The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 10 – *12 October 2021*

East Suffolk Council comments on Deadline 8 submissions from the Applicant

20026200 East Suffolk Council

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Introduction

This submission at Deadline 10 provides ESC's comments on selected submissions made by the Applicant at Deadline 8. Unless otherwise noted, these comments have been given to the Applicant in advance of Deadline 10, hopefully ensuring amendments can be made to submissions by the Applicant at Deadline 10.

6.3 Volume 2 Main Development Site Chapter 2 Description of the Permanent Development Appendix Document Index 2B of the Environmental Statement: Lighting Management Plan - Clean Version - Revision 3.0 [REP8-052]

This document at Deadline 10 needs to include the correct Fig 2B.1 to show all required dark corridors (it currently omits the central dark corridor through the Temporary Construction Area, linking Kenton Hills and Ash Wood. Given the ecological mitigation importance of this feature it must be shown on this plan (as it is on Figure 2B.3).

6.13 Additional Ecology Survey Report (September 2021) [REP8-061]

Interim Bat Survey Report 2021

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:
11	3.1.5	*Microphone Placement.*	It is unclear why the microphones have been positioned relatively low down (less than 2m above the ground) and with them sometimes angled 45 degrees downwards. We query whether this may have reduced the effectiveness of the detectors in certain locations	Clarify and justify the microphone positioning (this could be reviewed by the Ecology Review Group).
14	Table 3-1	*Rationale behind the selection of different detector deployment locations.*	The rationale set out in the table is noted. ESC welcomes the additional detectors which have been deployed in 2021, including the reintroduction of a number which were used in previous years but not in 2020.	N/A
18	3.1.7	*Static Detector Programming.*	Static detector deployment has been split into two periods within each survey month, with, it is assumed, half the survey points covered in each period. Whilst we understand why this has been done for operational reasons, it does mean that there is likely to be less comparability between periods, months and years as all survey points are not being monitored at the same time. It is noted that this is acknowledged in the Survey Limitations section (3.1.16).	Include Appendix A in updated report (this could be reviewed by the Ecology Review Group).

			There is also no Appendix A in the report.	
19	3.1.8 to 3.1.10	*Data Analysis Methodology.*	Whilst we understand the rationale for the use of automated analysis of the recorded calls, we query whether manual verification of calls of rarer species or those with overlapping or highly variable call parameters has been undertaken. It is understood that this approach was undertaken when data collected earlier in the project was analysed to ensure that confidence could be had in the results of the auto-identification outputs.	Utilise manual verification of calls from rarer species or those with overlapping or highly variable call parameters (this could be reviewed by the Ecology Review Group).
24 and 25	4 and 5	*Results and Discussion.*	In the absence of the Results and Discussion sections we can provide no further comment at this time.	Provide the results of 2021 surveys and discussion of these (this could be reviewed by the Ecology Review Group).

8.2(B) Outline Landscape and Ecology Management Plan - Clean Version [REP8-076]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:
31	5.1.15 and 5.1.16	*Amenity Grassland.*	This section is titled Amenity Grassland, but the text mostly relates to reedbed and open water habitats. The section should be separated so that the text for	Separate Amenity Grassland and Reedbed and Open Water text.

			Amenity Grassland and the text for Reedbed and Open Water habitats are distinct.	

8.2(B) Outline Landscape and Ecology Management Plan - Tracked Changes Version [REP8-077]

Landscape

The revised oLEMP reflects the latest developments in respect of the Deed of Obligation and most recent updates to provisions for discharge of requirements. There are other minor amendments including provision for the use of Pill Box Field for outage carparking should the need arise, and updates to various landscape management regimes. These are all noted without further comment.

8.3 A(B) Two Village Bypass Landscape and Ecology Management Plan Clean Version [REP8-074]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:
4	1.1.5	*Detailed landscape schemes.*	The Applicant has commented in relation to long term management of the habitats (new and retained) associated with the scheme, this has been noted. The detailed plans required under Requirement 22A should confirm who will be responsible for long term management of these habitats.	N/A
14-16	4.3.5 to 4.3.8	*Specimen Trees – Bat 'hop-overs'.*	The inclusion of planting to compensate the loss of any ancient or veteran trees (following all possible avoidance measures) is welcomed.	N/A

			Detail on the provision of bat 'hop-overs' is also welcomed and it is noted that the final detail of these is to come following the completion of further bat surveys.	
19	5.2.3	*Habitat Creation Method Statement.*	The requirement for the production of a habitat creation method statement to be submitted to ESC for approval prior to works commencing is noted.	N/A
24	Table 5.2, Row P1	*Water levels to be topped up using non-chlorinated/untreated water as required to ensure depth of ca. 50% of planned maximum depth during the establishment period.*	As per our comments at Deadline 6 [REP6-032], it is unclear why this management measure is included as any ponds created should be self-sustaining. Occasional drying out can also be of benefit to ponds. We do not consider that topping up of ponds is a sustainable management measure, and therefore should not be included in the LEMP.	Remove this management activity.

8.3 A(B) Two Village Bypass Landscape and Ecology Management Plan Tracked Changes Version [REP8-075]

Landscape

The Two Village By-Pass LEMP has been revised and updated to address issues arising through the issue specific hearings. It contains minor updates required as oLEMP converts to LEMP, and as the wording of Requirements and other associated documents is progressively clarified. Overall, its contents are noted with the proviso that the matter of screen planting to address the issues of the Farnham roundabout falling within the visual connection between Parkgate Farm and Farnham Church is still to be fully resolved at this time.

8.3 B(B) Sizewell Link Road Landscape and Ecology Management Plan - Clean Version [REP8-078]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:
5	1.1.5	*Detailed landscape schemes.*	The Applicant has commented in relation to long term management of the habitats (new and retained) associated with the scheme, this has been noted. The detailed plans required under Requirement 22A should confirm who will be responsible for long term management of these habitats.	N/A
6	1.1.9	*Control Documents.*	Should this paragraph read "Requirement 22A(5)" rather than "Requirement 22°(5)"?	Correct the reference to the Requirement in this paragraph.
16-18	4.3.4 to 4.3.7	*Specimen Trees – Bat 'hop-overs'.*	The inclusion of planting to compensate the loss of any ancient or veteran trees (following all possible avoidance measures) is welcomed. Detail on the provision of bat 'hop-overs' is also welcomed and it is noted that the final detail of these is to come following the completion of further bat surveys.	N/A
27	Table 5.2, Row P2	*Water levels to be topped up using non-chlorinated/untreated water as required to ensure depth of ca. 50% of planned maximum depth during the establishment period.*	As per our comments at Deadline 6 [REP6-032], it is unclear why this management measure is included as any ponds created should be self-sustaining. Occasional drying out can also be of benefit to ponds. We do not consider that topping up of ponds is a sustainable management measure, and therefore should not be included in the LEMP.	Remove this management activity.

8.3 B(B) Sizewell Link Road Landscape and Ecology Management Plan - Tracked Changes Version [REP8-079]

Landscape

The Sizewell Link Road LEMP contains minor updates required as oLEMP converts to LEMP, and as the wording of Requirements and other associated documents is progressively clarified. Overall, its contents are noted without further comment.

8.3(C) Associated Development Design Principles - Tracked Changes Version [REP8-081]

Page 8 – Table 3.1 - NPR – Design Principles – Sustainability Principle 3. The change to this lighting design principle adds in wording to ensure that stray light spill from the Northern Park and Ride onto Little Nursery Wood and other habitats will be minimised both laterally and vertically – previously this was dimensionally unspecified. Please note that there is a typo at 'vertically'. This change is welcomed.

