



The Sizewell C Project

8.4 Planning Statement - Final Update and Signposting Document

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1 PLANNING STATEMENT: FINAL UPDATE AND SIGNPOSTING DOCUMENT

- 1.1.1 This document is to be read alongside the **Planning Statement** [APP-590] submitted with the DCO application in May 2020 and the **Planning Statement Update** [REP2-043] submitted in June 2021. The Planning Statement and the Planning Statement Update remain relevant and appropriate in substance as an introduction to and an assessment and explanation of the planning issues raised by the Sizewell C DCO application in the context of relevant planning policy. Against that background, those documents together with this document set out the planning assessment of the application against policy. It is this document, however, which now provides the Applicant's assessment of the planning balance to be struck in this case (please see the revised version of Section 11 of the Planning Statement provided at the end of this document).
- 1.1.2 Whilst the structure, essential principles and overall conclusions of the Applicant's assessment have not changed since the submission of the application, certain things have moved on: either because of external developments (such as the publication of new policy) or because some issues have developed during the course of the examination. This may be because greater clarity has been brought to them with the benefit of the examination or because (for example) mitigation measures have been developed and agreed with stakeholders.
- 1.1.3 This document updates the **Planning Statement** [APP-590] in those important respects. It follows the structure and order of the Planning Statement and provides information on where matters may have changed. It does so without setting out those matters at length. Rather it signposts (using references from the Examination library) to where changed or updated information has been brought to the examination. Where appropriate, it provides a brief commentary about that information.
- 1.1.4 The exception to this approach is in relation to Chapter 11: Planning Balance and Conclusions, which has been rewritten taking account of that updated material, and which is set out in those revised terms at the end of this document.
- 1.1.5 First, the table below signposts to the examination material which updates and should be read together with the **Planning Statement** [APP-590].

PART ONE: UPDATE AGAINST SECTIONS 1-10 OF THE PLANNING STATEMENT

Table 1.1: Planning Statement Signposting Table

Planning Statement reference	Applicant's latest position / update submitted to the Examination
Executive Summary	
The summary of the Applicant's planning assessment is set out in revised Section 11 at the end of this document.	
Section 1 – Introduction	
Section 1.4: Planning and Environmental Designations	
Paragraph 1.4.4: Sizewell Marshes SSSI	The permanent land take within the Sizewell Marshes SSSI has reduced to 5.45% (5.74ha.) and the temporary SSSI land take has reduced to 1.89% (1.99ha.), as described in Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 [REP8-120] , epage 33].
Paragraph 1.4.10: Coastal Change Management Area	<p>Policy SSP42 of East Suffolk Council's Site Allocations and Area Specific Policies Development Plan Document (January 2017) has now been superseded by Policy SCLP9.3 of the Suffolk Coastal Local Plan (September 2020).</p> <p>The site continues to be located partially within a Coastal Change Management Area.</p>
Section 1.5: Planning History	
Paragraph 1.5.11: Sizewell B relocated facilities planning permission	The judicial review challenge was dismissed at the High Court, heard in October 2020. A subsequent application for permission to Appeal against that decision was rejected by the Court of Appeal in November 2020. As such, the permission remains extant (LPA ref: DCO/19/1637/FUL) and works commenced on site at the end of 2020. This is also reflected in the Joint Local Impact Report [REP1-045] , epage 16].
Part ii: Sizewell B relocated facilities	A revised (second) application for Sizewell B relocated facilities was submitted on 19 November 2020 and planning permission was granted on 18 February 2021 (LPA ref: DC/20/4646/FUL). Again, this is reflected in the Joint Local Impact Report [REP1-045] , epage 17].

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	<p>The proposals to relocate the Sizewell B facilities are included within the DCO Application [AS-005] and were incorporated through the Accepted Changes (April 2021) [PD-013]. The reason for this approach, as set out in paragraphs 1.5.12 to 1.5.14 of the Planning Statement, is unchanged.</p>
Section 1.6: Overview of the Consultation Process	
Paragraph 1.6.4: Consultation Report	<p>During the course of the DCO Examination, SZC Co. has continued to carry out proportionate non-statutory consultation on the Proposed Changes (and subsequently Accepted Changes) to the DCO Application. A number of Addenda have been submitted to the Consultation Report during the course of the DCO Examination and set out how feedback has been taken into account from each consultation, namely:</p> <ul style="list-style-type: none"> • Consultation Report Addendum [AS-153] • Consultation Report Second Addendum [REP3-009] • Consultation Report Third Addendum [REP5-044] • Consultation Report Fourth Addendum [REP7-278] • Consultation Report Fifth Addendum [REP8-045]
Section 1.7: Legislative and Policy Summary	
Paragraph 1.7.10: Change of circumstances	<p>Please read this section of the Planning Statement together with Section 3 and its related update set out further below. In particular, it is explained in the Planning Statement [APP-590] that the appropriate approach to the consideration of a 'change in circumstances' for these purposes has evolved significantly since the production of the Planning Statement, with the benefit of case law and precedent.</p> <p>Additionally, since the production of the Planning Statement [APP-590] and Planning Statement Update [REP2-043], the Government has published a suite of draft</p>

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	<p>National Policy Statements (NPS) for energy infrastructure, subject to consultation between 6 September and 29 November 2021. The Draft NPS EN-1 directs that the current suite of NPSs should have effect for any application accepted for Examination before the designation of the 2021 amendments, but that any emerging draft NPS <i>“are potentially capable of being important and relevant considerations in the decision-making process”</i>.</p> <p>The Draft NPS EN-1 is considered further below in the updates to Section 3. NPS EN-6 does not form part of the consultation on the basis that the review concluded that <i>“there are no changes material to the limited circumstances in which it will have effect (see the Written Ministerial Statement of 7 December 2017)”</i>.</p> <p>The observations made in respect of the Written Ministerial Statement within the Planning Statement at paragraphs 1.7.7 and 1.7.8 are therefore unchanged. The existing NPS EN-1 and EN-6 continue to provide information, assessments and statements, including those concerning the need for nuclear power, which continue to be important and relevant to the Sizewell C Project. (These matters are developed in more detail in relation to Chapter 3).</p>
Section 1.8: Guide to the Application	
Paragraph 1.8.3: Books in the Navigation Document	<p>There are now a total of ten different Books in the Navigation Document (Doc Ref. 1.3(Q)). The eight Books have been supplemented by two additional Books:</p> <ul style="list-style-type: none"> • Book 9 contains the Examination Documents; and • Book 10 contains the final control documents, to be certified.
Section 2 – Location and Site Description	
Section 2.2: The Main Development Site	
Paragraph 2.2.1 – site area	<p>The proposals for the Main Development Site now cover a total site area of 1010.5ha, of which 370.6ha are onshore and the remaining 639.9ha are offshore.</p>

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	<p>The changes that led to this 1.1ha reduction in site area on the Main Development Site are illustrated on Figure 2.2.28 of the Environmental Statement Addendum Figures, Chapter 2 Main Development Site. Part 1 of 4 [AS-190, epage 34]</p> <p>Further details of the changes that led to this update were submitted in January 2021 and are set out in the Environmental Statement Addendum [AS-181, epage 76].</p>
Paragraph 2.2.4 (second bullet) – Sizewell B Relocated Facilities	This area now also comprises land associated with Sizewell A, to facilitate the provision of the SZB outage car park on previously developed land. Further details are set out in the Environmental Statement Addendum [AS-181 , epage 54].
Section 2.3: The Associated Development Sites	
a) Northern Park and Ride at Darsham Paragraph 2.3.2	The site of the Northern Park and Ride at Darsham was reduced in January 2021 to correct minor mapping boundary discrepancies. The site area is now approximately 27.8 ha. For more information refer to the Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 3 Northern Park and Ride Appendix 3.2.A Update to the Description of Development - Revision 1.0 [AS-240].
b) Southern Park and Ride at Wickham Market Paragraph 2.3.6	The site of the Southern Park and Ride was changed in January 2021 to remove a thin strip of land to the south of the A12 as it was determined to not be required. The site area is now approximately 26.1 ha. The part of the site which would contain the parking and buildings, postal consolidation building and Traffic Incident Management Area (TIMA) is approximately 18ha in area, with the remainder of the site encompassing a section of the A12, and an associated slip road. For more information, refer to Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 4 Southern Park and Ride Appendix 4.2.A Update to the Description of Development - Revision 1.0 [AS-242].
Section 3 – Legislative and Policy Context	

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Section 3.3: The Approach to Decision Making in this Case	
<p>Paragraph 3.3.8: Change of circumstances</p>	<p>The approach to “change of circumstances” and National Policy Statements in the context of the Ministerial Statement, referred to at paragraph 3.3.5 has been clarified by the court since the submission of the DCO application. These matters are discussed in the Planning Statement Update [REP2-043], particularly in Section 3. As stated there at paragraph 4.1.5, <i>“The Drax judgements have helpfully clarified that any material change in circumstances relating to matters affecting the weight to be attached to the NPS, or the need case which it sets out, are not matters for this examination but for a review of the NPS pursuant to section 6 of the 2008 Act.”</i></p> <p>The Planning Statement Update [REP2-43] also reports on a suite of relevant government publications since the submission of the DCO application, including in particular the Energy White Paper. As explained in Section 4 (from paragraph 4.1.8) of the Planning Statement Update, the White Paper confirms that the need for energy infrastructure set out in the NPS remains and that <i>“the current NPS will continue to provide a proper basis on which the Planning Inspectorate can examine and the Secretary of State will make decisions on applications for development consent.”</i></p> <p>These matters are also explored in the Applicant's response to EXQ G.1.4, and G.1.11 [REP2-100]; and G.2.0 to G.2.7 [REP7-050].</p> <p>Subsequently, the Government published for consultation a suite of draft NPS for energy infrastructure. The consultation confirms that:</p> <ul style="list-style-type: none"> • for applications accepted for Examination before the designation of the 2021 amendments, the 2011 suite of NPS should have effect in accordance with the terms of those NPSs. The role of NPS EN-1, as

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	<p>explained in the Planning Statement, is therefore unchanged.</p> <ul style="list-style-type: none"> NPS EN-6 does not form part of the consultation and will continue to have the role set out in the 2017 Written Ministerial Statement during the development of a new nuclear NPS. For projects which will deploy after 2025, the Consultation Document¹ states that EN-6 provides information, assessments and statements which may continue to be important and relevant. <p>These matters are further elaborated in the Applicant's response to EXQ G.3.0 [REP8-116].</p>
Section 3.4: NPS EN-1 and EN-6	
Paragraph 3.4.3: National Planning Policy Framework	The National Planning Policy Framework (NPPF) was revised in July 2021. Paragraph 5 of the NPPF (2021), quoted in paragraph 3.4.3 of the Planning Statement, is unchanged.
Section 3.6: Need – Changes in circumstances?	
Section 3.6: Need – Changes in circumstances?	<p><u>Published Documents on the need for new nuclear power generation</u></p> <p>The Planning Statement Update [REP2-043] sets out relevant and important documents published since the submission of the DCO Application (May 2020) relating to the need for new nuclear power generation. The Planning Statement Update highlights the following published documents:</p> <ul style="list-style-type: none"> Updated Energy and Emissions Projections 2019 (October 2020) The Ten Point Plan for a Green Industrial Revolution (November 2020) National Infrastructure Strategy (November 2020) Response to the National Infrastructure Assessment (November 2020)

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015302/nps-consultation-document.pdf

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	<ul style="list-style-type: none"> • The Sixth Carbon Budget: The UK's path to Net Zero (December 2020) • The Energy White Paper – Powering our Net Zero Future (December 2020) <p>The Energy White Paper, informed by the more recent analysis, re-confirms the scale and urgency of the need. The White Paper states (on page 55) that <i>“the need for the energy infrastructure set out in the NPS remains”</i>.</p> <p><u>Draft NPS EN-1</u></p> <p>The established need and urgency of new energy infrastructure, including new nuclear power generation, is unchanged in the draft NPS EN-1. Draft EN-1 sets out <i>“why the government sees a need for a significant amount of new large-scale energy infrastructure to meet its energy objectives”</i> and <i>“why the government considers that the need for such infrastructure will often be urgent”</i>. In the consideration of individual Projects, it states:</p> <p><i>The Secretary of State should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the government has demonstrated that there is a need for those types of infrastructure, as described for each of them in this Part.</i></p> <p><i>In this Part, the Secretary of State identifies the level of need for new energy infrastructure. In relation to the weight to be given to that identified need, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.</i></p> <p>For nuclear power generation, the draft NPS EN-1 identifies a number of advantages:</p> <ul style="list-style-type: none"> • Nuclear plants provide continuous, reliable, safe low-carbon power (paragraph 3.3.39);

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	<ul style="list-style-type: none"> Nuclear plants produce no direct emissions during operation and have direct life-cycle GHG emissions comparable to off-shore wind (paragraph 3.3.39); Nuclear generation provides security of supply benefits by utilising alternative fuel source to other thermal plants, with a supply chain independent from gas supplier (paragraph 3.3.39). <p>Again, these matters have been set out in response to ExQ3 G.3.0 [REP8-116].</p> <p>These matters were examined at ISH9 and the Applicant's Written summary of its Oral Case is set out at [REP7-102]. That document supplements the analysis in the Planning Statement Update, and includes a useful summary of the Applicant's response to a number of issues raised by Interested Parties in this context. The Applicant commends that analysis to the Examining Authority and the Secretary of State.</p>
Paragraph 3.6.17: Weight to be attached to NPS EN-1 and EN-6	<p>Paragraph 3.6.17 of the Planning Statement stated that significant weight should be given to government policy in NPS EN-1 and EN-6. The question of weight is a matter for the decision maker but it is relevant in this context that the status of the NPS as a proper basis for the purpose of examining the application has been reconfirmed in up to date government policy in the Energy White Paper at page 55. EN-1 and EN-6 provide the primary policy for the examination and determination of the application.</p> <p>These matters are addressed in the Applicant's response to ExQ1 G.1.12 and G.1.16: see [REP2-100] and [REP3-046].</p>
Section 3.7: NPS EN-1 and EN-6: Site Specific Assessment	
Paragraph 3.7.8: Appraisal of Sustainability for Sizewell	The key assumptions forming the Appraisal of Sustainability (AoS) for the Sizewell site were discussed at Issue Specific Hearing 5, highlighting that the assessment of Sizewell was on the basis of 'at least one reactor' on the site (paragraph 1.2.6 of [REP5-110] and paragraph 3.3.1 of NPS EN-6).

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	The Applicant also submitted a Route Map against the AoS Report for Sizewell [REP8-119, epage 235] at Deadline 8. This sets out where matters raised in the AoS have been addressed in the DCO Application or Examination documents.
Section 3.8: Site Specific Assessment: Change in circumstances?	
Paragraph 3.8.8: Preparation of a new NPS	<p>An explanation that there has been no material change in the site circumstances since the designation of the NPS is addressed in the Applicant's response to ExQ1 G.1.10 and AI.1.5 [REP2-100] and [REP3-046] and in the Written Summaries of Oral Submissions made at ISH9 [REP7-102, epage 5].</p> <p>As NPS EN-6 explains at paragraph 4.2.4: "<i>The site assessments (in Annex C) set out why the listed sites are considered suitable and give context to concerns that were raised by the public.</i>"</p> <p>In response to submissions made at ISH9, the Applicant explained that the passage of time itself is not a change in circumstances for the purposes of policy support for the sites listed in NPS EN-6. As Annex C (at C.8.6) to the NPS explains, the Government is satisfied that Sizewell is credible for deployment by 2025 "<i>whether or not it is deployed by that date.</i>" The Government's Response to Consultation on the Siting Criteria, 2018 also confirmed (at paragraph 3.10) that "<i>the sites listed in EN-6 on which a new nuclear power station is anticipated to deploy after 2025 will continue to be considered appropriate sites and retain strong Government support during the designation of the new NPS.</i>"</p>
Section 3.9: NPS EN-1 and NPS EN-6: Applying the Policies to the Sizewell C Application	
Paragraph 3.9.3: Presumption in favour of granting consent	<p>The approach to the presumption set out in NPS EN-1 is carefully addressed in paragraphs 3.9.3 to 3.9.5 and that assessment remains appropriate.</p> <p>As stated there, while the policy presumption does not formally apply, it nevertheless constitutes an important and</p>

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	<p>relevant consideration weighing in favour of granting development consent, because it reflects the Government's underlying assessment of need, impacts and alternatives, all of which remain directly relevant to the application.</p> <p>In this context it is important that the Government has restated the validity of those matters in the Energy White Paper and that the recent draft of NPS EN-1 states:</p> <p><i>4.1.2 The Energy White Paper emphasises the importance of the Government's net zero commitment and efforts to fight climate change. Given the level and urgency of need for infrastructure of the types covered by energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.</i></p> <p>These matters are addressed in the Applicant's response to ExQ3 G.3.0 [REP8-116]. As explained there:</p> <p><i>"The draft NPS reports that it has been the subject of an Appraisal of Sustainability, which considered alternatives to its proposed policy approach. On page 12 it explains that the alternatives included an alternative without nuclear (Alternative A3) and paragraph 1.7.9 explains that Alternative A3 'which is the same as EN-1 but without Nuclear' would be:</i></p> <ul style="list-style-type: none"> <i>• adverse for the achievement of Net Zero due to greater on-going emissions from unabated gas;</i> <i>• adverse on Security of Supply as reliant on a small group of electricity generating technologies; and</i> <i>• adverse for the Natural Environment as emphasis on renewables and natural gas with CCS would require large areas of land and sea to meet the same energy output as EN-1.</i>

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	<i>Based on the above, these recent publications do not affect the application of policy to the Sizewell C project or the need for new electricity generating infrastructure of the type of proposed."</i>
Paragraph 3.9.6: Consideration of alternatives to the NPSs approach: impacts.	The Draft NPS EN-1 undertook the same exercise to provide an assessment of reasonable alternatives to the EN-1 policies at a strategic level. The alternatives were rejected on the basis that none were as good as, or better than, the strategy in EN-1. The assessment of EN-1 recognised that significant adverse effects are likely to remain for landscape, biodiversity, townscape and seascape impacts. EN-1 acknowledges that <i>"it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts"</i> .
Paragraph 3.9.8: Appraisal of Sustainability and Habitats Regulations Assessment	At Deadline 8, the Applicant submitted: <ul style="list-style-type: none"> Route Map against the Appraisal of Sustainability Report for Sizewell [REP8-119, epage 235] Route Map against the Habitats Regulations Assessment for Sizewell [REP8-119, epage 290]
Paragraph 3.9.11: Matters not relevant to the determination of an NSIP	SZC Co. responded to ExQ1 G.1.5 [REP2-100] regarding matters identified in the NPS that are not relevant for the decision-maker. The list of matters contained in paragraph 3.9.11 is unchanged in the Draft NPS EN-1, with corresponding paragraphs in the draft NPS identified below: <ul style="list-style-type: none"> The need for the NSIP (Draft NPS EN-1 paragraph 3.2.5). The availability of alternative technologies to the proposed development (Draft NPS EN-1 paragraph 4.2.11). The effects of any necessary Grid connection can be considered and assessed separately (Draft NPS EN-1 paragraph 4.10.4).

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	<ul style="list-style-type: none"> • Matters covered by other regulatory regimes including pollution control (Draft NPS EN-1 paragraph 4.11.5). • Safety matters which are subject to other regimes (Draft NPS EN-1 paragraph 4.12.3). • Health issues which are subject to separate regulations (Draft NPS EN-1 paragraph 4.3.5). • Whether security issues have been adequately addressed when the application is submitted to the Secretary of State (Draft NPS EN-1 paragraph 4.15.3).
Paragraph 3.9.15: NPS Tracker	During the course of the Examination, SZC Co. has submitted and kept updated a detailed NPS Tracker , with a final version submitted at Deadline 10 (Doc Ref. 9.14(E)). The NPS Tracker sets out where the Project has complied with the requirements of NPS EN-1 and EN-6.
Paragraph 3.9.16: Other important and relevant issues	<p>Draft NPS EN-1 makes clear that for any application accepted for Examination before the designation of the 2021 amendments (such as the Sizewell C Project), the 2011 suite of NPSs should have effect. However, the emerging draft NPSs are “<i>potentially capable of being important and relevant considerations in the decision-making process</i>”.</p> <p>On this basis, Appendix A of this document sets out an assessment of the Sizewell C Project against the changes proposed within the Draft NPS EN-1.</p>
Section 3.10: Other Planning Policy Considerations	
Paragraph 3.10.1: National Planning Policy Framework	The National Planning Policy Framework (NPPF) was revised in July 2021. Paragraph 5 of the NPPF (2021), quoted in paragraph 3.10.1 of the Planning Statement, is unchanged.
Paragraph 3.10.2: Important and relevant matters	SZC Co. responded to ExQ1 G.1.12 and G.1.16 [REP2-100] regarding matters that are both important and relevant in decision-making, highlighting and explaining the primacy that must be given to the policies of the NPSs.

