

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

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 6 OF 6

R.3 [Radiological considerations](#)

SA.3 [Section 106](#)

SE.3 [Socio-economic](#)

TT.3 [Traffic and Transport](#)

Wa.3 [Waste \(conventional\) and material resource](#)

ExQ3	Question to:	Question:
R.3	Radiological considerations	
R.3.0	The Applicant, ONR, Environment Agency	<p>Permits and Licences</p> <p>In the event that the latest change request were to be accepted;</p> <p>(i) Please provide an update on the latest position regarding the progress of the respective permits and licences required to construct and operate the proposed development.</p> <p>(ii) Please advise on the likely timeline for concluding the consideration of these licences and permits.</p> <p>(iii) Is there anything at this stage that you consider may prevent the issuing of such licences or permits?</p>
R.3.1	ONR	<p>Permits and Licences</p> <p>As of D7 the Applicant does not have a clear pathway to delivering the water supply for construction to meet the current timetable of proposed development.</p> <p>(i) In the event that the latest change request is accepted, this could facilitate the provision of a desalination plant for a temporary period during construction, but not for future operation. Walker Morris on behalf of Northumbrian Water Limited (NWL) have now responded at D7 with a holding objection to the proposed development and while it remains committed to pro-active engagement NWL believe the ideal outcome for water supply to Sizewell C may be for the Applicant to have a self sufficient water supply.</p> <p>(ii) Could the ONR advise if this has any implications for the licensing or timetable of the proposed development?</p> <p>(iii) Is one of the licence conditions that a reliable water supply to the site at the quantum necessary is available and secured?</p> <p>(iv) The Change request seeks only a temporary period for the desalination plant while the preferred option of a piped water supply is facilitated. At what point would the permanent supply need to be in place?</p>
R.3.2	Applicant, ONR, EA	<p>Radiological Safety</p> <p>TASC at [REP6-076] identify a series of concerns with regard to radiological safety during operation and post operation.</p>

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		Can the ONR and EA advise in respect of these concerns and confirm if any of the matters raised will not be safeguarded by the licensing/permitting regime
R.3.3	ONR, EA	<p>EPR Safety</p> <p>IPs including TASC have raised safety concerns in light of information regarding ongoing issues at other EPR reactor sites around the world.</p> <p>Please confirm that the safety concerns are covered by the licensing/permitting regime. If there are any outstanding matters which you regard as being more appropriately dealt with through the DCO process advise what these are.</p>
R.3.4	The Applicant, ONR, EA	<p>Radioactive waste</p> <p>The Deadline 5 submission of Professor Blowers [REP5-189], submits that the potential suitability of the site for the management of radioactive waste during operations and far beyond into the future is a matter for the Examination and its scope should not be limited by relying on the evidence of the ONR and the EA. 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 viability of the site, threatening the decommissioning process and the long-term management of radioactive waste. Please respond and set out your view as to the appropriate process for the consideration of the long-term management of radioactive waste and whether you have any concerns in that respect at this stage?</p>
TT.3 Traffic and Transport		
TT.3.0	The Applicant	<p>Sizewell Link Road – Travel Distance and Journey Times.</p> <p>The Route W option could have reduced overall travel distance and journey time to the site. These factors provide a reliable guide to the transport sustainability of possible solutions. Explain why consideration of these factors was not included in Table 7.1 of Appendix A of the Planning Statement as a Key Environmental Factor in considering the various alternatives.</p>
TT.3.1	Applicant	<p>Sizewell Link Road (SLR) – Use as Temporary Haul Road.</p> <p>It is assumed that the use of the SLR construction site as a temporary haul road will commence once the bridge over the railway is completed. Explain:</p>

