

**Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project**

**The Examining Authority's third written questions and requests for information (ExQ3)**

**Issued on 09 September 2021**

**Responses are due by Deadline 8: 24 September 2021**

**PART 1 OF 6**

**G.3** [General and Cross-topic Questions](#)

**Ag.3** [Agriculture and soils](#)

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ExQ3	Question to:	Question:
<b>G.3</b>	<b>General and Cross-topic Questions</b>	
G3.0	The Applicant	<b>Policy approach:</b> The draft Overarching National Policy Statement for Energy (EN-1) was published on 6 September 2021. In addition, the associated 'Planning for New Energy Infrastructure Draft National Policy Statements for energy infrastructure' consultation document was published which includes comments in relation to EN-6. Please provide an update in the light of these recent publications setting out any perceived implications for the application of policy to the Sizewell C Project and the need for new electricity generating infrastructure of the type of proposed.
G3.1	The Applicant, ESC, SCC	<b>Policy approach:</b> Please confirm your view as to the correct policy approach in this case to development within the AONB in the light of relevant NPS, NPPF and Local Plan policies relating to major development in such locations?
<b>Ag.3</b>	<b>Agriculture and soils</b>	
Ag.3.0	The Applicant	<b>Permanent and Temporary Loss of Agricultural Land</b> The content of Appendix E 'ALC Land Take Summary Table' [REP6-24] is noted. However, the response by Natural England to FWQ Ag.2.2 at Deadline 7 contends that data inconsistencies remain within Table 17.6 of [APP-277]. Please provide a response.
Ag.3.1	The Applicant	<b>Outline Soil Management Plan (oSMP)</b> The response by Natural England to FWQ Ag.2.2 at Deadline 7 details several required amendments to the oSMP. Please consider each amendment and confirm whether changes to the oSMP are required. Where not considered necessary, please provide a detailed justification.
<b>AQ.3</b>	<b>Air Quality</b>	
AQ.3.0	The Applicant	<b>Clarification</b> Following the submission responding to actions at ISH4 Socio economic and community issues Para 1.3.12 refers to a number of receptors, and says the results are presented in



ExQ3	Question to:	Question:
		[AS-127]. Please advise which plans show the locations of each of the receptors identified. SX18 does not appear to be present, but please advise for each.
AQ.3.1	The Applicant, ESC	<p><b>Monitoring and Reporting of Results</b></p> <p>Concern was expressed throughout the ISH on Air Quality on future monitoring of air quality in respect of PM10, PM2.5, and NOx.</p> <p>(i) Has a monitoring and reporting regime now been agreed?</p> <p>(ii) Please confirm where this is secured within the DCO documentation.</p> <p>(iii) Please advise how, the public will be kept apprised of the findings of the ongoing monitoring.</p>
AQ.3.2	Applicant, ESC, EA	<p><b>Medium Combustion Plant Directive and Non Mobile Machinery - Clarification</b></p> <p>There are a series of generators that would be used through construction and operation which are covered by different regimes of control.</p> <p>(i) Can each party confirm the position in respect of how the different elements are controlled so that there is a clear understanding of who controls what (EA – Medium combustion Plant?) (ESC- Non Mobile Machinery up to 560Kw) and if agreed how the in combination effects of the different plant is controlled to an appropriate level.</p> <p>(ii) If it is not agreed, please explain what the differences are.</p> <p>(iii) Will plant above 560Kw be covered by controls under the Medium Combustion Plant Directive? Or through an EA permit?</p> <p>(iv) Please clarify what is the EA permitting threshold.</p>
AQ.3.3	Applicant, ESC,	<p><b>Ozone</b></p> <p>In the event that the latest change request were to be accepted would this have any implications for ozone?</p> <p>At the ISH8 on Air Quality, it was indicated that raised ozone levels in the vicinity of the site were largely related to activities from elsewhere although this is not agreed by all parties. Are their implications for raised ozone downwind of the application site irrespective of the change request?</p>