Page 12 – Table 3.2 - SPR – Design Principles – Sustainability Principle 3. The same comments above also apply for the Sizewell Link Road, with additional wording that light spill beyond the site boundary will be minimised to one lux both laterally and vertically. This change is welcomed.

Page 15 – Table 3.3 - FMF – Design Principles – Sustainability Principle 3. Additional wording here includes, for the first time, reference to light spill and for that to be minimised both laterally and vertically. This is welcomed by ESC.

Page 24 – Table 3.6 – Yoxford Roundabout – General/Masterplanning Principle 9. Additional wording here includes for the first-time, reference to light spill to be minimised both laterally and vertically. This is welcomed. The existing road junction (Middleton Road with A12) is already lit and Yoxford is a village with (intermittent) street lighting. However, ESC wish to ensure that the lighting design is not overly urban in effect and that the proposed roundabout's edge-of-countryside location is accounted for. The minimisation of light spill will help mitigate some night-time impacts of this new highways feature. ESC welcomes its inclusion.

Reference to the minimisation of light spill laterally and vertically is also included as additional wording to the sustainability principles for the highways improvements that include junction remodelling at Knodishall, Bramfield and Saxmundham; and also, rail improvements. ESC notes the main change covers updates to lighting provision and clarification of best practice objectives which are considered acceptable.

8.11(E) Code of Construction Practice Clean Version [REP8-082] and Code of Construction Practice Appendices Clean Version [REP8-085]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:
73	Table 6.1, Row 1	*Construction noise task specific controls.*	A definition of "noisy plant" is required so that the ECoW and contractors understand what types of plant require additional control measures in the noise sensitive areas.	ESC expects this to be corrected in the version of the CoCP to be submitted at Deadline 10.
285; 357; 393; 446 and 478	Part C, Appendices E; I; K; N and P	*Non-licensable Method Statements – Reptiles - for the following sites:* • *Southern Park and Ride* • *Two Village Bypass* • *Sizewell Link Road* • *Freight Management Facility* • *Green Rail Route*	The reptile method statements for these sites still make reference to the potential for translocation of any encountered animals to receptor sites at the MDS. As set out in our response to Examiner's Questions 3 Bio.3.0, moving animals from these AD sites to the MDS is not appropriate and the method statements must be updated to remove this and ensure that any encountered animals are kept within suitable habitat at or adjacent to the AD site where they are found.	ESC expects this to be corrected in the version of the CoCP to be submitted at Deadline 10.

9.4 Terrestrial Ecology Monitoring and Mitigation Plan - Clean Version - Revision 3.0 [REP8-089]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:
25	3.2.6	*SSSI Construction Method Statements.*	Requirement 12D covers SSSI Construction Method Statements, not Requirement 12C.	ESC expects this to be corrected in the version of the TEMMP to be submitted at Deadline 10.
53	Table 4.4	*Bat Monitoring (Construction and Operation) – Commuting Routes and Home Ranges.*	Not all of the monitoring locations described in the table appear to be included on the plan in Appendix 1 (which shows 2021 static detector monitoring locations). For example, there does not appear to be two monitoring locations on the eastern boundary of Goose Hill. The absence of monitoring at all of the described locations in 2021 may risk there being insufficient baseline data available to make comparative assessments with data collected in the future. It is noted that the precise scope of future corridor monitoring locations will be agreed with the EWG, this must be before any site clearance commences so that an adequate baseline can be established.	ESC expects this to be corrected in the version of the TEMMP to be submitted at Deadline 10.

9.11 Informal Recreation and Green Space Proposals - Revision 1.0 [REP8-135]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:

N/A	Whole doc.	*Additional informal recreational and green space proposals.*	ESC understands the rationale behind the identification of these additional recreational opportunity improvements. Whilst we have no objection to the principle of them being delivered as part of the project, there are several locations where careful design, delivery and monitoring will be required to ensure that the proposals do not result in an adverse impact on the existing or future ecological value of the area. These include: • Creation of new access to Leiston Common (location 9) which could result in adverse impacts on the designated site (County Wildlife Site) and protected and/or UK Priority species (such as reptiles and breeding birds); • Creation of new off-road mountain biking trails in Kenton Hills (location 13) which could result in adverse impacts on protected species including reptiles (Kenton Hills contains one of the proposed reptile receptor sites) and bats (such as the loss of roosts/potential roost features if tree removal is required). It is understood that delivery of these proposals is secured by the signed and executed Deed of Obligation which requires detailed plans to be approved by East Suffolk Council in consultation with Suffolk County Council and the ERG. These plans must include up to date ecological assessment of the areas for each of the proposals, measures to avoid or mitigate	N/A

			any adverse impacts on ecological receptors and details of how use of the new recreational features will be monitored and cross-referenced with the ecological monitoring which is secured under the TEMMP so that if increased recreational use is adversely impacting on ecological receptors this can be identified and addressed.	

9.13 Sizewell C Coastal Defences Design Report [REP8-096]

Introduction:

ESC has reviewed this Design Report but wants the ExA to be clear that the questions and commentary below DO NOT need to be resolved by the Applicant by the close of Examination. We do not anticipate these being responded to by the Applicant in their submissions at Deadline 10. They will form part of our anticipated ongoing discussion with the Applicant leading to approval of the HCDF / SCDF design under DCO requirement 12B (as was), this is referenced in the SoCG. ESC considered it would be helpful for the ExA to be able to recognise that there are unresolved matters but is satisfied that there is a defined pathway to resolving them.

Presented in table form, this document constitutes East Suffolk Council's review and findings of the Coastal Defences Design report [REP8-096]. The review is confined to the subject matter of the impacts of the proposed structures on coastal processes and morphology. In particular, the review considers the sufficiency of the information provided in the Design Report and highlights any particular aspects where clarification, confirmation or further information is sought.

The table comprises:

- First column: the relevant page number (document, not pdf page);
- Second column: a reference (section, figure or table number);
- Third column: relevant source document extract (text or Figure snapshot)

- Fourth column: our observations and concerns on the cited extract
- Fifth column: our requested action upon the Applicant (see below).

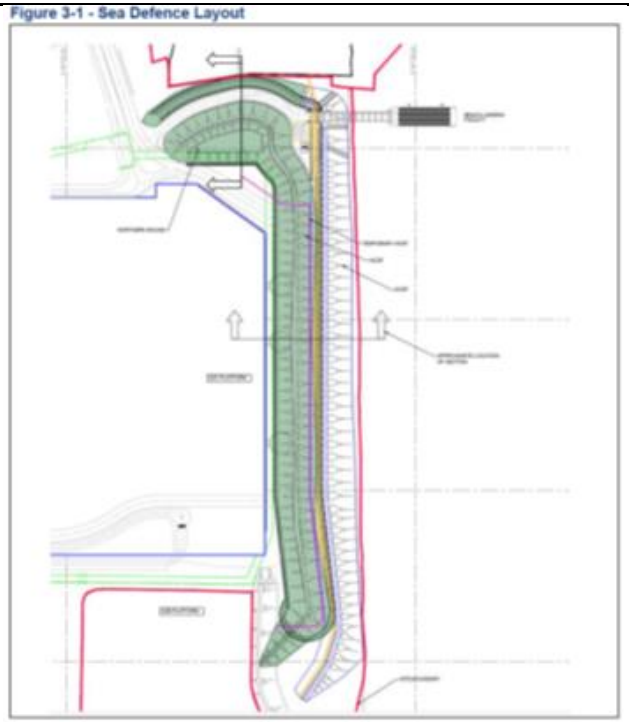
All extracts from the Design Report, including page, section number, text and footnotes etc. are shown in *italics* in the first three columns, including references elsewhere as appropriate.

In Column 5 the requests take one of the following three forms, or a combination thereof:

- Clarification
- Confirmation
- Further information.

