. Applicants should</i>	See responses to EN-1 paragraph 5.7.5 to 5.7.24, together with the response to EN-6 paragraph 3.6.7.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>demonstrate that future adaptation/flood mitigation would be achievable at the site, after any power station is built, to allow for any future credible predictions that might arise during the life of the station and the interim spent fuel stores.</i>	
	EN-6 3.6.16	<i>Applicants should set out measures to mitigate the risk of flooding on or from individual sites that may result from the development, including any associated infrastructure such as possible marine landing jetties/docks. For further information on mitigation measures see Section 5.7 of EN-1.</i>	See responses to EN-1 paragraph 5.7.5 to 5.7.24.
Water Quality and Resources	EN-6 3.7.3	<i>In addition to fulfilling the requirements of Section 5.15 of EN-1, the applicant's assessment should also set out the characteristics of cooling water for new nuclear power stations and the specific implications of the proposal on marine and estuarine environments.</i>	<p>The characteristics of cooling water infrastructure in the development of new nuclear power stations is considered in Volume 1, Appendix 6Q of the ES [APP-171].</p> <p>Volume 2, Chapter 21 of the ES [AS-034] and Volume 1, Chapter 2, Section 2.16 of the ES Addendum [AS-181] assesses the impact of the Sizewell C Project on the marine</p>

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			environment, estuaries and coastal waters.
	EN-6 3.7.4	<i>The IPC should consider the cumulative effects of a development consent application for the construction of a new nuclear power station at a specific site with other major infrastructure proposals in accordance with the requirements of EN-1 (in particular Section 4.2 of EN-1).</i>	The cumulative impact assessment, provided in Volume 10 of the ES [APP-572 to APP-582] and Volume 1, Chapter 10 of the ES Addendum [AS-189] consider the cumulative effects of the Sizewell C Project with other major infrastructure proposals.
	EN-6 3.7.5	<i>The IPC should liaise closely with the EA who will consider issues of water quality (including any water abstraction and discharge) as part of the environmental permitting process (see Section 2.7 of this NPS).</i>	Volume 2, Chapter 19 of the ES [APP-297] explains the pre-application consultation that has been undertaken with the Environment Agency on the approach to groundwater and surface water assessment, the impacts of groundwater and surface water resources and the potential ecological implications. This also included discussions on the approach to permitting.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
	EN-6 3.7.6	<i>In the design of any direct cooling system the locations of the intake and outfall should be sited to avoid or minimise adverse impacts on legitimate commercial and recreational uses of the receiving waters, including their ecology. There should also be specific measures to minimise impact to fish and aquatic biota by entrainment or by excessive heat or biocidal chemicals from discharges to receiving waters.</i>	As explained in paragraph 21.5.23 of the Volume 2, Chapter 21 of the ES [APP-314], embedded mitigation measures are implemented in the design of the intake and outfall headworks, including locating the outfalls of the cooling water infrastructure east of the Sizewell-Dunwich Bank approximately 3km offshore, thereby allowing greater dilution of cooling water discharges and reducing potential intersections with the shore.
	EN-6 3.7.7	<i>Discharges into water sources will be controlled in accordance with permits issued by the EA. Applicants will be expected to demonstrate Best Available Techniques to minimise the impacts of cooling water discharges.</i>	The necessary environmental permits for the Sizewell C Project are identified within the Schedule of Other Consents, Licences and Agreements [REP3-011].
	EN-6 3.7.8	<i>The contamination of soils and water resources can be mitigated through the EIA process and managed</i>	Mitigation measures which will be implemented to minimise disturbance of / remediate (if necessary) existing contamination and avoid creation of

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		<i>through the possible implementation of Environmental Management Plans.</i>	<p>potential pollutant linkages are identified within the relevant topic chapters in Volumes 2 to 9 of the ES and included in the Code of Construction Practice [REP5-078].</p> <p>Specifically, mitigation measures are set out the ES in:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 19, Section 19.7 of the ES [APP-297] for the main development site; and • Section 7 of Chapter 12 of Volumes 3 to 6, 8 and 9 and Section 4 of Chapter 12 of Volume 7 of the ES [APP-376, APP-407, APP-441, APP-476, APP-507, APP-536 and APP-570] for the associated developments.
Coastal change	EN-6 3.8.3	<i>In light of the findings of the Nuclear AoS, applicants should assess the site's geology, soils and geomorphological processes in order to understand the ongoing natural ecological, coastal and geomorphic processes. This will include identifying</i>	Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181], presents a summary of baseline assessment for coastal geomorphology.

