



The Sizewell C Project

6.1 Volume 1 Introduction to the Environmental Statement
Chapter 6 EIA Methodology
Appendix 6C - Responses to EIA Scoping Opinion Comments

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CONTENTS

| | | |
|---|--|----|
| 1 | Introduction..... | 1 |
| 2 | Response to comments received from the Planning Inspectorate..... | 2 |
| 3 | Response to comments received from other consultation bodies | 48 |

1 Introduction

- 1.1.1 This appendix has been prepared in response to paragraph 1.1.3 of the Planning Inspectorate's Scoping Opinion (2019) for the Sizewell C Project included as **Appendix 6B** of this volume; “*The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES*”.
- 1.1.2 Two tables have been prepared for clarity, one to summarise the responses to the Planning Inspectorate’s comments (**Table 1.1**) and the other to summarise the responses to other consultation bodies (**Table 1.2**) that were consulted by the Planning Inspectorate and included within Appendix 2 of the 2019 Planning Inspectorate's Scoping Opinion (**Volume 1, Appendix 6B**).



2 Response to comments received from the Planning Inspectorate

Table 1.1: Response to comments received from the Planning Inspectorate

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|-------------------------|----------------------------------|---------------------------|---|---|
| Sizewell C Project Wide | The Proposed Development | 2.2.1 | Very little information is provided in the Scoping Report regarding the existing land use and the features in the surrounding area of the Proposed Development. In addition to detailed baseline information to be provided within aspect specific chapters of the ES, the Inspectorate would expect the ES to include a section that provides an overview of the context of the Proposed Development, including information on any relevant designations and sensitive receptors. The ES should identify land that could be directly or indirectly affected by the Proposed Development as well as any associated off-site mitigation proposals. | The introductory chapters (Chapter 1) of Volumes 2 to 9 of the Environmental Statement (ES) provide an overview of the site and surrounding area, including information on land use, environmental features and sensitive receptors. These are also illustrated in a figure which accompanies the chapter. Further details on the site and surrounding area provided in the baseline sections of each of the topic chapters. |
| ES Preparation | The Proposed Development | 2.2.2 | The anticipated areas in hectares and proposed dimensions (maximum and minimum heights, footprints etc) of structures are not provided in the Scoping Report project description. The project description in the ES must include sufficient detail to understand the parameters which form the basis of the assessment of environmental effects. This should include the proposed dimensions of buildings, structures and the land use requirements through all phases of the Proposed Development (demolition, construction, operation, and decommissioning). The proposed ground level above ordnance datum (AOD) should also be provided for all structures and areas of made-up ground. | Details of proposed development which form the basis of the assessment of environmental effects are provided in Chapters 2 to 4 of Volume 2 and Chapter 2 of Volumes 3 to 9 of the ES and associated appendices. This includes information on : <ul style="list-style-type: none"> • The general site layout, site access, buildings and structures (where applicable), utilities and drainage, landscaping, security and lighting; • The parameters which identify defined envelopes within which future development would be undertaken; • The sequence and methods for construction, including material quantities and number of construction personnel and vehicles; • The operation of the proposed developments; and • The removal and reinstatement of temporary associated development sites (where applicable). The level of information presented within the ES is considered sufficient to assess the likely significant environmental effects and mitigation measures to be identified. |
| ES Preparation | The Proposed Development | 2.2.3 | Paragraph 3.2.3 of the Scoping Report refers to Figure 3.1 for the locations of the four components of the main development site. The text does not follow the numbering shown on Figure 3.1, making it more difficult to correspond and confirm the respective location and extent of features depicted. The ES must clearly present this information | An accurate description of the location and extent of the main development site is provided within Volume 2 Chapters 2 to 4 of the ES and is accompanied by figures and associated appendices. |
| Main Development Site | Supporting Information / Studies | 2.2.4 | Appendix 1A of the Scoping Report states that "studies confirming the stack height are expected to be completed in late 2014 to inform the radiological assessment". The Scoping Report makes no reference to stack height or information regarding the results from the previous study. The ES should include results from relevant stack height studies and where relevant this information should influence assessments in other aspect chapters, such as landscape and visual impacts and the assessment of air quality impacts. | A stack height assessment for the diesel generators, including dispersion modelling, was undertaken for the purposes of environmental permitting and to ensure compliance with Best Available Techniques (BAT). This assessment gave due consideration to minimising ground-level air quality impacts and the increased visual impacts of a taller stack. The nuclear auxiliary stacks would discharge gaseous radioactive effluent during the operational phase and SZC Co. has therefore optimised radiological impacts through the application of BAT for the purposes of environmental permitting and balanced this against the visual impacts of increasing the stack height. Details on the stack heights are provided in Volume 2, Chapter 2 , and summary stack height assessments is provided in Chapter 6 of the same volume. The air quality and radiological impact assessments are provided in Chapters 12 and 25 of Volume 2 of the ES respectively. |
| ES Preparation | Figure Production | 2.2.5 | The ES should include the information necessary to clearly depict the proposed DCO boundary. If figures or plans are included for this purpose they should be clearly labelled to demonstrate the existing land use and the proposed construction and operational land use. Existing local features including those to be retained within the operational design and which are referred to in the assessment should also be shown clearly and labelled. | Chapter 1 of Volumes 2 to 9 include a figure which clearly depicts the proposed DCO boundary for all SZC Project sites. These chapters also include figures which provide information on the existing land use, environmental features and sensitive receptors for the site and surrounding area. Chapters 2 to 4 of Volume 2 and Chapter 2 of Volumes 3 to 9 , and accompanying figures and associated appendices, provide a description of the proposed development and extent. |

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| ES Preparation | Temporary Elements | 2.2.6 | The ES must provide a detailed description of all the permanent and temporary works which form part of the Proposed Development applied for in the dDCO. The ES should describe the anticipated lifetime of any temporary elements (eg the entire construction period or a part thereof). The Scoping Report states in Paragraph 6.21.91 that temporary structures will be designed in such a way as to facilitate their deconstruction at the end of their lifetime. The features of their design should be described in the ES where relevant to the assessment of likely significant effects. | Details of permanent and temporary works which form part of the proposed development are summarised in Chapters 2 and 3 of Volume 2 of the ES and within Chapter 2 of Volumes 3 to 9 . The ES describes the anticipated lifetime of temporary works and a sufficient description is provided to allow the likely significant effects of the construction phase to be identified. |
| Off Site Associated Development | Road and Rail Strategy | 2.2.7 | The Scoping Report does not provide clear detail regarding the proposed approach to the delivery of the road or rail led transport strategy. The Inspectorate is unclear how and when the decision to pursue one or both strategies will be made. The Applicant should ensure that the approach to the implementation of the transport strategy is agreed early in the process as this will form the basis of the assessments in the ES. The ES should describe the proposed works and explain how they form part of the chosen strategy. If decisions relating to this option are to be deferred or options are pursued (see comments under Alternatives and Flexibility, below) the ES should ensure that any flexibility of this sort is addressed and appropriately assessed decisions relating to this option are to be deferred or options are pursued (see comments under Alternatives and Flexibility, below) the ES should ensure that any flexibility of this sort is addressed and appropriately assessed. | <p>Following EIA Scoping in 2019, the integrated transport strategy was consulted on in the Stage 4 Consultation which combines elements of both road and rail access strategies. This included an explanation about how it would be delivered and implemented.</p> <p>SZC Co. has chosen the integrated transport strategy as the transport strategy for the Sizewell C Project, and this strategy has been assessed by the EIA.</p> <p>A summary of the alternative considerations for the transport strategy are provided in Volume 1, Chapter 4, together with an indication of the main reasons for selecting the chosen option and comparison of the environmental effects.</p> <p>Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 provide a description of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co.</p> <p>Further details on the transport strategy are provided in the Transport Assessment (Doc Ref. 8.05).</p> |
| Off Site Associated Development | The Proposed Development | 2.2.8 | The Inspectorate considers that where a DCO application includes works described as 'Associated Development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as Associated Development. This could be presented in a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008. | <p>The ES has been structured such that the assessments of the main development site and associated development sites are provided within separate volumes. Each of these volumes presents an assessment of the likely significant environmental effects of the Sizewell C Project during construction, operation and removal and reinstatement phases (where relevant).</p> <ul style="list-style-type: none"> • Volume 1 - Introduction • Volume 2 - Main development site • Volume 3 - Northern park and ride • Volume 4 - Southern park and ride • Volume 5 - Two village bypass • Volume 6 - Sizewell link road • Volume 7 - Yoxford roundabout and other highway improvements • Volume 8 - Freight management facility • Volume 9 - Rail • Volume 10 - Cumulative and transboundary effects. <p>The ES has therefore been presented to ensure that the effects that primarily derive from the main development site and the various associated development sites can be fully understood.</p> |
| Two Village Bypass | The Proposed Development | 2.2.10 | Paragraph 3.5.2 states that the Two Village Bypass will form a new section of the A12 and remain as a legacy element of the proposals (this element is also described as forming part of both transport strategies). The ES should explain what will happen to the bypassed section of the existing A12 as a result of the proposals and assess any significant effects. Similarly, the fate of other sections of existing highway that would become disused due to the other proposed highways works should be described in the ES and any significant effects assessed. | <p>The ES provides a description of the proposed two village bypass (including details on construction and operation) in Chapter 2 of Volume 5. The existing section of the A12 through the two villages would be retained and downgraded. An assessment of the likely significant environmental effects associated with these proposals is presented in Chapters 4 to 12 of Volume 5 of the ES.</p> <p>The effects on the existing transport network, including the section that is bypassed, is assessed as relevant. This is reported within Volume 5, Chapters 4 (Noise and Vibration) and 5 (Air Quality), as well as in Volume 2, Chapters 10 (Transport), 11 (Noise and vibration) and 12 (Air quality) which presents the impact assessment of changes in traffic across the network to understand if there is the potential for significant adverse effects.</p> |

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| Off Site Associated Development | The Proposed Development | 2.2.11. | A number of new structures including bridges, drainage infrastructure, lighting columns, and signage are proposed as part of the off-site associated development. The ES should ensure that these are adequately described and that relevant design parameters are appropriately secured in the dDCO. Further comments relating to the assessment impacts associated with these structures are provided in the aspect tables in Section 4 of this Opinion. | A description of the permanent and temporary works and structures which form part of the associated development sites is provided in Chapter 2 of Volumes 2 to 9 of the ES . Relevant design parameters would be secured through the DCO, where necessary. |
| Other Highway Improvements (A140/B1078) | The Proposed Development | 2.2.12 | It is noted that the A140/B1078 off-site associated development is not illustrated on any plans provided with the Scoping Report, however plans are provided for the other off-site associated developments. The ES should be accompanied by a complete suite of plans which show the entire Proposed Development on which the assessment of significant effects has been based. | Chapter 2 of Volume 7 (Yoxford Roundabout and Other Highway Improvements) includes a description of the proposed improvements and indicative locations for highway safety measures (including the A140/B1078 junction west of Coddendam). Figures which show the highway improvements and highway safety measures are included within this chapter. |
| Main Development Site | Sizewell B relocated facilities | 2.2.13 | The Inspectorate notes the information in Paragraphs 3.2.6 to 3.2.8 of the Scoping Report regarding the parallel application for proposed relocation of Sizewell B facilities, made separately to the local planning authority, East Suffolk Council (ESC). The Scoping Report states that the proposed relocation of Sizewell B facilities will also be included within the Proposed Development dDCO application so that the ES can consider these works. Limited information has been provided about the nature of the Sizewell B Facilities relocation works, and they have not been included in the description of the Proposed Development. It has therefore not been possible to include specific comments regarding these activities in this Scoping Opinion. If these works are to be included within the dDCO, a full description and assessment of the likely significant effects made must be included in the ES. | The Sizewell B Relocated Facilities proposals have been consented by a separate planning permission (ref DC/19/1637/FUL) and are included within Volume 2, Chapters 2 to 4 . Each of the topic chapters present the assessment of Sizewell B Relocated Facilities in the context of the works proposed in the Sizewell C Project DCO application. Where there is the potential for the environmental effects described within the Sizewell B Relocated Facilities ES to alter as a result of the proposed Sizewell C Project proposals, these are detailed in the chapters. The ES for the Sizewell B Relocated Facilities is included within the ES as Volume 1, Appendix 2A . |
| Other Rail Improvements | The Proposed Development | 2.2.13 | The Inspectorate notes from Network Rail's response in Appendix 2 that some works to existing rail infrastructure would be undertaken under separate consent. The ES should assess all likely significant effects associated with works necessary for the Proposed Development regardless of the consent route followed. The consenting route should be clearly stated in the ES so that the decision maker is able to discern the effects that are directly applicable to the DCO. | A description of the works to existing rail infrastructure and an assessment of their likely significant effects is presented within Volume 2 and Volume 9 of the ES . This includes track upgrades to the Saxmundham to Leiston branch line and upgrades to up to eight level crossings. The majority of the land for these upgrade works is within the existing rail or highway boundary. SZC Co. is in discussions with Network Rail about the most appropriate way for the works to be carried out but is applying for the required powers over all of the land necessary for the development. |
| ES Preparation | Construction Phasing | 2.2.14 | Phasing of the main development site is discussed in Paragraphs 3.3.9 to 3.3.15, and phasing of the off-site associated development is outlined in Paragraphs 3.4.11, 3.5.7, 3.6.4, 3.7.8, and 3.8.6. The ES should clearly set out the proposed phasing of works and include details such as, the anticipated timescales associated. Such detail will be relevant to assessments in the ES. This should include information on how the timescales of the relocation of the Sizewell B facilities and of the off-site associated development are related to the phasing of the main development site. | The overarching construction programme for the Sizewell C Project is presented within Volume 1, Chapter 2 , which includes information on the relationship between the phasing of the main development site and associated development, as well as Sizewell B Relocated Facilities works. More detailed descriptions of the construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES . The Sizewell B Relocated Facilities proposals are described in Volume 2, Chapters 2 to 4 . |
| ES Preparation | Glossary | 2.2.15 | The project description in the Scoping Report occasionally introduces previously unmentioned terminology (eg Fish Recovery and Return system, the abbreviation ISFS (Interim Spent Fuel Store)) either with no further explanation or explanation only in later paragraphs. The Applicant should ensure that technical terms and associated acronyms introduced in the ES are described at first mention. The Inspectorate encourages the inclusion of a glossary or other reference material in the ES for this purpose. | A glossary of terms and list of abbreviations relevant to the Sizewell C Project and ES is provided as Volume 1, Appendix 1A of the ES . |