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	The applicant set out its approach to these issues in response to ExQ1 G.1.12 [REP2-100] at epage 28 and by responding to the answers of others to the same question at [REP3-046] .
Paragraph 3.10.5: ESC Development Plan	<p>The East Suffolk Council Suffolk Coastal Local Plan (SCLP) was adopted in September 2020, after the submission of the DCO Application (May 2020). SZC Co. responded to ExQ1 G.1.15 [REP2-100] regarding the status of the Local Development Plan and at [REP3-046] to responses by others to the same question. The responses show that ESC and SZC Co. are aligned on this issue.</p> <p>Appendix B of the Planning Statement Update [REP2-043] provided a review of modifications to the SCLP policies prior to adoption and explained the implications of these changes for the assessment of policy presented in the Planning Statement. It identifies that the final SCLP policies are in accordance with National Policy and are, therefore, not materially different from the policy framework that was relied upon in the Planning Statement. The assessments made within the Planning Statement continue to be appropriate.</p> <p>These matters were also examined at ISH9 - please see [REP7-102] and [REP7-072].</p>
Paragraph 3.10.13: Regional and other policy documents	SZC Co. responded to ExQ1 G.1.13 [REP2-100] regarding regional and local planning policies of relevance to the Sizewell C Project.
Paragraph 3.10.19: Marine Policy Statement	<p>SZC Co. responded to ExQ1 G.1.17 [REP2-100] on the regard that must be given to the Marine Policy Statement in the Sizewell C Examination. The position set out in paragraph 3.10.19 of the Planning Statement remains appropriate and up to date.</p> <p>[REP7-074] provides an East Marine Plan Policy Checklist.</p>
Section 3.11: Other Legislative Requirements	

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Paragraph 3.11.1: Licences, Consents and Agreements	The Schedule of Other Licences, Consents and Agreements has been updated during the course of the Examination to reflect the latest status of ongoing licences, consents and agreements, in addition to any changes to reflect Accepted Changes to the DCO Application. A final Schedule of Other Licences, Consents and Agreements is submitted at Deadline 10 (Doc Ref. 5.11(C)) to reflect the position of licences, consents and agreements at the close of the Examination.
Section 4 – The DCO Application	
Table 4.1: Main development site: operational infrastructure and Sizewell B relocated facilities.	Work No. 1E was added to Schedule 1 of the draft Development Consent Order following the acceptance of Change 3 in April 2021. This relates to Change 3. Further details are set out in the Environmental Statement Addendum [AS-181 , epage 53].
Table 4.1: Main development site: offshore infrastructure.	Work No's 2M – 2P were added to Schedule 1 of the draft Development Consent Order following the acceptance of Change 19 in September 2021. This relates to the marine infrastructure required for the temporary desalination plant. Further details are set out in the Fourth Environmental Statement Addendum [REP7-030 , epage 141].
Table 4.1: Fen meadow compensation sites and, if required, marsh harrier habitat improvement area (Westleton).	Work No. 18 was added to Schedule 1 of the draft Development Consent Order following the acceptance of Change 11 in April 2021. This relates to the site to the north of Pakenham for fen meadow compensation. Further details are set out in the Fourth Environmental Statement Addendum [REP7-030 , epage 73].
Section 5 – Main Development Site	
Paragraph 5.4.2 (second bullet) – Pakenham fen meadow compensation area.	Additional land for fen meadow compensation was added to the Project at a site to the north of Pakenham. Further details are set out in the Environmental Statement Addendum [AS-181 , epage 73]. The final site boundary was confirmed at Works Plans [REP8-007 , epage 19].
Section 5.2 – Design Evolution.	SZC Co. has continued to evolve the design post-submission of the application and during the course of the examination for the main reasons set out in the introduction to this document. A detailed understanding of the way that the design has evolved can be understood

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	from a review of the track-changes to the Design and Access Statement submitted at Deadlines 5, 9 and 10.
Paragraph 5.4.2 (second bullet)	This list now includes a permanent fen meadow compensation site to the north of Pakenham.
Paragraph 5.5.2, sub-section g) Other Site Structures, Infrastructure and Works, including Highway Works and Earthworks	<p>Amendment of bullet point 4 (underlined) to “<i>Vehicular and pedestrian crossing over the Sizewell Marshes SSSI south of Goose Hill in the form of a single span bridge with embankments</i>”. This relates to Change 6. Further details are set out in the Environmental Statement Addendum [AS-181, epage 61].</p> <p>Amendment of bullet point 13 (underlined) to: “<i>Landscape restoration works and planting, including flood mitigation and associated wetland habitat</i>”. This relates to Change 5. Further details are set out in the Environmental Statement Addendum [AS-181, epage 59].</p> <p>Addition of bullet point: “<i>Relocation of certain Sizewell B infrastructure, including: outage laydown area; access roads; up to 579 operational car parking spaces (Option 1)</i>”. This relates to Change 3. Further details are set out in the Environmental Statement Addendum [AS-181, epage 53].</p> <p>Addition of new bullet point: “<i>Mammal culvert under Lover's Lane between Sizewell Marshes SSSI and Aldhurst Farm</i>”. This relates to Change 4. Further details are set out in the Environmental Statement Addendum [AS-181, epage 59].</p>
Paragraph 5.6.1, sub-section b) Main Platform	Addition of bullet point: “ <i>Temporary desalination plant and associated infrastructure (initial location)</i> ”. This relates to Change 19. Further details are set out in the Fourth Environmental Statement Addendum [REP7-030, epage 141].
Paragraph 5.6.1, sub-section c) Temporary Construction Area	Addition of bullet point: “ <i>Temporary desalination plant and associated infrastructure (subsequent location)</i> ”. This relates to Change 19. Further details are set out in the Fourth Environmental Statement Addendum [REP7-030, epage 141].

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	<p>Amendment of bullet point 4 to clarify all parking numbers are “up to” figures rather than “approximate”.</p> <p>Amendment of bullet point 5 to correct omission (underlined) to “Up to 1,000 car parking spaces <u>and 75 HGV parking spaces</u>”</p>
Paragraph 5.6.1, sub-section d) Land East of Eastlands Industrial Estate	<p>Amendment of bullet point 3 to correct omission (underlined) to “Up to 400 caravan pitches providing up to 600 bed spaces (based on 1.5 people per caravan), including <u>up to 400 car parking spaces</u>, serviced plots and associated facilities for staff welfare and amenity”.</p> <p>Amendment of bullet point 4 to clarify HGV parking space numbers are “up to” 80 rather than “approximately” 80.</p>
Paragraph 5.6.1, sub-section e) Offshore works area	<p>Addition of bullet point: “Construction and tunnelling works related to marine infrastructure associated with temporary desalination plant.” This relates to Change 2. This relates to Change 19. Further details are set out in the Fourth Environmental Statement Addendum [REP7-030, epage 141].</p> <p>Addition of bullet point: “Temporary Marine Bulk Import Facility”. For the avoidance of doubt, this was referred to as the temporary Beach Landing Facility throughout part of the examination period. This relates to Change 2. Further details are set out in the Environmental Statement Addendum [AS-181, epage 45].</p>
Paragraph 5.6.1, sub-section f) Other temporary development	<p>Addition of bullet point: “temporary marine outfall”. This relates to Change 8. Further details are set out in the Environmental Statement Addendum [AS-181, epage 65].</p>
Paragraph 5.7.3	<p>Works relating to the relocation of certain Sizewell B facilities may now begin pursuant to planning permission reference DC/19/1637/FUL or DC/20/4646/FUL issued by East Suffolk Council. This relates to Change 3. Further details are set out in the Environmental Statement Addendum [AS-181, epage 53].</p>

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Paragraph 5.7.5	Further details on the construction programme and methodology are now provided in the Construction Method Statement (Doc. Ref. 10.3).
Paragraphs 5.7.6 and 5.7.7	This paragraph is now superseded by Section 2.1 of the Construction Method Statement (Doc. Ref. 10.3), which provides details of the phasing schedule.
Paragraph 5.7.8 and Plate 5.1 – phasing schedule	<p>The phasing schedule in Plate 5.1 is now superseded by the phasing schedule in Plate 2.1 of the Construction Method Statement (Doc. Ref. 10.3).</p> <p>The Deed of Obligation (Doc Ref. 10.4) requires SZC Co. to use reasonable endeavours to deliver works indicated on Plate 2.1 by the milestone dates. Where, despite using reasonable endeavours, the timescales indicated in Plate 2.1 cannot be met, SZC Co. must nevertheless deliver the key components of the Project listed in Paragraph 2.1.6 of the Construction Method Statement in accordance with the long stop dates listed therein.</p>
Section 6 – The Development of Related Strategies	
Section 6.3: SZC Co's Workforce Strategies	
Section 6.3: SZC Co.'s Workforce Strategies	6.3: The Workforce Strategies (The Accommodation Strategy [APP-613] and the Economic Statement [APP-610], which includes as appendices an Employment, Skills and Education Strategy and a Supply Chain Strategy [APP-611], the referred to in this section are application documents that have not themselves been updated since they were submitted, but the mitigation principles within them have now been developed in detail and provide mitigation which is now secured by the Deed of Obligation (Schedules 3, 4, 5, 7 and 15), alongside details of monitoring and governance for each.
Paragraph 6.3.38: Community Safety Management Plan	6.3.38: For clarity, the Community Safety Management Plan is not itself secured by the Deed of Obligation, but the measures it refers to are (unless otherwise secured by the DCO).
Section 6.4: Transport Strategy	
6.4: Transport Assessment	A Consolidated Transport Assessment has been updated [REP4-005] and revised CWTP and CMTP updated,

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6.4.4: Park and Rides	<p>agreed with SCC and appended to the Deed of Obligation (Doc Ref. 10.4).</p> <p>The selection of the park and ride strategy and locations has been examined and the Applicant's position is recorded in the following examination documents:</p> <p><u>Southern park and ride</u> EXQ Al.1.24 to Al.1.25 and AR.1.23 of Doc Ref. 9.55 - Comments on Responses to the ExA's First Written Questions (ExQ1) Submitted at Deadline 3 [REP5-121].</p> <p>TT.1.103 of Doc Ref. 9.11 - Responses to the ExA's First Written Questions (ExQ1) Volume 1 - SZC Co. Responses [REP2-100].</p> <p><u>Northern park and ride</u> TT.1.102 of Doc Ref. 9.55 - Comments on Responses to the ExA's First Written Questions (ExQ1) Submitted at Deadline 3 [REP5-121].</p> <p>Table 8.1, Transport section (response to Heveringham Hall Estate) of Doc Ref. 9.28 – Comments on Written Representations [REP3-042].</p>
6.4.10: Direct bus services	<p>The position has moved on and is set out below:</p> <p>SZC Co. proposes to run direct bus services to the main development site. Direct bus services from Ipswich, Woodbridge/Martlesham, Lowestoft and Leiston have been assessed in the Consolidated Transport Assessment [REP4-005] but the actual direct bus routes will be agreed by the Transport Review Group (TRG) based on the workforce profile and locations, as secured in the CWTP.</p> <p>Direct buses outside of the area bounded by the A12, River Deben and River Blyth would be an alternative to using the park and ride facilities and those workers living within 800m of a direct bus stop would be allocated to a direct bus service rather than a park and ride facility. Direct bus services within the area bounded by the A12, River Deben and River Blyth would be based on concentrations of workers and those workers living within 800m of a direct</p>

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	bus stop would be allocated to a direct bus service rather than be eligible for a parking permit.
6.4.12: Walking and Cycling	An assessment of the existing network of local walking and cycling routes has been made and improvement measures identified in the updated Rights of Way and Access Strategy submitted at Deadline 10 (Doc. Ref. 10.26). Informal Recreation and Green Space Proposals [REP8-135] are appended to, the Deed of Obligation submitted at Deadline 10 (Doc. Ref. 10.4), whilst the PRow Fund and Leiston Walking and Cycling Projects [REP9-022] explains the significant benefits to local connectivity, recreation and amenity that would be achieved by the measures agreed with Suffolk County Council and committed to in Schedule 16 of the Deed of Obligation.
Implementation of the Construction Worker Travel Plan	<p>A CWTP (Annex L of the Deed of Obligation (Doc Ref 10.4)) has been developed and agreed with the transport stakeholders and will be secured through an obligation in Schedule 16 of the Deed of Obligation (Doc Ref 10.4).</p> <p>The CWTP (Annex L of the Deed of Obligation (Doc Ref 10.4)) addresses the potential to encourage a mode shift from car to more sustainable modes of travel. SZC Co. is committed to achieve the mode share targets in the CWTP that have been assessed as part of the DCO application as set out in the Consolidated Transport Assessment [REP4-005].</p> <p>The workforce transport strategy embedded in the DCO delivers a very high non-car mode share even before the CWTP is implemented. A key focus of the CWTP is therefore on the measures which will be put in place to ensure successful delivery of a bus-based approach to the daily movement of the construction workforce during the Sizewell C construction works.</p> <p>The Sizewell C Project will achieve a significant sustainable travel mode share during the construction phase, with 80% of the construction workers in the early years and 83% at peak construction making their daily journey to work at the</p>

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	<p>main development site via sustainable modes for at least part of their journey.</p> <p>Travel to work by car would be managed through the commitment to achieve the mode share targets, coupled with the control on parking spaces and parking permits. During the early years, car parking at the main development site and LEEIE (combined) will be restricted to 650 spaces, which is secured via Requirement 8 of the DoO (Doc Ref 10.4). During peak construction, once the northern or southern park and ride facilities are available for use, parking would be restricted to 1,000 spaces at the main development site.</p> <p>SZC Co. will employ a fly parking patrol team to carry out daily patrols to identify possible cases of fly parking. They will be both proactive and reactive, following up reports from local residents to the Sizewell C community help line who believe Sizewell C construction workers may be fly parking.</p> <p>Workers would be allocated to a mode of travel during their induction based on the principles set out in the CWTP. Compliance with the CWTP (Annex L of the Deed of Obligation (Doc Ref 10.4)) would be a requirement of all construction employees and contractors working at the main development site. It would be reinforced through a consenting and management process which would be produced in discussion with the local authorities.</p>
Section 6.5: Freight Management Strategy	
Paragraph 6.5.7: Beach landing facility	<p>The application was amended through a change to the application (Change 2) submitted in January, 2021 to include a new temporary beach landing facility for the importation of bulk materials; now called the temporary Marine Bulk Import Facility (MBIF). Please see Part 1 of the Proposed Changes [AS-281] at electronic page 26 and the description of the MBIF in the ES Addendum, Volume 1, Chapter 2 [AS-181] at electronic page 49.</p> <p>Those documents describe the purpose of the MBIF, which is further elaborated in the Freight Management Strategy [AS-280].</p>

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	At the same time (Change 1), the application was amended to enable 4 trains per day (with the theoretical potential for 5), rather than 3 trains per day assumed in the submitted application. [AS-281] at epage 17.
Paragraph 6.5.12: Selection of the Integrated Strategy, rather than the Rail-led Strategy	These matters are elaborated in the Initial Statement of Common Ground with Network Rail [REP2-074] and in the Applicant's response to EXQ. AI.15 [REP2-100] .
Paragraph 6.5.17: Integrated Strategy	<ul style="list-style-type: none"> The MBIF is added to the list of components of the integrated transport strategy.
Paragraph 6.5.21: Benefits of the Integrated Strategy	<p>These issues were updated in the Freight Management Strategy [AS-280] which revised the HGV mode share from an estimated 61% (paragraph 1.2.6) to approximately 40% as a result of the increase to 4 trains per day and the addition of the MBIF.</p> <p>Modal split was explained in the Modal Split paper submitted as Appendix A to the Written Submissions Responding to Actions following ISH12 [REP5-114].</p> <p>The most up to date position is set out in SZC Co.'s Response to Comments on ExQ2 AI.2.0 submitted at Deadline 10 (Doc Ref. 9.124) and in the final Version of the CTMP (Annex K to the Deed of Obligation) (Doc Ref 10.4) which commits to monitoring modal split against an aspiration to achieve a greater than 60% mode share by rail or sea.</p> <p>The CTMP also explains that the HGV limits have been reduced to:</p> <ul style="list-style-type: none"> An early years cap of 600 two-way HDV movements (300 vehicles) (HDVs include buses and HGVs) During peak construction, a cap of 650 two way HGV movements; and A target of no more than 500 HGV movements in any given quarter.

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	<p>Collectively these measures have been strongly supported by stakeholders, including SCC and ESC. The Applicant has demonstrated that the committed freight management strategy, limits as far as reasonably practical the movement of freight by HGV, whilst at the same time maintaining and enhancing the significant investment in road based mitigation measures, including the provision of two long-sought bypasses on particular pinch-points on the local road network.</p>
Section 6.6: Water Supply Strategy	
<p>Section 6.6 – Water Supply Strategy</p>	<p>The applicant has applied for a temporary desalination plant, for use until a permanent water supply is made available. Section 2.2 of the Change Report [REP7-285] provides further details on the scope and reasoning for this change.</p> <p>Alongside that report, an updated Water Supply Strategy [REP7-036] has been submitted. This confirms a three-phase approach to sourcing potable water is proposed:</p> <ul style="list-style-type: none"> - Phase 1: Water provided through trucks. - Phase 2: Water provided through an on-site temporary desalination plant. - Phase 3: A permanent water transfer main provided by Northumbrian Water Limited (NWL). <p>The current proposal for a permanent water supply therefore remains for NWL to construct a water transfer main to supply Sizewell C from their Northern Central Water Resource Zone.</p> <p>This relies on abstraction from the River Waveney and its associated Waveney Augmentation Groundwater Scheme ("WAGS") operated by the Environment Agency (EA).</p> <p>Based on the findings of an interim Water Industry National Environment Programme ("WINEP") report, the EA informed NWL (on 26 August 2021) that a sustainability reduction may be applied to NWL's</p>

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	<p>abstraction licence for the River Waveney and the WAGS abstraction licences. Further modelling work is being carried out to investigate this further and the results are expected in mid-October. The outputs of this work will inform whether NWL is able to supply Sizewell C's permanent water supply from the River Waveney. Should this be the case then NWL remain committed to supplying Sizewell C's permanent water supply demand via the Sizewell Transfer Main.</p> <p>In the event that NWL is not able to provide water for Sizewell C from this source, new supply schemes will need to be identified in NWL's Water Resources Management Plan 2024 which may take longer to deliver. NWL remains committed to delivering SZC's long term water supply as soon as reasonably practicable.</p>
Section 6.7: Associated Development	
<p>Two village bypass – Section c) – Paragraphs 6.7.19 – 6.7.26 and Plate 6.7</p>	<p>The latest description of development for the two village bypass can be found in the two village bypass Description of Development - Tracked Changes Version [REP5-060].</p> <p>This updates Section 6.7 of the Planning Statement as follows:</p> <ul style="list-style-type: none"> • Paragraph 6.7.29 – The PRow diversions are explained at [REP5-060] (electronic page 6 – 10). • Paragraph 6.7.23 - Inclusion of a portal culvert underneath the accommodation access track to the east of the River Alde to allow an existing watercourse to pass beneath the track • Paragraph 6.7.23 – Inclusion of a crossing of the roundabout at the eastern end of the road for Non-Motorised User use (pedestrians, cyclists and equestrians). • Plate 6.7 has been updated - the updated version in the Second Environmental Statement Addendum, Volume 2, Figure 3.2.2 [REP5-066]

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<p>Sizewell link road - Section d) - Paragraphs 6.7.27-6.7.35 and Plate 6.8</p>	<p>The latest description of development for the Sizewell link road can be found in the Sizewell Link Road Description of Development - Tracked Changes Version [REP5-058], as updated by the Fifth ES Addendum [REP8-072]. These documents update Section 6.7 of the Planning Statement as follows:</p> <ul style="list-style-type: none"> • Paragraph 6.7.27 - the design speed of the Sizewell link road is 60mph rather than 50mph (as explained in SZC Co.'s Written Submissions responding to actions arising from Issue Specific Hearing 13 [REP8-127]). • Paragraph 6.7.29 – the latest version of Chapter 2 of Volume 6 of the ES is in the Sizewell Link Road Description of Development - Tracked Changes Version [REP5-058], as updated by the Fifth ES Addendum [REP8-072]. • Paragraph 6.7.30 – 10th bullet point - a new priority junction on the west side of the Sizewell link road at Pretty Road is no longer proposed. • Paragraph 6.7.30 - 11th bullet point – rather than a new single span overbridge which would carry non-motorised users over Pretty Road, it is now proposed that a new multi-span overbridge would carry vehicles and non-motorised users over the Sizewell link road and connect to Pretty Road on either side. • Paragraph 6.7.32 – the latest version of the Transport Assessment is REP4-005. • Paragraph 6.7.33 – information regarding the site selection process for the Sizewell link road is provided in the following documents: <ul style="list-style-type: none"> - SZC Co.'s response to ExQ1 AI.1.27 – AI.1.34 and TT.1.91 [REP2-100] (electronic pages 192-202, 1,292-1293) - Sizewell link road Response Paper [REP2- 108] (electronic pages 244-269). - Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1