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		<ul style="list-style-type: none"> (i) The time the SLR site will be used as a haul road for materials to / from the Main Development Site; (ii) The numbers anticipated per day during that time; and (iii) If for some reason that this temporary haul road would be unavailable would additional HGV be travelling on the B1122 through Middleton Moor and Theberton?
TT.3.2	Suffolk County Council	<p>SLR – Timing of Delivery and Impact on B1122.</p> <p>Are you satisfied that the Early Years mitigation along the B1122 and the controls proposed by the Applicant address any outstanding concerns relating to the B1122 prior to the SLR becoming operational? Set out any remaining areas of concern.</p>
TT.3.3	Applicant, Network Rail and SCC	<p>A12 – Darsham Level Crossing</p> <p>In response to TT.2.5 Network Rail (NR) have responded that they will be applying for funding for full barrier control crossing enhancement as part of its funding submission for CP7 (Mar 2024). They also note should funding not be secured, the mitigation works could not be delivered, and NR could not support the Park & Ride car park operation due to the unacceptable risk. The Applicant has already agreed a 50% contribution to the works, but delivery of the works will be dependent on NR securing funding for the other 50%. It is proposed to have a Framework Agreement concerning the additional contribution and NR state that the Northern Park and Ride can only become operational if mitigation is secured and delivered within 6 to 12 months of the opening of the Park and Ride site.</p> <p>Explain:</p> <ul style="list-style-type: none"> (i) Is the enhancement to full barrier control considered necessary for safe operation of the level crossing to accommodate the additional traffic level associated with the Proposed development; (ii) What would happen if funding was not secured as part of the NR CP7 settlement; and (iii) Do the County Council have any views as to the safe operation of this crossing as a result of the Proposed Development?
TT.3.4	Applicant, Suffolk County Council	<p>Early Years - Farnham and Stratford St Andrew.</p> <p>Is there any mitigation proposed to manage the additional traffic through Farnham and Stratford St Andrew to mitigate any problems on the A12 through these villages in</p>



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		advance of completion of the Two Village Bypass? And additionally, explain the rationale for such an approach.
TT.3.5	The Applicant	<p>Early Years – Transport Assessment.</p> <p>The Applicant now proposes a two part definition of what constitutes the Early Years.</p> <ol style="list-style-type: none"> (1) For HDV numbers the Early Years will finish once the Sizewell Link Road and the Two Village Bypass are completed. (2) For construction workers the Early Years modal split targets in the CWTP are suggested to control travel by car up to the point of opening of one of the Park and Rides. <p>The Consolidated Transport Assessment (TA) [REP4-005] in paragraphs 4.1.3 and 6.2.16 states only one definition of the Early Years, that is “when both the main development site and associated development sites are under construction, without any highways mitigation in place.”</p> <p>Table 7.7 of the TA sets out the modelling assumptions for the whole network in the Early Years.</p> <p>It is clear that the Early Years modelling has been done assuming 1500 construction workers to the main development site and 730 to the Associated Development Sites.</p> <p>It is also clear from the definition provided in the TA that the Early Years construction workers TA assumption was not based on any of the Associated Development sites anticipated to be operational. Table 7.7 only quantifies construction workers for Associated Development Sites and not any workers using the sites as a Park and Ride.</p> <p>It therefore follows that if one or both park and rides are operational and in use there may well be many more construction workers driving on the network to access the Park and Ride sites for operational purposes and in addition Park and Ride operational buses from either one or both Park and Ride sites. Their travel patterns will not have been assessed in the Early Years scenario in the Consolidated Transport Assessment and related assessments.</p>



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		<p>A reliance on a modal split target in the Early Years for construction worker travel only to the main development site will not control workers numbers and traffic on the wider network and certainly not limit the traffic levels to those assessed in the TA for the Early Years.</p> <p>Explain:</p> <ul style="list-style-type: none"> (i) How the modal split approach for construction worker travel currently proposed will ensure that the Early Years assessments in the TA and resulting assessments will not be compromised; and (ii) Why there should not be one consistent definition of the Early Years for all travel.
TT.3.6	The Applicant	<p>B1122 Early Years</p> <p>The Early Years caps that relate to HDVs on the B1122 at Theberton and Middleton Moor are now proposed to include HGV, buses, HGV associated with Associated Development sites and potentially up to 40 tankers /day associated with Change No.19, if accepted.</p> <p>Explain:</p> <ul style="list-style-type: none"> (i) Is it intended to use 30m³ water tankers and are these articulated vehicles? (ii) The expected number of buses to use the B1122 in the Early Years; (iii) The expected number of HGV's relating to the Associated Development (AD) Sites expected to use the B1122 in the Early Years; and (iv) Previous justification maintained that the cap was developed for the requirements for HGV without buses, AD site HGV and water tankers. Could caps not be refined to minimise the number of HDV on the B1122 in the Early Years, i.e if no water tankers then could caps be adjusted downwards and in similar way for AD site and buses. The desired outcome should be to have caps to both level and timing in the early years that can be managed by both the DMS and the Transport Review Group to minimise the environmental effects on the B1122 by having a much more reactive approach to the cap level.
TT.3.7	Suffolk County Council	<p>Control over Construction Traffic and Worker Travel</p> <p>Explain whether you agree with the controls proposed by the Applicant and if not explain why you consider some amendment is needed for:</p> <ul style="list-style-type: none"> (i) HDV caps proposed within the Construction Worker Travel Plan; and