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| Main Development Site | The Proposed Development | 2.2.16 | The Scoping Report describes various phases of earthworks including those required to establish the 'main development site platform' at 7.3m AOD, the flood defences, a beach landing facility, and excavations including borrow pits. Reference is made to sourcing material from within the 'temporary construction site' or from off-site areas. The ES should explain the anticipated quantity and likely source of material required to deliver the Proposed Development. The ES should also describe the anticipated phasing of earthworks and restoration works if applicable. The location and extent of borrow pits, the northern mound, stockpiles and other earthworks should be described in the ES with reference to the works to be secured in the dDCO. | Volume 2, Chapter 3 provides a description on the various phases of earthworks from site stripping in phase 1 to removal and reinstatement in phase 5. A Materials Management Strategy (Volume 2, Appendix 3A) and Conventional Waste Management Strategy (Volume 2, Appendix 8A) have been prepared, and together with Chapter 3 of Volume 2 , include the details of anticipated quantities and the source of materials (whether excavated from within the site, or imported from off-site) required to deliver the Sizewell C. In addition, the location and extent of borrow pits, the northern mound, stockpiles and other earthworks are described in Chapter 3 with reference to how the works would be secured. An assessment of proposed development is presented in Volume 2 Chapters 7 to 28 , as relevant. |
| ES Preparation | Construction Methodology | 2.2.17 | The Inspectorate considers that where relevant to the assessments, the ES should provide information on the construction methods and activities associated with each phase; siting and size of construction compounds (including on and offsite); lighting equipment/requirements; and number, movements and parking of construction vehicles (both heavy goods vehicles (HGVs) and staff. Information should also be provided within the ES on whether any construction activities are restricted to a particular time of year. | Details of construction methods and activities associated with each component of the Sizewell C Project are presented within Chapter 3 of Volume 2 and Chapter 2 of Volumes 3 to 9 , this includes details on temporary construction compounds, lighting, HGV movements and parking, and construction workers. The information provided in these chapters has been used to inform the assessments undertaken and is considered sufficient to assess the likely significant effects of the Sizewell C Project and identification of appropriate mitigation measures. |
| Main Development Site | The Proposed Development | 2.2.18 | The descriptions of the cooling systems (including seawater intake and outflow), anticipated liquid discharges, spent fuel, and gaseous emissions in Chapter 3 of the Scoping Report are at a high level. The project description in the ES should provide a full description of these processes, with further detail in the technical assessments where relevant, of the anticipated nature and quantity of materials or substances used and produced in the construction, operation and decommissioning of the Proposed Development. | A detailed description of the proposed cooling systems and the associated processes are provided within Chapter 4 of Volume 2 . |
| Main Development Site | The Proposed Development | 2.2.19 | The description of the Proposed Development in the ES should include sufficient explanation of the proposed facilities and processes for the management of spent fuel, in order to allow the decision-maker to have confidence that safe, secure and environmentally acceptable interim storage arrangements will be available. The ES should assess the significant environmental effects of spent fuel management, including the treatment and transport of Low Level Waste (LLW) mentioned in Paragraph 3.12.11 of the Scoping Report. Further comment is provided in Section 4 of this Opinion. | Chapter 7 of Volume 2 presents an overview of the proposed arrangements for the management and storage of radioactive wastes and spent fuel arising during operation of the Sizewell C power station. The potential environmental effects associated with direct dose and discharges are considered in Chapter 25 of Volume 2 . |
| Main Development Site | The Proposed Development | 2.2.20 | The Scoping Report identifies the anticipated electricity generation of the power station itself but does not provide information on the energy demand and energy used by other elements of the Proposed Development, for example details of the CHP plant associated with the proposed accommodation campus. This information should be provided in the ES, where relevant to the assessments of significant effects. | Volume 2, Chapters 2 to 4 provide a description of energy requirements, and associated plant for the project, including the potential option for CHP for the accommodation campus. An assessment of such plant is presented in Volume 2, Chapters 7 to 28 , as relevant. |

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| Main Development Site | Operation and Maintenance | 2.2.21 | Information on the operation and maintenance of the Proposed Development should be included in the ES where relevant to the assessments, regarding the number of full/part-time jobs; the operational hours and if appropriate, shift patterns; and the number and types of vehicle movements generated during the operational stage. A distinction may need to be made between normal operation and specific operations, for example outage periods, to demonstrate the basis for the assessment of significant environmental effects | Details of operation and maintenance of the main development site are provided within Chapter 4 of Volume 2 , this includes normal operations and outages. Details of the operation and maintenance of the associated development sites are provided within Chapter 2 of Volumes 3 to 9 . Details within these chapters includes details on workforce/staff, operational hours and the number and types of vehicle movements, as relevant to the site. |
| ES Preparation | Decommissioning | 2.2.22 | The Inspectorate acknowledges that decommissioning will be subject to a separate consent(s) from the Office for Nuclear Regulation (ONR) under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999. The Inspectorate welcomes the inclusion of a high-level environmental assessment of the decommissioning of the Proposed Development within the ES and considers that the process and methods of decommissioning should be explained and options presented in the ES, where possible. The assessment should provide information about the predicted future baseline which has been applied to the assessment of decommissioning effects. The estimated timescales for the life span of the Proposed Development should also be set out, along with an indication of the certainty in this regard. The sensitivity of the findings in the assessment to any departure or deviation from the estimated timescales should be explained. | Details on the decommissioning of Sizewell C as well as a high-level assessment of the potential environmental effects are provided within Chapter 5 of Volume 2 . |
| Main Development Site | Spent Fuel storage | 2.2.23 | The Inspectorate notes that the operational life of the Sizewell C power station is anticipated to be 60 years, while the life of the spent fuel storage element of the development would be at least 100 years, and is anticipated to be capable of operating independently beyond the life of the operational power station. The ES should describe how the facilities associated with the management of spent fuel storage are likely to be maintained and assess any significant effects associated with these activities. | An overview of the proposed arrangements for the management of radioactive wastes and spent fuel arising during operation of the Sizewell C power station is provided within Chapter 7 of Volume 2 . No significant adverse effects are predicted. |
| ES Preparation | Reinstatement | 2.2.24 | The Scoping Report describes works to remove the temporary elements of the Proposed Development but provides limited detail. The ES should provide full details of the nature of these works including the anticipated phasing and reinstatement proposals, including how they are to be secured in the dDCO. The ES should assess the likely significant effects which could arise from the removal of the temporary elements of the Proposed Development. | Details of the removal and reinstatement works are detailed within Chapter 3 of Volume 2 and Chapter 2 of Volumes 3, 4, 8 and 9 . Where relevant, an assessment of the removal and reinstatement works of the temporary elements of the Sizewell C Project is presented in each of the technical assessment chapters of the volumes noted above. |
| ES Preparation | Alternatives | 2.2.26 | The Inspectorate notes that no alternatives will be considered for the location of the Sizewell C site and the design of the reactors, as these have been determined through a site selection assessment and the UK Generic Design Assessment (GDA) process. The Inspectorate acknowledges the Applicant's intention to consider alternatives in respect of the design and layout of remaining aspects of the Proposed Development within the ES and notes the information in Chapter 4 of the Scoping Report. The Inspectorate would expect to see a discrete section in the ES that provides details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects. | Volume 1, Chapter 4 of the ES provides details of the main strategic alternatives considered by SZC Co. relevant to the Sizewell C Project, and includes details of the alternatives considered for the accommodation infrastructure, movement of people and movement of materials. In addition, Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 of the ES provide a summary of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co. including details of alternatives in respect of design and layout. |

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| ES Preparation | Alternatives | 2.2.27 | Paragraph 4.3. of the Scoping Report addresses the selection process of the transport strategy which will form the final design. The Scoping Report states that the ES will include a justification for the strategy selected for the final design including the consideration of environmental effects. The Inspectorate is unclear whether the decision to pursue one or both strategies will be made prior to completion of the ES. If a decision will not have been made and both strategies are to be assessed in the ES, the ES should clearly set out the anticipated environmental effects associated with both alternative transport strategies or identify a worst case using appropriate parameters and assumptions. | <p>Following EIA Scoping in 2019, the integrated transport strategy was consulted on in the Stage 4 Consultation which combines elements of both road and rail access strategies. SZC Co. has chosen the integrated transport strategy as the transport strategy for the Sizewell C Project, and this strategy has been assessed by the EIA.</p> <p>A summary of the alternative considerations for the transport strategy are provided in Chapter 4 of Volume 1, together with the main reasons for selecting the chosen option and comparison of the environmental effects.</p> <p>Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 provide a description of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co.</p> <p>Further details on the transport strategy are provided in the Transport Assessment (Doc Ref. 8.05).</p> |
| ES Preparation | Alternatives | 2.2.28 | The Scoping Report does not provide clear detail regarding the proposed approach to delivery of the road or rail led transport strategy. The Applicant should ensure that the approach to the implementation of the transport strategy is agreed early in the process as this will form the basis of the assessments in the ES. The ES should clearly set out the proposed works that form the chosen strategy. | SZC Co. has chosen the integrated transport strategy as the transport strategy for the Sizewell C Project. The transport strategy is described in the Transport Assessment (Doc Ref. 8.05). The integrated strategy has been assessed by the EIA and reported in the ES . |
| ES Preparation | The Proposed Development | 2.2.30 | The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. | Details of parameters or limits which form the basis of the assessment of environmental effects are provided in Chapters 2 to 4 of Volume 2 and Chapter 2 of Volume 3-9 of the ES. Any design assumptions upon which the assessment is based, these are clearly set out in these chapters. The description of the development provided is considered to be adequate to comply with the requirements of Regulation 14 of the EIA Regulations 2017. |
| ES Preparation | The Proposed Development | 2.2.31 | It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion | The proposed development remains materially the same as that which was subject to the July 2019 Scoping Opinion issued under the 2017 EIA Regulations and therefore a new scoping opinion has not been requested. In line with Regulation 14, the ES is based on the most recent scoping opinion adopted (July 2019). |
| ES Preparation | The Proposed Development | 2.2.32 | The Scoping Report makes particular note of the uncertainty regarding the chosen transport strategy for the Proposed Development, as the Scoping Report does not explicitly state that either the road-led or rail-led (not both) will be taken into the assessment in the ES, although it is understood from the Scoping Report that only one will be implemented. With regard to the comments above regarding Regulation 14 of the EIA Regulations the Inspectorate strongly advises that a strategy is decided upon prior to making an application for development consent. | SZC Co. has chosen the integrated transport strategy as the transport strategy for the Sizewell C Project. The transport strategy is described in the Transport Assessment (Doc Ref. 8.05). The integrated strategy has been assessed by the EIA and reported in the ES . |
| ES Preparation | Scope | 3.1.2 | Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. | In line with Regulation 14, the ES has been based on the July 2019 Scoping Opinion which comprises the most recent adopted scoping opinion and no matters are scoped out apart from those specifically set out by the 2019 Scoping Report and agreed by the July 2019 Scoping Opinion. Where further consultation has been undertaken following the submission of the 2019 EIA Scoping Report, this is detailed within Volume 1, Appendices 6D to 6Y . The proposed development remains materially the same as that described by the 2019 Scoping Report. |