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<i>impacts on coastal processes, intertidal deposition and soil development processes that maintain terrestrial/coastal and/or marine habitats.</i>	<p>Detailed description of geomorphic processes and impacts are given in Technical Appendix 20A of Volume 2 of the ES [APP-312] and associated feeder reports.</p> <p>Potential effects on soils and the interrelationship with ecological processes have been addressed in relevant soils and agricultural chapters in Volumes 2 to 9 of this ES [APP-277, APP-371, APP-402, APP-435, APP-470, APP-502, APP-531 and APP-563], and updated by Volume 1 of the ES Addendum [AS-181, AS-184 and AS-185].</p>
	EN-6 3.8.4	<i>For Oldbury and Hinkley Point, the AoS found that the sites themselves and other schemes which may be proposed in the Severn Estuary could result in cumulative effects. The possible in-combination effects of such schemes would require more detailed assessment by the IPC should applications for those schemes be sought or granted as at the strategic level it is not possible to identify whether or not such</i>	<p>Volume 10, Chapter 4 of the ES [APP-578], and updated by Volume 1 Chapter 10 of the ES Addendum [AS-189], considered the potential impact of the Sizewell C proposals in-combination with other schemes within the zone of influence, including:</p>

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		<i>schemes would have a detrimental impact on coastal change at the listed sites.</i>	<ul style="list-style-type: none"> National Grid Interconnector Eurolink National Grid Interconnector Nautilus Scottish Power East Anglia ONE North and East Anglia TWO
	EN-6 3.8.5	<i>In applying the policy on mitigation set out in Section 5.5 of EN-1, and having taken account of the effects of climate change over the lifetime of the project (including any decommissioning period), the IPC should be satisfied that the application will include measures where necessary to mitigate the effects of, and on, coastal change.</i>	<p>Volume 2, Chapter 20 of the ES [APP-311], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181], outlines the proposed mitigation measures which take into account climate change over the lifetime of the proposed development. A further climate change resilience assessment and in-combination climate impacts assessment is presented in Volume 2, Chapter 26 of the ES [APP-342]. A high-level description of the anticipated activities for the decommissioning of the Sizewell C power station, including a summary of the types of environmental effects likely to occur is provided in</p>

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			Volume 2, Chapter 5 of the ES [APP-189]. As discussed in Volume 2, Chapter 5 of the ES [APP-189], for the decommissioning of the proposed development, it is necessary to obtain prior consent from the Office for Nuclear Regulation and undertake a separate EIA at the time of submission.
Biodiversity and geological conservation	EN-6 3.9.3	<i>In carrying out an assessment in accordance with Section 5.3 of EN-1, applicants should also consider the effects of the construction of a new nuclear power station on the groundwater regime and its effects on terrestrial/coastal habitats</i>	<p>An Environmental Impact Assessment (EIA) has been undertaken for the Sizewell C Project and includes an assessment of the likely effects arising from the construction and operation of a new nuclear power station on groundwater, as well as terrestrial and coastal habitats. This is set out within Volume 2, Chapter 14 of the ES [APP-224] updated by Volume 1, Chapter 2 of the ES Addendum [AS-181].</p> <p>The associated developments are not considered to have any impacts on coastal habitats. The potential effects on water quality are assessed in</p>

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			Volumes 3 to 9, Chapter 12 of the ES [APP-376 , APP-407 , APP-441 , APP-476 , APP-507 , APP-536 and APP-570] in respect of the associated development sites, updated by Volume 1, Chapters 5 and 6 of the ES Addendum [AS-184 and AS-185]
	EN-6 3.9.4	<i>At the project level, baseline studies on nationally and internationally important habitats and species that may be affected as a result of the development should be undertaken by the applicant to inform the assessment of the cumulative ecological effects.</i>	<p>Extensive baseline studies of nationally and internationally important habitats and species have been undertaken for the Sizewell C Project. These are presented within:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 14 of the ES [APP-224] and supporting technical appendices. • Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523 and APP-555] and supporting technical appendices.