Pg. No.	***Section Ref.***	***Relevant Text / illustration***	**Observations and Concerns**	**Requested (primarily through the discharge of requirement stage):**
1	*1.1.3*	*In light of the response by stakeholders, in the preliminary hearings, the ExA requested 'Design details and plans for Hard Coastal Defence Feature (HCDF)', to be provided to the examination at Deadline 2 on 2nd June. This 'Sizewell C Coastal Defences Design Report' has been prepared in response to this information request and is not for approval*	To note for information.	N/a
2	*1.1.4*	*All levels given in this Technical note are designed finished levels including for the future effects of settlement*	Noted and assumed that this is up-to-date regarding incremental changes, e.g. Adaptive Design and later changes.	It is assumed that our assumption is correct, if it is incorrect the Applicant can advise through the future MTF process.

3	*2.1.3*	Figure 2-1 - Sea Defence Layout, May 2020 DCO submission 	For information and comparison with Fig. 3-1	N/a
	2.2.1	*Design parameter changes.* *Life 80 years (2110) increased to 120 years (2140)* *Climate Change UKCP09 updated to UKCP18.* *To be seismically qualified.*	To Note.	N/a
	2.2.3	*The modified sea defence comprises the following…* • *Up to 2m thickness of landscaping over the revetment on the seaward slope giving a maximum total height of 14.6m OD.* • *An adaptive sea defence height of +16.4m OD excluding landscaping with a*	This issue is returned to later in this critique. Our concern is how these landscaping features are allowed for both in terms of their influence on hydraulic performance of the revetment and/or the logistics/practicality of their removal.	Further information: more detailed questions to follow later in the critique.

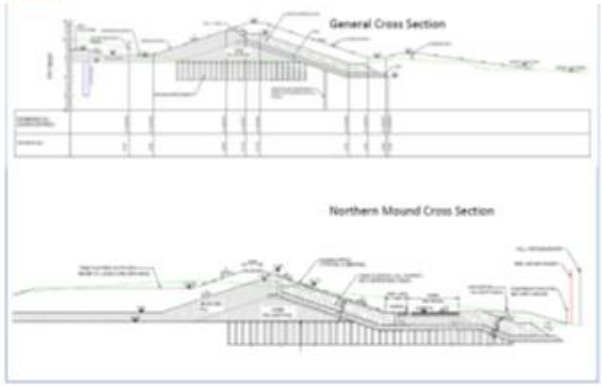
		maximum height of +18.0m OD including landscaping		
	Fig 3.1		The north end of the HCDF now shows the realigned and more retreated position of the HCDF. The south end overlap with Sizewell B has moved seaward possibly beyond the easting of the BLF promontory. The `typical' section location is not at the most critical point that would be either the BLF or the Southern kick-out. The SCDF width varies and the seaward line is not straight / even. Is it defined by the MHWS countour?	Further information and clarifications sought: Provide additional sections at BLF and Southern extent showing Temp HCDF, HCDF and SCDFs plus unconstrained shoreline profiles at 2020, 2050, 2080, 2110 and 2140. This has not been provided. Typical XS is at 264015mN. In figure 3.5 a 2014 beach profile is used. Provide legible underlying bed contours across the whole frontage, not just confined to the north end. Extend to show a portion of Minsmere. This has not been provided.

				Provide a legible scale and identify the easting/northing lines. This has not been provided. Why do the south ends of the HCDF and SCDF not coalesce with the structure and alignment of the Sizewell B bund? How has the SCDF width and seaward extent been determined? Explanation has now been provided. Is the HCDF toe detail at the BLF at the Adapted profile level (-1.5m ODN)? Explain why the temp piled defence moves outside the perm defence footprint at the Northern end. Temp HCDF removed at northern end.

				Light temp piling to protect SSSI from contamination during works. Will the temporary piled defence outside the footprint be fully removed when decommissioned? Light piling - yes. We understand that the Sizewell C coastal defence feature is not allowed to make contact with the Sizewell B coastal defence, as the latter is a live operational power station. However, according to the drawing, the two defences are in contact. Please advise / provide the redesign. Further comment is given later in the review.

	Fig 3.1	*See also point 3.6.2 `This area of the sea defence is closer to the existing line of MHWS and therefore has a smaller beach volume in front of it than the main run of the sea defence.'*	Impact of red line site boundary on works. Appears to constrain the SCDF at southern end splay and works at northern mound. Red line is assumed to be MHWS contour.	Does the site boundary limit the extent of the SCDF and any future adaptive works? This is implied by 3.6.2. If yes, what are implications of those constraints on the Adaptive profile? If NO what is the purpose of the site boundary?
	3.3.1	*The Adaptive Design will only be implemented if mean sea level rise exceeds the reasonably foreseeable design value during the operational life of the structures from approximately 2030 to 2140 (see Section a) et seq. for further details of trigger criteria for the implementation of the Adaptive Design).*	ESC is not convinced that there is no risk of erosion affecting the HCDF toe, at a level of ODN, before 2140. If this occurs, does it trigger construction of the Adaptive design?	Are there any Credible Maximum coastal change scenarios to year 2140 that would trigger construction of the Adapted profile top protect the HCDF toe from undermining failure?
3	*Fig 3.3*		As noted in previous reviews, what is the rationale for the design, maintenance and ultimate plight of the Landscaping layer that would be placed over the rock armour with an estimated overall thickness (including the narrow extension of the SCDF) of about 2.9m.	Clarifications required regarding: • At what point will the landscaping soil/vegetation be removed so that the rock revetment can perform efficiently when needed?

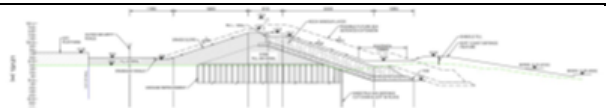
			The hydraulic efficiency (run up and overtopping amelioration) of rock armoured slopes depends (inter alia) upon energy dissipation with the voids of the rock matrix. Filling them with soil plus nearly three metres more above the rock level would, on the face of it, be highly detrimental to performance.	• Is it the case that the hydraulic performance is premised on the basis of the landscaping being kept in place? If so, what additional height of crest is thus required (and allowed for?) to offset the lost efficiency in slope performance? • Regarding the latter being affirmative, what impact does this have on HCDF footprint?

	3.4.3	Figure 3-5 – Permanent Sea Defence, Typical Cross-section and Northern Mound  	3.4.3 The seaward toe of the sea defence extends approximately 3m further east (seaward) than in the original DCO submission. This change in seaward extent between the current design and the May 2020 version is driven by the change in crest level of the Permanent Sea Defence (+10.2mOD in May 2020 submission, increasing to +12.6mOD in the change submission) and the minimum 5m standoff to the outer Sizewell C site fence that fixes the landward (western) boundary. This security standoff represents a minimum value that was already assumed in the May 2020 DCO application in order to minimise the Sizewell C footprint. The increase in crest height is due to the increase in climate change allowance between UKCP09 and UKCP18 and the extended design life of the sea defence.	Clarification: The section is designed to avoid the RSPB boundary. Please show section on plan. How does this feature "rotate" (roundhead) to align with the now realigned HCDF at the north end?
	3.3.3	*The seaward toe of the sea defence in the January 2021 Change submission extends*	See related comment in 3.9.11.	How far has the HCDF toe extended seaward at

		approximately 8m further east (seaward) than in the original DCO submission. This change in seaward extent is driven by the change in crest level of the Permanent Sea Defence (+10.2mOD in May 2020 submission, increasing to +12.6mOD in the change submission) and the minimum 5m standoff to the outer Sizewell C site fence that fixes the landward (western) boundary.		amended south end Sizewell B overlap detail? Assumed 26m.
	3.3.4	*The design considers a number of constraints and interfaces, including: Minimising seaward extent of HCDF commensurate with engineering function.*		Explain what design changes have been applied since May 2020 that have moved the seaward extent of the works to landward or limited its movement to seaward?
10	*Tbl 3.1*	*Reasonably Foreseeable.* *Long-term coastal erosion of 0 – 20m*	20m / 120 years = retreat rate of 0.17m/yr. At 1:10 slope (tbc) = up to 1.7m drop in level at current MHWS contour as beach profile moves landward. This retreat rate differs significantly from assumptions in [REP7-101] 3.1.1.2 that identifies a range of 1.01 to 2.23 m/yr as worst case scenarios.	Add forecast eroded baseline beach profiles, extrapolated to years 2050, 2080, 2110 and 2140 to all drawings that are relevant to the assessment of HCDF toe resilience and SCDF management. This is necessary to demonstrate how a retreating baseline shoreline will affect SCDF