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| ES Preparation | Scope | 3.1.3 | The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken. | In line with Regulation 14, the ES has been based on the July 2019 Scoping Opinion which comprises the most recent adopted scoping opinion and no matters are scoped out apart from those specifically set out by the 2019 Scoping Report and agreed by the July 2019 Scoping Opinion. Where further consultation has been undertaken following the submission of the 2019 EIA Scoping Report, this is detailed within Volume 1, Appendices 6D to 6Y . The proposed development remains materially the same as that described by the 2019 Scoping Report. |
| ES Preparation | Scope | 3.2.1 | The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES. | Details of environmental requirements identified within the NPSs in relation to each of the technical assessments are included within Appendices 6D to 6Y of Volume 1 of the ES (which set out the relevant legislation and methodology for each technical topic) and within Chapter 1 of Volume 10 of the ES . |
| ES Preparation | Scope | 3.3.1 | The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables: <ul style="list-style-type: none"> • to demonstrate how the assessment has taken account of this Opinion; • to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects; • to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement); • to describe any remedial measures that are identified as being necessary following monitoring | This appendix has been prepared to demonstrate how SZC Co. has taken account of the Scoping Opinion. Summary tables are included within each technical assessment to detail the residual effects (after mitigation), and includes a summary of the proposed mitigation and/or monitoring measures. Volume 10 (Cumulative and Transboundary Effects) of the ES describes the interrelationship and cumulative effects. A mitigation schedule has also been prepared and submitted with the DCO application in the Mitigation Route Map (Doc Ref. 8.12) which summarises the proposed mitigation and monitoring measures and sets out the securing mechanisms. |
| ES Preparation | HRA | 3.3.2 | It is noted from Natural England's response in Appendix 2 that the Proposed Development lies within the Outer Thames Estuary Special Protection Area (SPA) and the Southern North Sea Special Area of Conservation (SAC) and lies adjacent to other internationally designated sites. The ES should be co-ordinated with the information submitted to inform an assessment under the Habitats Regulations (Habitat Regulation Assessment (HRA) report). | The Shadow HRA Report (Doc Ref. 5.10) assesses the potential for effects on the European sites referred to and the assessment aligns with that undertaken for the terrestrial ecological assessments presented in Volumes 2 to 9 of the ES . |
| ES Preparation | Project-Wide | 3.3.4 | The Scoping Report states that Volume 2 will also include 'project-wide' assessments but does not detail the assessments this refers to. The Inspectorate advises that the ES should clearly set out this information. The Inspectorate appreciates the scale of the Proposed Development and why it may be advantageous to structure the ES in the way proposed. However, the Inspectorate is concerned that the above approach will make it difficult to understand the significant environmental effects of the Proposed Development in the entirety, and risks assessing each individual element in isolation. The assessments in the ES must explain the overall effects of the Proposed Development and the Inspectorate advises that the 'project-wide' assessments are given careful consideration to ensure a robust approach is applied. | Where an assessment presented in Volume 2 of the ES does not inherently consider effects at a project level, an assessment of project-wide effects is included within Chapter 3 of Volume 10 . |
| ES Preparation | Alternatives | 3.3.5 | It remains unclear from the outline structure set out above whether the ES will assess one or both of the road-led or the rail-led transport strategies. The Inspectorate reiterates the comments above in Section 2 of this Opinion regarding refinement of the design options. Should both options form part of the application, the ES must fully assess these options using appropriate assessment techniques. | SZC Co. has chosen the integrated transport strategy as the transport strategy for the Sizewell C Project. The transport strategy is described in the Transport Assessment (Doc Ref. 8.05). The integrated strategy has been assessed by the EIA and reported in the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|-----------------------|---------------------------------|---------------------------|--|--|
| Main Development Site | Sizewell B relocated facilities | 3.3.6 | The Scoping Report states that the relocation of the Sizewell B facilities will form part of the dDCO, while these works are not described in detail in the Scoping Report they are listed along with the permanent works identified in Paragraph 3.3.6. It has therefore been assumed that they are intended for inclusion in the request for a Scoping Opinion for the Proposed Development. The limited description hampers the ability to provide specific comments regarding these works and so the Scoping Opinion does not extend to address these elements of the Proposed Development. | The Sizewell B Relocated Facilities proposals are included within Volume 2, Chapters 2 to 4 . Each of the topic chapters within Volume 2 present the assessment of Sizewell B Relocated Facilities in the context of the works proposed in the Sizewell C Project DCO application. Where there is the potential for the environmental effects described within the Sizewell B Relocated Facilities ES to alter as a result of the proposed Sizewell C Project proposals, these are detailed in the chapters. The ES for the Sizewell B Relocated Facilities is included within the ES as Volume 1, Appendix 2A . |
| Main Development Site | Sizewell B relocated facilities | 3.3.7 | The Inspectorate notes the proposed approach to append and cross-refer to the ES which accompanied the application to ESC for the relocation of the Sizewell B facilities. Comments are provided elsewhere in this Opinion regarding consideration of changes to the works or to the receiving baseline environment, and the Inspectorate considers that the proposed approach is likely to make interpretation of the ES more difficult. The Inspectorate advises that the ES for the Proposed Development must assess the proposals to be included in the DCO in their entirety and include a complete assessment of the likely significant effects of the Proposed Development including any works subject to parallel consenting or permitting regimes. | The ES for the Sizewell B Relocated Facilities is included within the ES as Volume 1, Appendix 2A . However, each of the topic chapters Volume 2 present the assessment of Sizewell B Relocated Facilities in the context of the works proposed in the Sizewell C Project DCO application. Where there is the potential for the environmental effects described within the Sizewell B Relocated Facilities ES to alter as a result of the proposed Sizewell C Project proposals, these are detailed in the chapters. |
| ES Preparation | Project-Wide | 3.3.8 | Table 7.1 of the Scoping Report states that waste management and emissions to soils and agricultural land, major accidents and disasters, and climate change effects will be addressed in Volume 2 of the ES (although elsewhere in the Table it states that a chapter on climate change is proposed in each volume of the ES). This would imply that these matters are not to be considered as 'project-wide' but for the main development site only. The Inspectorate considers that these matters must be assessed where significant effects could occur for the Proposed Development in its entirety, including during the construction, operation, and reinstatement phases. The assessment should be carried out relevant to all elements of the Proposed Development including those that form the content of Volumes 3-9 of the ES. In this regard the Applicant is referred to comments in Paragraph 3.3.4 of this Opinion. | Whilst included as Chapters 8, 26 and 27 of Volume 2 , the waste management, climate change and major accidents and disasters assessments consider the effects of the Sizewell C Project in its entirety. |
| ES Preparation | Utilities | 3.3.9 | The Inspectorate recommends that the ES assess the significant environmental effects associated with the Proposed Development and its interaction with utility receptors/ infrastructure assets, such as (but not limited to) existing gas and water pipelines, overhead/underground electrical cables, sewer network, and potable water supply. This should include consideration of both onshore and offshore receptors and assess impacts during construction, reinstatement, and operation of the proposed development. | Existing utilities which cross the Sizewell C Project site may require diversion. Discussions with utility providers are underway to confirm whether utility infrastructure would need to be protected or diverted (where asset protection measures are not suitable) or whether there would be sufficient clearance from the works that they would not be affected. An appropriate approach would be agreed with the relevant statutory undertaker (i.e. the utility company) through a formal application and would include appropriate protective measures where required. |
| ES Preparation | Baseline | 3.3.10 | The ES should include a description of the baseline scenario with and without implementation of the Proposed Development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. | The ES provides this description of the current baseline conditions within Chapter 1 and each of the technical assessments presented within Volumes 2 to 9 of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|-----------------------|------------------------|---------------------------|--|---|
| ES Preparation | Baseline | 3.3.11 | In light of the number of ongoing developments within the vicinity of the Proposed Development application site, the Applicant should clearly state which developments will be assumed to be under construction or operational as part of the future baseline. As part of this, the relationship with the proposed relocation of the Sizewell B facilities must be fully explained. The ES for the Proposed Development must address where the assessments associated with the Sizewell B may be out of date (in light of changes to the works or evolving baseline conditions) and the implications for the assessments for the Proposed Development. | In line with Regulation 14, the ES also describes the likely future baseline conditions without implementation of the development. A description of the future baseline is included within each technical assessment of Volumes 2 to 9 of the ES . This includes reference to developments within the vicinity of the proposed development that are considered to form part of the future baseline. Volume 10, Appendix 1B presents the Short list of identified schemes and identifies if they form a cumulative scheme or part of the future baseline. Each of the topic chapters Volume 2 present the assessment of Sizewell B Relocated Facilities in the context of the works proposed in the Sizewell C Project DCO application. Where there is the potential for the environmental effects described within the Sizewell B Relocated Facilities ES to alter as a result of the proposed Sizewell C Project proposals, these are detailed in the chapters. |
| Main Development Site | Sizewell B | 3.3.12 | The Scoping Report does not explain what, if any, overlap is anticipated between the Proposed Development and the continued operation of Sizewell B and the decommissioning of Sizewell A. This information is relevant to the assessment of cumulative effects (see Table 4.22 in Section 4 of this Opinion) and should be addressed in the ES. | Decommissioning activities at Sizewell A and continued operational activity at Sizewell B are considered to form part of the existing baseline. The potential for cumulative effects is therefore inherent within the assessments. |
| ES Preparation | Construction Phasing | 3.3.13 | The Scoping Report outlines the assessment scenarios that will be considered but does not stipulate any timescales or phasing for the scenarios described. The ES should explain the timescales of the assessment scenarios including how the information on the phasing of the construction works has been incorporated. | The overarching construction programme for the Sizewell C Project is presented within Volume 1, Chapter 2 , which includes information on the relationship between the phasing of the main development site and associated development, as well as Sizewell B Relocated Facilities works. More detailed descriptions of the construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES . |
| ES Preparation | Assessment timescales | 3.3.14 | The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter. | Details of the dates of supporting surveys and other information are provided within the topic chapters, Volumes 2 to 9 . |
| ES Preparation | Assessment Methodology | 3.3.15 | The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes between 'significant' and 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. The Inspectorate notes the information in Chapter 5 of the Scoping Report, Section 5.3, and is satisfied with this approach. | Chapter 6 of Volume 1 sets out the overarching methodology for the assessment and defines the approach to distinguishing between 'significant' and 'non-significant' effects which aligns to that set out in the 2019 Scoping Report. Any deviation from the overarching methodology is explained within Volume 1 Appendices 6D to 6Y . For clarity and ease of the reader, the assessment methodology is also summarised in the technical chapters in Volumes 2 to 9 . |
| ES Preparation | Assessment Methodology | 3.3.16 | Given the scale of the Proposed Development and the anticipated duration of the construction phase and indicative lifespan of the operational phase, the temporal scale of identified impacts should be estimated and set out in the ES. Should terms such as 'short-term' or 'long-term' be used these should be defined in the ES. | Descriptions of temporal scale are provided within Appendices 6D - 6Y of Volume 1 of the ES and are summarised in the technical chapters in Volumes 2 to 9 as relevant. |
| ES Preparation | Limitations | 3.3.17 | The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved. | In line with Regulation 14 and the Scoping Opinion, the ES includes details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the ES in sections titled 'Limitations and Assumptions' relevant to each technical assessment within Appendices 6D to 6Y of Volume 1 of the ES and within the relevant chapters of the Volumes 2 to 9 of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|----------------|------------------------|---------------------------|--|---|
| ES Preparation | Residues and Emissions | 3.3.18 | The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments. | In line with Regulation 14 and the Scoping Opinion, the ES provides an estimate by type and quantity, of expected residues and emissions. Specific reference is also made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant within technical assessments of Volumes 2 to 10 . |
| ES Preparation | Mitigation | 3.3.19 | The Inspectorate notes the proposed approach described in Section 5.4 of the Scoping Report to the description of mitigation and residual effects in the ES. Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. | As set out within Chapter 6 of Volume 1 , each technical assessment provides details of primary and tertiary mitigation measures which are considered to be an inherent part of the proposed development when assessing effects. Where an adverse significant effect is predicted within a technical assessment, additional (secondary) mitigation and or monitoring is identified to reduce or avoid the adverse significant effect, where reasonably practicable and available. Each technical assessment presents a summary of residual effects which considers all mitigation identified within the assessment. |