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	<p>(7 July 2021) [REP5-114] (paragraphs 1.9.8-1.9.23).</p> <ul style="list-style-type: none"> - Comments on Responses to the ExA's First Written Questions (ExQ1) Submitted at Deadline 3 Response to AL.1.30 - AL.1.34 [REP5-121] (electronic page 186-198). - SZC Co. Responses to the ExA's Second Written Questions (ExQ2) Volume 1 [REP7-056] (TT.2.11 and TT.2.12, TT.2.13, electronic pages 334-344). - Written Summaries of Oral Submissions made at Compulsory Acquisition Hearing 1 Part 1 (17 August 2021) [REP7-064] (electronic pages 5-7). - Written Submissions Responding to Actions Arising from Compulsory Acquisition Hearing 1 Part 1 (17 August 2021) [REP7-066] (electronic pages 3 – 7). - SZC Co. Response to Question CA.2.10 and TT.2.10, TT.2.12 [REP7-056] (electronic page 139, 334, 336). - Comments on Responses to the ExA's Second Written Questions (ExQ2), TT.2.10, [REP8-115] (electronic page 296-297) - SZC Co.'s Responses to the ExA's Third Written Questions, TT.3.0, [REP8-116] (electronic page 151-153). <ul style="list-style-type: none"> • Paragraph 6.7.33 – the design speed of the Sizewell link road should read 60mph. The site area provided should read 'approximately 109ha' [REP8-072]. • Plate 6.8 has been updated – see the updated version in the Second Environmental Statement Addendum, Volume 2, Figure 4.2.2 [REP5-068] and the updated red line shown in Figure 2.4 [REP8-073] of the Fifth Environmental Statement Addendum [REP8-072].
Section 7 – Planning Assessment – Benefits and Assessment Principles	
Section 7.1: Introduction	

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Paragraph 7.1.4: draft heads of Terms	<p>These have now evolved with the benefit of the examination and continued engagement and are set out in the Deed of Obligation (Doc Ref. 10.4).</p> <p>In particular, the Deed of Obligation, including the measures and funds that it commits to, is now agreed with the planning authorities and with those stakeholders named. None of those parties now disputes the adequacy of the obligations made there.</p>
Section 7.2: Benefits of the Sizewell C Project	
Section 7.2: 7.2.2: Economic benefits	<p>In response to the Examining Authority's written questions about the weight that should be given to the economic benefits (G.1.24 and G.1.25 [REP2-100]) SZC Co has provided additional information to substantiate the benefits set out in the Economic Statement [APP-610]– in summary this includes:</p> <ul style="list-style-type: none"> - Evidence that the Project's assumption about local recruitment is likely to under-state the potential scale of benefit for local jobs; - Evidence that the assessment should therefore be regarded as precautionary in its approach to mitigating effects by NHB workers; - An explanation that the assessment deliberately understates the scale of local/regional supply chain benefit – based on up-to-date HPC information which shows local supply chain spend is significantly greater than estimated; - An independent assessment of the potential local and regional supply chain benefits by the Sizewell C Consortium, a collection of more than 200 leading companies and organisations from across the country, leading to a Memorandum of Understanding (MoU) being signed between the group, MPs and regional stakeholders. The group estimates that the Sizewell C Project may exceed estimates for local/regional supply chain benefit estimated by the Applicant (estimated at c. £1.5bn within the Economic Statement [APP-610] at paragraph 3.4.13), estimating that £4.4bn may be

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<p>a) An Urgent Need for Nuclear Power (Paragraphs 7.2.3 – 7.2.13)</p>	<p>retained in the East of England. This demonstrates market confidence in the supply chain capacity available, and the fact that potential contractors are willing to sign up to the MoU proves that they are willing to make a commitment to local and regional investment.</p> <p>Although the urgency of the need for new nuclear generation is a matter of settled Government policy, and not therefore a matter for examination in relation to individual development proposals, SZC Co. has nevertheless updated its position, particularly in the following examination documents:</p> <ul style="list-style-type: none"> • Planning Statement Update [REP2-043] • New Nuclear: Urgency and Need [REP5-117] • Post Hearing submissions including written submissions of Oral Case at ISH9 [REP7-102] • SZC Co.'s response to ExQ2 G.2.0 to G.2.12 [REP7-050]. <p>Those listed documents are commended to the ExA.</p> <p>It is relevant in this context to draw attention to Appendix A of the Planning Statement Update which reports on the modelling undertaken on behalf of the Government to inform the preparation of the Energy White Paper. That analysis demonstrates the importance of the contribution which new nuclear needs to make to meet internationally important objectives for carbon reduction and UK targets for zero carbon by 2050.</p> <p>The Applicant's updated case is also captured in the Summary of Oral Submissions made at ISH9 [REP7-102].</p> <p>In its response to EXQ G.2.5 [REP7-050] the Applicant explained its view on the weight which should be attached to the contribution which Sizewell C would make to</p>

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	meeting the Government's urgently expressed need for new low carbon energy and concluded: <i>"Having regard to those matters, the weight that should be attached to the Sizewell C project's "actual contribution" to satisfying the need for this type of infrastructure must be very substantial."</i> (emphasis added)
Section 7.3: Assessment Principles	
7.3.8: Funding Statement	The Funding Statement [APP-066] has been updated and through a subsequent Addenda [AS-011, AS-150] to take into account changes to the project.
7.3.17: Environmental Statement	Updated - please see: ES [APP-159 to APP-582], as updated by the subsequent ES Addenda [AS-179 to AS-292, REP5-062 to REP5-069, REP6-017, REP7-029 to REP7-033, REP8-072 to REP8-073] and information listed within the ES Signposting Document (Doc Ref. PDB-2(C)), which take into account changes to the project, corrections to assessments, and additional information provided.
7.3.25: Shadow HRA.	Updated – please see: Shadow HRA [APP-145 to APP-152], as updated by the subsequent Shadow HRA Addenda [AS-173 to AS-178], REP2-032, REP7-279, SZC Co's Comments on the RIES (Doc Ref. 9.119) which take into account changes to the project, corrections to assessments, and additional information provided.
7.3.40: Site selection	Further information on the consideration of alternatives is provided within: SZC Co responses to ExQ1s [REP2-100], ExQ2s [REP7-050] and ExQ3s [REP8-116].
7.3.48: Main Site Design and Access Statement	The final version of the DAS is provided within Doc Ref. 10.18 which includes updates to design principles agreed throughout the examination to incorporate further mitigation within design.
7.3.61: Coastal defences	Since the submission of the application, SZC Co has changed the height of the permanent hard coastal defence feature to 12.6m AOD, with the maximum crest height of the adaptive sea defence up to 16.4m AOD. In addition, the minimum crest height of the SSSI crossing has been increased to 8.6m.

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	<p>SZC Co has also submitted the following additional information into the examination which is relevant to climate change resilience:</p> <ul style="list-style-type: none"> - Coastal Processes Monitoring and Mitigation Plan (Doc Ref. 10.5); - Flood Risk Addenda [AS-157 to AS-172; REP2-026 to REP2-031, REP5-045 to REP5-046] – to take into account changes to the application, corrections and additional information; - SZC Co responses to ExQ1s [REP2-100], ExQ2s [REP7-050] and ExQ3s [REP8-116]. <p>Additional information on the drainage strategy and updated Drainage Strategy (Doc Ref. 10.14).</p>
7.3.69: National Grid	The final SOCG with National Grid was submitted at Deadline 9 - REP9-016.
7.3.76: Other consents and licences.	The Schedule of Other Consent & Licences has been updated to take into account the changes to the application. A final Schedule of Other Licences, Consents and Agreements is submitted at Deadline 10 (Doc Ref. 5.11(C)) to reflect the position of licences, consents and agreements at the close of the Examination.
7.3.94: Health and wellbeing	<p>The health and wellbeing assessment has been updated within the subsequent ES Addenda [AS-179 to AS-292, REP6-017, REP7-029 to REP7-033] and information listed within the ES Signposting Document (Doc Ref. PDB-2(C)) to take into account changes to the project, corrections to assessments, and additional information provided.</p> <p>Further information has also been provided in response to ExQ1s [REP2-100], ExQ2s [REP7-050] and ExQ3s [REP8-116]. A Statement of Common Ground has been agreed with the CCG conforming agreement on all issues (except dentistry) and there are no outstanding issues relating to health and wellbeing with ESC or SCC.</p>
Section 8 – Planning Assessment – Main Development Site	
Section 8.2: Air Quality and Emissions	
Paragraph 8.2.3: CO ₂ emissions	In response to ExQ1 CC.1.3 [REP2-100] , the Applicant set out a response to the 6 th carbon budget published by the Committee for Climate Change in 2020 and provided a

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	<p>Life Cycle Carbon Assessment of the Sizewell C Project [REP2-110]. The Planning Statement Update [REP2-043] explains the role of new nuclear generation in the context of the 6th carbon budget, noting the continued clear and urgent need for new nuclear.</p> <p>Paragraph 8.2.3 of the Planning Statement is unchanged, in that NPS EN-1 (paragraph 5.2.2) makes clear that CO₂ emissions are not reasons to prohibit the consenting of projects nor is it appropriate to impose restrictions on them, other than set out in the NPSs.</p>
Paragraph 8.2.7: Air quality mitigation measures	The Statement of Common Ground with East Suffolk Council and Suffolk County Council (Doc Ref. 9.10.12(B)) submitted at Deadline 10 provides the latest position in respect of the agreed air quality mitigation measures, setting out that all matters are agreed.
Paragraph 8.2.32: Transport management plans	The Construction Worker Travel Plan and Construction Traffic Management Plan are appended to the final Deed of Obligation (Doc Ref. 10.4), at Annex K and L respectively and agreed with ESC and SCC.
Section 8.3: Biodiversity and Geological Conservation	
Paragraph 8.3.5: Working with the grain of nature	<p>The Applicant's position in respect of EN-1 paragraph 5.3.5 was discussed at Issue Specific Hearing 10 and the Applicant's oral evidence and submissions are summarised in [REP7-069]. In short, 5.3.5 does not set a development control test. The remaining parts of EN-1 5.3 set out how the aims of the Government's biodiversity strategy (as listed in 5.3.5) are to be applied in guiding decision-making. The Planning Statement, to be read alongside the NPS Tracker (Doc Ref. 9.14(E)), identifies where such policy tests are addressed by the DCO Application, namely 5.3.6 to 5.3.8 of EN-1.</p> <p>The current status of the 'Working with the grain of nature' document, as reference in EN-1 paragraph 5.3.5, is explained in the Comments on Earlier Submissions and Supplementary Written Submissions to CAH1 and ISH8-ISH10 [REP8-119]. The document has been replaced by the 'Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services' as the Government's current biodiversity strategy and which is due to be updated / replaced.</p>

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Paragraph 8.3.11: Regional and local sites	The application of NPS EN-1 paragraph 5.3.13, as referenced in paragraph 8.3.11 of the Planning Statement, was discussed at Issue Specific Hearing 10 [REP7-069] . The reference to 'local sites' in 5.3.13 includes County Wildlife Sites. Designated sites of regional (including county level) and local importance; protected species have been considered within the ES and ES Addendum where relevant.
Paragraph 8.3.16-8.3.19: Appraisal of Sustainability	The Applicant has submitted a route map against the Appraisal of Sustainability Report for Sizewell referred to in NPS EN-1 [REP8-119] , setting out where matters raised have been addressed in the DCO Application or Examination documents.
Paragraph 8.3.34: Strategies and Management Plans	Additional Management Plans have been produced and submitted to the DCO Examination, including: <ul style="list-style-type: none"> • Terrestrial Ecology Monitoring and Mitigation Plan (Doc Ref. 9.4(C) / 10.28) • Draft Fen Meadow Plan (Doc Ref. 9.64(B) / 10.6) • Wet Woodland Strategy (Doc Ref. 9.8(B) / 10.31) • Draft Wet Woodland Plan (Doc Ref. 9.108(A) / 10.13) • On-site Marsh Harrier Compensatory Habitat Strategy (Doc Ref. 9.16(B) / 10.21)
Paragraph 8.3.35: Westleton compensation site	The Westleton site remains included within the order limits for the provision of further compensatory marsh harrier habitat, if the Secretary of State believes this is required. Further details of how the site would be designed, created, managed and monitored are now set out in the Westleton Marsh Harrier Compensatory Habitat Strategy [REP8-101] .
Paragraph 8.3.39: Ancient Woodland and Veteran Trees	The Applicant's position in respect of EN-1 paragraphs 5.3.14 and 5.3.18 was discussed at Issue Specific Hearing 10 and the Applicant's oral submissions are summarised in [REP7-069] and supplemented by the Applicant's subsequent written submissions [REP7-073] and the

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	<p>Applicant's Comments on Earlier Deadlines submitted at Deadline 10 (Doc Ref. 9.120).</p> <p>In respect of 5.3.14, there would be no loss of ancient woodland from any part of the Project. The Project proposals in respect of the Main Development Site will not result in the loss of any veteran trees. The position in respect of the Associated Development sites is discussed below against Section 9 of the Planning Statement.</p>
Paragraph 8.3.46: Marine ecology mitigation measures	<p>During the DCO Examination, additional monitoring and management plans have been submitted in respect of marine ecology. Namely:</p> <ul style="list-style-type: none"> • Draft Fish Impingement and Entrainment Monitoring Plan (Doc Ref. 9.89(B) / 10.7) • Draft Marine Mammal Mitigation Protocol (Doc Ref. 9.89(B) / 10.8) • Draft Sabellaria Reef Management and Monitoring Plan (Doc Ref. 9.90(B) / 10.10)
Section 8.4: Coastal Change	
Paragraph 8.4.14: Relevant national and local marine policy	<p>At Deadline 7, the Applicant submitted a checklist for the Sizewell C Project against the policies in the 2014 East Inshore and East Offshore Marine Plans (Department for Environment, Food and Rural Affairs, 2014) [REP7-074], to test and demonstrate the Project's compliance.</p>
Section 8.7: Historic Environment	
Paragraph 8.7.17: Terrestrial historic environment assessment	<p>SZC Co.'s assessment of terrestrial heritage was discussed at Issue Specific Hearing 13 (ISH13) and written summaries of oral submissions were provided at [REP8-123]. As stated at ISH13, SZC Co.'s understanding and treatment of setting and assessment methodology and scope is appropriate, and has been agreed with Historic England (see Table 2.1 in the Statement of Common Ground [REP2-070]) and with ESC and SCC (see Table 8.1 in the SoCG (Doc Ref. 9.10.12(B))).</p>
Section 8.8: Landscape and Visual	

Planning Statement reference	Applicant's latest position / update submitted to the Examination
Paragraph 8.8.27-8.8.35: Area of Outstanding Natural Beauty	<p>The Applicant has made extensive submissions in respect of the impact on the Area of Outstanding Natural Beauty, notably in:</p> <ul style="list-style-type: none"> • Written Summaries of Oral Submissions at ISH 5 [REP5-110]. • Written summaries of oral submissions at ISH12 [REP8-122]. • Written summaries of oral submissions at ISH13 [REP8-123]. • Responses to EXQ AR1.8 and LI.1.2 [REP3-046] and [REP8-115]; Cu 1.0 [REP5-121]; and G.3.1 [REP8-116].
Section 8.9: Land Use, including Open Space, Green Infrastructure and Green Belt	
Paragraph 8.9.10: Assessment of amenity and recreational effects	<p>Issue Specific Hearing 12 (ISH12) discussed the adequacy of the assessment of visitor displacement to amenity and recreational areas, in addition to the assessment of amenity and recreational effects on the AONB. SZC Co.'s oral submissions to ISH12 are summarised in [REP8-122].</p>
Paragraph 8.9.20: Mitigation measures for amenity and recreational use	<p>The provision of alternative green space was discussed at Issue Specific Hearing 12 [REP8-122].</p> <p>Two Monitoring and Mitigation Plans have been submitted during the course of the DCO Examination, to reflect the different approaches required in the light of the Shadow HRA Report [APP-145 to APP-149] and Shadow HRA Second Addendum [REP2-032], and are appended to the final Deed of Obligation (Doc Ref. 10.4):</p> <ul style="list-style-type: none"> • Monitoring and Mitigation Plan for Minsmere-Walberswick European Site and Sandlings (North) European Site (Doc Ref. 10.4, Annex U) • Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary European Sites (Doc Ref. 10.4, Annex V)

Planning Statement reference	Applicant's latest position / update submitted to the Examination
	The two plans set out how monitoring and mitigation with respect to recreational disturbance must be implemented at seven European sites to ensure that adverse effects on the integrity of the sites does not arise as a consequence of this effect pathway.
Section 8.14: Water Quality and Resources	
Paragraph 8.14.27, bullet 3: site Vessel Management Plan	The Applicant has prepared and submitted an Outline Vessel Management Plan (OVMP) (Doc Ref. 9.65(C) / 10.23) to the DCO Examination, secured through the final DCO (Doc Ref. 3.1(J)). The OVMP sets out proposed restrictions to vessel movements and routes and provides the strategy to protect the Outer Thames Estuary Special Protection Area from vessel movements during the winter months.
Section 9 – Planning Assessment – Associated Development Sites	
Table 9.1 Summary of effects for associated development sites – Northern park and ride (Darsham)	The updated assessment of air quality as a result of the January change request to increase rail movements and provide an additional temporary Beach Landing Facility (BLF) concluded that the magnitude of change in NO ₂ , PM ₁₀ and PM _{2.5} would remain imperceptible across all modelled receptors, resulting in a negligible effect which is not significant [AS-182] .
Table 9.1 Summary of effects for associated development sites – Southern park and ride (Wickham Market)	The updated assessment of air quality as a result of the January change request to increase rail movements and provide an additional temporary Beach Landing Facility (BLF) concluded that the magnitude of change in NO ₂ , PM ₁₀ and PM _{2.5} would remain imperceptible across all modelled receptors, resulting in a negligible effect which is not significant [AS-183] .
Table 9.1 – Two village bypass	<p>The summary of residual effects for the two village bypass in Table 9.1 remains up to date.</p> <p>The residual effects for the two village bypass are provided in Environmental Statement (ES) [APP-444 to APP-477], as updated by the subsequent ES Addenda [AS-184, AS-197, AS-244, AS-245, AS-246, REP5-066, REP5-067, REP6-017] and REP7-030 to REP7-033 and REP8-072.</p>

Planning Statement reference	Applicant's latest position / update submitted to the Examination
Table 9.1 - Sizewell link road	<p>The summary of residual effects for the Sizewell link road in Table 9.1 remains up to date. It should however be noted that as well as likely major and moderate adverse noise effects on nearby receptors (significant adverse) there are likely moderate and major beneficial noise effects on nearby receptors (significant beneficial).</p> <p>The residual effects for the Sizewell link road are provided in the ES [APP-444 to APP-477], as updated by the subsequent ES Addenda [AS-185, AS-198, AS-248, AS-249, AS-250, REP5-068, REP5-069, REP6-017 and REP7-030 to REP7-033 and REP8-072].</p>
Section a) Northern Park and Ride (Darsham) Paragraph 9.1.7	<p>Further detail on the implications of the relevant policies in the Local Plan as adopted, compared to the emerging Local Plan referenced in the Planning Statement can be found in the response to ExQ1 CA.1.73 [REP2-100].</p>
Section a) Northern Park and Ride (Darsham) Paragraphs 9.1.9 and 9.1.12.	<p>Further information on how the proposed northern park and ride satisfies the NPS EN1 test for minimising impacts on the best and most versatile agricultural land can be found in the response to ExQ1 Ag.1.28 [REP2-100].</p>
Section b) Southern Park and Ride (Wickham Market) Paragraphs 9.1.15 and 9.1.17	<p>The DCO change submission of January 2021 included the lengthening of the 3m landscape bund adjacent to the north-west boundary of the southern park and ride site, stopping short of the 10m buffer zone to the south-west boundary. The extension of the landscape bund would provide additional screening to views from the B1116 and a nearby footpath. Full details of the change, accepted by the Examining Authority, can be found in the following documents:</p> <ul style="list-style-type: none"> • Additional Submission in relation to the Applicant's request for changes to the application 2.7 Southern Park and Ride Plans For Approval - Revision 2.0 [AS-125]; • Additional Submission in relation to the Applicant's request for changes to the application 2.7 Southern Park and Ride Plans Not For Approval - Revision 2.0 [AS-126]; • Additional Submission in relation to the Applicant's request for changes to the application and

Planning Statement reference	Applicant's latest position / update submitted to the Examination
	<p>Additional Information - 6.14 Environmental Statement Addendum Volume 1: Environmental Statement Addendum Chapters Chapter 4 Southern Park and Ride - Revision 1.0 [AS-183];</p> <ul style="list-style-type: none"> • Additional Submission in relation to the Applicant's request for changes to the application and Additional Information - 6.14 Environmental Statement Addendum Volume 2: Environmental Statement Addendum Figures Chapter 4 Southern Park and Ride - Revision 1.0 [AS-196]; • Additional Submission in relation to the Applicant's request for changes to the application and Additional Information - 6.14 Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 4 Southern Park and Ride Appendix 4.2.A Update to the Description of Development - Revision 1.0 [AS-242]; and • Additional Submission in relation to the Applicant's request for changes to the application and Additional Information - 6.14 Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 4 Southern Park and Ride Appendix 4.4.A Air Quality [AS-243].
Section b) Southern Park and Ride (Wickham Market) Paragraph 9.1.16	<p>More information of the traffic improvement measure through Wickham Market has been provided during the Examination. Section 10.4(d) of the Consolidated Transport Assessment [REP4-005] describes in some detail the road safety context along the B1078 between the A140 and B1116 in Wickham Market, as well as a package of road safety improvements proposed to be secured via a "B1078 Road Safety Contribution" in the draft Deed of Obligation [REP8-088]. This package of measures was developed in close consultation with SCC as the highway authority, and the intention is that SCC would deliver those improvements using the funding mechanism set out above.</p>

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Section c) Freight Management Facility Paragraph 9.1.19	Paragraph 9.1.19 of the Planning Statement refers to a scheduled ancient monument on site. This is an error. There are scheduled monuments in the surrounding area to the east of the site but not on the site itself. Figure 1.2 of Volume 8, Chapter 1 of the ES show the locations of these monuments [APP-510] .
Section d) Two village bypass Paragraph 9.1.26	<p>The principle of the two village bypass was agreed in the initial Statement of Common Ground (SoCG) with the Councils (East Suffolk Council and Suffolk County Council) at Deadline 2 [REP2-076] (electronic page 12). Whilst subsequent SoCG have been prepared, these have focused only on matters that are outstanding and therefore do not comment on what was agreed at Deadline 2.</p> <p>The Councils have also set out their support for the two village bypass as effective mitigation as well as providing a transport legacy in their Joint Local Impact Report [REP1-045] (epage 240-241).</p> <p>During the examination SZC Co. has provided further information on the need for the two village bypass. This can be found in the two village bypass summary paper [REP2-108] (epages 148 – 170).</p>
Section d) Two village bypass Paragraph 9.1.30	<p>The route of the two village bypass has been agreed in the initial Statement of Common Ground (SoCG) with the Councils (East Suffolk Council and Suffolk County Council) [REP2-076] (epage 12).</p> <p>SZC Co. has provided additional information on the site selection of the two village bypass. This can be found at:</p> <ul style="list-style-type: none"> • SZC Co.'s response to ExQ1 AI.1.17 – AI.1.22 [REP2-100] (epage 179-188) • Two village bypass summary paper [REP2-108] (epages 170 – 180). • SZC Co.'s Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 [REP8-120] (epage 46-48).

