



The Planning Act 2008

*Sizewell C (SZC)*

Planning Inspectorate Reference: *EN010012*

*Deadline 7 – 3 September 2021*

East Suffolk Council's (20026200) Response to Examining Authority's Second Round  
of Written Questions

## Part 4

### Contents

Examining Authority's Second Written Questions .....	2
DCO.2 Draft Development Consent Order (DCO) – comments on the Applicants' responses to ExQs1 (all para numbers are prefixed DCO.) ...	2
FR.2 Flood risk, ground water, surface water.....	4
HW.2 Health and wellbeing .....	5
HE.2 Historic environment (terrestrial and marine) .....	6
LI.2 Landscape impact, visual effects and design .....	7

Examining Authority's Second Written Questions			
DCO.2 Draft Development Consent Order (DCO) – comments on the Applicants' responses to ExQs1 (all para numbers are prefixed DCO.)			
DCO.2.0	The Applicant, ESC, SCC, Natural England, MMO	Attention is drawn to the Commentary on the DCO which includes commentary on the Deed of Obligation	ESC has provided commentary on this in our submission at D7: ESC comments on Deadline 6 submissions.
DCO.2.6	Applicant, ESC, SCC	1.54 Please update the ExA on the position. In particular what are the views of the councils on fees?	The Applicant's response to DCO1.54 is noted and welcomed. However, ESC would remind the Applicant that it has been agreed that on any Requirement to be discharged by ESC as lead authority, SCC will be consulted and vice versa. There is

			<p>therefore no Requirement that would not involve consultation with another body.</p> <p>ESC understands that the draft Deed of Obligation to be submitted by the Applicant at D7 will acknowledge fees will be paid to ESC for the consideration of the discharging of Requirements.</p>
DCO.2.9	Applicant, ESC	1.75–The ExA will consider this response further and in the light of ISH1	ESC welcome the ExA considering this further.
DCO.2.10	Applicant, ESC	1.97 – what is the position if notice of end is not given?	ESC welcome the Applicant’s response to this question.
DCO.2.14	Applicant, ESC	1.128 –“In the Applicant's view, the proposed Natural Environment Improvement Fund in its final form is likely to meet the policy tests for obligations set out in National Policy Statement”. “Likely” sounds rather tentative.	The draft Deed of Obligation to be submitted at Deadline 7 has, at Schedule 11, the proposed Natural Environment Fund proposals set out. ESC considers that the submitted version complies with the policy tests for obligations in that they are necessary, directly related to impacts arising from the development and are fairly related in scale to the development as a whole.
DCO.2.15	Applicant, ESC	(i) Please include the TEMMPP in the documents to be certified by the SofS. (ii) There are some concerns about including the entire ES as one certified document given its size. Evidence of that is the length of the ES Signposting Document [REP2-025] at 108 pages. Should it be broken down in the certification provisions?(iii) Additionally, given its complexity, the ExA would welcome views from the Applicant, ESC and SCC	ESC agrees with the concerns raised by the ExA particularly regarding the length of the ES if it is to be included as a certified document. ESC would welcome provision by the Applicant of a schedule of certified documents to serve as a guide.

		on the inclusion and certification of a guide if a suitable document exists in the examination documentation.	
<b>FR.2 Flood risk, ground water, surface water</b>			
FR.2.10	Suffolk County Council, Environment Agency, East Suffolk Internal Drainage Board, East Suffolk Council	<p><b>Ancillary Construction Area (ACA) (or LEEIE) Drainage Strategy Technical Note.</b></p> <p>Appendix B [REP5-120] sets out the drainage design for the ACA. Provide any comments you have in relation to the strategy set out in this document.</p>	<p>ESC defers to the Environment Agency, the East Suffolk Internal Drainage Board, and Suffolk County Council as Lead Local Flood Authority to provide detailed response to this Appendix. There have been previous concerns with regards to the strategy proposed for this site which lies to the north of an area of Leiston prone to surface water flooding (subject to its own Leiston Surface Water Management Plan led by SCC working with Anglian Water, Environment Agency, and the IDB as well as local stakeholders). The Strategy acknowledges the limitations with the site from an infiltration perspective which is welcomed. However, we need to be satisfied that the storage required prior to discharge to watercourse is adequate and that discharge to watercourse, in particular if to the Sizewell Marshes SSSI, does not have an adverse impact on biodiversity. To avoid an impact on biodiversity any discharge should be at a rate no greater than the existing greenfield runoff rate and it is essential that the quality of any water being discharged is no worse than that currently in the accepting watercourse. The design of the drainage system should include the mechanisms to adequately capture and remove any pollutants, control discharge rates and monitor both the water quality and the rate of water discharge to confirm that these are within acceptable thresholds. The drainage strategy should also document what the thresholds</p>