| ES Preparation | Mitigation | 3.3.20 | The Scoping Report states in Paragraph 5.4.5 that secondary mitigation (measures implemented to reduce or avoid significant effects but not embedded in the design of the Proposed Development) will not feature on any application plans. The Inspectorate advises that any secondary mitigation relied upon for the purposes of the assessment of likely significant effects should be described in the ES (and wider application where appropriate). The description should include adequate detail to allow it to be examined and understood, and for the outcomes of the ES which rely on it to be examined and understood. The Inspectorate advises that the ES must address the timing of implementation of any mitigation measures within the wider proposals, and details of how any mitigation proposed is to be secured, with reference to specific DCO requirements or other legally binding agreements. | A mitigation schedule has been prepared and submitted with the application for development consent (Doc Ref. 8.12) which summarises the proposed mitigation and monitoring measures in the ES , as well as the proposed securing mechanisms. This schedule sets out the secondary mitigation measures proposed by EDF Energy and relied upon for the purposes of assessing the significance of residual effects. |
| ES Preparation | Major Accidents | 3.3.21 | The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note 11) to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES. | Chapter 27 of Volume 2 of ES provides a description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the Sizewell C Project to risks of major accidents and/or disasters which are relevant to the project. This assessment follows the approach outlined in the EIA Scoping Report and has regard to relevant guidance. Chapter 27 includes a description of the measures to prevent or mitigate effects of such events on the environment and details of the preparedness for and proposed response to such emergencies. |
| ES Preparation | Major Accidents | 3.3.22 | Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies. | Reference has now been added to Directive 2012/18/EU of the European Parliament and of the Council and Council Directive 2009/71/Euratom. Chapter 27 of Volume 2 includes a description of the measures to prevent or mitigate effects of such events on the environment and details of the preparedness for and proposed response to such emergencies. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|----------------|--------------------------|---------------------------|--|--|
| ES Preparation | Climate Change | 3.3.23 | The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change. | Chapter 26 of Volume 2 presents an assessment of Climate Change, this includes consideration of the impact of the Sizewell C Project on climate (nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change including consideration of in combination climate change effects. This chapter includes climate change resilience measures. |
| ES Preparation | Transboundary Effects | 3.3.24 | Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Scoping Report has not indicated whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State. | Chapter 5 of Volume 10 presents the assessment of transboundary effects associated with the proposed development. Volume 10, Appendix 5A includes a completed 'long list proforma' as included as Annex 1 to PINS Advice Note Twelve: Transboundary Impacts and provides further details of the site, proposed development and the potential transboundary effects. |
| ES Preparation | Transboundary Effects | 3.3.25 | Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected. | Volume 10, Appendix 5A has been prepared to help inform the statutory notification and consultation process in respect of transboundary effects of the Sizewell C Project on other European Economic Area Member States. |
| ES Preparation | Transboundary Effects | 3.3.26 | Section 5.6 of the Scoping Report acknowledges the requirements of the EIA Regulations and states that the EIA will consider transboundary effects and that the ES will report the assessment in a standalone chapter. The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected. The Inspectorate refers the Applicant to Advice Note 12, which sets out the Transboundary special arrangements the Inspectorate will follow in relation to nuclear NSIPs. | Chapter 5, Volume 10 of the ES presents an assessment of transboundary effects associated with the proposed development. Reference is made within this chapter to the statutory arrangements the Inspectorate will follow in relation to nuclear NSIPs as provided in PINS Advice Note Twelve. |
| ES Preparation | Reference List | 3.3.27 | A reference list detailing the sources used for the descriptions and assessments must be included in the ES. The Applicant should make effort to ensure that referencing in the ES to other material and to other parts of the ES is accurate. | Accurate reference lists are provided at the end of each chapter of the ES . Chapters cross refer to other chapters within the ES , or relevant documents submitted with the application for development consent, as required. |
| ES Preparation | Expertise Statement | 3.3.28 | In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation. | A Statement of Competence is included as Appendix 1B of Volume 1 . This provides details of the relevant expertise and qualifications of the competent experts involved in the preparation of the ES . |
| ES Preparation | Confidential Information | 3.4.1 | In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2004. | This point has been considered in the preparation and submission of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|--------------|-----------------|---------------------------|---|--|
| Project-Wide | Socio-economics | 4.1.2 | The Scoping Report explains the Applicant's intent to establish the construction workforce indicative skills profile and the split between non-home based and home-based workers. Any research conducted by the Applicant to inform the profile should be explained in the ES and described having regard to the existing Labour Market offer. | Appendix 9A of Volume 2 provides a technical note which sets out the construction workforce profile over the duration of the construction period, including job types, and skills mix for the earlier contracts, used within the socio-economics assessment. The findings of the technical note have been used to inform the likely demand for accommodation, the development of the Employment, Skills and Education Strategy (appended to the Economic Statement in Doc Ref. 8.9), and feeds into the Gravity Model to inform the Transport Assessment. |
| Project-Wide | Socio-economics | 4.1.3 | The Scoping Report states that the Gravity Model will be developed in consultation with the relevant stakeholders. Assumptions made in the construction of the model should be clearly explained in the ES along with any limitations and uncertainty identified. | Further details of the assumptions used to develop the Gravity Model are provided in Volume 2, Appendix 9C , and includes details of the core workforce and transport assumptions. |
| Project-Wide | Socio-economics | 4.1.4 | The Scoping Report states that the Applicant has engaged local focus groups to identify potential sensitive receptors which could be affected by the proposal. The terms of the engagement, scope and methodology of the study conducted should be explained clearly along with the criteria used to identify the receptors. | As set out in Chapter 9 of Volume 2 , a series of formal socio-economic working groups, incorporating representatives from ESC and SCC and SZC Co. were established from 2013. The working groups have considered the Sizewell C Project assumptions and methodology adopted for the assessment, the approach to assessing effects and identifying critical issues, and the development of analysis leading to mitigation. Membership of the working groups has expanded to include other relevant stakeholders, including but not limited to local tourism and skills/educational organisations, the emergency services, and the NHS as the assessment has progressed. A series of technical notes were prepared as part of this engagement and formal consultation process, and provided in Appendices 9A to 9E . The Consultation Report (Doc Ref. 5.1) also describes consultation undertaken by SZC Co. and provides response to comments made by individuals, statutory bodies and other organisations. |
| Project-Wide | Socio-economics | 4.1.5 | Paragraph 6.2.7 of the Scoping Report states that the spatial extent of the study area remains as per paragraphs 6.2.5 to 6.2.7 of Appendix 1A. Paragraph 6.2.5 of Appendix 1A states that the spatial scope of the socio-economic baseline studies varies by impact category. The Inspectorate recommends that the spatial scope applied to establish the study area is defined and clearly presented in the ES. The study area must be sufficient to address all likely significant effects including cumulative effects with other developments. Where necessary, the study area should be depicted on figures/plans in the ES. | A detailed description of the study area for the socio-economics assessment is provided within Volume 2 Chapter 9 and Appendix 6E of Volume 1 . The spatial extent of the socio-economic assessment includes the main development site, all associated development sites, and the surrounding area, with administrative geographies defined by each socio-economic topic. The precise areas used are partly influenced by data availability and, in some cases, also reflect the boundaries of relevant service planning areas, e.g. for school or health facilities. Therefore the spatial scope of the socio-economic baseline studies varies by impact category. |
| Project-Wide | Socio-economics | 4.1.6 | The Scoping Report states at paragraph 6.2.7 that the study area remains as set out at paragraphs 6.2.5 to 6.2.7 of Appendix 1A. These paragraphs show two construction workforce spatial distribution areas: a 60-minute travel time representing the estimated extent of daily travel to construction site by non-home based workers and a Construction Daily Commuting Zone (CDCZ) used for the home-based labour market (up to 90-minute travel time). The ES should explain and justify the reasons supporting the selection of the distribution study areas. Information used to support the approach should be presented in the ES or in an accompanying appendix. | A detailed description of the study area for the socio-economics assessment is provided within Volume 2 Chapter 9 and associated appendices, as well as Appendix 6E of Volume 1 . This includes further detail on reasoning for the different construction workforce spatial distribution areas. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|--------------|-----------------|---------------------------|---|--|
| Project-Wide | Socio-economics | 4.1.7 | Paragraph 6.2.7 of the Scoping Report states that effects on visitors to the Suffolk Coast will also be considered. The ES should define the spatial extent of the touristic area potentially affected and demonstrate the level of agreement reached with relevant consultation bodies. | A Tourism Survey was undertaken by Ipsos Mori in 2019 following consultation with local stakeholder group including the Councils, DMO and AONB and local tourist destinations. Appendix 9F of Volume 2 explains the methodology and approach to the survey. The study area for the Tourism Survey was developed through engagement with the above stakeholder group to reflect both the existing DMO area, AONB and the extent of the potential environmental effects of the Sizewell C Project. |
| Project-Wide | Socio-economics | 4.1.8 | Paragraph 6.2.15 of the Scoping Report states that a quantitative Tourism Survey was conducted to help identify the sensitivities of returning and new visitors to the Suffolk Coast. The ES should explain the methodology and the criteria used particularly that which is used to identify the sensitivity of receptors, the magnitude of the of the potential impacts and the significance. Where professional judgment is employed, the ES should explain the reasoning and limitations. | A Tourism Survey was conducted by Ipsos Mori in 2019. The purpose of this was to establish the baseline tourist use. This information was used to inform a professional judgement on the sensitivity of receptors considered within socio-economic assessment provided in Chapter 9 of Volume 2 . The survey findings were also used to inform professional judgements on the magnitude and significance of effects. |
| Project-Wide | Socio-economics | 4.1.9 | The ES should explain what are the worst case scenarios (both during construction and operations) considered in the assessment. Paragraph 6.2.17 of Appendix 1A states that the assessment will be focused primarily on the peak construction period. Any assumption made in terms of timescale, peak workforce, skills requirements should be explained in the ES. | The Socio-economic ES chapter (Chapter 9 of Volume 2) is linked to the workforce profile, which sets out the change of employment required as a result of the construction activity across the duration of the construction phase. The assessment uses the peak of construction workforce demand which represents the potential 'worst case' effect, for example, demand on accommodation or public services. However, the assessment also considers, where relevant, any effects that may also be significant across the wider timescales of the Project. Assumptions and limitations relevant to the socio-economic assessments have been set out in Appendix 6E of Volume 1 and within the technical notes provided within Appendices 9A to 9E, Volume 2 . |
| Project-Wide | Socio-economics | 4.1.10 | The ES should demonstrate how the spatial distribution of the predicted impacts (both adverse and beneficial) have been factored into the assessment of significant effects. | The Socio-economic ES chapter (Chapter 9 of Volume 2) assesses effects at standard (regional, local) scales and identifies the potential for localised effects where relevant to the receptor - e.g. in the case of effects on housing in areas close to the site. These scales are defined within Volume 1, Appendix 6E of the ES . Where the receptor is only relevant at wider special scales e.g. provision of public services, or regional labour market effects - assessments are limited to that scale. |
| Project-Wide | Socio-economics | 4.1.11 | Paragraph 6.2.22 of the Scoping Report states that potential impacts during construction are consistent with those set at Table 6.2.4 of Appendix 1A which does not distinguish between adverse and beneficial effects The ES should clearly show this distinction. | The Socio-economic ES chapter (Chapter 9 of Volume 2) clearly states where an effect is adverse or beneficial as required by policy, legislation and guidance. |
| Project-Wide | Socio-economics | 4.1.12 | The ES should assess impacts associated with business displacement, as the Proposed Development will compete for the same local workforce and skills alongside other sectors. Potential effects on local business in terms of recruitment/retaining workforce should be assessed where significant effects are likely | The Socio-economic ES chapter (Chapter 9 of Volume 2) includes an assessment on labour market churn (sometimes called 'displacement') in order to determine if significant effects are likely to occur. |
| Project-Wide | Socio-economics | 4.1.13 | The ES should include assess impacts from the Proposed Development on social cohesion where significant effects are likely to occur. | The Socio-economic ES chapter (Chapter 9 of Volume 2) includes an assessment of potential effects on social cohesion, in order to determine if they are significant, and proposes mitigation as appropriate. |
| Project-Wide | Socio-economics | 4.1.14 | Paragraph 6.2.23 of the Scoping Report states that the potential impacts of the Proposed Development during operation remain as set out at paragraphs 6.2.36 and 6.2.38 of Appendix 1A. The ES should assess temporary and permanent impacts associated with staff influx to the local area during construction and the operation phase of the Proposed Development, i.e. during maintenance and outage work when temporary additional staff is required. | The Socio-economic ES chapter (Chapter 9 of Volume 2) considers the effects related to temporary construction workers on e.g. accommodation, labour market and public services, including reference to maintenance and outage at Sizewell C (when operational) and Sizewell B (as part of cumulative effects). |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