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	<p>As set out in SZC Co.'s response to AI.1.22 the proposed two village bypass would avoid Foxburrow Wood Ancient Woodland entirely and the alignment will maintain a 15m buffer to this Ancient Woodland. This buffer is in accordance with Natural England's standing advice² (November, 2018).</p> <p>SZC Co.'s Written Submissions arising from ISH10 [REP7-073] (epages 5-9) and SZC Co.'s Comments on Earlier Deadlines submitted at Deadline 10 (Doc Ref. 9.120) sets out information on Veteran Trees within the two village bypass site. .</p>
Section d) Two village bypass Paragraph 9.1.31	<p>The summary of environmental effects remains up to date.</p> <p>The environmental effects for the two village bypass are provided in Environmental Statement (ES) [APP-444 to APP-477], as updated by the subsequent ES Addenda [AS-184, AS-197, AS-244, AS-245, AS-246, REP5-066, REP5-067, REP6-017] and REP7-030 to REP7-033 and REP8-072].</p>
Section d) Two village bypass Paragraph 9.1.32	<p>The summary of environmental effects remains up to date.</p> <p>The likely significant environmental effects for the two village bypass are described in the Environmental Statement (ES) [APP-444 to APP-477], as updated by the subsequent ES Addenda [AS-184, AS-197, AS-244, AS-245, AS-246, REP5-066, REP5-067, REP6-017] and REP7-030 to REP7-033 and REP8-072].</p>
Section d) Two village bypass Paragraph 9.1.33	<p>The road traffic noise modelling was updated in the Third ES Addendum [REP6-017]. As a result, this paragraph is corrected to read:</p> <p>During the peak construction year (2028) for the main development site on a typical day when the two village bypass is used for Sizewell C construction traffic, significant noise effects have been identified at: Parkgate Farm, Hill Farm, The Old Vicarage, Pond Barn Cottages,</p>

² <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

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	<p>Farnham Hall, Farnham Hall Farmhouse, Church Bungalow and Walk Barn Farm. During the busiest day in the peak construction year of 2028, further significant noise effects are expected at Chapel Cottages.</p> <p>During the peak construction year (2028) on a typical day, and also on the busiest day, beneficial significant noise effects are expected at 15 properties. The full list can be found at Appendix A of Third ES Addendum [REP6-017] (electronic page 27).</p>
Section d) Two village bypass Paragraph 9.1.34	<p>The Noise Mitigation Scheme only applies where SOAEL is exceeded, as explained by SZC Co. at ExQ1 NV.1.37 [REP2-100]. Paragraph 9.1.34 is corrected to read as follows:</p> <p>Where individual properties meet the qualifying tests set out in the Noise Mitigation Scheme (Annex W of the Deed of Obligation (Doc Ref 10.4), they will be eligible for improvements in noise insulation. The assessment to determine eligibility will be carried out post-consent and will be based on the detailed design of the two village bypass.</p>
Section d) Two village bypass Paragraph 9.1.36	<p>The Associated Development Design Principles (Doc Ref 10.1) require SZC Co. to engage with Suffolk County Council and East Suffolk Council to evaluate the potential additional noise mitigation benefits that could be offered by quiet road surfaces and/or landscaping. The agreed outcomes of those evaluation processes must be implemented prior to the opening of the road under either Requirement 22 or 22A of the draft DCO (revision 10 [REP8-035] (Doc Ref 3.1(I) as amended by Doc Ref 3.1(J) at Deadline 10) depending on whether the works sit within or outside the highway boundary.</p> <p>As set out within SZC Co.'s response to ExQ2 LI.2.31 and LI.2.33 [REP7-056] (electronic page 293 and 294) and during ISH13 [REP8-127] (electronic page 9-11) SZC Co. has met with representatives from FERN (residents of Farnham) and Mollett's Partnership on a number of occasions to develop additional soft landscape within the</p>

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	order limits to address concerns raised by residents. Any additional screening will be within the order limits so that SZC Co. can secure and deliver the additional landscaping screening as part of Requirement 22A of the draft DCO.
Section d) Two village bypass Paragraph 9.1.37	The Councils have also set out the benefits for the two village bypass as effective mitigation as well as providing a transport legacy in their Joint Local Impact Report [REP1-045] (electronic page 240-241).
Section e) Sizewell link road Paragraph 9.1.38	<p>Within the following submissions SZC Co. has demonstrated that the proposed Sizewell link road is the most appropriate route:</p> <ul style="list-style-type: none"> • SZC Co.'s response to ExQ1 Al.1.27 – Al.1.34 and TT.1.91 [REP2-100] (electronic pages 192-202, 1,292-1293) • Sizewell link road Response Paper [REP2- 108] (electronic pages 244-269). • Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 (7 July 2021) [REP5-114] (paragraphs 1.9.8-1.9.23). • Comments on Responses to the ExA's First Written Questions (ExQ1) Submitted at Deadline 3 Response to Al.1.30 - AL.1.34 [REP5-121] (electronic page 186-198). • SZC Co. Responses to the ExA's Second Written Questions (ExQ2) Volume 1 [REP7-056] (TT.2.11 and TT.2.12, TT.2.13, electronic pages 334-344). • Written Summaries of Oral Submissions made at Compulsory Acquisition Hearing 1 Part 1 (17 August 2021) [REP7-064] (electronic pages 5- 7). • Written Submissions Responding to Actions Arising from Compulsory Acquisition Hearing 1 Part 1(17 August 2021) [REP7- 066] (electronic pages 3 – 7). • SZC Co. Response to Question CA.2.10 and TT.2.10, TT.2.12 [REP7-056] (electronic page 139, 334, 336). • Comments on Responses to the ExA's Second Written Questions (ExQ2), TT.2.10, [REP8-115] (electronic page 296-297)

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	<ul style="list-style-type: none"> SZC Co.'s Responses to the ExA's Third Written Questions, TT.3.0, [REP8-116] (electronic page 151-153). <p>ESC considers that the proposed routeing makes the Sizewell Link Road acceptable mitigation for the impacts of construction traffic (LIR paragraph 16.70 [REP1-045] and paragraph 2.2 [REP3-060]).</p> <p>At Deadline 3 SCC stated [REP3-084] that “SCC welcomes the provision of a clearer explanation of the Applicant's route choice than hitherto provided and, whilst it considers that the position is more finely balanced than is presented in [REP2-108], with a range of environmental and transportation benefits and disbenefits in both route options, and that no demonstrable ‘best’ solution emerges, it nonetheless acknowledges that the Applicant has made that choice and so formulated its proposals. SCC is therefore now focused on addressing that choice on its own merits”. It would appear from this statement that SCC does not suggest that alternative routes for the Sizewell Link Road ought to be considered as relevant and important matters for the Secretary of State's determination of the application.</p> <p>For the reasons set out in the submissions referenced above, it is SZC Co.'s case, not just that the route selected for the SLR is the best route but that there are no alternatives to the route selected for the SLR. No alternative routes have been designed (even in outline form) by others, assessed or tested and none have been shown to be actually deliverable.</p> <p>SZC Co.'s Written Submissions arising from ISH10 [REP7-073] (electronic page 9-11) and SZC Co.'s Comments on Earlier Deadlines submitted at Deadline 10 (Doc Ref. 9.120) sets out information on Veteran Trees within the Sizewell link road site.</p>
Section e) Sizewell link road Paragraph 9.1.39	The road traffic noise modelling was updated in the Third ES Addendum [REP6-017] . As a result, this paragraph is corrected to read:

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	<p>During the peak construction year (2028) for the main development site on a typical day when the Sizewell link road is used for Sizewell C construction traffic, significant adverse noise effects have been identified at: Fordley Hall, Trust Farm, Dovehouse Farm, Theberton Hall, Church Farm, Doughty Wylie Crescent, Theberton Grange, Theberton House, Oakfield House, Hawthorn Cottages, Rookery Farm, Keepers Cottage, Town Farm, Hawthorn Farm, Moat House, South of Theberton Grange and Rose Farm. During the busiest day in the peak construction year of 2028, further significant adverse noise effects are expected at B1122 East of Yoxford.</p> <p>During the peak construction year (2028), on a typical day and the busiest day, beneficial significant noise effects are expected at 11 properties. The full list can be found at Appendix B of Third ES Addendum [REP6-017].</p>
Section e) Sizewell link road Paragraph 9.1.40	<p>The Noise Mitigation Scheme only applies where SOAEL is exceeded, as explained by SZC Co. at ExQ1 NV.1.37 [REP2-100] . Paragraph 9.1.40 is corrected to read as follows:</p> <p>Where individual properties meet the qualifying tests set out in the Noise Mitigation Scheme (Annex W of the Deed of Obligation (Doc Ref 10.4), they will be eligible for improvements in noise insulation. The assessment to determine eligibility will be carried out post-consent and will be based on the detailed design of the Sizewell link road.</p>
Section e) Sizewell link road Paragraph 9.1.41	<p>The road traffic noise modelling was updated in the Third ES Addendum [REP6-017]. As a result, this paragraph is corrected to read:</p> <p>Noise levels at properties along the link road are expected to reduce following completion of the Sizewell C power station, as the road will no longer be used for Sizewell C construction traffic. However, significant noise effects are anticipated to remain in the long term at: Fordley Hall,</p>

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	Trust Farm, Dovehouse Farm, Oakfield House and Hawthorn Cottages.
Section e) Sizewell link road Paragraph 9.1.42	<p>The Noise Mitigation Scheme can be found at Annex W of the Deed of Obligation (Doc Ref 10.4).</p> <p>The Associated Development Design Principles (Doc Ref 10.1) require SZC Co. to engage with Suffolk County Council and East Suffolk Council to evaluate the potential additional noise mitigation benefits that could be offered by quiet road surfaces and/or landscaping. The agreed outcomes of those evaluation processes must be implemented prior to the opening of the road under either Requirement 22 or 22A of the draft DCO, depending on whether the works sit within or outside the highway boundary.</p> <p>As set out during ISH13 [REP8-127] (electronic page 4-8) SZC Co. has met with representatives with landowners of properties close to the proposed Sizewell link road on a number of occasions to develop additional soft landscape within the order limits to address concerns raised by residents. Any additional landscaping screening will fall to be considered as part of the details to be submitted for approval pursuant to Requirement 22A of the draft DCO.</p>
Section e) Sizewell link road Paragraph 9.1.43	SZC Co.'s Responses to the Examining Authority's First Written Questions (ExQ1) - Volume 3 - Appendices Part 1 of 7 [REP2-108] explains the benefits of the Sizewell link road (see paragraphs 2.1.1 (electronic page 199) to 2.1.122, but 2.1.118-2.1.122 provide a summary).
Section e) Sizewell link road Paragraph 9.1.44	<p>During the examination SZC Co. have provided further detail regarding why it is appropriate for the Sizewell link road to be provided permanently. This can be found in the following documents:</p> <ul style="list-style-type: none"> SZC Co.'s response to ExQ1 A1.1.32 and ExQ1 A1.1.33 [REP2-100] (electronic pages 196 – 201) Sizewell link road Response Paper [REP2- 108] (electronic pages 240-243) SZC Co.'s Written Submissions Responding to Actions Response to A1.1.30 [REP5-121].

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Planning Statement reference	Applicant's latest position / update submitted to the Examination
	<ul style="list-style-type: none"> • SZC Co.'s response to ExQ2 CA.2.10 [REP7-056] (electronic page 139). • SZC Co.'s Written Summaries of Oral Submissions made at Compulsory Acquisition Hearing 1 Part 1 [REP7-064] (electronic pages 3-6) • Written Submissions Responding to Actions Arising from Compulsory Acquisition Hearing 1 Part 1 (17 August 2021) [REP7-066] (electronic page 3). • Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 [REP8-120] (electronic pages 51-62). • SZC Co.'s D10 Comments on Responses to the Applicant's Responses to the ExA's Second Written Questions (ExQ2) (Doc Ref: 9.124, Part 3, question CA.2.10). • SZC Co.'s D10 Comments on Submissions to Earlier Deadlines and Subsequent Written Submissions to ISH11-14 (Doc Ref: 9.120). This document sets out SZC Co.'s response to submissions submitted by SCC at Deadline 9 that the DCO examination should be extended to allow consultation on an amendment to the DCO that would promote the SLR as a temporary road only. <p>ESC agrees with SZC Co. that the Sizewell link road, as proposed, should be retained as a long-term legacy (Statement of Common Ground (Doc Ref. 9.10.12(B)).</p>
Section f) Yoxford Roundabout and Other Highway Improvements Paragraph 9.1.46	The Yoxford Roundabout Plans for Approval have been updated to show the existing highway (all traffic) to be permanently converted to highway (non-motorised users). The Roadside Nature Reserve 197 (designated due to presence of fungi) would still be retained and protected. Please see drawing SZC-SZ0701-XX-000-DRW-100179 Rev 03 [REP2-012].
Section f) Yoxford Roundabout and Other Highway Improvements Paragraph 9.1.50	Updates to noise modelling were made as part of the change submission in January 2021 to account for the reduced HGV traffic estimates due to the increase in freight train movements and the inclusion of a new, temporary beach landing facility (for updated strategic traffic modelling in the January change request, please refer to the Transport Assessment Addendum [AS-266]). Volume 1, Chapter 7 of the Environmental Statement Addendum

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	[AS-186] summarises that, although the effect categories are not predicted to change at any of the receptors considered, all of the changes in traffic noise are either beneficial, i.e. a smaller increase in traffic noise or a greater reduction in traffic noise, or there is expected to be no change in the significance of effects. For more detail, please refer to Volume 3: Environmental Statement Addendum Appendices Chapter 7 Yoxford Roundabout and Other Highway Improvements Appendices 7.3.A-C Noise and Vibration [AS-251] .
Section g) Rail Paragraph 9.1.60	<p>During the Examination, SZC Co. has developed the Rail Noise Mitigation Plan (RNMP) in consultation with Network Rail and freight operating companies. The RNMP includes measures to mitigate and minimise railway noise and vibration that might arise from running construction trains on the East Suffolk line, the Saxmundham to Leiston branch line, and the rail extension route, as part of the Sizewell C project. The latest draft of the RNMP is submitted at Deadline 10 (Doc Ref. 10.9) and the final version will be submitted to ESC for approval under the terms of Requirement 25 of the draft DCO.</p> <p>Yoxford roundabout and the other highways improvements were not updated in the Third ES Addendum [REP6-017] but the Yoxford outcomes were contained in the Third ES Addendum in Appendix C [REP6-017], electronic page 83] to put all the road traffic noise outcomes in one place for completeness.</p>
Section 10 – Requirements, Obligations and Securing Mechanisms	
Section 10.1	A number of updates have been made in relation to documents that control the project. Appendix C to this note sets out the levels of documents within the application and the status of each level. Plate 1 sets the Development Consent Order (DCO) (Doc Ref. 3.1(I)) and Deed of Obligation (DoO) (Doc Ref. 17(G)) in the context of other controls on the Sizewell C Project and demonstrates how the different levels of documents relate to each other. Table 1 lists out the plans and strategies referred to in the dDCO and Table 2 lists out the plans and strategies referred to in the DoO . These tables show which level a document is, the documents it relates to,

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	<p>where it is secured, and which body is responsible for approving the named Level 2 documents and any updates to the Level 1 documents. For each Level 1 document there is a specific governance group which will have oversight of the activities controlled by that document. The formal role of the relevant governance group is set out within each Level 1 document where it is relevant.</p>
Section f) Implementation Plan	<p>During the examination, SZC. Co's commitments to the Implementation Plan have been reviewed and updated. Requirement 13 secures the binding commitment to carry out work No. 1 in accordance with the Construction Method Statement (Doc Ref. 6.3 3D(D)) to ensure the timely provision of mitigation measures. Additional obligations are also now proposed and the overall package of measures is more than sufficient to secure that the development will be undertaken in a manner that is consistent with the environmental impact assessment. The framework of controls includes a combination of triggers, limits and <i>Grampian</i> restrictions that work together in limiting the project to the environmental envelope assessed within the environmental impact assessment, and which are also then consistent with the project's deliverability requirements. These controls include:</p> <ul style="list-style-type: none"> • Construction Method Statement (Doc Ref. 6.3 3D(D)): secures the sequencing of the construction works within the main development site, including the offshore works. The Phasing Schedule (Plate 2.1) is no longer indicative. Other key points to note are: • Construction sequencing: The CMS identifies five phases of the main development site construction works: <ul style="list-style-type: none"> ▪ Phase 1: sets out the initial works that would be undertaken, including the SSSI Crossing, realignment of the Leiston drain, the cut off wall and cut-off wall platform and layout of construction roads;

Planning Statement reference	Applicant's latest position / update submitted to the Examination
	<ul style="list-style-type: none"> ▪ Phase 2: then secures the permanent and temporary beach landing facility. ▪ Phase 3: then relates to the construction of buildings, plant, facilities and other structures ▪ Phase 4: then relates to the installation and testing of mechanical and electrical plant and the permanent coastal defence feature ▪ Phase 5: then relates to the removal of the temporary facilities to allow completion of the groundworks, landscape and main platform works. <p>The Construction Method Statement has been updated at Deadline 10 to include <i>Grampian</i> triggers for the Sizewell link road, two village bypass, temporary beach landing facility and rail works. As secured by the DoO (Doc Ref. 8.17(G)), SZC Co. must use reasonable endeavours to deliver works indicated on Plate 2.1 by the milestone dates. Where, despite using reasonable endeavours, the timescales indicated in the Plate 2.1 cannot be met, SZC Co. must nevertheless deliver the following key components of the project in accordance with the following <i>Grampian</i> triggers, unless otherwise approved in writing by ESC (following the procedure set out in Schedule 23 of the dDCO):</p> <ul style="list-style-type: none"> • Phase 1 site clearance works must not commence until the earthworks required for the flood mitigation land have been completed, except for site clearance works required to undertake those earthworks. • Phase 2 must not commence until either the desalination plant is operational, or an alternative mains water supply that may otherwise be approved by ESC, is in place. • Main Platform Phase 2 backfilling with imported material must not be commenced until the Branch line / LEEIE rail spur (Work No. 4D) and the green rail route (Work No. 4B) are available for use.

Planning Statement reference	Applicant's latest position / update submitted to the Examination
	<ul style="list-style-type: none"> • The Sizewell link road (Work No. 11), the two village bypass (Work No. 12) and the temporary Beach Landing Facility must be available for use either within six months of the commencement of Phase 3, or before the Phase 3 Installation of the Reactor Building Liner can be installed. • Phase 5 Cold-flush testing commissioning works must not commence until operation of the temporary desalination plant has ceased. <p>The Accommodation Campus and caravan park is then secured separately by Schedule 3 of the Deed of Obligation.</p> <p>Schedule 9 of the DoO requires that a detailed construction plan must be submitted to ESC before construction works commence. This plan will detail these anticipated milestones. Progress and reporting against these milestones will be made to the Planning Review Group, established pursuant to Schedule 17 of the DoO.</p> <p>The CMS is therefore the primary document that describes the sequence of construction activities that are relevant to the ES. Requirement 8 of the dDCO secures the sequencing of the works on the main development site, meaning that the works must be completed in accordance with the details set out in the CMS, unless otherwise approved by ESC.</p> <p>The CMS is then supplemented by a series of additional and bespoke controls that will help provide further confidence that the mitigation relied on by the ES will be secured. This includes:</p> <ul style="list-style-type: none"> • HGVs: have clearly defined limits for the period before and after the Sizewell link road and two village bypass are available for use set out in the Construction Traffic Management Plan (Annex K, DoO (Doc Ref. 8.17(G))). These limits ensure that the impacts during construction are no worse than that assessed. The Implementation Plan, secured

Planning Statement reference	Applicant's latest position / update submitted to the Examination
	<p>by Schedule 9 of the Deed of Obligation), then provides additional comfort that SZC Co. will take reasonable endeavours to deliver the highway mitigation to the timescales set out. The combination of these controls gives the Local Authorities a high degree of comfort and control over the impacts of the project, but without risking the funding or delivery of the project.</p> <ul style="list-style-type: none"> • Construction worker travel: the Construction Worker Travel Plan (Annex L, DoO (Doc Ref. 8.17(G))). sets out mode share targets for the period before and after the park and ride sites have become available for use. Requirement 8 also then proposes absolute car parking limits that apply to the periods before and after. Again, the Implementation Plan's purpose is to provide additional comfort that the park and ride sites will be delivered in a timely fashion, but allows for some limited degree of flexibility in terms of timing that reflect the projects' practical deliverability requirements. Again, the combination of parking limits, modal share targets and then the timescales secured by the Implementation Plan give the Local Authorities a high degree of comfort over the anticipated impacts and control over the project. • Noise: the CoCP (Doc Ref. 8.11(E)) sets noise thresholds that apply across all construction at either the main development site (CoCP Part B), or for the associated development sites. Specific controls are then identified in the Draft Main Development Site Noise Management and Mitigation Plan (Appendix B, Part B, CoCP (Doc Ref. 8.11(E))) for noisy activities. These triggers and thresholds require SZC Co. to agree a bespoke mitigation plan for works above a set threshold in advance of those works commencing. The controls in the CoCP then work together with any measures found necessary in the bespoke plans in ensuring that the impacts identified in the ES are not exceeded.