ExQ3	Question to:	Question:
AQ.3.4	PHE, ESC	<p><b>Ozone</b></p> <p>Concerns continue to be expressed by Interested Parties (Frances Crowe D7) REP7-XX as to the likely adverse health effects as a consequence of a combination of increased ozone and increased particulate matter and NOx linked to the construction of and transport for the proposed development.</p> <p>Can ESC and PHE confirm their position in respect of any effects of ozone either in itself or in combination with other pollutants and any risks to human health that may arise.</p>
AQ.3.5		<p><b>Monitoring of PM<sub>2.5</sub></b></p> <p>It would appear higher levels of PM<sub>2.5</sub> are linked to poorer health outcomes for residents/people subject to exposure at higher levels and that this increase in risk, increases over time.</p> <p>(i) Is this considered to be a reasonable assumption?</p> <p>(ii) If so would it not be appropriate to monitor levels of PM<sub>2.5</sub> now to understand the baseline position in advance of the commencement of work in the event the DCO were to be granted, and to have a requirement/obligation to monitor future levels both on the main freight routes but also at and around the main construction site?</p> <p>(iii) If this were not undertaken can the SoS be assured that the test to protect human health during construction and subsequent operation are being met?</p>
<b>Al.4</b>	<b>Alternatives</b>	
Al.3.0	The Applicant	<p><b>General assessment principles:</b></p> <p>Please provide an update in relation to the Applicant's consideration of alternatives in the light of the judgment in <i>R (Save Stonehenge World Heritage Site Limited) v Secretary of State (Holgate J, 30 July 2021)</i> with particular regard to the absence of any consideration of alternatives for the main site platform and decisions relating to the reactor design.</p>
Al.3.1	The Applicant	<p><b>General assessment principles:</b></p> <p>The Deadline 5 submission of Bill Parker [REP5-191], states that a core issue is that the space between the sea to the east and the SSSI Sizewell Marshes to the west is too narrow to accommodate this specific nuclear power station design. He questions why: "only one inappropriate design of nuclear station has been presented". Please explain why</p>

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		other alternatives to the nuclear power station design and dimensions sought have not been considered and assessed?
Al.3.2	The Applicant	<p><b>General assessment principles:</b></p> <p>The Deadline 5 submission of Professor Blowers [REP5-189], in relation to the potential suitability of the site puts forward three qualifications to the Applicant's assumption that the site is not an issue since Sizewell is one of those sites listed in the NPS. In addition, his Deadline 7 submission states that the recent report of the IPCC has a direct bearing on the development of a nuclear power station such as Sizewell C on a coastal location and is relevant to the policy on strategic siting assessment. Please respond and comment on the need to assess the suitability of the site as a whole in the light of the NPS designation and in the light of the recent report of the IPCC.</p>
Al.3.3	The Applicant	<p><b>General assessment principles:</b></p> <p>The draft Overarching National Policy Statement for Energy (EN-1) was published on 6 September 2021. This includes reference at Section 1.7 to the Appraisal of Sustainability and Habitats Regulation Assessment and explains the assessment of alternatives to EN-1 and to the consideration of alternatives in Section 4.2. Please comment on any implications arising from that assessment for the inclusion of Nuclear generation within EN-1, and for the consideration of alternatives to the proposed development generally.</p>
<b>AR.3 Amenity and recreation</b>		
AR.3.0	The Applicant, SCC, Local Access Forum	<p><b>Suffolk Coastal Path</b></p> <p>It is expected that equestrians will have to dismount to ensure safe crossing underneath the permanent BLF, via the use of mounting blocks.</p> <p>(i) Do SCC regard this as a suitable solution for equestrians?</p> <p>(ii) How has the safety of elderly and disabled riders using such a facility been assessed?</p> <p>(iii) Are there details setting out the dimensions, type of block and suitability of surface both of the block and surrounding ground set out anywhere? If not how are these details to be agreed?</p> <p><b>(iv)</b> What provision would there be for maintenance going forwards.</p>

**ExQ3: 09 September 2021**

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The Planning Inspectorate  
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