			for discharge are and what the relevant pollutant parameters are to allow for transparent monitoring and reporting.
<b>HW.2 Health and wellbeing</b>			
HW.2.2	Applicant, ESC, SCC	<p><b>Dust Monitoring and Particulate Matter</b></p> <p>(i) In light of the advice from Public Health England in responses to FWQ AQ.1.35 and AQ.1.42 can you confirm that the Dust Management Plans will include sources of dust emissions; the location of sensitive health receptors; monitoring standards and guidelines; and a reporting schedule which allows for timely intervention if elevated concentrations are recorded.</p>	<p>ESC considers that the information provided with regard to Dust Management Plans does not yet provide sufficient information to confirm satisfactory control of dust and airborne particulate matter.</p> <p>The Applicant's outline dust management plan only provides a series of suggested control measures for specific construction activities to minimise dust emissions. ESC has asked the Applicant for more detail on the location of construction activities, mitigation measures and proposed air quality monitoring locations. The Applicant has committed to submitting a dust monitoring and management plan (DMMP) and flow chart to show the relationship of the different dust management documentation. Following receipt ESC will confirm whether the DMMP contains sufficient information to enable effective inspection and control of dust impacts.</p> <p>Once the monitoring locations are agreed through the DMMP, these will be discussed within the Environmental Review Group (ERG). The Applicant has already committed to the ERG, which ESC will form part of. One purpose of this group is to discuss air quality monitoring results, with a minimum meeting frequency of 6 months. This is considered satisfactory for review of progress against annual mean particulate concentrations (dust, PM<sub>10</sub> and NO<sub>2</sub>). In addition,</p>

			<p>alert levels will be set to address concerns regarding short term dust, PM<sub>10</sub> and on-site NO<sub>2</sub> air quality standards. In the event that air quality alert levels are breached, short notice meetings would need to be held to discuss additional mitigation required.</p>
<b>HE.2 Historic environment (terrestrial and marine)</b>			
HE.2.0	ESC, SCC, Historic England	<p><b>MDS: Requirement 3: Archaeology and Peat</b> Noting discussions at ISH1 on 6 July 2021 and the subsequent submission by the Applicant [REP5-106], are you content with the inclusion of the term 'general accordance' in Requirement 3 [REP5-029]?</p>	<p>As this question is specific in relation to requirement 3 which is archaeology specific, ESC defer to Suffolk County Council as the responsible authority for archaeology.</p>
HE.2.8	SCC, ESC	<p><b>Sizewell Link Road: Hill Farmhouse</b> Noting the response made at [REP3-044], do you concur that in respect of the historic interest the construction and operation of the SLR would result in a minor adverse effect which would not be significant?</p>	<p>Please note that the Hill Farmhouse that should be referred to here is the one that falls within the parish of Farnham and is affected by the Two Village Bypass and not the Sizewell Link Road, as stated in the question. We have reviewed the response made by the Applicant at [REP3-044] and we concur with the Applicant's conclusion that in respect of the historic interest of the Grade II listed Hill Farmhouse, Farnham, the construction and operation of the Two Village Bypass would result in a minor adverse effect which would not be significant.</p>
HE.2.10	The Applicant, SCC, ESC, Historic England	<p><b>Enhancement to Proposed Mitigation Schemes</b> Please provide an update on discussions regarding potential enhancement of mitigation schemes for the below assets: (i) Theberton Hall</p>	<p>ESC can confirm that officers have participated in one meeting with the Applicant that included District and County Council colleagues (landscape, ecology and environmental protection) in respect of a general discussion on mitigation proposals that consist of landscaping in relation to: Theberton Hall, Farnham Hall and Hill Farmhouse</p>

		(ii) Abbey Cottage (iii) Farnham Hall (iv) Hill Farmhouse (v) Barrow Cemetery Group (FMF site)	<p>(Middleton, not Farnham). There have been no discussions in respect of Abbey Cottage. The Barrow Cemetery Group (Freight Management Facility) is under the consideration of County Archaeology colleagues and not ESC. Historic England was not a party to the meeting.</p> <p>The meeting was an initial scoping meeting only, with the potential for further meetings in the future to address specific technical issues arising from land ownership, future management, associated costs, maintenance liabilities in the long term, and the provision of technical drawings and information. The actual design of the mitigation was not discussed.</p>
<b>LI.2 Landscape impact, visual effects and design</b>			
LI.2.1	SCC, ESC, Natural England, The AONB Partnership, National Trust, Stop Sizewell C, TASC	<b>Additional Construction Visualisations</b> Additional illustrative day and night-time construction photomontage visualisations are to be produced from four Representative Viewpoints [REP5-117]. Please comment on the suitability of the selected locations.	ESC considers that the additional nominated ( <a href="#">REP5-117</a> ) illustrative day and night-time construction photomontage visualisation viewpoints are suitable for the purpose of giving an understanding of peak construction activity from a range of contrasting aspects and with important public accessibility.
LI.2.3	The Applicant, SCC, ESC	<b>Design Review Panel</b> Please provide an update regarding discussions on the proposed role of a design review panel.	ESC has provided the Applicant with further detail on the existing RIBA Suffolk Design Review Panel and how it operates.
LI.2.4	ESC, SCC	<b>Design Review Panel</b>	