Planning Statement reference	Applicant's latest position / update submitted to the Examination
	<ul style="list-style-type: none"> • Rail Noise: Requirement 25 secures the Rail Noise Mitigation Strategy (now to be called Draft Rail Noise Mitigation Plan (Doc Ref. 6.14 9.3E(A))) in advance of rail movements. The approved strategy will then be implemented, monitored and enforced for the duration of overnight rail movements. • Ecology: Requirements 12C, 14A, 14B, and 14C are Grampian styled requirements that prevent defined works commencing until certain criteria or events have taken place. • Marine: Requirements 7A and 12B then provide Grampian style controls in relation to the marine works and prevent works taking place until the relevant details have first been approved. <p>It should also be recognised that there are other provisions within Schedule 9 of the DoO which are relevant. Paragraphs 2.2-2.6 provide obligations on SZC. Co to closely monitor and report on the implementation of the project against the terms of the Implementation Plan. The obligations include the requirement to promptly notify the Planning Group of any material delay in the completion of any Key Environmental Measure, to propose and implement remedial measures as soon as reasonably practicable. As set out above, these provisions are fully enforceable.</p> <p>In combination, this is a very substantial suite of commitments going far beyond what was considered acceptable by the Secretary of State when granting development consent for the development of Hinkley Point C.</p>

PART TWO: UPDATED SECTION 11 OF THE PLANNING STATEMENT

11 PLANNING BALANCE AND CONCLUSIONS

- 11.1.1 NPS EN-1 and NPS EN-6 provide the framework for development consent decisions on applications for new nuclear power stations which are capable of deployment by the end of 2025. NPS EN-6 identifies Sizewell C as a site potentially suitable for the deployment of a new nuclear power station. Whilst SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station, it is no longer possible for deployment to take place by the end of 2025. The Government Response to Consultation on Siting Criteria (July 2018), however, confirms that *‘sites listed in EN-6 on which a new nuclear power station is anticipated to deploy after 2025 will continue to be considered appropriate sites and retain strong Government support during the designation of the new NPS’*.
- 11.1.2 Significant weight should be given to the policy in NPS EN-1 and EN-6. The NPS remain Government policy, and the merits of that policy are not open to challenge through the examination process.³
- 11.1.3 The Energy White Paper (at page 55) confirms that the current suite of NPS remain relevant Government policy and continue to provide a proper basis on which the Planning Inspectorate can examine and the Secretary of State can make decisions on applications for development consent.⁴ As NPS EN-1 explains (at paragraphs 4.1.5-6), the NPS have primacy for policy purposes *‘given the national significance of the infrastructure’*.
- 11.1.4 The primacy of the NPS for the purposes of this application is accepted by the local planning authority, although no conflict is alleged with local plan policies. The reasons why the NPS must have primacy are set out in response to ExQ G.1.12 [REP2-100] and G.2.14 [REP7-050] and were also addressed in oral submissions at ISH9.⁵ That rationale is compelling, and it is telling that there has been no significant attempt by any Interested Party to rebut it.
- 11.1.5 The principle of the need for new nuclear power stations, and that this need is urgent, is firmly established in NPS EN-1 and NPS EN-6. In accordance with NPS EN-1, substantial weight should be given to the contribution which

³ See the Planning Statement Update [REP2-043] at Section 3, the Written Summary of Oral Submissions at ISH9 [REP7-102] at paragraphs 1.2.4-1.2.16 and section 1.3, and responses to written questions ExQ1 G.1.5 [REP2-100].

⁴ That position was confirmed again in the draft of a replacement NPS EN-1 (at page 11), published in September 2021.

⁵ See Written Summary of Oral Submissions at ISH9 [REP7-102] at section 1.5

projects would make towards satisfying this need. NPS EN-1 (at paragraph 3.5.10) confirms that new nuclear generation will play a vitally important role in the decarbonisation of the electricity system and this is echoed in NPS EN-6 (at paragraph 1.1.1), which explains the vitally important role new nuclear plays in providing reliable and secure energy as part of a diverse energy mix as the UK transitions to a low carbon economy.

- 11.1.6 The urgency and importance of new nuclear is emphasised in the strongest terms in both NPSs, and NPS EN-6 confirms (at paragraph 2.2.3) that delay in deployment would increase the risk of the UK being locked into a higher carbon energy mix for a longer period than is consistent with the Government's ambitions to decarbonise electricity supply.
- 11.1.7 That these matters are of critical national importance is put beyond doubt by the terms of the Energy White Paper and the evidence base which supports it. In 2019 the Government committed to bring all greenhouse gas emissions to net zero by 2050, a step change from the 80% reduction from 1990 levels which underpinned the NPSs. Meeting that commitment requires a fourfold increase in low carbon energy and hence the White Paper confirms that the Government is pursuing large scale new nuclear as part of the future energy mix and that the Government aims to bring at least one large-scale nuclear project to the point of Final Investment Decision by the end of this Parliament. Sizewell C is the only credible project able to satisfy that policy aim.
- 11.1.8 The scale and urgency of the challenge is brought home by the modelling work undertaken for the White Paper, which highlights, for example, the substantial capacity that has been or will shortly be lost as older nuclear power stations are decommissioned. Renewable energy has an increasingly important role to play but the White Paper confirms (on page 43) that it must be supplemented by technologies which provide a stable baseload of energy when the wind does not blow, or the sun does not shine. The modelling shows that it is likely that the UK will need Sizewell C deployed by 2035 to bring new nuclear capacity to 8GW and that the need for nuclear capacity is likely to grow to between 20GW and 40GW by 2050.⁶
- 11.1.9 NPS EN-1 at paragraph 3.2.3 requires that substantial weight should be given to considerations of need but that the weight that is attributed to considerations of need in any given case should be proportionate to the anticipated extent of the project's actual contribution to satisfying that need.⁷ Sizewell C would provide 3,340MW low carbon electricity. No

⁶ See Planning Statement update [REP2-043] Appendix A.

⁷ SZC Co's suggested approach to the application of this element of the policy is summarised in its Written Summary of Oral Submissions at ISH9 [REP7-102], section 1.4.

project in the UK has ever contributed more. For this reason, and in the context explained above, the Applicant's position is that:

*“Having regard to those matters, the weight that should be attached to the Sizewell C project's “actual contribution” to satisfying the need for this type of infrastructure must be **very substantial**.”* (emphasis added)
8

- 11.1.10 It is difficult to identify that any Government planning policy for any form of development has ever expressed a need to be more important or more urgent. Energy security is nationally important, whilst climate change is the single most important issue facing the planet.
- 11.1.11 Given the level and urgency of need, paragraph 4.1.2 of NPS EN-1 states that the decision maker should ‘*start with a presumption in favour of granting consent to applications for energy NSIPs*’. Whilst the policy presumption does not formally have effect where the decision falls to be made under Section 105 of Act, it nevertheless constitutes an important and relevant consideration weighing in favour of granting development consent because it reflects the Government's underlying assessments of need, impacts and alternatives, all of which remain directly relevant to the application.
- 11.1.12 Alternative energy sources and alternative sites were considered by Government in developing national policy and discounted.⁹ They do not need to be considered again in the determination of this application.
- 11.1.13 In accordance with paragraph 4.1.3 of NPS EN-1, in making a determination of the application, the decision maker should take into account:
- the potential benefits, including in addition to its contribution to meeting the need for energy, its contribution to job creation and any long term or wider benefits; and
 - the potential adverse impacts, including any long term and cumulative adverse impacts as well as any measures to avoid, reduce or compensate for any adverse impacts.
- 11.1.14 To enhance the overarching national benefit of delivering a new power station, SZC Co. has worked closely with stakeholders in the region to develop economic strategies with a range of measures that combine to

⁸ SZC Co.'s response to EXQ G.2.5 [REP7-050]

⁹ Including most recently in the preparation of revised draft NPS EN-1 (see SZC Co.'s response to EXQ G.3.0 [REP8-116]).

create an environment in which education, skills and workforce development can flourish, to the benefit of both the Sizewell C Project and the region.¹⁰

- 11.1.15 The total value of the Sizewell C Project is estimated at £20bn. It was estimated conservatively in the application that there could be a local retention of in excess of £1.5bn over the construction period, equivalent to an average of £125m per year. Already, however, a comparable approach to working closely with local supply chain companies has resulted in £2.7bn at Hinkley Point C being secured by local business.
- 11.1.16 The construction stage would lead to a boost to the local economy, equating to (at least) £2.5bn over the course of the construction and supporting over 42,000 person-years of construction employment. Total wages over the construction process could be around £2.6bn and, at the peak of construction, a third of employment (2,600 roles) are conservatively expected to be filled by existing local residents. If proportions are similar to Sizewell B, up to 480 of these roles would be filled by people who were formerly unemployed or previously inactive workers. Again, however, similar initiatives of investment in local education, training, skills and jobs brokerage has meant that 36% of the workforce at Hinkley Point C is home based, and the figure has been as high as 50%.
- 11.1.17 The operational phase would provide a long-term boost to the economy. The operational phase is expected to boost GDP by around £225m per year and support approximately 900 permanent jobs with associated wages of £44.5m per year, and an additional approximately 1,000 workers during maintenance and refuelling outages, which would last for up to two months and occur approximately every 18 months for each reactor. Further, multiplier effects across the UK for nuclear power suggests an additional local indirect employment of around 60% of direct employment, representing a further 360 jobs as an indirect result of the Sizewell C Project.
- 11.1.18 In addition to the delivery of the power station, which is of national significance, the Sizewell C Project would result in separate local and regional long term infrastructure benefits through the delivery of the upgrades to the Saxmundham to Leiston branch rail line, the two village bypass, the Sizewell link road and a series of road safety improvement schemes which would address existing accident issues at junctions on the local highway network. The bypasses would deliver long term, transformational legacy benefits for local communities at Farnham, Stratford St Andrew, Yoxford and Theberton in particular, which those

¹⁰ A summary of these initiatives is given in SZC Co.'s response to ExQ1 G.1.24 and G.1.25 [\[REP2-100\]](#)

communities have sought for many years but which would not be delivered if it were not for Sizewell C.

- 11.1.19 A series of enhancements to facilities for pedestrians, cyclists and equestrians are also proposed to benefit existing users as well as new ones. Again, the scale of investment in enhanced local connectivity would be transformational, with particular care having been taken to enhance local pedestrian and cycle amenity in Leiston and a number of villages and to design enhancements to the local rights of way network, which fill in missing links, enhance the quality of routes and build on the opportunity created by the new bypasses to transform local recreation and amenity in the bypassed communities.¹¹
- 11.1.20 Few projects have been designed from the outset, through consultation to embed such comprehensive mitigation within the application proposals.
- 11.1.21 Remarkably, the Applicant is able to conclude in the Fourth ES Addendum [REP7-029] that there would be no significant residual transport effects from the development once account is taken of the comprehensive mitigation put in place. That mitigation includes an exceptional Freight Management Strategy in which investment in rail and marine facilities enables non road modes to be optimised for freight transport, with impacts on communities consequently limited. Nevertheless, those communities most affected by HGV movements would benefit from investment in bypasses and from an approach to noise mitigation which exceeds policy requirements.
- 11.1.22 Detailed agreement has been reached with the planning and transport authorities, not only over the physical mitigation necessary but also over the timing of its provision and SZC Co. is aware that this has brought comfort to those authorities that the mitigation necessary will be delivered in a sequence that is timely and effective.
- 11.1.23 Notwithstanding that conclusion, in Schedule 16 of the Deed of Obligation, SZC Co. commits to a monitoring strategy which effectively guarantees that outcome by providing a Contingent Fund, which can be drawn upon in the event that significant adverse effects not anticipated in the application are identified. That approach to embedded mitigation, further mitigation and adaptive mitigation based on monitoring is characteristic of the application.
- 11.1.24 Local sports and recreation facilities would also be enhanced through the further improvements proposed at Aldhurst Farm for recreation and the

¹¹ The scale of enhancement can be appreciated, for instance, from the summary of PROW improvements set out at [REP9-022].

investment in community sports facilities at the Alde Valley Academy in Leiston.

- 11.1.25 Enhancement is a characteristic consequence of much of the embedded and additional mitigation proposed as part of the Sizewell C application.¹² That submission explains why it is appropriate in SZC Co.'s view for these matters to be taken into account.
- 11.1.26 The NPS anticipates that the construction and operation of a new nuclear power station is likely to lead to adverse effects which cannot always be satisfactorily mitigated – both generally and specifically at Sizewell.¹³ The NPS makes clear, however, at NPS EN-1 paragraph 1.7.11 that some adverse effects are a necessary and inevitable consequence of meeting the country's need for a range of large scale energy projects, the potentially suitable sites for which are all in sensitive rural locations.
- 11.1.27 The deliberate nature of that policy approach is apparent, for instance, in the fact that the NPS policy test from NSIP development in an AONB is different from the equivalent policy test in the NPPF or local plans. The NPS policy requires regard to be had to the particular need for new energy NSIPs and requires the decision maker to recognise that the ability to consider alternative locations is constrained by the NPS policy on (the absence of) alternatives.¹⁴ The introduction of that variation to the policy approach that would apply under the NPPF was made in the context of a decision to identify Sizewell as a potentially suitable site for a new nuclear power station, having regard to its location within the AONB and a strategic environmental assessment of its likely adverse impacts.
- 11.1.28 SZC Co. has been careful to understand the special qualities of the AONB in this case and to design the new power station sympathetically with an approach to design that has been commended by the Design Council and with a strong governance process put in place to ensure high quality execution. Against that background a package and process of proportionate mitigation has been agreed with ESC and SCC, whose objections relating to the AONB have been withdrawn.
- 11.1.29 Similarly, the NPS recognises that the development of Sizewell C will directly impact on the Sizewell Marshes SSSI but nevertheless identifies

¹² These matters were set out at Deadline 9 in response to a request from the Examining Authority [\[REP9-021\]](#).

¹³ See for instance, NPS EN-1 paragraph 1.7.11 and EN-6 Annex C at C.8.63 and C.8.81-83. The use of the word 'satisfactorily' is perhaps curious in this context. Whether it means satisfactorily in the sense of the decision maker being satisfied or whether it means 'fully', SZC Co. has set out to show that the mitigation proposed is effective and that adverse effects have been mitigated as far as possible. The NPS acknowledges that there may be residual impacts but that these may be acceptable given the nature of large scale energy NSIPs and their importance.

¹⁴ See, for instance, the commentary on this issue at [\[REP5-110\]](#)

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Sizewell as a potentially suitable location and recognises that it may not be possible to fully compensate for the loss of habitat (NPS EN-6 at C.8.63). SZC Co. has adopted a detailed and far-reaching approach to mitigation, including through the advance and successful creation of wetlands at Aldhurst Farm and for the careful selection of three locations for the establishment of compensatory fen meadow habitat. The approach to ecological understanding and mitigation has been exemplary and the project as a whole offers a significant biodiversity net gain.

- 11.1.30 This will be reinforced through SZC Co's progressive vision for the future of the Sizewell estate to enhance the character, ecology and amenity of the local landscape by replacing species-poor arable farmland and plantation woodland with species-rich semi-natural landscape habitat that is characteristic of the local area. Restoration of the temporary construction area will transform a 172 ha area of largely ecologically unremarkable and predominantly arable farmland into a carefully conceived dry sandlings grassland and mixed woodland across a gently undulating and naturalistic landscape. Not only will the new habitats support a much wider range of biodiversity and enhance landscape character, they will enhance the setting of local heritage sites, improve access and recreation opportunities and ensure the long-term sustainability and resilience of the landscape, including resilience to predicted climate change.
- 11.1.31 Mitigation has been thoughtfully conceived and often embedded in the project's design and opportunities found for inherent enhancement. Water levels management in the SSSI is an example. By putting in place monitoring and mechanisms to guard against any adverse impact, SZC Co. has designed an outcome that can be positively managed to optimise water levels and thereby both preserve and enhance the environment of the SSSI. Similarly, the soft coastal defence design feature necessary to provide long term protection to the hard coastal defence brings with it a long term protection for this part of the coast that is not currently achievable.
- 11.1.32 Notwithstanding the findings of the assessments and the mitigation proposed, the TEMMP commits the Applicant to longer term terrestrial ecology monitoring and to mitigate any adverse effects that may arise but that are not currently anticipated. This amounts to an exceptional long term commitment to protection of the local environment.
- 11.1.33 The sensitive, evidence based approach extends to the sHRA which identifies the precautionary need for monitoring to ensure no adverse effects on integrity from recreational disturbance, with the result that a comprehensive package of mitigation has been put in place and the planning authorities and Natural England are satisfied with the approach taken. Monitoring and management will now be in place to influence

existing recreational impacts as well as the limited impacts anticipated as a result of Sizewell C. Similarly, the same authorities are satisfied with the precautionary approach to promote mitigation and contingent further mitigation for the potential impact on marsh harrier habitat.

- 11.1.34 The Sizewell C **Non-Technical Summaries** for the submitted Environmental Statement and for the ES Addendum [[APP-159](#), [AS-179](#), [REP5-062](#) and [REP7-029](#)] do identify significant adverse effects in relation to noise, landscape & visual impacts, ecology, amenity and recreation and soils and agriculture. However, those findings were taken as a base from which further mitigation should be developed. The extent of mitigation now set out in the DCO, the DCO Requirements and the Deed of Obligation is comprehensive and detailed in respect of each topic area.
- 11.1.35 As a result, agreement on the scale and terms of that mitigation has been reached with East Suffolk and Suffolk County Councils (and with all funding recipients), with the result that neither authority now considers that development consent should be refused. The Deed of Obligation, together with the provisions of the DCO put in place a governance structure to ensure local involvement in the delivery of the project and its mitigation.
- 11.1.36 Even with mitigation in place the Sizewell C Project is, however, likely to result in some residual adverse effects, as would be expected with any nationally significant infrastructure and as anticipated in the NPSs. These residual effects, however, are small in scale compared with the overriding benefits of the Application.
- 11.1.37 In this context, the Community Fund has an important role to play. It is based on the approach which has been found to be successful at Hinkley Point C: a fund for the community run by the community focused on enhancing the quality of life for communities that may be affected by residual impacts from Sizewell C.
- 11.1.38 This Planning Statement (updated), together with the **NPS Tracker** (Doc Ref. 9.14(E)), provides an assessment of those potential adverse effects for the Sizewell C Project. The analysis follows the assessment principles and generic and nuclear considerations in NPS EN-1 and NPS EN-6, and national and local policy where relevant. It demonstrates that the proposed development would not cause any potential adverse effects that, considered individually, cumulatively or as a whole, are so severe that the decision maker should refuse the application and, moreover, that each aspect of the proposals is acceptable in planning terms when considered against the relevant national and local policies.

- 11.1.39 Whilst every case is different, the Secretary of State’s decision on the Hinkley Point C application in 2013 provides a guide to how a decision may be reached in these circumstances. The Secretary of state gave substantial weight to residual impacts but considered that they were:

“...significantly outweighed by the Hinkley Point C project’s potential to bring local benefits and by the vital contribution it would make to the achievement of energy and climate change policy objectives which are of crucial national importance.”¹⁵

- 11.1.40 It would be reasonable to reach a similar conclusion in this case where the benefits of the scheme, particularly the delivery of new nuclear power generating capacity, are overwhelmingly greater than the residual adverse effects.

- 11.1.41 There is a clear and compelling case in favour of the DCO being made.

¹⁵ Hinkley Point C decision letter paragraph 6.6.