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|--------------|-----------------|---------------------------|---|---|
| Project-Wide | Socio-economics | 4.1.15 | The Inspectorate recommends that the ES should include sufficient detail in relation to the employment and training strategies with a clear set of criteria and objectives and any commitment to monitor the results. | The Socio-economic ES chapter (Chapter 9 of Volume 2) includes reference to the Employment, Skills and Education Strategy (appended to the Economic Statement in Doc Ref. 8.9), which sets out criteria, objectives and approach to monitoring effectiveness. |
| Project-Wide | Socio-economics | 4.1.16 | Paragraph 6.2.26 of the Scoping Report states that the principles for mitigation of potential adverse impacts remain as set out at paragraphs 6.2.39 to 6.2.44 of Appendix 1A. These do not include mitigation of any adverse effect on agricultural businesses. Any measures to mitigate effects to agricultural businesses should be described in the ES. | The assessment of likely effects on agricultural businesses is presented in the soils and agriculture ES chapters, provided at Chapter 17 of Volume 2 , and Chapter 10 of Volumes 3 to 9 , and includes details of measures details embedded into the design or management measures to minimise impacts on the agricultural businesses. |
| Project-Wide | Transport | 4.2.2 | Noting the information in Sections 3.4 to 3.10 of the Scoping Report, the ES must set out the predicted road and rail movements (by type, including numbers in and numbers out) for the chosen transport strategy for all phases of the Proposed Development, in particular the construction phase. | <p>The Transport Assessment (Doc Ref. 8.5) has been prepared to describe the supporting transport strategy and assess the transport impacts, and informs aspects of the ES (Doc Ref. Book 6).</p> <p>The following Sizewell C Project phases have been considered:</p> <ul style="list-style-type: none"> • early years construction phase when the main development site and associated development sites are under construction; • peak construction phase when the main development site is under construction and the associated development sites are operational; and • operational phase when the Sizewell C nuclear power station is operational, the permanent associated development sites are retained and the temporary associated development sites have been removed/restored. <p>Chapter 10 of Volume 2 of the ES reports the assessment of road and rail movements for the Early Years, Peak Construction and Operational (post construction) phases.</p> |
| Project-Wide | Transport | 4.2.3 | The Inspectorate notes from Table 3.1 the "potential for extended hours (i.e. beyond 07:00-23:00)". The ES should explain the anticipated frequency that extended operational hours would be required for HGVs (and trains, if relevant) and incorporate this into the assessment of likely significant effects. Any interactions with other ES aspects, for example impacts on noise sensitive receptors, should be explained and assessed where significant effects are likely. | At Stage 4 consultation SZC Co. consulted on the potential for extended hours (i.e. beyond 0700:-23:00). However the extended hours do not form part of the DCO submission and the Transport Assessment (Doc 8.5) has been prepared on the basis of the first HGV arriving at the main development site no earlier than 07:00 and the last HGV departing the main development site no later than 23:00. The timing restrictions will be enforced through the Construction Traffic Management Plan (CTMP) (Doc Ref 8.7), which is to be secured through the Section 106 Agreement (see draft Section 106 Agreement Heads of Terms appended to the Planning Statement (Doc Ref 8.4)). |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|--------------|---------------|---------------------------|--|---|
| Project-Wide | Transport | 4.2.4 | The ES should explain the potential transport impacts associated with decommissioning of temporary infrastructure (rail, accommodation, contractor's area etc), including whether there is any potential for interaction with transport impacts resulting from operation of the proposed Sizewell C. Any likely significant effects should be assessed. | <p>The Transport Assessment (Doc Ref. 8.5) has been prepared to describe the supporting transport strategy and assess the transport impacts, and informs aspects of the ES (Doc Ref. Book 6).</p> <p>The following Sizewell C Project phases have been considered:</p> <ul style="list-style-type: none"> • early years construction phase when the main development site and associated development sites are under construction; • peak construction phase when the main development site is under construction and the associated development sites are operational; and • operational phase when the Sizewell C nuclear power station is operational, the permanent associated development sites are retained and the temporary associated development sites have been removed and land reinstated. <p>Chapter 10 of Volume 2 of the ES reports the assessment of road and rail movements for the Early Years, Peak Construction and Operational (post construction) phases.</p> |
| Project-Wide | Transport | 4.2.5 | A new road bridge over the East Suffolk railway line is proposed (as part of the road-led strategy only), along with various upgrades and level crossing works to the East Suffolk railway line and the branch line. The ES should describe any interactions between existing rail infrastructure and the Proposed Development. Any likely significant effects on sensitive receptors including rail travellers should be assessed in the ES. | <p>The East Suffolk line predominantly carries passenger services operated by Greater Anglia, and typically, 15 trains per day run from Ipswich to Lowestoft and 17 trains per day run from Lowestoft to Ipswich, with services stopping at all stations. The proposed Sizewell link road would require a crossing over the East Suffolk line.</p> <p>It is envisaged that the proposed Sizewell link road would be built in a west to east direction, and the overbridge which crosses the East Suffolk line would be constructed through pre-fabricated steel bridge deck elements, which would be transported to site for assembly. Three overnight closures would likely be required to construct three pairs of beams forming part of the overbridge over the East Suffolk line. These measures would minimise disruption impacts on the East Suffolk line (where passenger services are generally limited to day time movements) and no significant effects are anticipated.</p> |
| Project-Wide | Transport | 4.2.6 | The Scoping Report refers to proposed transport infrastructure (for example, the Sizewell Link Road) as being "...built during the early years of construction". The ES should set out the anticipated timing and duration of construction of each proposed transport element (including upgrades/changes to existing infrastructure) and confirm how these fit into the phased construction programme. | <p>The overarching construction programme for the Sizewell C Project is presented within Volume 1, Chapter 2, which includes information on the relationship between the phasing of the main development site and associated development, as well as Sizewell B Relocated Facilities works.</p> <p>More detailed descriptions of the construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES.</p> |
| Project-Wide | Transport | 4.2.7 | The Scoping Report refers to an assessment of traffic-related noise and air quality impacts. However, it is unclear if this would include impacts from trains using the proposed green rail route (under the rail-led strategy). The ES should describe the potential impacts from construction and operation of the proposed rail infrastructure (including noise, air quality and any other relevant aspects) and assess any likely significant effects. It should be clear how the assessment relates to the maximum number of train movements along the green route (described in the Scoping Report as being up to five deliveries, ten movements per day). | <p>The Transport Assessment (Doc Ref. 8.5) has been prepared to describe the supporting transport strategy and assess the transport impacts, and informs aspects of the ES (Doc Ref. Book 6). Chapter 11 of the Transport Assessment summarises the rail strategy for the construction of the Sizewell C Project during the early years rail operation and full rail operation once the green rail route is complete.</p> <p>The ES considers all likely significant effects associated with the maximum number of rail movements associated with the project. The assessment of noise and vibration, and air quality effects associated with the rail proposals are presented in Chapters 4 and 5 of Volume 9 of the ES respectively.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|--------------|---------------|---------------------------|---|---|
| Project-Wide | Transport | 4.2.8 | <p>The ES should clearly define the study area used for the assessment and explain the approach taken to do so, which should be influenced by the extent of likely impacts. The study area and modelled network for the VISUM model should be illustrated on a plan in the ES.</p> <p>The Applicant should make effort to agree with relevant consultation bodies the study area/s, baseline data, assessment methodologies (including use and development of the VISUM model and the number and location of junctions that require localised modelling) and mitigation measures.</p> | <p>The Transport Assessment (Doc Ref. 8.5) defines the modelled study area (with figures provided as appropriate) and this is summarised in Chapter 10 of Volume 2 of the ES. There have been extensive efforts over many years to agree modelling methodology with Suffolk County Council.</p> <p>Detail of consultation undertaken can be found in Appendix 6F of Volume 1 of the ES.</p> |
| Project-Wide | Transport | 4.2.9 | <p>The ES should identify and justify the locations for the traffic count surveys. The locations should be depicted on a supporting plan included within the ES or supporting appendices.</p> <p>The approach to undertaking baseline counts for non-motorised users (including cyclists, pedestrians and equestrians) should be detailed in the ES and effort made to agree the approach with relevant consultation bodies.</p> | <p>Chapter 10 of Volume 2 of the ES provides a summary of the baseline for the study area with further detail provided in the Transport Assessment (Doc Ref. 8.5). Appendix 15A of Volume 2 provides further details of Visitor Surveys which have been undertaken.</p> |
| Project-Wide | Transport | 4.2.10 | <p>Noting that traffic generated by periodic outage at Sizewell B will be included in all future year traffic modelling scenarios for robustness, the Scoping Report states that "This will remove the need to assess the impacts of seasonality using the VISUM model since the impacts of Sizewell B outage are greater than those of seasonality". The ES should provide a thorough justification to support this approach, including why traffic generated by a periodic outage at Sizewell B is considered to be the worst case scenario.</p> <p>It is unclear if an assessment of traffic impacts during temporary outage periods at the proposed Sizewell C is proposed. The Inspectorate advises that this matter is taken into account in the traffic modelling and assessed in the ES where significant effects are likely to occur.</p> <p>The ES should also explain whether there is any potential for periodic outages at Sizewell B and C with seasonal changes, and if so, how the likely traffic impacts have been considered in the ES assessment. Effort should be made to agree the approach with relevant consultation bodies.</p> | <p>Analysis of seasonality is provided in Chapter 2 of the Transport Assessment (Doc Ref 8.5). This shows that only "Friday August PM" traffic flows were higher on the A12 than the 'neutral month' Friday PM flows that have been modelled. However the SZC traffic flows modelled, assumes 100% of staff are present when in reality only around 85% of staff would be present due to shift rotas. This over-representation of SZC traffic (on a Friday PM) combined with the SZB outage traffic, would result in similar flows to those seen in August and assessment of a typical 'August' day would not result in the need for any additional mitigation to that already proposed.</p> <p>As set out in Volume 2, Chapter 10 of the ES, all future year scenarios have been modelled including traffic flows generated by an outage at Sizewell B, which is performed periodically (approximately every 18 months and lasting up to two months), so that robust traffic flows are reflected in each scenario. This is highly robust, given that a planned outage only occurs for 10% of the time.</p> <p>A scenario of an outage at Sizewell B and C occurring concurrently during the operational phase has not been assessed as the outages would be planned to not coincide. Whilst there is a possibility for unplanned outages at Sizewell B or C to coincide with a planned outage, this is highly unlikely to occur and, therefore, is not considered to be a typical or reasonable scenario to assess.</p> |
| Project-Wide | Transport | 4.2.11 | <p>Whilst Appendix 1A identifies types of receptors which are sensitive to changes in traffic flows (e.g. schools), details of specific receptor locations for the purposes of the assessment are not provided. The Applicant should justify the choice of sensitive receptors with reference to the extent of the likely impacts and seek to agree these with the relevant consultation bodies. The Inspectorate advises that the sensitive receptors should include rail travellers (as noted above), heritage assets and nature conservation sites where significant effects are likely to occur.</p> | <p>Justification for choice of sensitive receptors is provided within Chapter 10 of Volume 2 and the associated methodology appendix (Volume 1, Appendix 6F).</p> <p>Freight trains would operate after the last passenger train in the evening and before the first passenger train the following morning and would therefore not have any effect on rail passenger journey times. There would therefore be no effect on rail passenger delay and rail passengers have been scoped out from the assessment.</p> <p>An assessment of effects on heritage assets is presented in the terrestrial historic environment chapters of the ES (Volume 2, Chapter 16 and Volumes 3 to 9, Chapter 9) and considers the effects from Sizewell C vehicle (road and rail) movements on air quality (Volume 2, Appendix 12B) and noise (Volume 2, Chapter 11).</p> <p>An assessment of effects on heritage assets is presented in the terrestrial ecology and ornithology chapters of the ES (Volume 2, Chapter 14 and Volumes 3 to 9, Chapter 7) and considers the effects from Sizewell C vehicle (road and rail) movements on air quality (Volume 2, Appendix 12B) and noise (Volume 2, Chapter 11).</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|--------------|---------------|---------------------------|--|---|
| Project-Wide | Transport | 4.2.12 | <p>In addition to pedestrians, impacts to other types of non-motorised users such as equestrians and cyclists should be assessed where significant effects are likely. The assessment should be supported by baseline counts as noted above.</p> <p>If any temporary or permanent diversions of PRoW are required, the affected section of the route and the proposed diversion should be described in the ES. It should be clear in the ES how long any temporary diversions are likely to be in place and how provision of the diversions would be secured through the DCO or other suitable mechanisms. Any likely significant effects to users of PRoW (including pedestrians, cyclists and equestrians) should be assessed.</p> | <p>Details of any proposed diversions to public rights of way during construction and operation are described in Chapter 2 to 4 of Volume 2, and Chapter 2 of Volumes 3 to 9.</p> <p>Effects on users of public rights of way have been assessed in transport ES chapter (Volume 2, Chapter 10), as well as within the amenity and recreation ES Chapters (Volume 2, Chapter 15 and Chapter 8 of Volumes 3 to 9)</p> |
| Project-Wide | Transport | 4.2.13 | <p>The Scoping Report explains that the construction traffic modelling will take account of "...any mitigation measures that are anticipated to be in place by this time". The ES must clearly identify the relevant measures and explain the extent to which the findings of the traffic modelling (and conclusions of significance of effect) are reliant on their delivery. If the delivery of mitigation measures before construction cannot be guaranteed, the ES should present the significance of effect both with and without delivery of these measures.</p> | <p>The Transport Assessment (Doc Ref. 8.5) and Chapter 10 of Volume 2 of the ES consider an Early Years scenario without mitigation in place and a Peak Construction scenario with mitigation (such as the construction of the associated development sites) is completed.</p> |
| Project-Wide | Transport | 4.2.14 | <p>The Scoping Report explains that major known developments with planning permission (in addition to the Scottish Power Renewables developments) will be included in the reference case for the traffic modelling. Whilst a list of such developments is not provided in the Scoping Report, the Applicant is advised to keep this under review should any other development come forward which may trigger the need to update the traffic modelling work.</p> <p>The relationship between the developments included in the reference case for the traffic modelling and the 'other developments' considered in the cumulative assessment should be clearly explained in the ES and effort made to agree the approach with relevant consultation bodies.</p> | <p>The status of committed developments has been kept under regular review with Suffolk County Council and East Suffolk Council and updated when necessary. The reference case is described within Chapter 10 of Volume 2. The cumulative effects assessment with other plans and projects is presented in Chapter 4 of Volume 10 and details those schemes considered to form cumulative development.</p> |