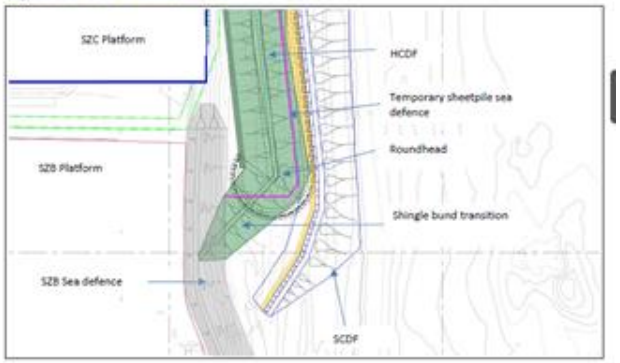
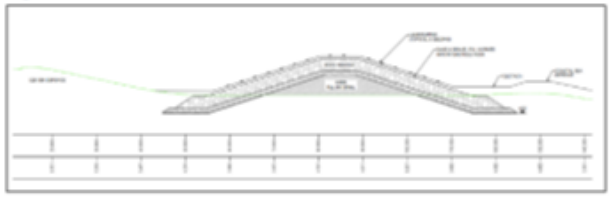
				degradation and replenishment actions. Why does the RF erosion rate differ from the range used in [REP7-101]?
10	*Tbl 3.1*	*Credible Maximum.* *Long-term coastal erosion of 20m to 40m*	40m / 120 years = retreat rate of 0.33m/yr. At 1:10 slope (tbc) = up to 3.3m drop in level at current MHWS contour as the beach profile moves landward. This retreat rate differs significantly from assumptions in [REP7-101] 3.1.1.2 that identifies a range of 1.01 to 2.23 m/yr as worst case scenarios.	Add forecast eroded baseline beach profiles, extrapolated to years 2050, 2080, 2110 and 2140 to all drawings that are relevant to the assessment of HCDF toe resilience and SCDF management. This is necessary to demonstrate how a retreating baseline shoreline will affect SCDF degradation and replenishment actions. Why is the 2.23 m/yr worst case erosion rate identified in [REP7-101] not used as the Credible Maximum retreat value in this report?
12	*3.4.1*	*The HCDF comprises a rock revetment with a double armour layer of 6 to 10 tonne quarried armour stone rock over a rock underlayer,*	Layer thicknesses based on this grading are: Mean 8 tn rock has Dn50 of ~1.45m.	Confirm that the upper surface of the rock layer at the HCDF toe is at 4m ODN

		granular core and ground improvements (where needed).	2 layer thickness = 1.8 * 1.45 = 2.6m plus underlayer of ~ 1m?. Total thickness 3.6m? Looks like ~ 4m ODN on profile.	that is ~1m below the existing 5m berm and above the level of the shingle back beach landward of the berm. No response but confirmed in new drawings.
12	*Table 3-2*	Re armour size: *A concrete armour solution is frequently considered when a larger rock size is required. A concrete armour solution is not required for the HCDF but may be required for the Adaptive Design.*	This is not very informative. Please provide the rationale for selecting very large rock armour over concrete armour units in this case. Generally, concrete armour units can be placed to a steeper slope than rock, thus reducing footprint (in fact the steeper slope can be preferred to obtain higher friction forces between units). It is understood that a higher crest may be required to obtain the target overtopping limit. However, we would like to see that this topic has been assessed and the reasoning for rock or concrete armour properly addressed. Regarding the suggestion of using an armour solution for the Adaptive Design, we would question the	Further information is required as explained in the comment box to the left.

			suitability of using the massive rock armour as a bedding layer for this, given the respective size of the two armour types. Please be aware that our concern is that opportunities to reduce the HCDF footprint may be missed and hence we are questioning certain aspects of the design in this respect only. We are not criticising the design per se.	
13	*Fig 3.5*	*Permanent Sea Defence, Cross-Sections (Baseline and Adaptive)*		
			Buildability	Clarification / further information: The same circumstances for which the Adaptive Design would be built (narrowing shore) would suggest that construction could be challenging. It is relevant to the impact on coastal processes to know how the Adaptive Design

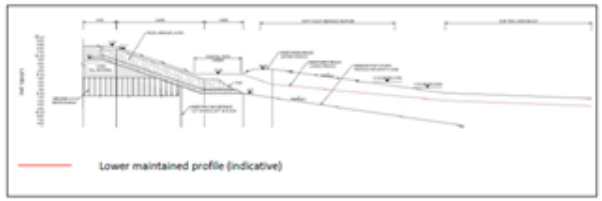
				including dredging might be constructed, e.g. as a marine operation, or other? No detail provided.
15	*Fig.3-7*	Figure 3-7 - Permanent Sea Defence, Cross-Sections (Baseline and Adaptive)  	The section shows landscaping treatment on top of the adaptive additional armour layer. This could be at variance with the former design and with references elsewhere in the present document version.	Please confirm, is this inclusion deliberate or an oversight. If deliberate it would attract the same concerns as expressed on page 3 Fig. 3.3
13	*3.4.4*	*Numerical modelling of the beach storm response indicates that the toe of the HCDF would not be at risk of being exposed in a design basis 1 in 10 000 year storm event provided it is set at 0.0m OD or lower. This modelling is based on the 2140 climate change parameters (RCP8.5, 95%ile).* *<u>These profiles will be subject to further study and modelling work during the detailed design.</u>*	See comments on possible retreat and lowering in table 3.1. There is potential for further changes that may move the toe lower and seaward.	Why is there no reference to a retreated future shoreline position (up to 2140?) nor assumptions on presence/absence of a SCDF? What is the basis of the modelling and hence justification of the toe depth. For example, if storm induced beach scour then how does this figure with the long term beach lowering (as above mentioned), the local geology, and scour arising

				from interference with the then old HCDF. More detail is required.
14	*3.4.5*	*Sizewell B tie-in. (Illustrated below)* *The design of the interface with the Sizewell B defences has been refined since the design phase underpinning the May 2020 DCO submission. The Sizewell C Permanent Sea Defences are to be seismically qualified, whereas it has been confirmed that the existing Sizewell B sea defences are not seismically qualified. It is therefore necessary to separate the two defence structures from one another. The proposed Sizewell C sea defence included in the January 2021 change submission overlaps the Sizewell B defence rather than merging into it.*	The HCDF at the southern end has moved seaward and may now be closer to the MHWM than the BLF promontory. The SCDF at this point is reduced in width from the DCO and Change submissions. The SCDF transition to south of it appears modest and potentially preliminary? There appears to be a small valley between the SCDF and the HCDF slope behind.	Provide additional sections at Sizewell B tie in showing Temp HCDF, HCDF and SCDF plus unconstrained shoreline profiles at 2020, 2080 and 2140. This has not been provided. The impact of this seaward movement on coastal processes and SCDF design and operation should be assessed in the appropriate report and included in [REP7-101]. Noted that this does consider it.
15	*3.6.1*	*3.6.1 The design of the interface with the Sizewell B defences has been refined since the design phase underpinning the May 2020 DCO submission. The Sizewell C Permanent Sea Defences are to be seismically qualified, whereas it has been confirmed that the existing Sizewell B sea defences are not seismically*	Notwithstanding the fact that the exhibited Sizewell B interface contravenes its own no-contact rule: With good design, engineering and construction logistics, what would be preventing the new HCDF from	Further explanation sought, in particular with respect to a pro-active and imaginative design that obviates the southern splay out of the HCDF roundhead.