		Paragraph 1.4.18 of [REP5-110] confirms that the design review panel would be used to provide independent support for the processing of design submissions defined by the requirements. Are you content with the proposed timing of the role?	ESC is in discussion with the Applicant regarding the appropriate timing of a Review Panel and the specific building design that it would relate to as it will only be utilised in relation to buildings that are design critical (prominent) and non-nuclear specific. It is anticipated the Review Panel would be instigated primarily in relation to the turbine halls and operational service centre. It is accepted that this would form part of the discharge of requirements phase post-decision.
LI.2.7	ESC, SCC, Natural England, The AONB Partnership, Stop Sizewell C, TASC	<b>SSSI Crossing – Design Amendment</b> Please review the amended SSSI crossing design [REP5-010] and provide comment.	<p>ESC has reviewed and noted the revised design for the SSSI crossing [REP5-010]. In respect of landscape related issues only, the revised designs are considered acceptable subject to submission of planting details for the embankments which can be dealt with at discharge of requirements stage. The previously submitted indicative landscape strategy plan for the embankments has been agreed as acceptable.</p> <p>In relation to ecology related issues, for the construction phase whilst the increase in the height between the base of the bridge deck and the ground to between approximately 6.1m and 6.8m is welcomed, it is noted that the design of the crossing includes a drainage pipe on the eastern side which lowers the crossing height in this area to approximately 5m. This is below the minimum height of 6m that the Environment Agency have requested in order to prevent the crossing structure resulting in significant fragmentation effects (particularly on invertebrates), and it is therefore a concern that the proposed crossing structure will result in an increased impact over other designs which are available. The Applicant has indicated that it may be possible to amend the</p>



			<p>design of the drainage pipe so as to ensure a minimum height of 6m and confirmation of the position is expected from the Applicant.</p> <p>For the operational phase, the reduction of the operational width of the bridge section of the crossing to 15m is noted and welcomed. The increase in the height between the base of the bridge deck and the ground to a minimum of 6m (and up to 6.8m in some areas) is also welcomed.</p>
LI.2.9	The Applicant, ESC, Natural England, The AONB Partnership, Stop Sizewell C, TASC	<p><b>Alternative Outage Car Park Note</b></p> <p>Please review and comment on the content of the SCC submission [REP5-171].</p>	<p>ESC has provided the following comment in our Deadline 6 submission [REP6-032]:</p> <p>SCC has responded to the ExA request at ISH5 to provide greater detail on how it considered an alternative to the proposed outage car park at Goose Hill could be achieved. ESC notes SCC's response but would like to highlight some concerns.</p> <p>At para. 13 page 3, SCC suggest that the Applicant sets up a "call-off" contract with one or more local farmers or landowners to permit temporary parking on their land should it be required in the event of an unplanned outage clashing with a planned outage. SCC does recognise that such use would require discussion with the local planning authority. As the local planning authority for the East Suffolk administrative area, ESC is concerned that any such arrangements would be unlikely to be acceptable in the countryside location (possibly within or visible from the AONB) in such an ad hoc manner. Appropriate and safe highway access would be required, and it is unlikely that such fields would be appropriate for vehicle parking without additional work including potential re-</p>

			<p>surfacing, any such temporary parking arrangement would have an unacceptable visual impact, be harmful to vehicle and pedestrian safety, lead to drainage problems in many areas, and cause community disruption and concern. Temporary facilities to facilitate park and ride from such areas would also add to the landscape and visual impacts and are likely to be objected to by local residents in most rural locations that are well related to the road access routes.</p>
LI.2.22	ESC, SCC, Natural England, The AONB Partnership, National Trust	<p><b>Design and Access Statement – Overarching Design Principles and Detailed Built Development Principles</b></p> <p>Several amendments and additions have been made to Tables 5.1 and 5.3 of the DAS [REP5-070]. Please review and comment on the amendments and additions.</p>	<p>Landscape: ESC has no further response in respect of landscape issues in relation to this matter.</p> <p>Design: Please note that in the Tracked Changes Version of the DAS that ESC has reviewed, there are, in fact, no amendments or additions to Table 5.1 Overarching Design Principles that were made for submission at Deadline 5 (July 2021). If changes made prior to Deadline 5 are referred to here by the question, we welcome those that have been included on sustainability (Overarching Design Principles 76-78).</p> <p>For Table 5.3 Detailed Built Development Principles, a new principle has been added – number 80 – to recognise the Main Access Building’s distinct location and function at the main site entrance. ESC welcomes the inclusion of this principle which draws attention to the particular nature of this building and its specific function and setting. As a result of its inclusion ESC is hopeful that a considered design will be</p>