| Project-Wide | Transport | 4.2.15 | <p>The ES should confirm the anticipated number of abnormal loads (including any to be delivered via the beach landing facility) and the types of vehicles/ vessels required. Any mitigation measures required to facilitate the delivery of abnormal loads should be detailed in the ES and any resultant likely significant effects should be assessed.</p> | <p>A BLF is proposed to be constructed at the main development site to allow for the delivery of abnormal indivisible loads throughout the construction phase and during the operational phase, to remove heavy and oversized loads from the road network.</p> <p>Where they cannot be transported by sea, there are likely to be abnormal indivisible loads transported by road. To mitigate disruption, there would be regular liaison with the emergency services and the highway authorities as set out in Construction Traffic Management Plan (CTMP) (Doc Ref. 8.7). In addition, the proposed Yoxford roundabout, Sizewell link road and two village bypass have been designed to accommodate abnormal loads, if required.</p> <p>Modelling does not include ALLs since they are occasional and it is not possible to model the effects of such individual movements within a strategic model such as that developed for the Sizewell C Project, which is described in the Transport Assessment (Document Reference 8.05).</p> |
| Project-Wide | Transport | 4.2.16 | <p>The Scoping Report explains that HGV movements to the construction site would be limited to "approved routes". The ES should clearly describe all routes to be used for vehicular, pedestrian and cyclist access during construction and operation of the Proposed Development and this information should be clearly presented on supporting plans contained within the ES. The ES should explain how adherence with the approved routes for HGVs would be ensured and how the proposed access route(s) relate to the selected sensitive receptors (see above).</p> <p>Diversion routes and other contingency measures for HGV traffic, for example in the event of a temporary closure of the Orwell Bridge, should be described and any likely significant effects assessed.</p> | <p>The proposed HGV and bus routes during the construction phase of the Sizewell C Project are provided in Figures 10.10 and 10.11 of Volume 2, Chapter 10 of the ES.</p> <p>These routes form the basis of the assessments in the ES. The Construction Traffic Management Plan (CTMP) (Doc 8.7) sets out how the HGV routes are to be enforced and this is included as tertiary mitigation in Volume 2, Chapter 10. The Traffic Incident Management Plan (TIMP) (Doc 8.6) sets out the management of Sizewell C HGVs and buses in the event of an incident on the highway network and this is included as tertiary mitigation in Volume 2, Chapter 10.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|-------------------------------|---------------------|---------------------------|---|--|
| Project-Wide | Transport | 4.2.17 | Paragraph 6.3.56 explains that a number of transport management plans would be prepared, "...aimed at managing and mitigating the significant traffic effects...". Draft/outline versions of these documents should be appended to the ES. The ES should demonstrate how adherence with the measures in these documents will be secured. | A Construction Traffic Management Plan (Doc Ref. 8.7), a Construction Workforce Travel Plan (Doc Ref. 8.8) and a Traffic Incident Management Plan (Doc Ref. 8.6) are submitted with the application for development consent. |
| Project-Wide | Transport | 4.2.18 | The ES should assess any likely significant effects which could occur as a result of the transport of waste. The ES should clearly explain any assumptions in this regard (for example, the number of vehicles required to transport waste materials, quantities of spent fuel and quantities of contaminated land). | The conventional waste and material resources ES Chapter (Volume 2, Chapter 8) presents an assessment of the material resource use and conventional waste generation effects arising from the construction and operation of the main development site and associated development sites and removal and reinstatement of the temporary development. |
| Project-Wide | Transport | 4.2.19 | The ES should identify the potential impacts to the condition of existing road and rail infrastructure resulting from HGV construction traffic. Any likely significant environmental effects should be assessed including the environmental effects of any proposals for post-construction restoration works. Any such works should be clearly described in the ES and it should be clear how they would be delivered and secured. | Volume 2, Chapter 10 provides for a highway conditions survey of the B1122 and maintenance of the road during early years of construction, which is to be secured through the Section 106 Agreement (see draft Section 106 Heads of Terms appended to the Planning Statement (Doc Ref 8.4)). The effect of the Sizewell C Project on rail passengers has also been included in Volume 2, Chapter 10 . |
| Main Development Site | Noise and Vibration | 4.3.1 | Paragraph 6.4.4 of the Scoping Report proposes that an assessment of impacts to fish and other marine species is scoped out of the Noise and Vibration ES aspect chapter and instead, is presented in the Marine Ecology ES aspect chapter. Scoping Report Appendix 1A (page 36) also intends to assess noise and vibration impacts to terrestrial ecology species in the Terrestrial Ecology and Ornithology ES aspect chapter. The Inspectorate is content that these matters can be assessed in the Marine Ecology and Terrestrial Ecology and Ornithology ES chapters of the ES. In this regard the Applicant's attention is drawn to the Inspectorate's comments in <u>Tables 4.6 and 4.15 of this Scoping Opinion</u> . | In line with the Scoping Report and Scoping Opinion, the assessment of noise and vibration impacts to fish and other marine species is presented in the Marine Ecology Volume 2, Chapter 22 . Noise and vibration impacts on terrestrial ecology species is considered in Volume 2, Chapter 14 and Chapter 7 of Volumes 3 to 9 as relevant. |
| Freight Management Facilities | Noise and Vibration | 4.3.2 | Table 6.5 of the Scoping Report proposes an assessment of noise and vibration impacts from freight management facility Option 2 only (the Innocence Farm site). The Scoping Report includes no justification in support of this approach. For the avoidance of doubt the Inspectorate does not agree to scope this matter out of the ES. The ES should describe the potential noise and vibration impacts arising from the use of freight management facility Options 1 and 2 and assess any likely significant effects. | A Freight Management Facility at Seven Hills forms part of the proposed development for the Sizewell C Project. In accordance with the Scoping Opinion, an assessment of the potential noise and vibration impacts during the construction, operation and removal and reinstatement of this facility is provided within Volume 8, Chapter 4 . |
| Project-Wide | Noise and Vibration | 4.3.3 | Noise impacts associated with the use of the emergency diesel generators should be assessed in the ES where significant effects are likely. | An assessment of noise impacts from the use of the emergency diesel generators has been undertaken as part of the operational assessment of Sizewell C. The assessment is presented in Volume 2 Chapter 11 and Appendix 11C and includes a sound level assessment of the back-up generator buildings would each contain three diesel generators. Each generator would require a fresh air supply, extraction of warm air (by a deck of extract/cooling fans), and an exhaust stack for dispersion of combustion gases to atmosphere. These three elements comprise the main sound sources from the back-up generators. Three scenarios are assessed including: commissioning testing, routine testing purposes and a scenario where there is Loss of Off-site Power (LOOP). |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|---------------------------------|---------------------|---------------------------|--|---|
| Project-Wide | Noise and Vibration | 4.3.4 | <p>It is noted that some additional survey work will be carried out at "key locations" to update the baseline as reported in paragraph 7.7.6 of Appendix 1A, including "in the areas around the proposed new road schemes". However, specific locations (further to those identified in Appendix 1A) have not been identified.</p> <p>The Applicant should ensure that the information used to inform the assessment is robust and includes a relevant baseline of noise and vibration for the entirety of the Proposed Development. The Applicant should make effort to agree the survey locations with relevant consultation bodies and the ES should fully justify the approach taken. The ES should contain details of the survey/ monitoring locations (with reference to supporting plans), sampling period and equipment used.</p> <p>In addressing these points, the Applicant should take account of the Inspectorate's comments above regarding freight management facility Option 1.</p> | <p>Where relevant, the ES provides details of the survey work undertaken to inform the noise and vibration assessment within Volume 2 to 9, and monitoring locations are presented on figures, as well as a full summary provided within Volume 2, Appendix 11A.</p> <p>The noise and vibration assessments also provide details of the consultation undertaken to agree survey locations with full details of methodology provided within Appendix 6G of Volume 1.</p> |
| Project-Wide | Noise and Vibration | 4.3.5 | <p>The Scoping Report explains that the study area for the purposes of the noise and vibration assessment remains consistent with that described in Appendix 1A (paragraphs 7.7.3 – 7.7.5), although this has been extended in some instances to account for the proposed new road schemes/ improvements, rail crossings/ upgrades/ improvements and freight management facility Option 2.</p> <p>The ES should contain a robust justification in support of the chosen study area and receptors. The receptors should reflect the extent of the likely impacts from the entirety of the Proposed Development (including all new elements). The ES should explain how other relevant aspects (for example, construction traffic routes to the different parts of the application site) relate to the study area and sensitive receptors. The Applicant should make effort to agree the study area and sensitive receptor locations with relevant consultation bodies and these should be illustrated on figures in the ES.</p> <p>In addressing these points, the Applicant should take account of the Inspectorate's comments above regarding freight management facility Option 1.</p> | <p>Justification of the study areas used for the purpose of the noise and vibration assessment is presented within each of the noise and vibration assessments within Volumes 2 to 9 of the ES. The principles for defining this study area and consultation undertaken as part of the process are set out within Appendix 6G of Volume 1. The location of sensitive noise receptors are shown on figures within Volumes 2 to 9.</p> |
| Project-Wide | Noise and Vibration | 4.3.6 | <p>The Inspectorate notes the intention to set out proposed criteria for the assessment of impacts from vibration. In the ES, the selected criteria should be supported by reference to recognised guidance and any agreement reached with relevant consultation bodies. Where relevant, it should be clear how the criteria are specific to different sources of vibration</p> | <p>The assessment criteria for the construction and operational vibration effects assessment within Appendix 6G of Volume 1, and summarised in the noise and vibration chapters presented in Volumes 2 to 9. Clear justification of the approach taken is provided within the appendix, including reference to guidance and details of consultation.</p> |
| Off Site Associated Development | Noise and Vibration | 4.3.7 | <p>The Inspectorate notes from Table 6.5 the intention to assess the potential noise impacts associated with construction and operational traffic at the main development site. It is unclear whether a similar assessment is proposed in relation to the other elements of the Proposed Development. For the avoidance of doubt, the ES should assess noise impacts associated with traffic generated across the entirety of the Proposed Development, where significant effects are likely.</p> | <p>Chapter 11 of Volume 2 presents the assessment of construction and operational traffic noise generated across the entirety of the Sizewell C Project, and is informed by the Transport Assessment.</p> <p>An assessment of traffic noise effects resulting from the operation of the proposed two village bypass, Sizewell link road and Yoxford roundabout on nearby sensitive receptors is also reported within Chapter 4 of Volumes 5, 6 and 7 of the ES. Chapter 4 of Volumes 3, 4 and 8, consider the effect of traffic noise arising from the internal circulatory road. Within Chapter 4 of Volume 9, the effect of noise generated from rail movements is also considered.</p> |
| Borrow Pits | Noise and Vibration | 4.3.8 | <p>In addition to the construction impacts referenced in paragraph 6.4.15 of the Scoping Report, the Inspectorate considers there is potential for noise and vibration impacts to sensitive receptors resulting from the use of borrow pits. The ES should describe the potential noise and vibration impacts associated with the use of borrow pits and assess any likely significant effects.</p> | <p>The ES provides an assessment of the potential noise and vibration impacts resulting from the use of the borrow pits within Volume 2, Chapter 11.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|-----------------------|---------------------|---------------------------|---|--|
| Main Development Site | Noise and Vibration | 4.3.9 | Noise impacts from ships/ barges associated with the beach landing facility (including loading and unloading) should be assessed where significant effects are likely. | The noise and vibration assessment for the main development site (Volume 2, Chapter 11) considers the construction of the beach landing facility. Operational activities associated with the beach landing facility (BLF) including the loading and unloading of the barges, are not considered as part of the construction noise assessment as presented in Volume 2 Chapter 11 and Appendix 11B . These operations are not considered to be a significant source of noise as identified through previous assessment work during previous stages of design and when considering the location of residential receptors in relation to the BLF. Impacts on ecological receptors (terrestrial and marine) and amenity and recreation receptors are considered in Chapters 14, 22 and 15 of Volume 2 of the ES respectively. |
| Project-Wide | Noise and Vibration | 4.3.10 | The Inspectorate is aware of other developments in proximity to the Proposed Development which have potential to be constructed over a similar timescale, including the Scottish Power Renewables developments. There is potential for significant cumulative noise and vibration effects from multiple large-scale construction activities taking place within a relatively confined geographic area. Detailed consideration of cumulative noise and vibration effects is required in the ES; this should be appropriately focussed towards the construction phases of the Proposed Development and other relevant developments. See further comments in Table 4.22 of this Opinion. | An assessment of cumulative noise and vibration effects with other developments in proximity to the Sizewell C Project is presented within Volume 10 of the ES . Volume 10, Chapter 1 describes the process that has been followed to identify relevant schemes to be considered within the cumulative effect assessment during the construction phase. |
| Project-Wide | Noise and Vibration | 4.3.11 | The ES should describe any proposals for monitoring of noise and vibration levels during construction (including any complaints procedures) and explain how such measures would be secured. | SZC Co. would have a system in place for noise monitoring and for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors, and procedures for investigating and acting appropriately as necessary upon the complaints. Further details are provided in the Code of Construction Practice (Doc Ref. 8.11). |
| Main Development Site | Air Quality | 4.4.1 | The Inspectorate noted that the proposed CHP plant intended to support the accommodation campus is not considered as a point source emission in the Air Quality aspect. Therefore, the Inspectorate is considering that this matter has been scoped out by the Applicant. The ES should assess significant effects associated with all sources of emissions to air during construction, including from point source emitters (i.e. the proposed CHP). The ES should also describe the methodology applied and the approach adopted to defining the study area. | Impacts from construction phase non-mobile plant emissions and the CHP at the Accommodation Campus (part of the main development site), are assessed in Chapter 12 of Volume 2 of the ES . The methodology for assessing air quality impacts is detailed in Volume 1, Appendix 6H of the ES and this includes details of the study area. |
| Project-Wide | Air Quality | 4.4.2 | The Scoping Report states that the operation impacts to be considered are detailed at paragraphs 7.8.53 and 7.8.54 of the Appendix 1A and remain unchanged. Appendix 1A does not detail sources of emissions and pollutants. The ES should assess significant effects associated with all sources of emissions to air during operations, including from point source emitters and traffic (eg PM10, NO2 NOx and PM2.5). The ES should also describe the methodology applied and the approach adopted to defining the study area. | The assessment of effects associated with point source and transport emissions are included in the ES. The methodology and approach to defining the study area is set out in Volume 1, Appendix 6H and described further in the air quality assessments presented in Volumes 2 to 9 of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