ExQ3	Question to:	Question:
		(ii) Modal split control proposed within the Construction Worker Travel Plan.
TT.3.8	The Applicant, Suffolk County Council	<p>Highway Mitigations.</p> <p>Outline the mitigations proposed and also explain any areas where mitigations are yet to be agreed for the following locations:</p> <ul style="list-style-type: none"> (i) Marlesford; (ii) Little Glemham; (iii) Yoxford; (iv) Middleton Moor; (v) Theberton; and (vi) B1125 Westleton and Blythburgh.
TT.3.9	The Applicant	<p>Construction Works on the A12</p> <p>Suffolk County Council [REP6-049] Table 4, 1.3.17 state they have made strong representations about the delivery of the A12 junctions and connections at Yoxford and the Two Village Bypass and the Sizewell Link Road being delivered ahead of any works on the Main Development Site. Provide a response about the phasing of these improvements ahead of any works on the Main Development Site along with any suggested control mechanism.</p>
TT.3.10	The Applicant	<p>"Rat Running or Alternative Route Selection"</p> <p>The issue of "rat running" has been raised throughout the Examination by numerous Interested Parties. Explain how these concerns have been addressed and the strategy for dealing with any issues that may arise along with the relevant control mechanisms proposed to be secured within the DCO, in relation to:</p> <ul style="list-style-type: none"> (i) Car and LGV travel to and from the Main Development Site; and (ii) Car and LGV travel to and from the Park and Ride sites.
TT.3.11	Suffolk County Council	<p>"Rat Running or Alternative Route Selection"</p> <p>Explain your views as to the effectiveness of the Applicant's proposed strategy for monitoring and addressing any issues relating to "rat running". In addition, provide details of any areas where the Council considers that additional controls would be beneficial and the reasoning for such additional controls.</p>

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TT.3.12	The Applicant	<p>Parking Levels on Main Development Site</p> <p>In response to TT.2.9 the controls within the DCO were set out. Any parking provided within Work No. 1A would be controlled by requirement 8. However, there are other work areas, by way of one example parking will be created as part of the Work No.3, the accommodation campus and also additional parking can be created in accordance with Part 2 of Schedule 1. For control of traffic levels to be effective all trip end parking needs to be controlled. Explain how all parking provided as a result of the Proposed Development will be controlled within the DCO to ensure its use is only for the purpose intended and also that it does not compromise the mode share target approach within the CWTP.</p>
TT.3.13	The Applicant	<p>Fly Parking</p> <p>Explain the strategy that is proposed to be adopted to deal with the issues of fly parking. Also explain the mechanism for residents to report problems and how such problems are proposed to be dealt with expediently. In addition, explain how this approach would be secured in the DCO.</p>
TT.3.14	Suffolk County Council	<p>Fly Parking</p> <p>Provide any comments on whether the Council considers that the fly parking approach proposed by the Applicant is robust enough to address any problems that may arise. Additionally, provide any additional mechanisms you consider would improve the effectiveness of the proposed response along with the reasoning for such suggestions.</p>
TT.3.15	Applicant	<p>Traffic Monitoring</p> <p>Suffolk County Council [REP6-049] Table 5, 1.2.4 and 1.2.5 set out the case why the provision of Automatic Traffic Counters would greatly assist in the ability to monitor real time traffic flow and allow for more immediate responses to issues as they arise as well as to understand profiles and to identify atypical traffic patterns. This seems to offer a very responsive way of monitoring traffic over the lengthy construction period. Explain why the quarterly surveys proposed can provide the same level of monitoring and responsiveness.</p>
TT.3.16	Applicant	<p>Transport Review Group Membership</p> <p>It is understood that you are now proposing that Suffolk Constabulary have voting rights in the Transport Review Group. You are also proposing a fourth appointee from SzC to retain the overall balance. One of the appointed members will be from National Highways</p>

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The Planning Inspectorate
Yr Arolygiaeth Gynllunio

ExQ3	Question to:	Question:
		(NH). In the event that NH abstain from any matters that do not affect the trunk road network what is your suggested approach to retain the overall balance in the TRG
Wa.3	Waste (conventional) and material resource	
Wa.3.0	Environment Agency	Waste Management Strategy – Addendum [REP7-] The applicant at Deadline 7 has submitted an Addendum to the Waste Management Strategy setting out Key Performance Indicators (KPI). Are you satisfied this Addendum addresses your original concerns about the lack of KPI in the Waste Management Strategy?