APPENDIX A: ASSESSMENT OF THE SIZEWELL C PROJECT AGAINST THE DRAFT NPS EN-1

APPENDIX A: ASSESSMENT OF THE SIZEWELL PROJECT AGAINST THE DRAFT NPS EN-1

Draft NPS EN-1 Section	Topic	Summary of Changes in Draft NPS EN-1	Sizewell C Project
5.2	Air Quality and Emissions	<p>Paragraph 5.2.2 has moved to a new section on Greenhouse Gas Emissions (Section 5.3).</p> <p>Paragraph 5.2.9 (previously 5.2.10) has been amended to refer to the Project location in relation to a Local Air Quality Management Area or Clean Air Zone. Where a project is located in such an area, or in close proximity, the Applicant should engage with the relevant local authority to ensure the Project is compatible with the local air quality plan.</p> <p>Paragraph 5.2.11 (previously 5.2.12) requires the Secretary of State (SoS) to consider relevant advice within Local Air Quality Management guidance.</p>	<p>Volume 1, Appendix 6H of the Environmental Statement [APP-171] sets out the legislation, policy and guidance considered in the assessment of potential air quality impacts associated with the Sizewell C Project. As set out, the three local air quality management areas have been considered within the assessment and consultation was undertaken with East Suffolk Council (ESC), as the local authority.</p> <p>The position on air quality matters and agreement with the local authority is set out in the Statement of Common Ground with ESC and Suffolk County Council (SCC) submitted at Deadline 10 (Doc Ref. 9.10.12(B)).</p>
5.3	Greenhouse Gas Emissions	<p>New separate section in EN-1.</p> <p>Paragraph 5.3.4 sets out a requirement for a carbon assessment as part of the Environmental Statement and what this must include.</p>	<p>The Applicant submitted a Sizewell C Project GHG assessment as part of the DCO Application, which was supplemented during the Examination, as follows:</p> <ul style="list-style-type: none"> Volume 2, Chapter 26 of the ES [APP-342]; Volume 1, Chapter 2 of the First ES Addendum [AS-181]; and

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		<p>Paragraphs 5.3.5 to 5.3.7 sets out the requirements in the decision-making process, in that the SoS:</p> <ul style="list-style-type: none"> • Must be satisfied that the Applicant has assessed the Greenhouse Gas (GHG) emissions of all development stages, as far as possible. • Should be content that the Applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stages, but recognising that there are likely to be some residual emissions from construction and decommissioning. Positive weight should be given to processes to mitigate or offset emissions at these stages. • Does not need to assess individual applications against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments. <p>Paragraphs 5.3.8 to 5.3.10 sets out mitigation</p> <ul style="list-style-type: none"> • A carbon assessment should be used to drive down GHG emissions at every stage of the Proposed Development. • Applicants should look for opportunities to embed nature-based or technological solutions to mitigate or offset the 	<ul style="list-style-type: none"> • Volume 3, Appendix 9A submitted as part of the Responses to ExQ1 [REP2-110]. • Desalination Plant Greenhouse Gas Emissions Assessment (Doc Ref. 9.117(A)) submitted at Deadline 10. <p>The GHG impact assessment in the ES considered emissions arising from the construction and operation of the Sizewell C Project, including the removal and reinstatement of the temporary associated developments, and a high-level assessment of the decommissioning of the Sizewell C power station.</p> <p>Appendix 9A [REP2-110], as explained in response to ExQ1 G.1.22 [REP2-100], provides a more detailed calculation of the GHG emissions from the Sizewell C Project over its lifetime than the carbon assessment provided in the ES. The life cycle assessment report (LCA) includes the full lifecycle activities of Sizewell C. It identifies that, based on Government published data, the carbon intensity of Sizewell C for every kWh generated is similar or lower than the estimated carbon intensity of the other forms of low-carbon power generation (including gas, solar photovoltaics, onshore and offshore wind).</p> <p>As set out in NPS EN-1 para 5.2.2, and maintained in Draft EN-1 5.3.7, the Secretary of State is not required to consider individual applications against operational</p>
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		<p>emissions of construction and decommissioning.</p> <ul style="list-style-type: none"> Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the DCO, and taken into account in the SoS's decision making. 	<p>carbon emissions and their contribution to carbon budgets, net zero or other international climate commitments.</p> <p>Whilst the GHG assessment has not been drafted against the draft NPS requirement to list measures taken to reduce emissions, the SZC Project has not only been planned as an inherently sustainable development which will achieve substantial carbon savings relative to alternative forms of energy generation, all practical measures have been taken to limit its own impact. These include the exemplary approach to sustainable transport, for workers and for freight and the commitment to challenging levels of recycling in the Water Supply Strategy [REP7-036].</p>
5.4	Biodiversity and Geological Conservation	<p>In the Applicant's assessment, paragraph 5.4.4 (previously 5.3.4) has been expanded to refer to the design process as a way of embedding opportunities for nature inclusive design. The Applicant is encouraged to consider how the proposal can contribute to Biodiversity Net Gain, which can result in wider environmental gains.</p> <p>In decision-making, paragraphs 5.4.5 to 5.4.17 (previously 5.3.6 to 5.3.17) have been expanded as follows:</p> <ul style="list-style-type: none"> refer to the aims and goals of the government's 25 Year Environment Plan; 	<p>Biodiversity Net Gain (BNG) is addressed in the appropriate BNG reports [REP1-004], REP1-017 to REP1-019] which demonstrate net gain across the Sizewell C Project as a result of the habitat proposals associated with the Project.</p> <p>Appendix 6J of the ES, Volume 1 [APP-171] sets out the legislation, policy and guidance that has informed the assessment of terrestrial ecology and ornithology. This includes the Government's 25 Year Environment Plan.</p>

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		<ul style="list-style-type: none"> • require significant weight to be given to any residual harm to biodiversity resulting from a development; • refer to Wildlife Sites, which should be protected and enhanced through national planning policy, and expect developments to comply with the biodiversity and geological conservation requirements; • require a suitable compensation strategy where proposals would result in the loss or deterioration of ancient woodland and ancient or veteran trees; • proposals are expected to consider any opportunities to maximise the restoration, creation and enhancement of wider biodiversity. <p>In respect of mitigation, paragraphs 5.4.18 to 5.4.23 (previously 5.3.18 to 5.3.20) have been amended to refer to:</p> <ul style="list-style-type: none"> • Applicants should consider producing and implementing a Biodiversity Management Strategy; • in the design of direct cooling system, the locations of the intake and outfall should be sited to avoid or minimise adverse impacts on the receiving water including their ecology; 	<p>The Applicant's assessment of the terrestrial ecology and ornithology effects arising from the Sizewell C Project is presented in:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 14 of the ES [APP-224] and supporting technical appendices in relation to the main development site. • Volumes 3 to 9, Chapter 7 of the ES [APP-363, APP-394, APP-425, APP-461, APP-494, APP-523 and APP-555] and supporting technical appendices in relation to the associated developments. • Volume 1, Chapters 2 to 6 and 9 of the ES Addendum [AS-181, AS-182, AS-183, AS-184, AS-185 and AS-188]. <p>International, national and local designated sites, as well as their associated habitats and species, are considered within the assessments, including County Wildlife Sites.</p> <p>The approach to ancient woodland and veteran trees has been explained in a number of places – most notably SZC Co.'s Written Submissions arising from ISH10 [REP7-073] (electronic page 4 – 13) SZC Co.'s Comments on Earlier Deadlines submitted at Deadline 10 (Doc Ref. 9.120). There it is explained that there is no loss or adverse impact on ancient woodland and that the limited loss of veteran trees for the</p>
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		<ul style="list-style-type: none"> Applicants are encouraged to produce and implement a Geodiversity Management Strategy. 	<p>construction of the two bypasses is unavoidable. The scale of new woodland planting, including the commitment to specimen trees mitigates and compensates for the unavoidable impact.</p> <p>The ES and ES Addendum, as well as the TEMMP (Doc Ref. 10.28), oLEMP (Doc Ref. 10.22) and LEMPs (Doc Refs. 10.27 and 10.29) describe the mitigation measures as well as the enhancement measures which will increase the sites overall value for local biodiversity. Opportunities to conserve and enhance biodiversity conservation interests associated with the marine environment are described in Volume 2, Chapter 22 of the ES [APP-317], updated by Volume 1, Chapter 2 of the ES Addendum [AS-181].</p>
5.5	Civil and Military Aviation and Defence Interests	Minor text changes, not material.	No response required.
5.6	Coastal Change	<p>Paragraph 5.6.7 (previously 5.5.7) also requires the Applicant's assessment to assess how coastal change could affect flood risk management infrastructure, drainage and flood risk.</p> <p>Paragraph 5.6.10 (previously 5.5.10) expanded to note support for proposals that aim to facilitate the relocation of existing energy infrastructure from unsustainable locations at risk of coastal change, where it would result in climate resilient infrastructure.</p>	<p>The ES, Volume 2, Chapter 20 [APP-311] identifies potential impacts on coastal change. The Change Request 1-15 provided additional information in relation to coastal geomorphology and hydrodynamics, including the draft Coastal Processes Monitoring and Mitigation Plan (latest version submitted at Deadline 10 (Doc Ref. 10.5). The CPMMP includes monitoring and management actions for potential impacts on the Sizewell C Project components, including the two Beach Landing Facilities, the two Fish Recovery and Return outfalls, the Combined Drainage Outfall, and</p>

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			the main cooling water intake and outfall heads to ensure that no significant effects on coastal processes occur throughout the life of Sizewell C.
5.7	Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation	Minor text changes, not material.	No response required.
5.8	Flood Risk	<p>The introductory text has been expanded in paragraphs 5.8.1 to 5.8.5 to refer to:</p> <ul style="list-style-type: none"> • resilient energy infrastructure; • the Government's Flood and Coastal Erosion Risk Management Policy Statement. • preparedness of buildings in flood risk areas; • UK Climate Projections 2018; • Ensuring new energy infrastructure should be designed and constructed to remain operational in times of flood. <p>Text is added to paragraph 5.8.7 (previously 5.7.5) on the minimum requirements for Flood Risk Assessments to include:</p> <ul style="list-style-type: none"> • take account climate change impacts across a range of climate scenarios; • consider and quantify different types of flooding, including information on flood 	<p>Volume 2, Chapter 26 of the ES [APP-342], updated by the ES Addendum Volume 1, Chapter 2 [AS-181], presents an assessment of climate related impacts and explains how climate change has been considered with regard to design resilience and the effects of climate change on the Sizewell C Project. The ES chapters also provides the outputs of a climate change risk assessment undertaken using UK Climate Projections 2018 (UKCP18).</p> <p>The Sizewell C Project has been developed with a full understanding of the potential consequences of climate change and has incorporated mitigation measures embedded in the design.</p> <p>The submitted Flood Risk Assessments for the Sizewell C Project are as follows:</p> <ul style="list-style-type: none"> • The Main Development Site Flood Risk Assessment (MDS FRA) [APP-093 to APP-

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		<p>likelihood, speed-of-on-set, depth, velocity, hazard and duration;</p> <ul style="list-style-type: none"> • identify and secure opportunities to reduce causes and impacts of flooding overall, making as much use as possible of natural flood management techniques; • remaining risks can be safely managed, ensuring people will not be exposed to hazardous flooding. • information requirements on how the ability of water to soak into the ground may change with development; • measures to be included to ensure the development will be safe and remain operational during flood event throughout the development's lifetime without increasing flood risk elsewhere. <p>In respect of decision-making, paragraph 5.8.11 (previously 5.7.9) has been expanded to set out that the SoS should be satisfied where relevant:</p> <ul style="list-style-type: none"> • the Sequential Test has been satisfied; • SuDS have been used unless there is clear evidence that their use would be inappropriate; • in flood risk areas, the Project is designed and constructed to remain safe and operational during its lifetime without increasing flood risk elsewhere; 	<p>114] and Main Development Site Flood Risk Assessment Addendum (MDS FRA Addendum) [AS-157 to AS-170].</p> <ul style="list-style-type: none"> • Northern Park and Ride Flood Risk Assessment [APP-115 and APP-116]. • Southern Park and Ride Flood Risk Assessment [APP-117 and APP-118]. • Two Village Bypass [APP-119 to APP-135]. • Sizewell Link Road [APP-136 to APP-138] and Addendum [REP5-045 and REP5-046]. • Yoxford Roundabout and other highway improvements Flood Risk Assessment [APP-139 and APP-140]. • Freight Management Facility Flood Risk Assessment [APP-141 and APP-142]. • Rail Flood Risk Assessment [APP-143 and APP-144]. <p>NPS EN-6 (paragraph 3.6.9) confirms that the Sequential Test has been undertaken as part of the SSA process and the decision maker should not conduct the Sequential Test for any of the sites listed in EN-6. In doing so Government concluded that <i>“sites within this NPS in lower flood risk zones were not reasonably available alternatives to those in higher flood risk zones”</i></p>
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		<ul style="list-style-type: none"> the project includes safe access and escape routes, as part of an agreed emergency plan; land needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance. <p>Paragraph 5.8.12 (previously 5.7.10) has been amended to required drainage implications to be considered during the construction period and make provision for the maintenance of SuDS throughout a Project's lifetime.</p> <p>Paragraph 5.8.14 (previously 5.7.4) has been amended to refer to land expected to fall within Flood Zone 3b within the predicted lifetime of the Project.</p> <p>Paragraphs 5.8.15 to 5.8.19 (previously 5.7.14 to 5.7.17) regarding the Sequential Test and the Exception Test have been updated as follows:</p> <ul style="list-style-type: none"> additional commentary on the application of the Sequential Test on sites allocated in a development plan; reference to the Exception Test as allowing necessary development to 	<p>(paragraph 3.6.10). With regard to Sizewell, the NPS confirmed that the location of part of the site within Flood Zone 3 would not preclude it from being identified in the NPS where the regulator advised it could potentially be protected – which is confirmed at C.8.19. The application site boundary for the main development site extends beyond the land identified in EN-6 (i.e. the area of land nominated in 2009) to accommodate the full extent of the temporary construction works areas. The majority of the extended site area beyond the NPS boundary is in Flood Zone 1.</p> <p>The Drainage Strategy (Doc Ref. 10.14) sets out the site-wide drainage strategy of the Sizewell C Project. The overarching surface water drainage philosophy provides conventional SuDS through the steps / hierarchy presented in the Drainage Strategy, with details submitted to the authorities (ESC and SCC) through the relevant DCO Requirements.</p> <p>Flood Risk Emergency Plans have been submitted for the main development site, two village bypass and Sizewell Link Road as part of the respective flood risk assessments, as referenced above.</p>
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		<p>proceed in situations where suitable sites at lower risk of flooding are not available;</p> <ul style="list-style-type: none"> • explanation that the Exception Test is appropriate when the sequential test has identified reasonably available, lower risk sites appropriate for the proposed development, where accounting for wider sustainable development objectives, relevant policies would provide a clear reason for refusing development in an identified alternative location. <p>In the mitigation section, paragraph 5.8.23 (previously 5.7.21) has been updated to account for predicted impacts of climate change in the surface water drainage arrangements. Paragraph 5.8.26 (previously 5.7.25) has been expanded to refer to the local authority emergency planning and, where appropriate, the local resilience forum, in the production of an evacuation plan for a manned energy project.</p>	
5.9	Historic Environment	<p>Paragraphs 5.9.1 to 5.9.9 (previously 5.8.1 to 5.8.7) have been amended to refer to Scheduled Monuments and Protected Wreck Sites, and to set out what comprises a heritage assets and its significance.</p> <p>Paragraphs 5.9.10 to 5.9.16 (previously 5.8.8 to 5.8.10) has been expanded to:</p>	<p>The impact of the Sizewell C Project on the significance of heritage assets has been assessed according to relevant Historic England guidance and is set out within the respective chapters in Volumes 2 to 9 of this ES [APP-272, APP-334, APP-368, APP-399, APP-432, APP-467, APP-499, APP-528 and APP-560], and updated by the ES Addenda [AS-181, AS-183, AS-184, AS-185, AS-186, AS-187 and AS-188].</p>

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		<ul style="list-style-type: none"> require the Applicant to undertake an assessment of any likely significant heritage impacts of the Proposed Development as part of the EIA, including the consideration of heritage assets above, at, and below the surface of the ground; require studies on those heritage assets affected by noise, vibration, light and indirect impacts; encourage the Applicant to prepare proposals that can make a positive contribution to the historic environment, and to consider how the Project takes account of the significance of the heritage assets affected; require careful consideration in preparing the scheme on whether the historic environment impacts will be direct or indirect, temporary or permanent. <p>In decision-making, paragraphs 5.9.17 to 5.9.29 (previously 5.8.11 to 5.8.18) have been amended to:</p> <ul style="list-style-type: none"> take account of historic landscape character records; require the SoS to give great weight to the heritage asset's conservation; require the SoS to give considerable importance and weight to the desirability 	<p>The relevant ES Chapters (as above) explain the design of the Proposed Development, including a series of mitigation measures, to mitigate effects on heritage assets.</p> <p>As set out in Section 8.7 of the Planning Statement [APP-590], the proposed development would not lead to substantial harm to or total loss of significance of any designated asset. Three terrestrial heritage assets would suffer temporary but less than substantial harm through the construction phase only (and no substantial harm to or total loss of significance), being:</p> <ul style="list-style-type: none"> Leiston Abbey (first site) with later chapel and pillbox; Cottage 450m west of Upper Abbey Farmhouse; and Historic landscape character. <p>This harm is to be weighed against the public benefits of the proposed development, which are summarised in Section 7 of the Planning Statement [APP-590]. The planning balance is struck in Section 11 of the Planning Statement [APP-590]. For the reasons set out in that section, the benefits of the scheme are overwhelmingly greater than the residual adverse effects, including the less than substantial harm identified to the significance of heritage assets.</p>
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		<p>of preserving all designated heritage assets;</p> <ul style="list-style-type: none"> • set out the tests to be applied where a proposed development would lead to substantial harm (or total loss of significance of) a designated heritage asset, or less than substantial harm; • the effects to be taken into account on the significance of a non-designated heritage asset; • the treatment of the loss of a building (or other element) which makes a positive contribution to the significance of a Conservation Area or World Heritage Site; • to take into account deliberate neglect of, or damage to, a heritage asset. <p>In setting requirements, paragraph 5.9.33 has been inserted to require a Requirement or Obligation to be applied where the loss of significance of any heritage asset has been justified on the merits of a new development.</p>	<p>Further commentary in respect of the assessment and mitigation of heritage assets is set out in the ExQ1 responses [REP2-100], ExQ2 responses [REP7-056] and ExQ3 responses [REP8-116].</p>
5.10	Landscape and Visual	<p>In the Applicant's assessment, paragraphs 5.10.5 to 5.10.8 (previously 5.9.5 to 5.9.7) have been expanded to:</p> <ul style="list-style-type: none"> • require the Applicant to consult the Seascape Character Assessment and the Marine Plan Seascape Character Assessments for seascapes; 	<p>The Landscape and Visual Assessment chapters of Volumes 2 to 9 of the ES [APP-216], [APP-360], [APP-390], [APP-421], [APP-457], [APP-490], [APP-520] and [APP-551], updated by the ES Addenda [AS-181], [AS-184] and [AS-185] assess landscape and visual effects during construction and operation. The assessment considered the Seascape Character Assessment of</p>

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		<ul style="list-style-type: none"> require the assessment to demonstrate how noise and light pollution from construction and operational activities on residential amenity and on sensitive locations, receptors and views, will be minimised. <p>In decision-making, paragraph 5.10.10 has been inserted to require Applicants to consider how landscapes can be enhanced using landscape management plans.</p>	<p>Suffolk, South Norfolk and North Essex. It also considered the impacts of the Sizewell C Project on the landscape fabric, noise and artificial light.</p> <p>The DCO Application is supported by a series of Landscape and Ecology Management Plans:</p> <ul style="list-style-type: none"> An Outline Landscape and Ecological management plan (oLEMP) has been prepared for the main development site (Doc Ref. 10.22); and Landscape and Ecological management plans (LEMP) have been prepared for the Two Village Bypass (Doc Ref. 10.29) and Sizewell Link Road (Doc Ref. 10.27). <p>The LEMPs set out the objectives and general principles for the establishment and longer-term management of the landscape and ecological mitigation proposals identified for the main development site in order to mitigate adverse ecological effects identified in the ES.</p>
5.11	Land Use, including Open Space, Green Infrastructure, and Green Belt	Paragraph 5.11.2 (previously 5.10.2) has been expanded to encourage Applicant's to consider the provision of new and enhanced green infrastructure as part of an application.	The amenity and recreation impact assessment set out at Volume 2, Chapter 15 of the ES [APP-267] considers likely amenity and recreation effects arising from the main development site. For the associated development sites, this is set out in the relevant chapter in Volumes 3 to 9 of the ES [APP-366, APP-