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| Project-Wide | Air Quality | 4.4.3 | <p>The anticipated lifespan of the CHP is inconsistently described within the Scoping Report. It is also unclear whether other point source emitters (eg combustion plant) will be required for the Proposed Development. The ES should clearly describe the anticipated lifespan of the CHP and assess the impacts associated with it and other point source emitters during the construction and operation stages.</p> <p>The Applicant's attention is also directed to the comments of the Environment Agency (EA) at Appendix 2 of this Opinion with regards to the change in the EA's Regulatory Guidance Note 2 and the potential requirement for a permit under the Environmental Permitting Regulations 2018 for all combustion plant (including temporary construction plant) associated for the Proposed Development. The ES should include an assessment of construction impacts arising from combustion plant, together with mitigation as appropriate, where likely significant effects could occur.</p> | <p>The ES describes the lifespan of the proposed CHP within Chapter 3 of Volume 2 and provides an assessment of the impacts in Chapter 12 of Volume 2. Any other point source emitters (combustion plant) required for the proposed development are also assessed within the relevant air quality assessments included within Volumes 2 to 9 of the ES. Changes in relation to Regulatory Guidance Note 2 prepared by the Environment Agency are noted, and all combustion plant has been assessed appropriately. Mitigation measures are also identified where necessary.</p> |
| Project-Wide | Air Quality | 4.4.4 | <p>The Scoping Report states that the study area for the air quality assessment remains as defined in paragraphs 7.8.15 to 7.8.20 of Appendix 1A. It is noted that the study area will include the A12 between Ipswich to the south and Lowestoft to the north and the B1122 and other roads that area likely to experience some increase in traffic as a result of Sizewell C.</p> <p>The ES should clearly define and explain the chosen study area for the assessment of air quality effects associated with road traffic. The ES should explain the criteria used in considering construction and operation traffic, with cross reference to the transport assessment. The worst case scenario used in the assessment should be clearly identified.</p> <p>The Applicant should also make effort to agree the study area, baseline data, assessment methodology and mitigation measures with relevant consultation bodies.</p> | <p>The ES defines and explains the chosen study area and scenarios for the assessment of transport emissions during construction and operational phase within Chapter 12 of Volume 2 and Chapter 5 of Volumes 3 to 9, with appropriate cross-referencing to the Transport Assessment (Doc Ref. 8.5).</p> |
| Main Development Site | Air Quality | 4.4.5 | <p>Paragraph 6.5.9 of the Scoping Report states that the assessment of effects from point source emitters are considered up to 10km from the main development site. Some emitters (temporary or permanent) are located away from the main development site. Therefore, the Inspectorate is concerned that this could result in some receptors being missed. The Applicant should ensure that the study area applied in the assessment is sufficient to address the extent of the likely significant effects and takes into consideration the receptors likely to be affected. The Applicant should make effort to agree the study area with the relevant consultation bodies.</p> | <p>The air quality assessments presented within Volumes 2 to 10 of the ES consider the direct effects and cumulative effects of emissions from point sources at all relevant sensitive receptors. Details of relevant consultation is provided within Appendix 6H of Volume 1 of the ES.</p> |
| Main Development Site | Air Quality | 4.4.6 | <p>The Inspectorate considers that the site lies within a sensitive area for changes in air quality, which includes Sizewell Marshes SSSI. The impacts on Sizewell Marshes SSSI, other designated sites and sensitive ecological receptors within the zone of influence should be carefully assessed. There is a need to consider potential related effects due to an increase in airborne pollution including fugitive dust especially during site preparation and construction but also operation, and any increase in traffic-related emissions during construction and operation. The assessment of air quality in the ES should cross-refer to the terrestrial ecology and marine ecology chapters of the ES and any report made with respect to the Habitats Regulations. The Inspectorate notes that the Institute of Air Quality Management (IAQM) has published new guidance titled "a guide to the assessment of air quality impacts on designated nature conservation sites" in June 2019 which replaces the IAQM Position Statement on 'Use of a Criterion for the Determination of an Insignificant Effect of Air Quality Impacts on Sensitive Habitats' issued in January 2016.</p> | <p>The magnitude of the predicted changes in air quality at ecological designated sites within the zone of influence of the Sizewell C Project (construction and operation phases) is reported in the air quality chapters of Volumes 2 to 9 of the ES as appropriate. This information has been used, as relevant, to undertake the assessments in both the Terrestrial Ecology and Ornithology and Marine Ecology chapters of the ES and the Shadow Habitats Regulations Assessment (HRA) (Doc Ref. 5.10) .</p> <p>The assessment of effects on ecological features and habitats, including the Shadow HRA, follows the published guidance including the general principles outlined in the IAQM guidance "a guide to the assessment of air quality impacts on designated nature conservation sites" June 2019.</p> |
| Project-Wide | Air Quality | 4.4.7 | <p>The ES should identify how the Proposed Development may affect Air Quality Management Area(s) (AQMA) and/or prevent/assist the relevant Local Planning Authorities to achieve air quality objectives.</p> | <p>The air quality assessment has considered the effects of the project on Air Quality Management Areas within Volumes 2 to 9, as appropriate. Preliminary assessment of likely effects on AQMAs have been completed and will be shared with relevant consultation bodies.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|--------------|----------------------|---------------------------|--|---|
| Project-Wide | Air Quality | 4.4.8 | Paragraph 6.5.15 of the Scoping Report states that the proposed methodology for air quality is detailed at Paragraphs 7.8.10 to 7.8.14 of Appendix 1A. The Inspectorate notes that the pollutants considered at paragraph 7.8.12 of Appendix 1A does not include all of those gaseous emissions listed in the Scoping Report. The ES should include emissions from all potentially relevant sources in the assessment. The ES should detail the methodology used in the assessment and any mitigation measures deemed necessary. | <p>The air quality assessments presented within Volumes 2 to 9 of the ES include emissions from all potentially relevant sources. Appendix 6H of Volume 1 presents a detailed description of the assessment methodology that has been used to assess the effects on air quality arising from the Sizewell C Project. The scope of the air quality assessments during construction, operation and the removal and reinstatement phases, where relevant, for the Sizewell C Project includes:</p> <ul style="list-style-type: none"> • emissions of NOx including NO2 from engines (road vehicles, rail locomotives, combined heat and power engine, non-road mobile machinery and non-mobile plant); • emissions of CO and SO2 from engines (rail locomotives and non-mobile plant only); • emissions of particulate matter (PM10 and PM2.5 size fractions) from engines (road vehicles, rail locomotives, non-road mobile machinery, non-mobile plant); • emissions of fugitive particulate matter (dust and PM10 size fractions) from demolition, construction and removal and reinstatement phase works, where relevant; • changes in air pollutant concentrations and changes in dust deposition rates (sometimes referred to as soiling). <p>Primary and tertiary mitigation considered to form and inherent part of the proposed development together with secondary mitigation measures, where necessary, to reduce or avoid significant effects are identified where necessary.</p> |
| Project-Wide | Air Quality | 4.4.9 | <p>The Scoping Report acknowledges that mitigation measures beyond those embedded as part of the Proposed Development will be considered where such measures are deemed necessary. Consideration should also be given to the monitoring of dust complaints during construction and how this will be secured through the process.</p> <p>The Applicant should seek to agree mitigation measures and monitoring with relevant consultation bodies. Measures provided to mitigate impacts predicted through the assessment process should be clearly stated in the ES and secured in the draft DCO or other legally binding mechanism, as appropriate.</p> | <p>Secondary mitigation, mitigation beyond that included in the design of the proposed development, is outlined within the air quality assessment chapters for each aspect of the Sizewell C Project where required (Volumes 2 to 9 of the ES). Where it is considered that monitoring is required, it is identified within the relevant air quality chapter of the ES and reported in the CoCP.</p> |
| Project-Wide | Landscape and Visual | 4.5.2 | <p>Reference is made to 'Landscape and Visual Impact Assessment (LVIA) consultees' and various elements of the landscape and visual aspect study that have been or will be agreed with them, but the consultees are not named. The Inspectorate expects the ES to confirm which consultees / stakeholders have been approached to agree the approach, and that any agreements reached are documented in the ES.</p> <p>The Applicant should keep the preferred study area under review as the design of the Proposed Development evolves, so that the introduction of any additional visually intrusive elements which may affect sensitive receptors can be properly taken account of in the assessment. The Applicant should make efforts to agree the study area with relevant consultation bodies before undertaking the assessment. The study area in the ES must be defined sufficiently so that all potentially significant effects are assessed.</p> | <p>Volume 2, Appendix 13H provides a report of consultation undertaken and areas of methodology that were agreed with consultees. Appendix 13H also provides details of the bodies that were consulted on the assessment approach and methodology.</p> <p>The Zone of Theoretical Visibility (ZTVs) for the main development site and Associated Developments have been updated as the design of the schemes have evolved, in order to ensure that the study areas remain appropriate. Study areas are defined within each Landscape and Visual ES Chapter in the ES (Volume 2, Chapter 13 and Chapter 6 in Volumes 3 to 9) and have been agreed with the LVA consultees as set out in Volume 2, Appendix 13H.</p> |
| Project-Wide | Landscape and Visual | 4.5.3 | The Applicant should take care to ensure that the ES correctly identifies relevant designated sites e.g. Suffolk Coast and Heaths Area of Outstanding Natural Beauty, not Suffolk Coast and Heaths Area of Natural Beauty. | Designations have been correctly referenced throughout the ES . |
| Project-Wide | Landscape and Visual | 4.5.4 | The ES should describe any landscape mitigation measures relied upon during the construction period as well as the operational period. | Each Landscape and Visual chapter (Volume 2, Chapter 13 and Chapter 6 in Volumes 3 to 9 of the ES) includes a section that identifies landscape mitigation measures for both the construction period and the operational period, as applicable. This includes primary and tertiary mitigation considered to be an inherent part of the proposed development and secondary mitigation required to reduce or avoid any significant adverse effects, where reasonably practicable. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|--------------|-------------------------------------|---------------------------|--|--|
| Project-Wide | Landscape and Visual | 4.5.5 | The ES should define acronyms in the first instance e.g. ZTV is defined as Zone of Theoretical Vision in the Scoping Report whereas in Appendix 1A and the Guidelines for Landscape and Visual Impact Assessment (Third Edition) it is defined as Zone of Theoretical Visibility. The Inspectorate considers this likely to be an anomaly/oversight, however if there is any discernible difference this should be clearly explained in the ES. The Inspectorate expects that the ZTV for the Proposed Development will be established having regards to the proposed and relocated pylons for overhead lines. | A list of acronyms is provided in Appendix 1A of Volume 1 of the ES , with any topic specific acronyms also referenced in the Landscape and Visual chapters of Volumes 2 to 9 of the ES . The ZTVs for the main development site clearly set out which elements have been included to generate the ZTV. |
| Project-Wide | Landscape and Visual | 4.5.6 | The assessment of impacts from night time lighting should include all elements of the Proposed Development, including the power station site, roads, campus accommodation, and any off-site associated development. The Inspectorate recommends that the ES include an assessment of light spill to local residents where this has the potential to lead to significant effects from disturbance during the construction and operational periods. | A night-time lighting appraisal has been undertaken for the main development site and associated developments. These are included within an appendix to the landscape and visual chapters (Volume 2, Appendix 13, and Appendix 6B in Volumes 3 to 9). |
| Project-Wide | Landscape and Visual | 4.5.7 | The Scoping Report includes a list of potential effects associated with the Proposed Development but this list should not be regarded as conclusive at this stage since the full extent of the Proposed Development has not yet been determined. The ES should identify and assess all potentially significant effects. | The landscape and visual chapters (Volume 2, Chapter 13 and Chapter 6 in Volumes 3 to 9 of the ES) include an assessment of all likely effects from the proposed development. |
| Project-Wide | Landscape and Visual | 4.5.8 | The Inspectorate advises that the Applicant assess any significant effects arising from the potential impact of smoke and steam on amenity. Any visible plumes from aerial emissions should be described in the ES and included in the photomontages presented within the assessment of visual effects. | No visible plumes are anticipated to arise from proposed development during the operational and construction phase, so no assessment has been undertaken. |
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.1 | In addition to the other reasons stated in this Paragraph, the update to the approach should be in order to comply with the requirements of the 2017 EIA Regulations, and this should be made clear in the ES. | The assessment of terrestrial ecology and ornithology is considered compliant with the requirements of Regulation 14 of the EIA Regulations 2017. |
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.2 | The Scoping Report refers to the previous approach presented in Appendix 1A of the Scoping Report. However, the Scoping Report does not explicitly state what approach will be adopted as of now. The Scoping Report also fails to explain why the study area for the off-site associated development is set at being a maximum of 5km and why it is set at 20km for the main development site. The ES should include information to explain how the ecological Zone of Influence (ZoI) has been determined. The Inspectorate notes the approach to define a ZoI (Paragraph 7.2.17 of Appendix 1A) is based on the extent of the anticipated impacts. The Applicant should also make effort to agree the approach to establishing the ZoI with relevant consultation bodies. | The justification for the ZoI, study area and survey area for designated sites, plants and habitats, and species has been provided in each relevant Volume of the ES , both within the Terrestrial Ecology and Ornithology ES chapters within Volumes 2 to 9 and supporting technical appendices. |
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.3 | The Scoping Report states that 'a full suite' of ecological surveys will be undertaken in relation to the Two Village bypass and Sizewell LinkRoad. The Inspectorate considers that a robust baseline should be established for the entire Proposed Development, including all the off-site associated development (as indicated by Paragraph 6.7.7). The Scoping Report does not provide a comprehensive list of specific surveys undertaken/in progress. The Inspectorate also notes that there is no commitment to undertake surveys for freshwater invertebrates, fish species including European eel, and invasive species. These surveys may be required in order to establish the likely significant effects of the Proposed Development. The Applicant should make effort to agree the extent to the survey effort required to inform the assessment in the ES. If specific surveys are not carried out against the advice of relevant consultation bodies the ES should provide the reasons for not doing so with reference to likely significant effects. The ES should include details of the location, methodology, timings, and findings of the ecological surveys undertaken. The Inspectorate advises that appropriate figures are included in the ES to present this information. | A suite of ecological surveys have been undertaken to establish the baseline across the proposed development sites. A summary of the baseline surveys undertaken is provided within the Terrestrial Ecology and Ornithology ES chapter (Volume 2, Chapter 14 and Chapter 7 of Volumes 3 to 9), with further details provided in the accompanying appendices which includes details on the location, timings and findings of the surveys. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|---------------------------------|-------------------------------------|---------------------------|--|---|
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.4 | The Scoping Report states that terminology will be changed from 'Key Ecological Receptors' to bring the methodology in line with Chartered Institute of Ecology and Environmental Management (CIEEM) 2018 Guidelines for Ecological Impact Assessment. The Scoping Report does not explain how impacts to receptors of lower than 'medium' value will be assessed. The Inspectorate reminds the Applicant to ensure that sufficient regard is given to biodiversity as required by the NERC Act 2006 and the relevant NPSs, and that all receptors that could be significantly affected are assessed. | <p>In accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) 2018 Guidelines for Ecological Impact Assessment habitats and species considered sufficiently important (in nature conservation terms) to be a material consideration in the planning decision, as well as legally protected and/or controlled species for which there is a potential for a breach of their respective legislation as a result of the Sizewell C Project, are considered to be Important Ecological Features (IEFs).</p> <p>The first stage is to identify IEFs, to include habitats, species and ecosystems, including ecosystem function and processes, with reference to the geographical context in which they are considered important. An assessment is then made of whether these IEFs would likely be subject to impacts and, if so, these are taken forward into the Ecological Impact Assessment (EclA) as a material consideration in the planning decision. Where protected species are present and there is the potential for a breach of the legislation, those species are also included in the EclA.</p> <p>Those IEFs that qualify purely on the basis of legislative considerations (such as badgers) rather than as a result of their conservation status, are addressed separately in the EclA from those that are of material concern, with the latter being assessed in greater detail. For both, the ES outlines what measures are required to prevent any contravention of the legislation.</p> <p>A biodiversity net gain assessment has been undertaken, and included in the ES, for the permanent development sites, specifically the main development site (Volume 2, Appendix 14E), two village bypass (Volume 5, Annex 7A.4), Sizewell link road (Volume 6, Annex 7A.4) and Yoxford roundabout (Volume 7, Annex 7A.4).</p> |
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.5 | The Scoping Report states that the assumptions stated in Appendix 1A remain the basis for establishing the extent of effects from emissions to air and from release of pollutants to watercourses. However, no justification in support of these assumptions is provided or why they remain valid given the time which has elapsed. The Inspectorate advises that the consideration of such effects is informed by the relevant, updated, assessments and appropriate cross reference is made in the ES | All assessment assumptions and limitations have been reviewed and are clearly set out within each of the terrestrial ecology and ornithology assessments presented in Volumes 2 to 9 of the ES . Any generic assumptions in assessment methodology are presented in Volume 1, Appendix 6J . |
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.6 | Table 6.10 of the Scoping Report presents elements of the Proposed Development to be scoped in for assessment in the ES. There are no elements identified as being scoped out. The Table fails to describe what (if any) specific impacts will be assessed instead referring the reader to information contained in Appendix 1A. The ES must set out what impacts could occur in each phase of the Proposed Development, describe the receptors that could be affected, and provide an assessment of effects where they could be significant. Justification must be provided should any identified impact be ruled out of further assessment in the ES. | The ES has considered the potential terrestrial ecology and ornithology effects for the main development site and associated development sites in the respective volumes (Volumes 2 to 9). Where IEFs or specific impacts are scoped out, these have been clearly stated along with the relevant justification. |
| Off Site Associated Development | Terrestrial Ecology and Ornithology | 4.6.7 | The Scoping Report refers to the information presented in Appendix 1A and highlights some additional potential impacts. However, no justification is provided to explain the extent to which information in Appendix 1A remains relevant, in particular with regards to the off-site associated development where the proposals have changed. The relevant Paragraphs of Appendix 1A (7.2.38-7.2.39), as referred to in this section of the Scoping Report present information restricted to potential impacts at the main development site. The ES must consider potential impacts for the off-site associated development as well as the main development site and assess the ecological effects where these could be significant. | <p>In accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) 2018 Guidelines for Ecological Impact Assessment habitats and species considered sufficiently important (in nature conservation terms) to be a material consideration in the planning decision, as well as legally protected and/or controlled species for which there is a potential for a breach of their respective legislation as a result of the Sizewell C Project, are considered to be Important Ecological Features (IEFs).</p> <p>The first stage is to identify IEFs, to include habitats, species and ecosystems, including ecosystem function and processes, with reference to the geographical context in which they are considered important. An assessment is then made of whether these IEFs would likely be subject to impacts and, if so, these are taken forward into the Ecological Impact Assessment (EclA)</p> <p>The ES has considered the potential terrestrial ecology and ornithology effects for the main development site and Associated Development sites within Volume 2, Chapter 14 and Chapter 7 of Volumes 3 to 9. Where IEFs or specific impacts are scoped out, these have been clearly stated along with the relevant justification.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