16	*Fig. 3-6*	*qualified. It is therefore necessary to separate the two defence structures from one another. The proposed Sizewell C sea defence included in the January 2021 change submission therefore overlaps the Sizewell B defence, as shown in Figure 3-8, rather than merging into it.* Figure 3-6 - SZB Interface - Plan  	replacing the overlapping section (or part thereof) of the Sizewell B defence, thus enabling it to be brought further landwards and into alignment with the HCDF running northwards.	
16	*Fig. 3-9*	Figure 3-9 - SZB Interface – Roundhead 	Section looks incomplete. No armour! No dimensions.	Clarification. Please complete the illustration including dimensions.
14	*3.5.2*	*Landscaping material placed above the functional crest level of +12.6mOD is not considered to contribute to the claimed performance of the HCDF. However, it is*	The statement is almost implying that the landscaping material will be detrimental to performance of the HCDF, without saying as much.	This is the same argument as noted on page 3 Fig. 3.3. Clarification is needed on the performance/impact of landscaping, demonstrating

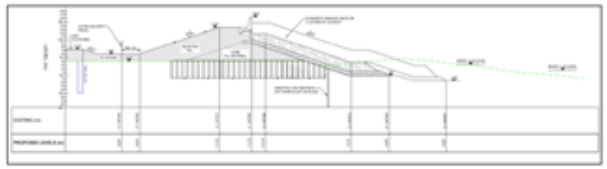
		recognised that the presence of this material will in practice provide some beneficial effect		definitively that there will be no additional incursion of the HCDF into the coastal regime as a result of it. We appreciate the recognition that the substrate will not contribute to the performance of the HCDF, but our concern is that it will be detrimental to hydraulic performance. Moreover, that this recognition is implicit in a shallower slope, resulting in a broader (and unwanted) footprint. Commented on also earlier in this review.
15	*3.6*	*Drainage Swale*		
	3.6.1	*The swale is included as a beneficial feature, <u>but is not strictly necessary in order to meet drainage requirements.</u>*	See below	See below
	3.6.2	*<u>The swale would not be present in the Adaptive Design configuration</u>. The landward slope of the Adaptive Design is set at the 5m minimum*	This feature presents an opportunity for the design team to compensate	If the swale is not required for the baseline HCDF and the Adapted profile is not

		offset from the outer fence line and it is this which defines the seaward extent of the HCDF.	for continuing seaward movement of the HCDF toe. See also other related comments in items 3.9.1 – 3.9.9 and Figure 3-12	certain to be required why not set the baseline HCDF rear slope face back to the 5m outer fence offset minimum and retreat the seaward face by 6.5m? A significant point remaining unanswered formally.
	3.7	*SCDF*		
	3.7.5	*….. However, expert geomorphological assessment contained in Appendix 20A of the ES concluded that, without mitigation, the shore would erode back within a few decades, risking exposure of the HCDF by 2053-2087.*	How do those previous erosion rates / extents compare with the current potential retreat assumptions in this document and [REP7-101]?	By what distance was the shoreline expected to retreat in order to expose the HCDF (that was further landward) at the time of the [APP-312] assessment? Are the current potential retreat assumptions different? Superseded after set back of northern parts of HCDF line
	3.7.8	*The exact shape, crest level, and crest width of the SCDF will be determined at detailed design stage*	Note potential for change of key components.	The SCDF is a dynamic structure. Whilst it might be formed to an *exact shape, crest level, and crest width, etc.,* it will be its

				development and evolution over time that determine its success. This should be addressed in the detailed design, considering a range of test scenarios over a range of time steps.
22	3.10.10	*3.10.10 Numerical modelling of the beach storm response indicates that the toe of the HCDF would not be at risk of being undermined in a design basis 1 in 10,000yr storm event provided it is set at 0.0m OD or lower. This modelling SIZEWELL C PROJECT SIZEWELL C COASTAL DEFENCES DESIGN REPORT was based on an eroded profile some 20m landward of the proposed/existing profile immediately prior to the storm. These profiles will be subject to further study and modelling work during the detailed design phase and will be based on the most recent survey information.*	Various estimates of underlying shoreline regression have been mooted. What is the basis for the eroded profile being 20m from that presently?	Further information sought on the point made (to left).
17	*Fig 3.8*	Figure 3-8 – SCDF, Indicative Lower Maintained Profile 		
17	*3.7.11*	*The lower maintained beach profile shown in red on Figure 3-8 and Appendix A.4 is required*		Does the Applicant guarantee to invest in beach

		to maintain the safety case for the sea defences such that the toe of the HCDF at +0.0m OD is not exposed in a design basis storm event. Again, the exact shape/volume of this profile will be determined at detailed design stage. The SCDF would be recharged to ensure that the lower maintained profile is not realised.		management measures that will sustain the SCDF at a level above the red line unless / until the HCDF is removed? Update this drawing to show the impact of erosion forecasts in table 3.1 on an unconstrained shoreline and on SCDF maintenance actions.
24	*3.10.28*	*The soft sea defence terminates at the maintenance ramp in the BLF area, as seen in Figure 3-14.*	The SCDF must function in an integrated fashion with the beaches to north and south of the Sizewell C site. It should not be constrained by a terminal groyne-like ramp structure.	Clarify position with regard to connectivity of SCDF with the northern shoreline.
24	*3.10.29*	*The maintenance access ramp on the south side of the BLF would be buried by the SCDF but could be uncovered when required for use.*	Ditto above.	Will the ramp crest be below the recharge trigger profile for the SCDF? If not it may block sediment movement.
22	*3.10.14*	*3.10.14 The infilling will likely use sediment within the same particle size range as the native beach face. Use of pebbles and cobbles towards*	We welcome this acknowledgement of the influence of the recharge particle size on the behaviour of the	Confirmation sought that particle size distribution of the SCDF will match that of