			<p>provided at a later stage. ESC supports the addition of Detailed Built Development Principle 80.</p> <p>If changes made to Table 5.3 prior to Deadline 5 are referred to here by the question, ESC welcomes those that have been included in relation to colour palette, colour options, specification and setting for the Turbine Halls, OSC and interim spent fuel store, all to be agreed with ESC (Detailed Built Development Principles 56-57).</p>
LI.2.23	ESC, SCC, Natural England, The AONB Partnership, National Trust	<p><b>Design and Access Statement – Overarching Design Principles</b></p> <p>In respect of Overarching Design Principles 17-21 [REP5-070], are you satisfied that the proposed design of the MDS meets the objectives of these principles?</p>	<p>ESC confirms that the proposed design of Sizewell C expresses itself clearly in plan layout and three dimensions as a master-planned composition with a strong over-riding concept behind the organisation of built form within the proposed site. ESC acknowledges that the composition relates across to the pre-existing stations at A and B in terms of the placement of volumes and forms, and the effect of that in three-dimensions and in long and short views across all three sites. ESC acknowledges that the design includes a clear approach to the appearance of some buildings from a distance through the choice of cladding and the manipulation of the cladding grid at differing distances, the effect of which may be to mitigate perceived scale.</p>
LI.2.24	ESC, SCC, Natural England, The AONB Partnership, Theberton	<p><b>Design and Access Statement – Accommodation Campus Design Principles</b></p> <p>Please review and comment on the revised design principles contained within Table A.1 [REP5-075].</p>	<p>Landscape: In respect of land matters pertaining to the accommodation campus, ESC is satisfied with relevant references within these design principles.</p>

	and Eastbridge Parish Council, Stop Sizewell C, TASC		Design: Appendix A – Accommodation Campus - Table A1 Key Design Principles, p242 [ <a href="#">REP5-075</a> ]. The additions here were first proposed by the Applicant in their June submission comments on Responses to the ExA's First Written Questions (ExQ1) Volume 1 - SZC Co. Responses [ <a href="#">REP3-046</a> ] They were due to be discussed at ISH 5 in which ESC participated but ESC had not seen or reviewed the Document at that stage. ESC is satisfied with the proposed amendments and additions to the Key Design Principles for the Accommodation Campus at Principle numbers 1,2,4,7,13,14,15 and 16. ESC is pleased to note that all of ESC's previous suggested additions have been incorporated in one way or another. We believe that these changes strengthen the Principles and are essential to ensure that they are comprehensive in their benchmarking of design quality. We are therefore content to support the amendments and additions to Table A1 at Appendix A of the DAS.
LI.2.26	The Applicant, ESC	<b>Design and Access Statement – Accommodation Campus Design Principles</b> Principle 13 in Table A.1 [ <a href="#">REP5-075</a> ] refers to the colour of buildings and the consideration to be given to the Suffolk Coast and Heaths AONB Guidance on the Selection and Use of Colour in Development document. In contrast, Detailed Built Development Principle 56 in Table 5.3 [ <a href="#">REP5-070</a> ] includes the need for the agreement of ESC in respect of cladding colours for the turbine halls. Whilst noting the content of	ESC consider that it is for the Applicant to advise the Examiners what consideration has been given to ensuring that there is a similar level of involvement by ESC in respect of the colour finish of the accommodation campus buildings to those on the MDS.

		Requirement 17 [REP5-029], what consideration has been given to a similar level of involvement of ESC in respect of the colour finish of the accommodation campus buildings?	
LI.2.30	The Applicant, SCC, ESC	<b>Associated Development Sites – Requirement 2 2A</b> SCC [REP5-176] considers they should be the discharging authority for Requirement 22A as the proposed landscaping is on highway land. Are discussions regarding this matter underway?	This is under discussion. There is some concern that some of the landscaping would be outside the area the highway authority would be willing to adopt. We therefore need to decide if the landscape requirement is best dealt with holistically by ESC or in part by SCC and in part by ESC.