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			<ul style="list-style-type: none"> Volume 1, Chapters 2-6 and 9 of the ES Addendum [AS-181, AS-182, AS-183, AS-184, AS-185 and AS-188].
	EN-6 3.9.6		<p>The site boundaries have been restricted to avoid the most sensitive habitats. Primary and tertiary mitigation measures which detail measure to avoid or minimise impacts to ecology have been described in:</p> <ul style="list-style-type: none"> Volume 2, Chapter 14 of the ES [APP-224] and supporting technical appendices. Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523 and APP-555] and supporting technical appendices. Volume 1, Chapters 2 and 5 of the ES Addendum [AS-181 and AS-184]

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
Landscape and visual impacts	EN-6 3.10.7	<i>In assessing the landscape and visual effects resulting from the electricity transmission network associated with the proposal for a new nuclear power station, the IPC should act in accordance with Section 4.9 of EN-1 and with EN-5 (in particular Section 2.8 of EN-5).</i>	See responses to EN-1 paragraphs 4.9.2 and 4.9.3.
	EN-6 3.10.8	<i>The IPC should not expect the visual impacts associated with a new nuclear power station to be eliminated with mitigation. Indeed, the scope for visual mitigation will be quite limited. Mitigation should, however, be designed to reduce the visual intrusion of the project as far as reasonably practicable.</i>	<p>The assessment and design of the Sizewell C Project has been an iterative process. Measures to mitigate landscape and visual effects including the siting of infrastructure, design of buildings and selection of colours and materials are presented in the Landscape and Visual Assessment chapters in Volumes 2 to 9 of the ES [APP-216, APP-360, APP-390, APP-421, APP-457, APP-490, APP-520 and APP-551], updated by Volume 1, Chapters 2, 5 and 6 of the ES Addendum [AS-181, AS-184 and AS-185].</p> <p>It is acknowledged that landscape and visual impacts cannot be avoided but</p>

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			mitigation measures designed to reduce impacts are outlined in Section 13.5 of Volume 2, Chapter 13 of the ES [APP-216], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] in respect of the main development site.
Socio-economics	EN-6 3.11.3	<i>Through the EIA, and in accordance with Section 5.12 of EN-1, the applicant should identify at local and regional levels any socio-economic impacts associated with the construction, operation and decommissioning of the proposed new nuclear power station.</i>	These paragraphs of the NPS EN-6 set out the requirements for the applicant's assessment which have been adhered to within Volume 2, Chapter 9 of the ES [APP-195], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181] . This includes potential pressures on local and regional resources, demographic change and economic benefits. A high-level assessment of the decommissioning stage is provided in Volume 2, Chapter 5 of the ES [APP-189].
	EN-6 3.11.4	<i>This assessment should demonstrate that the applicant has taken account of, amongst other things, potential pressures on local and regional resources, demographic change and economic benefits.</i>	
	EN-6 3.12.7	<i>The applicant should work with the local authority and the local primary care trust (in England) or the Health</i>	Appendix 6Y, Section 1.3, Part b) of the ES [APP-171] explains the pre-

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Human health and well-being		<i>Board (in Wales) to identify any potentially significant health impacts and appropriate mitigation measures. Where such measures relate to better public information on the extent of risk in relation to radiological hazard, the applicant should consult the Health Protection Agency on the appropriate standards for radiological protection.</i>	<p>application consultation undertaken on the health and wellbeing aspects of the Sizewell C Project. This included the establishment of the Sizewell C Health Working Group, incorporating representatives from SZC Co., East Suffolk Council, Suffolk County Council, Public Health Suffolk, Suffolk National Health Service and Suffolk, Ipswich, East Suffolk, and the Great Yarmouth and Waveney Clinical Commissioning Groups.</p> <p>Volume 2, Chapter 28 of the ES [APP-346] explains the role of the Sizewell C Health Working Group to explore, discuss and inform the health and wellbeing assessment undertaken for the Project, and to develop design features and mitigation measures to address changes in local healthcare demand, support the delivery of local</p>