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		<p>In the Applicant's assessment, paragraph 5.11.8 (previously 5.10.8) has been amended to encourage Applicant's to develop and implement a Soil Management Plan where contamination is present.</p> <p>In the mitigation section, paragraph 5.11.23 (previously 5.10.24) has been expanded to consider the creation of new or improved accesses. When altering existing rights of way, consideration should be given to the use, character, attractiveness and convenience of the right of way. The SoS is also directed to consider whether mitigation measures put forward by an Applicant are acceptable and whether requirements or other provisions should be included in the grant of development consent.</p>	<p>397, APP-429, APP-464, APP-497, APP-526 and APP-558].</p> <p>The proposals do not build on formal sports or open space. Local sports and recreation facilities would be enhanced through the investment in community sports facilities at the Alde Valley Academy in Leiston. In advance of the application, the Applicant committed to the (successful) creation of wetland at Aldhurst Farm and has subsequently provided 27ha of open access recreation land at Aldhurst Farm for recreation. Further enhancements are committed to Aldhurst Farm and to public access on the EDF estate in the Deed of Obligation and these complement the substantial commitment referred to below to enhance local public rights of way. Enhancement is a characteristic consequence of much of the embedded and additional mitigation proposed as part of the Sizewell C application.</p> <p>The Application is supported by an Outline Soil Management Plan [REP3-018]. This sets out the requirements for the handling and management of soils, so that site-won soils could be reused following the removal and reinstatement of temporary development.</p> <p>SZC Co.'s proposals for the treatment of existing rights of way is set out in the Rights of Way and Access</p>
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			<p>Strategy (Doc Ref. 10.26), including the necessary diversions and closures as well as long-term improvements. During the course of the DCO Examination, SZC Co. has reacted positively to all suggestions for enhancement to these measures, with an agreed investment of £2.5 million for the enhancement of public rights of way within the PRoW fund in the vicinity of Sizewell C which would provide a step change in the quality of routes available for recreation, amenity and exercise.</p>
5.12	Noise and Vibration	<p>Paragraphs 5.12.4 to 5.12.8 (previously 5.11.4 to 5.11.7) have been amended with regard to the Applicant's assessment in that:</p> <ul style="list-style-type: none"> the assessment should include an assessment of the effect of underwater or subterranean noise, if likely to cause disturbance; the Applicant should consider using best available techniques to reduce noise impacts; parallel tracking of environmental permits is encouraged where noise impacts determined by an environmental permit interface with planning issues. <p>In decision-making, paragraphs 5.12.9 to 5.12.11 (previously 5.11.8 to 5.11.10) have been expanded to:</p>	<p>The assessment of noise and vibration is set out in the relevant ES chapters; for the Sizewell C main development site in Volume 2, Chapter 11 of the ES [APP-202]; and for the associated developments in Volumes 3 to 9, Chapters 4 of the ES [APP-354, APP-384, APP-415, APP-451, APP-484, APP-515 and APP-545]. Appendix 6G of the ES, Volume 1 [APP-171] sets out the legislative, policy and guidance taken into account in the assessment, including the Noise Policy Statement for England, the NPPF and relevant national, regional and local policy and guidance.</p> <p>The DCO Application was supported by an Underwater Noise Effects Assessment [APP-329], supplemented at Deadline 5 [REP5-124], assessing the potential impacts of underwater noise arising from the construction and operation of the Sizewell C Project.</p>

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		<ul style="list-style-type: none"> require the SoS to have due regard to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise; where containment of noise within buildings is proposed, the SoS should take into account any other adverse impacts that such containment might cause e.g. on landscape and visual impacts. 	<p>Mitigation measures are set out in the noise and vibration ES chapters, as set out above, with reference to the Code of Construction Practice (Doc Ref. 10.2) as setting out the noise measures and controls. Further documents will be submitted for approval at particular stages of the Project, including separate Noise Monitoring and Management Plans for the Main Development and Associated Development sites.</p> <p>Noise containment is proposed for example for buildings on the main development site in order to enable the development to operate within the operational noise limit agreed with ESC, but these measures have no impact on the external appearance of the building.</p> <p>The status of environmental permits is set out in the Schedule of Other Consents, Licences and Agreement (Doc Ref. 5.11(C)).</p>
5.13	Socio-Economic Impacts	<p>Paragraphs 5.13.3 to 5.13.6 (previously paragraphs 5.12.2 to 5.12.5) have been expanded on the Applicant's assessment to:</p> <ul style="list-style-type: none"> Applicants may wish to provide information on the sustainability of the jobs created; consider the contribution to the development of low-carbon industries at the local, regional and national level; 	<p>An assessment of the socio-economic impacts at local and regional levels is provided within Volume 2, Chapter 9 of the ES [APP-195] and Volume 10 of the ES [APP-572 to APP-582] in respect of cumulative and transboundary effects. The assessment considers indirect beneficial impacts, sustainability, and low supplies and suppliers, supplemented by ISH4 Written Summaries [REP5-109].</p>

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		<ul style="list-style-type: none"> consider any indirect beneficial impacts for the region hosting the infrastructure; encouraged to ensure local supplies are considered in any supply chain; consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, including the need for temporary accommodation for construction workers (if required). <p>Paragraph 5.13.9 (previously 5.12.8) has been expanded to state that the SoS may wish to include a requirement for the approval of an employment and skills plan by the local authority.</p>	<p>The Application is supported by an Accommodation Strategy [APP-613], Employment, Skills and Education Strategy [APP-611] and Supply Chain Strategy [APP-611], summarised below:</p> <ul style="list-style-type: none"> The Accommodation Strategy [APP-613] provides a balance solution for meeting the temporary increase in local accommodation demand which the Sizewell C Project would generate. The strategy seeks to ensure that workers are accommodated in a way which maximises benefits and ensures that impacts are minimised and, where appropriate, mitigated and managed. The Employment, Skills and Education Strategy [APP-611] sets out measures that will be funded through the financial mitigation and managed by a governance and reporting process, secured through the Deed of Obligation (Doc Ref. 10.4). SZC Co.'s role will be to create the environment in which education, skills and workforce development can flourish, to the benefit of the Sizewell C Project and the region. The Supply Chain Strategy [APP-611] sets out the approach to engaging the local and regional supply chain for the Sizewell C Project.
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			It identifies and describes specific measures and processes that have been or will be put in place to support local and regional supply chain engagement to enable businesses in the east of England to compete for opportunities on the Sizewell C Project.
5.14	Traffic and Transport	<p>Paragraph 5.14.4 (previously 5.13.4) has been expanded to require the Applicant's assessment to also consider any possible disruption to services and infrastructure (such as road, rail and airports).</p> <p>A new paragraph (5.14.8) has been inserted to require the SoS to only consider preventing or refusing development on highway grounds if there would be an unacceptable impact on highway safety, or residual cumulative impacts on the road network would be severe.</p> <p>Paragraph 5.14.11 (previously 5.13.10) has been amended to refer the Applicant to the DfT water policy guidelines for the movements of AILs when preparing their application.</p>	<p>Throughout the Applicant's assessment, it has considered the potential disruption of the Project on existing infrastructure. Construction traffic impacts have been assessed in detail and the proposals include a number of significant mitigation measures to minimise disruption. This is set out in the Consolidated Transport Assessment [REP4-005], Written Summaries of ISH3 [REP5-108], ExQ2 responses [REP7-056] and ExQ3 responses [REP8-116].</p> <p>In the event of traffic disruption on the network, the Traffic Incident Management Plan (Doc Ref. 10.4) will mitigate the potential exacerbation of traffic delays. During construction, there would be regular liaison with the emergency services and the highway authorities in order to manage deliveries as set out in the Construction Traffic Management Plan (Doc Ref. 10.4).</p> <p>As set out in paragraph 8.2.18 of the Planning Statement, the potential for significant transport impacts has been largely dealt with by way of</p>

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			<p>embedded mitigation within the development proposals. Through the course of the DCO Examination, further mitigation and funding has been agreed with relevant stakeholders and secured through the Deed of Obligation, including the related transport management plans. The Fourth ES Addendum [REP7-029] concludes that there would be no significant residual transport effects from the development once account is taken of the comprehensive mitigation put in place.</p> <p>The water policy guidelines for AILs have been used to inform the AIL strategy, which has been made possible by SZC Co.'s commitment to the permanent beach landing facility.</p>
5.15	Resource and Waste Management	<p>Paragraphs 5.15.6 to 5.15.8 (previously 5.14.6) have been expanded to:</p> <ul style="list-style-type: none"> • where dredged material is included in the Applicant's assessment, to also include other uses of such material before disposal to sea; • encourage the Applicant to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local supplies; • encourage the Applicant to use construction best practices in relation to storing materials and to record materials to help reduce waste in future 	<p>The conventional waste management strategy for the Sizewell C Project, provided in Volume 2, Appendix 8A of the ES [APP-194] identifies options for waste management in line with the principles of waste hierarchy.</p> <p>Section 8.13 of the Planning Statement [APP-590] also explains that the waste hierarchy has been applied to minimise disposal and maximise reuse and recycling. It also summarises the mitigation measures that are proposed to provide an efficient use of material resources and reduction of waste arisings, and to reduce the potential impacts.</p>

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		decommissioning of facilities, by identifying materials that can be recycled or reused.	<p>The Outline Site Waste Management Plan (SWMP) [APP-194] and Addendum [REP7-021] establish and define key performance indicators (KPIs) for the principal waste streams, in order to minimise waste generation, maximise waste recycling and recovery and minimise the amount of waste sent to landfill. Further detail on the waste KPIs is summarise in response to ExQ1 W.1.12 [REP2-100].</p> <p>The Code of Construction Practice (Doc Ref. 10.2) Part B requires the contractors to produce a Site Waste Management Plan (SWMP), which would need to specify the information required by the Outline SWMP [APP-194]. This includes the sourcing, transport and use and disposal of waste and material resources, in a sustainable manner. Where waste needs to be taken off-site for re-use, recycling and recovery or disposal the SWMP would also detail information on waste carriers and the waste management facilities that should be used.</p> <p>Decommissioning is considered in Volume 2, Chapter 5 of the ES [APP-189]. This explains that arrangements for the decommissioning process would be refined periodically, with a Decommissioning Waste Management Plan developed prior to commencement of decommissioning. This will detail information on</p>
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			decommissioning waste and materials types and quantities and how this would be managed.
5.16	Water Quality and Resources	<p>New paragraphs 5.16.3 and 5.16.4 have been inserted into the Applicant's assessment section to encourage Applicant's to:</p> <ul style="list-style-type: none"> • where possible, manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids; and • consider protective measures to control the risk of pollution to groundwater beyond those outlined in Water Resource Management Plans. <p>Under paragraph 5.16.5 (previously 5.15.3), the ES should also demonstrate how proposals minimise the use of water resources and water consumption in the first instance.</p> <p>Paragraphs 5.16.8 (previously 5.15.6) expanded on the Water Framework Directive and advises that the overall aim of development should be to prevent deterioration in status of water bodies to support the achievement of the objectives in the River Basin Management Plans and not to jeopardise the future achievement of good status for any affected water bodies.</p>	<p>The Applicant has undertaken both a qualitative and quantitative assessment of the impacts of the Project on existing water quality, water resource and the physical characteristics of the water environment, as set out in the ES. The assessments are presented within the relevant groundwater and surface water chapters, Chapter 19 of Volume 2 of the ES [APP-297] and Chapter 12 of Volumes 3 to 9 of the ES [APP-376, APP-407, APP-441, APP-476, APP-507, APP-536 and APP-570] as well as Chapters 20 and 21 of Volume 2 [APP-311 and APP-314].</p> <p>As set out in Volume 2, Chapter 26 of the ES [APP-342], the Code of Construction Practice (Doc Ref. 10.2) sets out that the appointed contractor(s) will develop and implement a Construction Environmental Management Plan (CEMP) to measure, monitor and report on energy and water consumption and GHG emissions during construction. As set out in response to ExQ1 CC.1.7 [REP2-100], contractors' performance will be monitored by SZC Co. through the recording and reporting tool, ensuring compliance with the CoCP (Doc Ref. 10.2). The CoCP was amended at Deadline 10 to incorporate the commitments to water efficiency set out in the Water Supply Strategy [REP7-036].</p>

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		<p>Paragraph 5.16.13 (previously 5.15.10) has been expanded to require an Applicant to consult with the local water company and the EA or NRW when the Applicant needs new water infrastructure, significant supplies or impacts other water supplies.</p>	<p>That Strategy was informed by direct engagement with the local water company and the EA.</p> <p>A Water Framework Directive Compliance Assessment Report [APP-619 to APP-633] and accompanying Addendum [AS-277 to AS-279] has been prepared and submitted. Collectively, the reports considered impacts of the Sizewell C Project on water bodies and activities, and on protected areas located within the water bodies, and explains how the Project adheres to the European Water Framework Directive. As set out in Section 8.14 of the Planning Statement, construction and operational activities of the Sizewell C Project would not lead to a change in overall status of the water bodies. The Sizewell C Project is therefore deemed compliant with the Water Framework Directive.</p> <p>The Compliance Assessment Report and Addendum also consider the mitigation measures identified in the River Basin Management Plan (RBMP) and identify the proposed Sizewell C Project activities (construction and operational activities) would not affect the RBMP delivery.</p>
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APPENDIX B: STRUCTURE OF CONTROL DOCUMENTS AND SUBSEQUENT APPROVALS

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Table 1: Strategies and Plans Secured by the DCO

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1 STRUCTURE OF CONTROL DOCUMENTS AND SUBSEQUENT APPROVALS

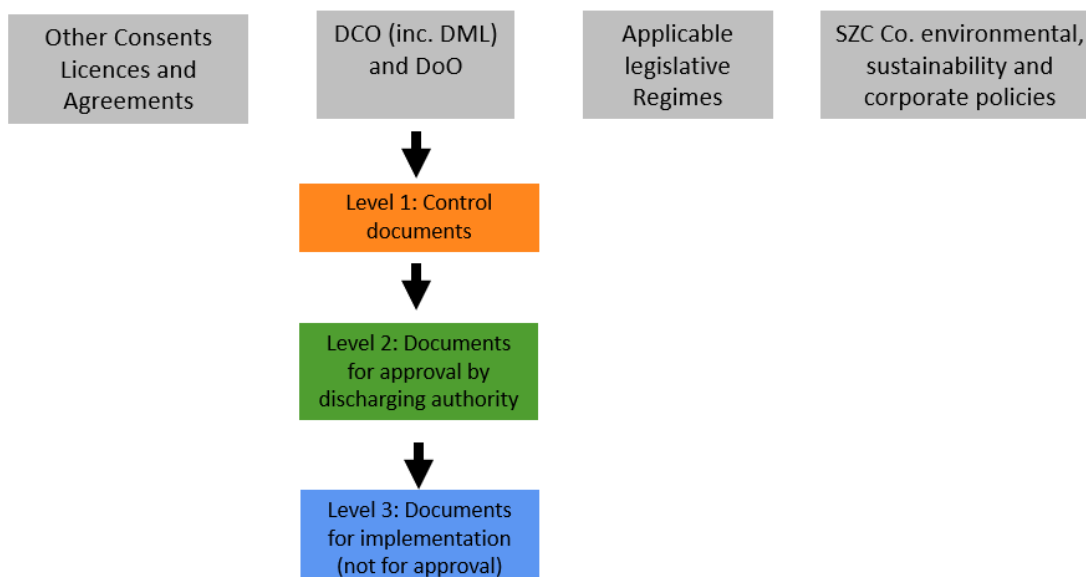
1.1 Overview

1.1.1 This note responds to the questions raised in ISH1 and subsequent hearings about the status of the various '*strategies*' and '*plans*' relied on in the DCO Application.

1.1.2 It sets out the levels of documents within the application and the status of each level. **Plate 1** sets the **Development Consent Order (DCO)** (Doc Ref. 3.1(J)) and **Deed of Obligation (DoO)** (Doc Ref.10.4) in the context of other controls on the Sizewell C Project and demonstrates how the different levels of documents relate to each other. **Table 1** lists out the plans and strategies referred to in the **dDCO** and **Table 2** lists out the plans and strategies referred to in the **DoO**. These tables show which level a document is, the documents it relates to, where it is secured, and which body is responsible for approving the named Level 2 documents and any updates to the Level 1 documents. For each Level 1 document there is a specific governance group who will have oversight of the activities controlled by that document. The formal role of the relevant governance group is set out within each Level 1 document where it is relevant.

1.1.3 The principles behind the consenting strategy are set out in Chapter 10 of the **Planning Statement** [[APP-590](#)]. The **DCO Explanatory Memorandum** (Doc Ref. 3.2(G)) and the **DoO Explanatory Memorandum** (Doc Ref.3.2(I)) both explain the obligations within each document and the consenting approach that has been taken. The **Mitigation Route Map** (Doc Ref. 8.12(F)) sets out in full the commitments which are required to mitigate the impacts identified in the **Environmental Statement** and where these are secured. This note does not replace the **Mitigation Route Map** (Doc Ref. 8.12(F)) but instead focuses on the '*plans*' and '*strategies*' within the application.

Plate 1: Structure of controls



- 1.1.4 The DCO would grant SZC Co. the authority and necessary powers to deliver the authorised development. The Articles and Schedules of the DCO mandate the scope and limit of those powers as well as controls which must be complied with through the construction and operation of Sizewell C.
- 1.1.5 Schedule 2 (requirements) sets out a series of commitments and controls that relate to the terrestrial works. The marine licence (DML) is Schedule 20 of the DCO and will be deemed if the Sizewell C DCO is granted. The DML authorises certain activities within the marine environment but again includes limits and controls on those activities and how the activities are carried out. The **draft DoO** commits SZC Co. to a further level of control and includes obligations on SZC Co. to act in a certain way to minimise the impact of any harm resulting from the construction and operation of Sizewell C. SZC Co. will be legally bound by all of the obligations listed in these documents as explained in **Appendix C** (Enforcement under the Evolving Approach) to the Written Submissions arising from ISH1 [\[REP5-113\]](#).
- 1.1.6 The DCO and DoO do not govern the delivery of Sizewell C in isolation. The **Schedule of other consents, licenses and agreements** (Doc Ref. 5.11(C)) sets out the main relevant controls, license and agreements which are required to construct and operate Sizewell C pursuant to different legal regimes containing their own enforcement mechanisms. Some of these have their own structures of control document (e.g. the Water Discharge Activities Permit will require a chlorination strategy). SZC Co. will also be

bound by all relevant legislation at the time of construction and operation which includes environmental and health and safety legislation.

- 1.1.7 Draft protected species licences (and accompanying ecology mitigation strategies) and ecology method statements have been submitted to the examination, which have informed the monitoring and mitigation measures set out within the **Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP)** (Doc Ref. 10.28). These draft license applications and supporting strategies have been submitted to provide visibility to all stakeholders and they will be submitted to Natural England under the Wildlife and Countryside Act 1981 and consented and enforced under that legislation. Where a species is not protected under this regime, SZC Co. has committed to the appropriate protection through the **Code of Construction Practice (CoCP)** (Doc Ref.10.2) and the **TEMMP** (Doc Ref. 10.28).

1.2 Updates to the control documents

- 1.2.1 Throughout the examination the control documents have been updated in response to comments from the Examining Authority and discussions with stakeholders. The suite of control documents has been reviewed to ensure that the securing mechanisms are described within each document and to refine the language used in relation to commitments. The final versions of the control documents have been copied to Book 10 and will be certified by the Secretary of State pursuant to Article 80 of the **dDCO**.

1.3 Level 1: Control Documents (Strategies and Plans Secured by the DCO and DoO)

- 1.3.1 The **Level 1 Control Documents** will either be certified under the **DCO** at grant or annexed to the **DoO** at the point of signing. They are either by topic or by site and set out the controls required over the project to ensure that the works are implemented within the limits of the environmental impact assessment. Some Level 1 Control Documents specify all measures assumed and needed by the EIA and do not have Level 2 documents underneath them and works must be carried out in accordance with these documents.

- 1.3.2 If a Level 1 document is a compliance document (i.e. the undertaker must act in accordance with the plan) then commitments are phrased as '*must*'. If a Level 1 document is a control document which informs a subsequent approval (i.e. a future plan must be in general accordance with this strategy) then commitments are phrased as '*will*'. The Subsequent Level 2 document will be a compliance document and commitments will then be phrased as '*must*'. Limited uses of the words '*would*'/ '*should*'/ '*could*' have been retained in the Level 1 documents. Each time such terms are used, the

usage has been checked and is considered to be appropriate. For example, where it is used in the conditional, the term describes the assessment or describes the expected outcome.

1.3.3 Caveats throughout the Level 1 control documents have been checked to ensure that they are necessary to the delivery of the project and do not undermine any assumptions relied upon in the environmental impact assessment. As explained in our **Response to ExA Commentary on the dDCO** [[REP7-058](#)]. This is how the following terms are used:

- ‘**Where practicable**’: means that the action should be done unless the degree of risk in a particular situation cannot be balanced against the time, trouble, cost and physical difficulty of taking measures to avoid the risk. In practice this means that something that would avoid a significant impact must be done in almost all circumstances. It would only be acceptable not to take the relevant step if there would not be a significant impact as a result, and therefore the risk would be low.
- ‘**Where possible**’ or ‘**as soon as possible**’: this is used to ensure that something happens in almost all instances, or as soon as it can be done.

1.3.4 There are some documents which are secured through the **dDCO** which control the design of the Sizewell C Project. These documents are not included in this note but approach to parameters and securing design approval is set out in Section 2.6 of the **Written Submissions Arising from ISH1** [[REP5-113](#)].

1.3.5 The **CoCP** is a Level 1 control document. However there are a number of ‘*strategies*’ or ‘*outline plans*’ which have informed the obligations included in the **CoCP**. These documents are:

- Outline Soil Management Plan [[REP3-018](#)];
- Conventional Waste Management Strategy [[APP-194](#)];
- Materials Management Strategy [[AS-202](#)];
- Outline Dust Management Plan [[APP-213](#)]; and
- Dredge Disposal Site Characterisation Report [[APP-328](#)].

Ecology consenting regime

1.3.6 A number of ecological mitigation strategies, draft licences and licensable and non-licensable method statements for protected species at the main development site were appended to **Volume 2 Chapter 14** of the **ES** [[APP-224](#)] and **Volume 1, Chapter 2, Section 2.9** of the **ES addendum** [[AS-181](#)]

and have been submitted at subsequent deadlines. These two sets of documents have a different status within the examination.