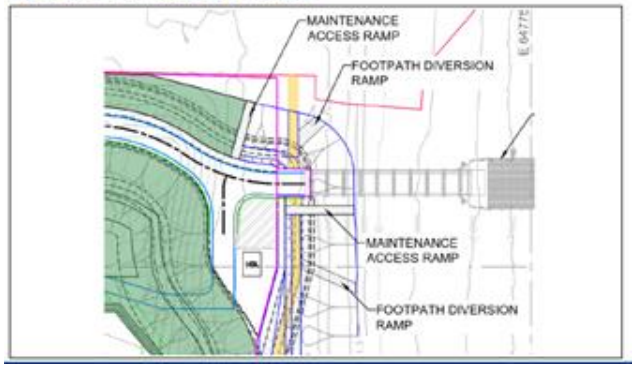
		the coarser end of the size spectrum, would provide enhanced longevity and reduce the frequency of subsequent recharge but for geomorphological, ecological, landscaping reasons the default position is that the SCDF will match the native particle size. BEEMS technical report [REP7-101], gives further details of the proposed beach recharge material.	SCDF in relation to the coastal geomorphology. It should be noted however, that the native material should match not just the source of material (native) but also its particle size distribution to the extent that normal retreat of the SCDF is not unnaturally stalled (held back) in relation to that of the adjacent as this would eventually result in recessed shorelines. The latter would have a negative impact on the longshore transport regime by creating a blockage both north and south of the HCDF.	the native material to avoid the development of recessed shores and negative impact on longshore transport.
	3.8	*Adaptive design.*		
	3.8.2	*Owing to the inherently uncertain nature of climate change, it is recognised that the RF climate change scenario may be exceeded, leading to more onerous climate change effects becoming prevalent. ONR and EA guidance therefore requires that the sea defence be capable of adaptation to a Credible Maximum (CM) sea level rise. The CM scenario is defined as the H++ climate change scenario as defined in UKCP09, as UKCP18 refers back to the*	The principle is understood together with the general approach of an Adaptive Design. However, the driver for the Adaptive Design appears to be substantially/wholly based around sea level rise. Coastal morphological changes will need to treated with equal importance, being key to the survival of the HCDF (being what is sits on).	Further information sought on the inclusion of coastal processes in the design basis for the Adaptive Design. This would cover both security of the HCDF (founding), and the impact on coastal processes, i.e. continuity of sediment transport.

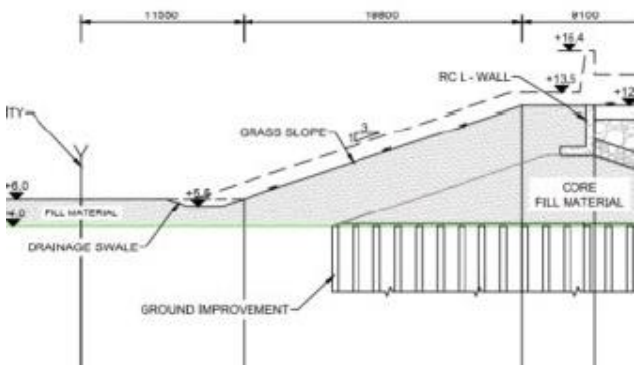
		UKCP09 estimates and does not provide updates estimates (refer to section 3.3.4a) et seq). The sea defences have therefore been designed to allow for future adaptation to accommodate the CM scenario, should it develop. The modified defences that would be delivered through implementing these future adaptations is termed the "Adaptive Design".		
	3.8.3	*Figure 3-9 shows the Adaptive Design, with tidal levels shown reflecting RF sea level rise to 2140. A larger-scale section is provided at Appendix A.5. The Adaptive Design of the HCDF would retain the SCDF in front of it.*	A SCDF to seaward of an Adaptive profile would be ~15m further east than for the basic HCDF design and would be location in the intertidal beach.	Demonstrate that retention of a SCDF to seaward of an Adaptive profile is viable.
		Figure 3-9 - Adaptive Design, Typical Cross-section of HCDF 		
	3.8.4	*In the Adaptive Design, concrete armour units would be overlaid on the previously placed rock revetment, and the toe section extended further seaward to a lower level. A toe level of -1.5mOD would be required, i.e. 1.5m deeper compared to when the proposed HCDF is originally built.*		Explain the basis of the -1.5m toe level with the Adapted design. This has not been provided.

28	*3.12.11*	*3.12.11 Increasing gradients to minimise the eastward extent was considered, but was discounted for the following reasons:* *• A steeper seaward slope would require a higher crest level to achieve the same overtopping performance.* *• A steeper seaward slope would require larger rock armour or the use of concrete armour units.* *• A slope steeper than 1 in 3 would be difficult to establish grass on and difficult to maintain as motorised machinery could not be used. This applies to both seaward and landward slopes. If a steeper slope were to be adopted for the revetment, landscaping opportunities would be limited. In order to achieve a naturalistic landscaped finish, the landscaped surface would still need to be at a maximum of 1:3 slope. With a higher crest level this would lead to an increased land take towards the beach, even if the buried structure were to become narrower.*	The comments are possible factors, but not qualified. See below queries by way of "show me": Demonstrate numerically the footprint reduction of a steeper slope vs the foot print gain caused by necessitated of a higher crest. Then why not use concrete armour units? Provide a comparative example. Alternative means of gaining machine access are available (see earlier comments). Please address these suggestions. How significant is the landscaping? Is it necessary to be all over the HCDF? Is it necessary at all? Quantify the extent to which this has negatively impacted the design (higher crest, wider footprint). Justify the need for landscaping in respect of the negative impact it would likely have on footprints and,	Further quantitative information is urgently required to support the designer's qualitative arguments.

		• *A slope steeper than 1 in 3 would require reinforcement to be stable for seismic loading. This applies front and back.* • *A landward slope steeper than 1 in 3 would be less resistant to surface erosion from overtopping water.*	hence, coastal processes. How is this to be mitigated? A factor, but one that could be engineered. A factor, but one that could be engineered.	
	3.9.9	• *A slope steeper than 1 in 3 would be difficult to establish grass on and maintain as motorised machinery could not be used. This applies to both seaward and landward slopes.*		Further information is sought on pro-active (imaginative) approaches to the issue. E.g. have you considered gradually sloping terraces? sheep? other…?
22	*3.9.11*	*At the Permanent BLF the seaward line of the sea defences <u>has not changed from the first DCO submission.</u>*	The Applicant previously stated that at the Permanent BLF the seaward line of the sea defences had moved seaward by 10m (compared with the	Provide a plan showing the May 2020 DCO and Current HCDF toe lines over full frontage.

			May 2020 information) because the adapted toe detail (with a lower level of -1.5m ODN) would be used at this more vulnerable promontory. The statement to the left is not consistent with that.	Clarify if the adapted toe detail is to be used at any location on the Sizewell C HCDF and North Mound frontage and illustrate where on a plan. No response but plans suggest not.
22	*3.9.12*	*However, the updated design drawings show additional features, refer to Figure 3-11 (below). These include:* *1 Maintenance access ramps: required to maintain the soft sea defence and repair the hard sea defence. <u>These will be permanent structures.</u>* *2 Coast Path diversion ramps for when the Permanent BLF is* *use. These are intended to be a soft feature created using shingle/sand beach material and temporary in nature.* *3 <u>A sheet pile abutment wall that replaces the end span on the Permanent BLF</u>. This allows the Coast Path to cross the Permanent BLF at grade.*	1 The new maintenance ramp to south of BLF has potential to alter the function of the SCDF by acting as a groyne to impede sediment movement. 2 The Coastal Path diversion ramps will be vulnerable to erosion. This detail has been brought to the attention of the SCC PRoW officer. 3 The Sheet Pile Abutment Wall also appears to protrude above the HCDF slope and therefore has potential to impede sediment movement.	Provide profile drawings to show the maintenance ramp and Pile Abutment wall in relation to the HCDF and SCDF slopes. This has not been provided. Provide an assessment of the potential impact of the maintenance access ramp and sheet pile abutment wall on i) the function of the SCDF and ii) the potential for the structures to impede alongshore sediment

				movement. This has not been provided. Identify any new monitoring and mitigation issues that these structures create and add them to the CPMMP. This has not been provided.
22		Figure 3-11 – Permanent BLF Interface 	This figure is relevant to the item above.	N/a