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			healthcare and health promotion objectives.
	EN-6 3.12.8	<i>The IPC should consider the positive effect of employment and other socioeconomic impacts (see Section 3.11 above) on human health and well being.</i>	Volume 2, Chapter 28 of the ES [APP-346] sets out the assessment of effects on the Sizewell C Project's construction and operational phases on human health and wellbeing. This includes a consideration of indirect health impacts arising from the Project.
Flag for Local Consideration: proximity to civil aircraft movements	EN-6 3.13.2	<i>The IPC should consider this Flag for Local Consideration in accordance with the policy set out in Section 5.4 of EN-1. Given the specific security arrangements in relation to air movements around nuclear sites, and the potential impact that new nuclear power stations may have on existing aerodromes and aviation activities, the application should assess the proximity of aircraft movements to the proposed site. Where necessary the IPC should seek the advice of the ONR to ensure that the proposed arrangements sufficiently safeguard the safety of the site.</i>	As set out in Section 8.15, part a) of the Planning Statement [APP-590], the Sizewell C main development site is not located in or adjacent to a Public Safety Zone, a Safeguarded Area, or an Air Traffic Control Area of a major civil aerodrome. The existing flight restriction zone over Sizewell prevents civil aircraft movements in the vicinity of the nominated site at an altitude of less than 2,000 foot. An exception is made

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			<p>for helicopters that have permission to land at Sizewell.</p> <p>The prevailing air traffic control regime has been developed taking account of the flight restriction zone around the existing site.</p>
Flag for Local Consideration: access to transmission networks	EN-6 3.14.2	<p><i>When considering a development consent application pursuant to this NPS, the IPC should refer to Section 4.9 of EN-1 in respect of the grid connection. Applications for above ground electricity lines of 132 kilovolts (kV) and above, and other infrastructure for electricity networks that is associated with a Nationally Significant Infrastructure Project, such as substations and converter stations, will be considered by the IPC using EN-5.</i></p>	See responses to EN-1 paragraphs 4.9.2 and 4.9.3.
Flag for Local Consideration: impact on significant infrastructure and resources	EN-6 3.15.1	<p><i>Significant infrastructure and resources includes:</i></p> <ul style="list-style-type: none"> • <i>motorways, major highways (for example A roads);</i> • <i>strategic rail network;</i> 	<p>The impact of the proposal on major highways, notably the A12, has been assessed in Volume 2, Chapter 10 of the ES [APP-198], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181]. Chapter 4 of the Consolidated</p>

Topic	NPS paragraph number	NPS Requirement	Compliance with the NPS
		<ul style="list-style-type: none"> • <i>gas transmission network;</i> • <i>electricity transmission network;</i> • <i>airports;</i> • <i>ports; and</i> • <i>Groundwater Source Protection Zones and Drinking Water Protected Areas.</i> 	<p>Transport Assessment [REP2-045 to REP2-052] sets out the overall transport strategy and explains how pressure on the A12 would be relieved through a series of measures notably including the freight management strategy and two park and ride facilities. The mitigation of impacts on the A12 would also ensure that there would be no significant impact on the operation of the port of Felixstowe.</p> <p>Regarding the electricity transmission network, ultimate responsibility for this lies with National Grid who has entered into contractual agreements with SZC Co. for connecting the new power station to its network. As set out in the Main Development Site Design and Access Statement [REP5-070 to REP5-075] and the Grid Connection Statement [APP-583], a new 400kV substation is proposed along with connection lines and pylons. The</p>
	EN-6 3.15.2	<i>Applications should demonstrate that the proposed development would not have an unacceptable adverse impact on significant infrastructure. The IPC should take into account any local authority impact report, advice from the relevant Nuclear Regulators and relevant policy in NPSs in assessing impacts on significant infrastructure and resources.</i>	
	EN-6 3.15.3	<i>In particular, the Nuclear AoS identified that there may be adverse effects during the construction and decommissioning phases on regional transport networks that may already be under stress, particularly where there are clusters of potentially suitable sites for new nuclear power stations. In considering this issue</i>	

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		<i>the policy set out in Section 5.13 of EN-1 (Transport and Traffic impacts) applies.</i>	proposals would be sufficient to avoid a significant impact. No significant effects are anticipated on the strategic rail network, gas transmission network, airports, ports or water protection designations (there are no Groundwater Source Protection Zones or Drinking Water Protected Areas within the site).
Flag for Local Consideration: size of site to accommodate construction and decommissioning	EN-6 3.16.1	<i>Some activities associated with the proposed development may take place outside of the boundaries of the listed site (for example construction and decommissioning activities – see Section 2.3 of this NPS). In considering an application for development consent IPC should assess all impacts of the proposed development that it considers relevant and important to the application in accordance with the Planning Act 2008, the policy set out in EN-1 and this NPS.</i>	The size of the main development site is defined by the Order Limits and shown in the Land Plans [APP-008 , AS-108 and AS-290]. It is sufficient to accommodate construction activities and decommissioning activities are expected to require less land than construction and so the size would be sufficient to accommodate these.