1.3.7 Draft licences and licensable method statements and mitigation strategies – these are submitted to the examination for information only. They form the applications to Natural England under the Wildlife and Countryside Act 1981 for protected species licences. The documents describe the species and activities which are licensable and the measures the applicant proposes to take to make these activities acceptable. Natural England will issue protected species licences with conditions that they consider appropriate as the regulator. These are included in the **Schedule of other Consents, licences and Agreements** (Doc Ref. 5.11(C)) These are:

- **Draft Sizewell C Project Bat Method Statement** (Doc Ref. 9.92 (A)) and **Main Development Site Bat Mitigation Strategy** [[APP-252](#)];
- **Main Development Site Draft Badger Licence Method Statement** [[REP5-049](#)] and **Main Development Site Badger mitigation strategy** [[APP-225](#)];
- **Main Development Site Draft Water Vole Licence** [[REP5-050](#)] and **Main Development Site Water Vole Mitigation Strategy** [[APP-252](#)];
- **Main Development Site Draft Natterjack Toad Licence** [[REP5-053](#)] and **MDS Natterjack Toad Mitigation Strategy** [[APP-252](#)];
- **Main Development Site Draft Deptford Pink Licence** [[REP5-052](#)];
- **Main Development Site Otter Draft Method Statement** [[REP5-051](#)];
- **Northern Park and Ride Draft Great Crested Newt Licence** [[REP7-025](#)];
- **Two Village Bypass Draft Badger Method Statement** [[REP5-054](#)];
- **Two Village Bypass Draft Water Vole Method Statement** [[REP5-055](#)];
- **Sizewell Link Road Draft Great Crested Newt Licence** [[REP7-026](#)]; and
- **Rail Draft Great Crested Newt Licence** [[REP7-087](#)]

1.3.8 Non-licensable method statements and mitigation strategies – these cover activities and species which are not protected by the Wildlife and

Countryside Act 1981 but require particular construction practices or mitigation measures. These are appended to and secured by the **CoCP** (Doc Ref. 10.2). They are Level 1 control documents and must be complied with pursuant to Requirement 2. Any changes to these statements and strategies must be approved by the Ecology Working Group. These are:

- **Main Development Site Bat Non-licensable Method Statement** (Doc Ref. Appendix D of 10.2);
- **Main Development Site Reptile Mitigation Strategy** (Doc Ref. Appendix C of 10.2);
- **Main Development Site Reptile Non-licensable Method Statement** (Doc Ref. Appendix E of 10.2);
- **Main Development Site Great Crested Newt Method Statement** (Doc Ref. Appendix F of 10.2);
- **Main Development Site Freshwater Fish and Aquatic Invertebrates Mitigation Strategy** (Doc Ref. Appendix A 10.2);
- **Bat Non-licensable Method Statement: Northern Park and Ride** (Doc Ref. Appendix B of 10.2);
- **Reptile Non-licensable Method Statement: Northern Park and Ride** (Doc Ref. Appendix C of 10.2);
- **Bat Non-licensable Method Statement: Southern Park and Ride** (Doc Ref. Appendix D of 10.2) ;
- **Reptile Non-licensable Method Statement: Southern Park and Ride** (Doc Ref. Appendix E of 10.2);
- **Bat Non-licensable Method Statement: Two Village Bypass** (Doc Ref. Appendix F of 10.2)];
- **Great Crested Newt Non-licensable Method Statement: Two Village Bypass** (Doc Ref. Appendix G of 10.2);
- **Otter Non-licensable Method Statement: Two Village Bypass** (Doc Ref. Appendix H of 10.2);
- **Reptiles Non-licensable Method Statement: Two Village Bypass** (Doc Ref. Appendix I of 10.2);
- **Bat Non-licensable Method Statement: Sizewell Link Road** (Doc Ref. Appendix J of 10.2);

- **Reptile Non-licensable Method Statement: Sizewell Link Road** (Doc Ref. Appendix K of 10.2);
- **Bat Non-licensable Method Statement: Yoxford** (Doc Ref. Appendix L of 10.2);
- **Bat Non-licensable Method Statement: Freight Management Facility** (Doc Ref. Appendix M of 10.2);
- **Reptile Non-licensable Method Statement: Freight Management Facility** (Doc Ref. Appendix N of 10.2);
- **Great Crested Newt Non-licensable Method Statement: Rail** (Doc Ref. Appendix O of 10.2); and
- **Reptile Non-licensable Method Statement: Rail** (Doc Ref. Appendix P of 10.2).

1.3.9 The **TEMMP** (Doc Ref. 10.28) is secured by Requirement 4. This Level 1 control document sets out the monitoring regimes that SZC Co. is committed to in relation to terrestrial ecology. This monitoring will be in addition to any monitoring required by Natural England as part of the protect species licence process.

1.4 Level 2: Subsequent Approvals (submitted post DCO/DoO)

1.4.1 On a project of this scale and complexity, it is not always possible for the Level 1 control documents to include the detail necessary to ensure that the correct practices and limits are applied in every context. Therefore, where appropriate, Level 2 documents must be produced for a further approval. In most cases the Level 2 documents submitted for approval must be in general accordance with the relevant Level 1 document. In their approval of Level 2 documents, the relevant discharging authority will consider compliance with the Level 1 control documents and whether any deviations are appropriate.

1.4.2 The **CoCP** (Doc Ref. 10.2) includes requirements for a series of Level 2 documents which will demonstrate how the controls in the **CoCP** (Doc Ref. 10.2) for particular environmental topics will be controlled across the project. These were collectively referred to as '*subject specific management plans*,' however, for clarity reference to this term has been removed and replaced by the specific names of the plans. These Level 2 plans will be subject to approval from the local planning authority and are to demonstrate to the relevant local authority how the measures within the **CoCP** (Doc Ref. 10.2) will be implemented throughout the construction of the project. These are:

- **Main Development Site Noise Monitoring and Management Plan**
(Draft: Doc Ref. Appendix B, Part B, **CoCP** Doc Ref 10.2)
- Associated Development Site Noise Monitoring and Management Plans (Draft: Doc Ref. Appendix A, Part C, **CoCP** Doc Ref.10.2);
- Main Development Site Dust Monitoring and Management Plan;
- Associated Development Dust Monitoring and Management Plan;
- Soil Management Plan;
- Materials Management Plan; and
- Waste Management Plan.

1.4.3 The **CoCP** (Doc Ref. 10.2) also refers to Level 2 documents which are secured and approved directly under the **DCO** (Doc Ref. 3.1(J)) or the **DoO** (Doc Ref 10.4) for completeness (e.g. the **Coastal Processes Monitoring and Mitigation Plan (Doc Ref. 10.5)**). Specific references have been added to the **CoCP** to provide clarity on where these Level 2 documents are secured.

1.5 Level 3: Implementation Documents

1.5.1 SZC Co. will require its contractors to prepare Construction Environment Management Plans (CEMPs) for its approval. These plans will demonstrate to SZC Co. how the specific works will be carried out in accordance with all relevant legislation and guidance: including the relevant Level 1 and Level 2 documents (most notably the **CoCP**, **Overarching Archaeological Written Scheme of Investigation** (Doc Ref. 10.24) , **TEMMP** (Doc Ref. 10.28) and the **Construction Method Statement** (Doc Ref.10.3). The **CoCP** (Doc Ref. 10.2) sometimes refers to particular elements of the CEMPS which are relevant to a particular topic to give context to SZC Co's confidence that the measure in the **CoCP** (Doc Ref. 10.2) will be complied with. The CEMPs will include, among other things:

- Environmental Incident Response Plan;
- Soil Resources Plan;
- Site waste management plan;
- AIL delivery and logistics plan;
- Emergency Flood Action Plan;

- Community Engagement Strategy;
- Fire prevention plans;
- Biosecurity control procedures plan; and
- Communicable disease management plan.

1.5.2 There are other Level 3 implementation documents which will be prepared by other bodies or groups under the **DoO**. These will explain how particular mitigation will be implemented where another body is responsible for the mitigation. These are as follows:

- Flood Risk Emergency Plans – prepared by the contractor and approved by SZC Co. in consultation with the Environment Agency;
- Private Housing Supply Plan - prepared by ESC and approved by the Accommodation Working Group;
- Tourist Accommodation Plan - prepared by ESC and approved by the Accommodation Working Group;
- PROW Communications Plan - prepared by ROW Working Group;
- Annual Tourism Fund Implementation Plan - prepared by ESC and approved by Accommodation Working Group; and
- Annual Skills Implementation Plan - prepared by Regional Skills Co-ordination Function (SCC).

1.6 Monitoring, Reporting and Governance

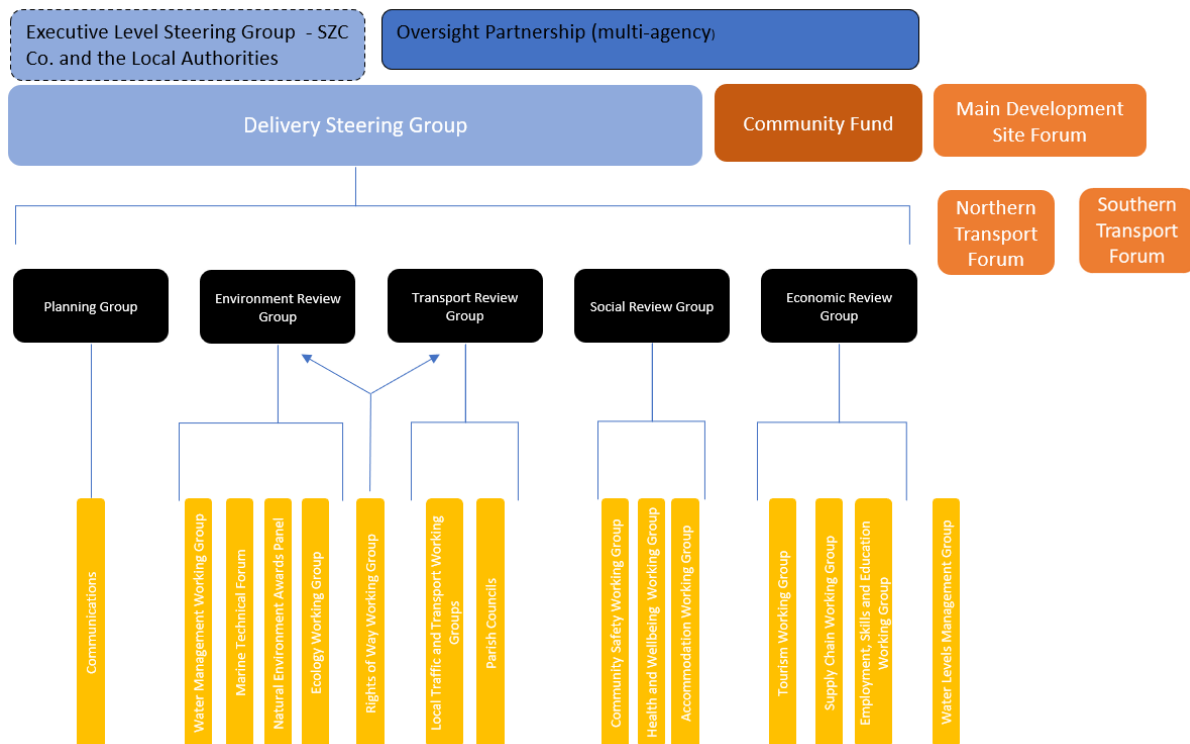
1.6.1 Monitoring and reporting will be provided to ESC, MMO, SCC, the Ecology Working Group, the Environment Review Group and Delivery Steering Group, as relevant. The governance groups are established by the **DoO**.

1.6.2 Through the Level 1 and Level 2 documents SZC Co. has or will set out detailed monitoring and reporting regimes. As the construction period is 9 to 12 years it is not inconceivable that the environmental setting may change and the potential harms identified in the EIA either do not come to pass or are different from what was predicted. The monitoring regimes have been carefully designed to ensure that data is captured on sensitive receptors and identified areas of harm. It has been designed to provide appropriate oversight of the implementation of the project for the discharging authority and other relevant statutory bodies to review the

effectiveness of mitigation and have regard to remedies that would be agreed with and implemented by SZC Co.

- 1.6.3 The **DoO** sets out a comprehensive governance structure (see **Plate 1**) which will review monitoring results and reports and agree any additional mitigation which is necessary as a result. The monitoring results will be reported to the relevant governance groups and the **DoO** gives authority to the groups to consider that data and instruct/agree particular actions in the event that certain triggers are reached. These triggers are set out in either the **DCO**, **DoO** or the Level 1 control documents; or there are situations where it is most appropriate for the governance group to agree the triggers as part of their approval of Level 2 documents.

Plate 2 Visual Representation of Governance Structure



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Table 1: Strategies and Plans Secured by the DCO

Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
CoCP (Doc Ref.10.2)	Main Development Site Dust Monitoring and Management Plan Associated Development Dust Monitoring and Management Plans Soil Management Plan Materials Management Plan Waste Management Plan	ESC	Rqt. 2	Environment Review Group
CoCP Part B and Part C: non-licensable method statements and mitigation strategies in paragraph 1.4.6.				Ecology Working Group
Freshwater Fish and Aquatic Invertebrates Mitigation Strategy (Appendix A, Part B, CoCP)				Ecology Working Group
CoCP Part B: Draft Main Development Site Noise Monitoring and Management Plan (Appendix B, Part B, CoCP)	Main Development Site Noise Monitoring and Management Plan			Environment Review Group

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
CoCP Part C: Draft Northern Park and Ride Noise Monitoring and Management Plan (Appendix A, Part C, CoCP)	Associated Development Sites Noise Monitoring and Management Plans			Environment Review Group
Overarching Archaeological Written Scheme of Investigation (Doc Ref.10.24)	Site-specific written schemes of investigation Site-specific post-excavation assessments Archaeological updated project design	SCC	Rqt. 3	Environment Review Group
Peat Strategy (Doc Ref. 10.25)	Peat archaeological written schemes of investigation	SCC	Rqt. 3	Environment Review Group
	Site-specific archaeological management plan	SCC	Rqt. 3	Environment Review Group
Terrestrial Ecology Monitoring and Mitigation Plan (Doc Ref. 10.28)		ESC	Rqt. 4	Ecology Working Group
Drainage Strategy (Doc Ref.10.14)	Drainage Strategy Update Details of surface and foul water drainage systems	SCC and ESC	Rqt. 5, 13A, 22	Water Working Group
	Construction Emergency Plan	SCC	Rqt 5A	n/a
Estate Wide Management Plan (Doc Ref. 10.15)		ESC	Rqt. 5C	Ecology Working Group

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
Rights of Way and Access Strategy (Doc Ref.10.26)	Public Rights of Way Implementation Plans	SCC	Rqt. 6A	Rights of Way Working Group
Main Development Site Water Monitoring and Response Strategy (Doc Ref.10.20))	Water Monitoring and Management Plan	ESC	Rqt. 7	Water Management Working Group
Draft Water Monitoring and Management Plan (Doc Ref.10.12)				
Draft Coastal Processes Monitoring and Mitigation Plan (Doc Ref.10.5)	Coastal Processes Monitoring and Mitigation Plan	ESC/ MMO	Rqt. 7A, DML 17	Marine Technical Forum
Construction Method Statement (Doc Ref.10.3)		ESC	Rqt. 8	Planning Group
Section 1.3 Lighting Management Plan (Doc Ref.10.17)		ESC	Rqt. 9	Environment Review Group
	SSSI Flood Risk Monitoring and Adaptive Defence Plan	ESC	Rqt. 12C	Environment Review Group
Outline Landscape and Ecology Management Plan (Doc Ref.10.22)	Landscape and Ecology Management Plan	ESC	Rqt. 14	Environment Review Group
Fen Meadow Strategy (Doc Ref.10.16)	Benhall and Halesworth Fen Meadow Plan	ESC	Rqt. 14A	Ecology Working Group

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
Draft Fen Meadow Plan (Doc Ref.10.6)	Pakenham Fen Meadow Plan	SCC		
Wet Woodland Strategy (Doc Ref.10.31)	Wet Woodland Plan	ESC	Rqt. 14B	Ecology Working Group
Draft Wet woodland plan (Doc Ref.10.13)				
[Westleton Marsh Harrier Compensatory Habitat Strategy (Doc Ref.10.30)] ¹	Marsh Harrier Implementation Plan	ESC	Rqt. 14C	Ecology Working Group
On-site Marsh Harrier Compensatory Habitat Strategy (Doc Ref.10.21)				
Section 1.4 Lighting Management Plan (Doc Ref.10.17)		ESC	Rqt. 15	Environment Review Group
Two Village Bypass Landscape and Ecology Management Plan (Doc Ref.10.29)		ESC	Rqt. 22A	Ecology Working Group
Sizewell Link Road Landscape and Ecology Management Plan (Doc Ref.10.27)		ESC	Rqt. 22A	Ecology Working Group
	Associated Development Land Restoration Scheme	ESC	Rqt. 24	

¹ If considered necessary by the Secretary of State

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
Draft Rail Noise Mitigation Plan (Doc Ref. 10.9)	Rail Noise Mitigation Plan	ESC	Rqt. 25	Environment Review Group
	Marine Environment Management Plans	MMO	DML 18	Marine Technical Forum
	Marine Archaeological Written Schemes of Investigation	MMO	DML 19	Marine Technical Forum
	Fisheries and Liaison Co-existence Plan	MMO	DML 20	Marine Technical Forum
Outline Vessel Management Plan (Doc Ref. 10.23)	Vessel Management Plans	MMO	DML 31a	Marine Technical Forum
	Maintenance Activities Plan	MMO	DML 34	Marine Technical Forum
	Sediment Sampling Plans	MMO	DML 36	Marine Technical Forum
	Aids to Navigation Management Plan	MMO	DML 38	Marine Technical Forum
Draft Marine Mammal Mitigation Protocol (Doc Ref. 10.8)	Marine Mammal Mitigation Protocol	MMO	DML 40	Marine Technical Forum
Draft Site Integrity Plan (Doc Ref.10.11)	Site Integrity Plan	MMO	DML 40	Marine Technical Forum
Draft Sabellaria Reef Management and Monitoring Plan (Doc Ref.10.10)	<i>Sabellaria</i> Reef Management and Monitoring Plan	MMO	DML 45	Marine Technical Forum

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
Draft Fish Impingement and Entrainment Monitoring Plan (Doc Ref.10.7)	Fish Impingement and Entrainment Monitoring Plan	MMO	DML 50	Marine Technical Forum
	Smelt Monitoring and Mitigation Plan	MMO	DML 51	Marine Technical Forum

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Table 2: Strategies and Plans Secured by the DoO

Level 1 Control Document	Level 2 Documents for Approval	Approval by	Securing Mechanism	Relevant Governance Group
	Private Housing Supply Plan (prepared by ESC)	AWG	DoO Sch 3	Accommodation Working Group
	Tourist Accommodation Plan (prepared by ESC)	AWG	DoO Sch 3	Accommodation Working Group
	Construction Workforce Delivery Strategy including an Apprenticeship Strategy (prepared by SZC Co.)		DoO Sch 7	Employment, Skills and Education Working Group
	Annual Skills Implementation Plans (prepared by SCC)	Economic Review Group	DoO Sch 7	Employment, Skills and Education Working Group
	Operational Employment Strategy (prepared by SZC Co.)	Employment, Skills and Education Working Group	DoO Sch 7	Employment, Skills and Education Working Group
Supply Chain Work Plan			DoO Sch 7	Supply Chain Working Group
Implementation Plan (Annex H, DoO (Doc Ref.10.4))			DoO Sch 9	Planning Group

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	Sports Facilities Management Plan (prepared by ESC)	SZC Co	DoO Sch 10	N/A
Informal Recreation and Green Space Proposals (Annex AB, DoO (Doc Ref. 10.4)))	Informal Recreation and Green Space Plan (prepared by SZC Co.)	ESC	DoO Sch 11	Environment Review Group
Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary (Annex V, DoO (Doc Ref.10.4)			DoO Sch 11	Environment Review Group
Monitoring and Mitigation Plan for Minsmere-Walberswick and Sandlings (North) (Annex U, DoO (Doc Ref.10.4)			DoO Sch 11	Environment Review Group
Noise Mitigation Scheme (Annex W, DoO (Doc Ref. 10.4))			DoO Sch 12	Environment Review Group
	Annual Tourism Fund Implementation Plan and subsequent Tourism Fund Implementation Plans (prepared by ESC)	Tourism Working Group	DoO Sch 13	Tourism Working Group
	Traffic management and monitoring system	SCC	DoO Sch 16	Transport Review Group
	Signage Strategy (prepared by SZC Co)	SCC	DoO Sch 16	Transport Review Group
Construction Traffic Management Plan (Annex K, DoO (Doc Ref.10.4)			DoO Sch 16	Transport Review Group

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Construction Worker Travel Plan (Annex L, DoO (Doc Ref.10.4))			DoO Sch 16	Transport Review Group
Traffic Incident Management Plan (Annex M, DoO (Doc Ref.10.4))			DoO Sch 16	Transport Review Group
Operational Travel Plan Principles (Annex J, DoO (Doc Ref.10.4))	Operational Travel plan (prepared by SZC Co)	SCC	DoO Sch 16	Transport Review Group
	PROW Communications Plan (prepared by the Rights of Way Working Group)		DoO Sch 16	Rights of Way Working Group
	AIL Route Scheme (prepared by SZC Co)	SCC	DoO Sch 16	Transport Review Group
	AIL Escort Guide (prepared by SZC Co)	Transport Review Group	DoO Sch 16	Transport Review Group

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