24	*Fig 3-12*		Compares May 2020 profile with Jan 2021. The common datum appears to be the Outer Main Site Fence at E647545. The 2021 HCDF toe is shown as 8m further seaward than 2020. Note the huge increase in scale of SCDF. Extract is relevant to the point made opposite.	Explain why it is not possible to move the basic HCDF rear slope landward to match the Adaptive rear slope profile – that may not be required? This would retreat the toe by ~6m and correct most of the 2021 8m toe advance. It would also reduce seaward intrusion by the Adaptive slope toe – if built.
22	*13.12.22*	*Landscaping, to provide at least 600mm of coverage over the seaward face of the sea defence, to crest levels varying between 13.2 m OD and 14.6m OD.*	It is intended that landscaping will be "naturalised" by creating dips and humps. Surely these features superimposed upon an already steep (in terms of maintenance) slope, will present a significant risk to plant and operatives alike.	Provide advice on the safety of operatives tasked with maintaining landscape features on (deliberately made) uneven ground at a 1 to 3 slope with a potential drop (roll) height of some 7m or so? How does this sit with CDM? How does this sit with HSE?
31	*3.12.20*	*Maintenance access ramps: required to maintain the soft sea defence and repair the*	Ramps plural.	One is beside the BLF. Where are others?

		hard sea defence. These will be permanent structures.		Do any others interfere with the SCDF?
37	*4.3.3*	*4.3.3 The Sizewell C Permanent Sea Defence, including the southern termination, would be constructed without intrusive works to the existing Sizewell B Sea Defences. The wedge between the structurally independent Sizewell B and Sizewell C Sea Defence systems would be infilled with shingle or other material prior to landscaping.*	This does not match Fig. 3.6 which shows the Sizewell C overlapping the Sizewell B.	Clarification sought on the nature of this interface, also considering the opportunity to align the two structures thus enabling the south end Sizewell C splay-out to be brought into alignment with the greater length of the structure.
37	*4.3.8*	*4.3.8 Construction of the Permanent Sea Defence would be carried out in stages. As the Permanent Sea Defence is constructed, the Temporary Sea Defences would be removed or cut down to permit the construction of Permanent Sea Defence.*	Is it not the case that the temporary sea defence is there to protect land site until the permanent sea defence is installed. Removal of the temporary sea defence ahead of constructing the permanent one would seem to defeat the objective.	Clarification sought on the point (to left).
38	*4.3.8*	*4.3.18 Following construction of HCDF, the SCDF profile would be formed using dredged imported shingle material and any suitable site won material. A trailer suction hopper dredger would dredge material from an existing licenced offshore extraction site and then moor offshore Sizewell C. The shingle would then be pumped*	This would appear to be at variance with the more recent initiative to use native sediment for the SCDF.	Further information required on source and grading of sediment used for the SCDF.

		ashore using a pipeline and moved into the profile using bulldozers.		

9.88 Estate Wide Management Plan for the EDF Energy Estate - Clean Version - Revision 2.0 [REP8-109]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:
11	3.2.3	*Additional bat foraging habitat in Kenton Hills.*	The addition of this paragraph securing the creation of additional bat foraging habitat in Kenton Hills, prior to any vegetation clearance on the Main Development Site is welcomed.	N/A
14	5	*Figures 1-5.*	Figures 1 to 5 show Rights of Way and Access routes rather than the plans listed in the Contents. This must be corrected for the final version of the EWMP.	Replace figures 1-5 with the correct ones.

9.96 Comments on Responses to the ExA's Second Written Questions (ExQ2) - Revision 1.0 [REP8-115]

Part 4 – HE.2 Historic Environment (terrestrial and marine):

HE.2.2 – Lower Abbey Farm: ESC has never been involved with archaeological mitigation proposals for Lower Abbey Farm. It is not within the application boundary – as advised here by the Applicant. No comment needed from ESC.

HE.2.4 – Coastguard Cottages: The impacts on the cottages from the Main Development Site, between the Applicant and National Trust, appears here to be concluded, with reference to the proposed Dunwich Heath Resilience Fund which will enable the National Trust to carry out enhancements to the cottages via interpretation. This is welcomed by ESC.

HE.2.8 – Hill Farmhouse, Farnham: The matter of the effect of the Two Village Bypass on the farmhouse is now settled and agreed between ESC and the Applicant – as noted here.

HE.2.10 – Enhancement to Proposed Mitigation Schemes: ESC's only comment here is that it reads as if the Applicant is currently devising an enhanced mitigation scheme for Farnham Hall for presentation to and discussion with FERN, the Interested Party that represents residents at the Hall. This includes the provision of additional screening and potential noise reduction and will take the form of a more detailed landscaping scheme, according to the Applicant. This is welcome. ESC notes from [REP8-127] at page 2, paragraph 1.6.1 that FERN is included in a table of landowners that provides an outline of landowner discussions regarding enhanced landscape proposals. It notes here that these proposals will need to be approved by ESC in due course and that emerging designs cannot yet be committed to. This is welcome confirmation that ESC will have some degree of control over the enhanced proposals at Farnham Hall which may have the potential to impact the designated heritage asset's protected setting. The table at page 9 suggests that emerging proposals revolve around ramp gradients, bunds and temporary fencing.

Part 4 LI.2 – Landscape Impact, Visual Effects and Design:

LI.2.4 – Design Review Panel: The Applicant's response refers to the Deadline 8 version of the draft Deed of Obligation which details the way in which the Suffolk Design Review Panel will be engaged. ESC has agreed the wording in the now signed and executed Deed. The timing of the involvement of the panel as set out by the Applicant here is agreed.

LI.2.23 – Design and Access Statement – Overarching Design Principles: ESC's response was not intended as a tacit endorsement; it was an objective assessment of the Applicant's approach to the overarching design principles.

LI.2.24 – Design and Access Statement – Accommodation Campus Design Principles: ESC notes that the Applicant accepts our agreement with the revised principles which have been largely based on our original suggestions to amend them as prompted by the ExA.

LI.2.26 - Design and Access Statement – Accommodation Campus Design Principles:

This document again refers to entering an agreement on a design governance framework 'to provide reassurance on the delivery of good design and the use of a design review panel'. According to the Applicant, the governance framework is not the design review panel. As ESC stated in

[REP8-140] in response to LI.2.5, ESC is not certain what the design governance framework is. ESC understood, from the Applicant, that this term had been erroneously included and was intended to refer to the design panel. As reference to the design governance framework has been repeated in this document. ESC assumes that the reference should be to the 'Design Review Panel'.

The Applicant states that this 'framework is currently being discussed with ESC and will include reference to the use of a design review panel, the design guardianship role and the role and status of design principles'. This is not the case. ESC do not consider a design governance framework to be necessary. A combination of the agreed design principles, the design guardianship role of the scheme designers, and the engagement of the Suffolk Design Review Panel will provide the necessary infrastructure to benchmark, oversee, and scrutinise ongoing design quality. There is no need for a formal framework.

9.97 Responses to the ExA's Third Written Questions (ExQ3) Volume 1 - SZC Co. Responses - Revision 1.0

Part 4 – HE.3 Historic Environment (terrestrial and marine):

HE.3.0 – Enhancement to Proposed Mitigation Schemes. The Applicant's comments here state that the detail of the enhancement proposals for Farnham Hall will be discussed with ESC as part of the detailed design process. This does not quite tally with what was stated at 9.106 Written Submissions responding to actions arising from Issue Specific Hearing 13: Landscape, Visual Impact, Design and Terrestrial Heritage (16 September 2021) at page 2, paragraph 1.6.1 [REP8-127] where it is acknowledged that they will need to be approved by ESC in due course. ESC would welcome discussions with the Applicant prior to submission under Requirement.

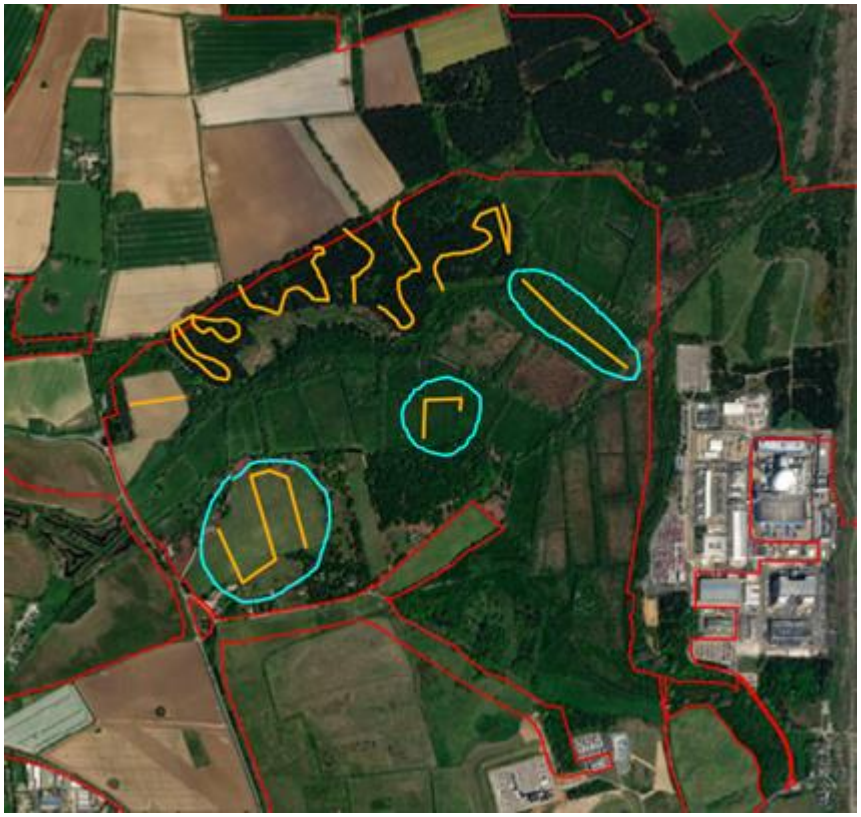
9.99 Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 [REP8-120] and Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 - Appendices Part 1 - Revision 1.0 [REP8-119]

Pg. No.	Section Ref.	*Relevant text / illustration*	Observations and concerns	Requested:

27	2.9.45	*Bat Roost Survey in Trees – Main Development Site.*	For clarity the original comments were made by ESC at Deadline 5 [REP5-138], not Deadline 3 as stated in the Applicant's response.	N/A
27	2.9.46	*Bat Roost Survey in Trees – Main Development Site – Comment 1.*	It is unclear how there can be "*no discrepancy between the 2020 and 2021 surveys*" if in the same sentence the Applicant then acknowledges that "*there are differences in the locations of some plotted trees*". If trees were reassessed and subsequently downgraded by the 2021 survey, then it is unclear why they were not all recorded in the 2021 survey report. It appears that some of the trees downgraded to 'Negligible' by the 2021 survey (e.g. trees G13, G15 and G16 all downgraded from 'Moderate' to 'Negligible') are listed in the 2021 report, so the explanation in 2.9.46 that downgraded trees were excluded does not seem to be consistent. It must be ensured that all trees to be removed have their potential for roosting bats assessed so that adequate mitigation measures are secured.	It is understood that all trees will be resurveyed prior to removal and the final number of replacement features will be dictated by that survey. It is understood that this will be secured by the Natural England licence.
30	2.9.48	*Comment 3.*	This comment was not made by ESC and we therefore have no comment on it.	N/A

30	2.9.49	*Comment 4.*	This comment was not made by ESC and we therefore have no comment on it.	N/A

Appendix B – Figure of Proposed Additional Habitat Improvement and Creation for Bats – Three of the features shown to be created for bat foraging are within or immediately adjacent to existing designated sites (two within Sizewell Marshes SSSI and one within Leiston Common County Wildlife Site), these are circled in blue on the figure below. Creation of new bat foraging habitat (particularly new planting) in these areas is likely to conflict with their existing wildlife value and therefore should not be undertaken. Creation of new bat foraging habitat should be restricted to areas outside of designated sites. The text description of the new habitat creation in the Estate Wide Management Plan only refers to works being undertaken in Kenton Hills.



Appendix F – Bailey Bridge Note – The need for the temporary bailey bridge in the early stage of construction is noted and understood. The confirmation of the build time (18 weeks) and the length of use (22 weeks) is also noted. The commitment that there will be no lighting of the bailey bridge itself or within the dark corridor is welcomed, as is the confirmation on usage in relation to noise. Based on the information available ESC has no further comments on this matter.

9.99 Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 - Appendices Part 1 - Revision 1.0

Appendix K: Sizewell C Construction Phase Visualisations Report

The written report outlines a number of caveats that sit behind the illustrations, which ESC understands and accepts given the timespan of the construction period and the constantly changing construction scenario. The important point to note is that the illustrations depict a worst-case scenario that shows an anticipated peak period of construction activity in terms of above ground infrastructure, and that there will be a gradual build up and then draw down either side of peak activity.

9.99 Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 - Appendices Part 3 [REP8-327]

Landscape and Visual Impact

The photomontages are based on the parameter style illustrations that ESC has previously seen, and which formed part of the original LVIA as embedded within the Environmental Statement. In this respect they contain no surprises but rather give a more realistic presentation of what can be expected in terms of visual impacts likely to arise during the construction phase. They are useful and informative, but they do not give ESC any reason to alter any previous responses in respect of anticipated landscape and visual impacts that are likely to arise during the construction phase.

Historic Environment

Figures 1.13 and 1.14 – National Trust Dunwich Coastguard Cottages car park – The visualisations here of as-existing and worst-case scenario during the construction phase are very helpful. ESC judges that they do support the views that the National Trust expressed about impacts arising during this phase on their non-designated heritage asset. ESC has no further comment to make on them.

9.102 Written Summaries of Oral Submissions made at Issue Specific Hearing 13: Landscape, Visual Impact, Design and Terrestrial Heritage (16 September 2021) - Revision 1.0 [REP8-124]

Page 7, 1.4 Agenda Item 4: Two Village Bypass: paragraph 1.4.1 refers to ESC's request for more planting (in respect of the Parkgate Farm roundabout/Farnham parish church). This is currently an area of uncommon ground between the parties.

Page, 8: paragraph 1.4.4: ESC welcomes the statement that the Applicant will be pleased to progress discussions on Parkgate Farm planting and that there is sufficient land within the red line to do so. However, it is not clear that there is land within the red line boundary and therefore this remains an area of uncommon ground between the parties.

Page 4 - Table 1.1 – SLR: There is reference here to discussions with the ESC conservation officer, the Interested Party at Theberton Hall Farm, and the Applicant. These would include heritage and landscape consultants and be in relation to Plumtreehill Covert and the impact on the setting of Theberton Hall. ESC welcomes this suggestion and is happy to be included. ESC considers that its Landscape Manager should participate. ESC notes that no such joint discussion has yet taken place, though it has been referenced in writing by the Applicant as a suggested meeting.

Page 9 – Table 1.2 – TVB: ESC has already commented above about enhanced landscape design proposals being discussed with FERN at Farnham Hall and detailed here at Table 1.2 Two Village Bypass. It is expected an update will be provided at Deadline 10 alongside details of proposals which ESC will review then; in addition to the revised Two Village Bypass LEMP, promised here (paragraph 1.12.1, p13).

Pages 13-14 – 1.16 – Suffolk Design Review Panel: ESC concurs with the contents of paragraphs 1.16.1 – 1.16.3. ESC considers that these now-agreed arrangements and DoO provisions should satisfy the panel that independent design review of detail quality will be provided and engaged at post-consent stage for all agreed Design Elements.