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|-----------------------|-------------------------------------|---------------------------|---|--|
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.8 | <p>The Scoping Report states that no habitat loss will result from designated sites from the off-site associated development. No evidence is provided to support this conclusion. There is also limited information on any other impacts which could arise on designated sites. It is noted that the Proposed Development lies within the Outer Thames Estuary SPA and adjacent to Minsmere to Walberswick Heaths & Marshes SAC and Minsmere-Walberswick SPA and Ramsar site. The response from Natural England in Appendix 2 identifies potential impact pathways to these sites and a number of other internationally and nationally designated sites, some of which are identified in Appendix 1A.</p> <p>The ES should include a full up to date description of the designated sites and habitats within the defined Zol and provide an assessment of the impacts of the Proposed Development where significant effects could occur. The assessment should include consideration of how designated sites and other valuable habitats may be ecologically linked to each other when determining the likely significant effects on their ecology.</p> | <p>Up to date descriptions and plans of designated sites relevant to the Zone of Influence of the Sizewell C Project are detailed within the respective volumes (Volumes 2 to 9). The assessment has considered potential ecological impacts to each designated sites, include ecologically linkages, and were relevant, these have been scoped in to and discussed within the impact assessment.</p> <p>The associated developments sites would result in no direct land take from statutory designated sites.</p> |
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.9 | <p>As well as the species identified, the crossing of watercourses could affect populations of other protected and valuable species if present, including fish species and aquatic invertebrates. Crossings also have the potential to impact on watercourse habitats and introduce barrier effects. These impacts should be assessed in the ES and where mitigation is proposed, within the design of any crossing structures, the ES should clearly reflect this in the description of the Proposed Development and indicate how the design will be secured.</p> | <p>Where the Sizewell C Project crosses or comes within the Zol of a watercourse and potential impacts are identified, these impacts have been scoped into the ES within Volumes 2 to 9, where relevant of justification for scoping out is provided. The primary (embedded design) mitigation often includes design measures that protect the integrity of watercourse banks, maintain connectivity, and maintain the safe passage of species. These specific measures are described within the relevant ES volumes and are considered within the terrestrial ecology and ornithology assessment.</p> |
| Main Development Site | Terrestrial Ecology and Ornithology | 4.6.10 | <p>Reference is made to a number of mitigation proposals which the Scoping Report suggests are embedded within the design of the Proposed Development, including the design of the Sizewell Marshes SSSI crossing, the re-alignment and water control measures on Sizewell Drain, drainage and lighting design, and proposals to retain, restore and create habitats. An unspecified solution to separate the main development site platform from the SSSI to avoid effects to hydrology and geology is also mentioned but not described. It is not clear how the measures described are captured by the description of the Proposed Development in the Scoping Report. The Inspectorate reminds the Applicant to ensure that all mitigation relied on in the ES is adequately secured.</p> | <p>Primary and tertiary mitigation measures have been specified within the relevant ES volumes, specifying those which are of benefit to terrestrial ecology and ornithology.</p> <p>Further detail is provided within the terrestrial ecology and ornithology ES Chapter (Volume 2, Chapter 14, and Chapter 7 of Volumes 3 to 9).</p> <p>The mitigation route map (Doc Ref. 8.12) provides a summary of mitigation measures relied upon in the ES and sets out the proposed securing mechanisms.</p> |
| Project-Wide | Terrestrial Ecology and Ornithology | 4.6.11 | <p>Mitigation measures are described in overview, and not in relation to specific impacts. Therefore, it is difficult to understand from the information in the Scoping Report if or how the mitigation hierarchy has been applied. The Inspectorate would expect the Applicant to correctly apply the mitigation hierarchy and the ES to clearly explain how this process has been applied to the assessment.</p> | <p>The mitigation hierarchy of avoidance, reduce or compensate, has been applied with an emphasis to include and embed appropriate measures into the design of the proposed development as primary mitigation. Primary and tertiary mitigation measures have been specified within the relevant ES volumes, specifying those which are of benefit to terrestrial ecology and ornithology.</p> |
| Project-Wide | Amenity and Recreation | 4.7.2 | <p>The ES should include figures/ plans that depict the different study areas and sensitive receptors used in the assessment.</p> | <p>Each of the amenity and recreation ES Chapters (Volume 2, Chapter 15, and Chapter 8 of Volumes 3 to 9) provides a written description of the study area and sensitive receptors within each of the Amenity and Recreation Assessments. These descriptions are supported by figures. .</p> |
| Project-Wide | Amenity and Recreation | 4.7.3 | <p>The Inspectorate notes that the criteria to establish the sensitivity of the identified receptors and magnitude of the impacts has been amended since the 2014 Scoping Report. The ES should clearly define which criteria have been used in describing the sensitivity of the receptors, the magnitude of the potential impacts and the significance. The ES should explain any reasons or limitations associated with the application of professional judgment.</p> | <p>Details of the assessment criteria which have been applied to the assessment of Amenity and Recreation impacts are included within Appendix 6K of Volume 1, with a summary provided in Volumes 2 to 9 of the ES. This includes the criteria used in defining the sensitivity of receptors, magnitude of potential impacts and significance within each of the Amenity and Recreation Assessments presented within Volumes 2 to 9 of the ES in accordance with the approach set out in the 2019 EIA Scoping Report. Any reasons or limitations associated with professional judgement are also set out.</p> |
| Project-Wide | Amenity and Recreation | 4.7.4 | <p>Noting the impacts identified in Paragraph 6.8.27 of the Scoping Report, the Inspectorate recommends that the Amenity and Recreation ES assessment addresses potential impacts on ecologically sensitive sites from increased visitor pressure, with reference to the Terrestrial Ecology and Ornithology assessment where applicable.</p> | <p>Where ecologically sensitive sites that are accessible to the public for recreation are identified within the study area of the amenity and recreation assessment, the ES has identified the potential additional recreational pressures for these sites. A rights of way and access strategy is provided in Volume 2, Appendix 15I. Reference is made, where relevant, to the terrestrial ecology and ornithology assessments.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|--------------|------------------------|---------------------------|--|---|
| Project-Wide | Amenity and Recreation | 4.7.5 | Paragraph 6.8.31 of the Scoping Report states that mitigation measures remain as set at Paragraphs 7.4.39 to 7.4.40 of Appendix 1A. The Inspectorate notes that the ES should include an up to date Right of Way and Open Access Strategy, that is developed in line with the objectives listed at paragraph 6.8.31 of the Scoping Report. | A Rights of Way and Access Strategy has been developed for the final Project and is presented within Appendix 15I of Volume 2 . The Rights of Way and Access Strategy has been developed in accordance with the objectives listed at paragraph 6.8.31 of the 2019 EIA Scoping Report. |
| Project-Wide | Historic Environment | 4.8.2 | This document (<i>Separate Scoping Document for impacts to setting</i>) has not been appended to the Scoping Report and the Scoping Report does not explain how it has been informed by it, including with regards to the study area which is noted in Paragraph 6.9.11 as remaining the same as stated in Appendix 1A. The Applicant should make effort to agree the scope of the assessment has been determined, with reference to any consultation with the relevant consultees. | Relevant consultees have been consulted separately on the settings scoping report, provided within Volume 1, Annex 6L.1 . This report sets out proposals for the scope of assessment of potential effects arising from change to setting of heritage assets caused by the construction and operation of the proposed Sizewell C Project and associated developments. |
| Project-Wide | Historic Environment | 4.8.3 | The ES should include details of the location, methodology, timings, and findings of the investigations undertaken. The Inspectorate advises that appropriate figures are included in the ES to present this information and that all supporting technical reports relevant to the assessment of significant effects are included in the ES or as an appendix. | Geophysical survey and evaluation trenching reports are included as appendices to the relevant ES chapters (Volume 2, Chapter 16 and Chapter 9 of Volumes 3 to 9), and findings of these surveys have been incorporated into ES chapters as appropriate. |
| Project-Wide | Historic Environment | 4.8.4 | The table describes the types of impacts anticipated for the elements of the Proposed Development to be scoped in for assessment in the ES, however it fails to identify specific impacts on identified receptors. The Table does identify any element of the Proposed Development to be scoped out. The Scoping Report provides no information regarding operational effects resulting from the off-site associated development. As noted above, the Scoping Report makes reference to a Settings Scoping Document which has been consulted upon, however no further detail is provided as to how this document has informed the approach to the assessment. The ES must describe the impacts to historic environment receptors and assess any likely significant effects that would occur. The assessment of likely significant effects should address impacts during operation across the entirety of the Proposed Development including the off-site associated development sites. | In terms of direct effects on heritage assets, the heritage scoping (Volume 1, Appendix 6L.1) report identified types of impact that would be assessed in the EIA and set out proposals for further investigation work to identify specific archaeological heritage assets within the various sites of the proposed development. Heritage assets identified as potentially subject to significant effects arising through changes to their setting during all stages of the project including construction, operation and removal and reinstatement phases (where relevant) have been assessed within Volumes 2 to 9 . |
| Project-Wide | Historic Environment | 4.8.5 | The Scoping Report does not explain if or how terrestrial and marine historic environment assessments will be presented in the ES. In the interests of clarity these comments apply to both the assessment of the terrestrial and the marine historic environment, and the Inspectorate expects both matters to be assessed in the ES. | Effects on the terrestrial historic environment have been assessed for the main development site and associated development sites. These assessments are presented at: Volume 2, Chapter 16 (main development site), Volume 3 Chapter 9 Northern park and ride), Volume 4 Chapter 9 (southern park and ride), Volume 5, Chapter 9 (two village bypass), Volume 6, Chapter 9 (Sizewell link road), Volume 7, Chapter 9 (Yoxford roundabout and other highways improvements), Volume 8, Chapter 9 (freight management facility), Volume 9, Chapter 9 (rail) and Volume 10, Chapters 3 and 4 (Inter-project cumulative effects and effects with other plan and projects). Effects on the marine historic environment have been assessed in respect of the main development site only, and this assessment is presented in Volume 2, Chapter 23 . |
| Project-Wide | Soils and Agriculture | 4.9.2 | The Scoping Report refers to the recommendations in Appendix 1B for the approach to further Agricultural Land Classification (ALC) and describes a scope of further work developed in consultation with Natural England. The ES should include the locations of the further surveys/ sampling studies. The ES should include a detailed description of the baseline conditions for the entire Proposed Development and should set out how this information has been gathered. | The ES provides details of soil survey (auger) locations within relevant chapters of Volumes 2 to 9 of the ES (Volume 2, Chapter 17 and Chapter 10 of Volumes 3 to 9) and associated appendices. An explanation of the methodology used to gather the baseline information on soils and Agricultural Land Classification (ALC) grades is provided within the ES chapters and associated appendices. |
| Project-Wide | Soils and Agriculture | 4.9.3 | The Scoping Report states that a clear statement will be made as to whether effects are significant or not significant, based on the methodology in Table 5.3. Sensitivity criteria are provided in Table 6.15 but the Scoping Report refers to Appendix 1A for magnitude criteria. It is not clear how this Table includes magnitude criteria for the new construction impacts listed in Paragraph 6.10.16. The ES should describe how significance will be defined with reference to a relevant and clearly defined methodology. | Volume 1, Appendix 6M of the ES sets out the methodology used to assign significance, including criteria for sensitivity of receptors and for magnitude of impact. This is summarised within each of the soils and agriculture chapters presented within Volumes 2 to 9 of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|--------------|-----------------------|---------------------------|--|--|
| Project-Wide | Soils and Agriculture | 4.9.4 | <p>The Scoping Report provides limited detail on the reinstatement of agricultural land. The ES should describe the approach to reinstatement of agricultural land with sufficient detail addressing details such as surface water features, the proposed drainage regime and the proposed reinstated land.</p> <p>The Scoping Report makes no reference to a Landscape Strategy and refers to how this was addressed in 2014 in Appendix 1A. If a Landscape Strategy is proposed, the strategy should include details related to comments made above. It should also be clear how such a strategy would be secured and delivered.</p> | <p>An outline Soil Management Plan (SMP) has been prepared and included within Volume 2, Appendix 17C. The SMP includes information on handling methods and measures which would be implemented to minimise impacts on soil resources such as:</p> <ul style="list-style-type: none"> • ensuring soils are stripped and handled in the driest condition possible; • ensuring topsoil and subsoil resources are stripped and stockpiled separately; • protection of stockpiles from erosion through establishment of a grass cover and from tracking over through appropriate signage and/or fencing; • confining vehicle movements to defined haul routes until all the soil resource has been stripped; and • ensuring the physical condition of all restored soil profiles to at least 1.2m below ground level is sufficient for the post-reinstatement agricultural use. <p>The requirements of the Outline Soil Management Plan are included within the Code of Construction Practice (CoCP) (Doc Ref. 8.11).</p> <p>The Outline Landscape and Ecology Management Plan (OLEMP) (Document Reference 8.02) sets out how soils would be used to support the establishment of the required landscape and habitat plans across the main development site.</p> |
| Project-Wide | Soils and Agriculture | 4.9.5 | The Scoping Report suggests that "toolbox talks" will be implemented as a form of mitigation. The ES should include sufficient detail relating to the talks and explain the level of confidence that can be attached to them as a form of mitigation. | Toolbox talks will form part of the mitigation as a way of upskilling those involved in soil related operations to ensure adherence to the requirements of the Soil Management Plan (SMP). These will be in addition to supervision, monitoring and auditing, all of which would be detailed in the SMP, and included, and secured through, the CoCP (Doc Ref. 8.11). |
| Project-Wide | Soils and Agriculture | 4.9.6 | The ES should assess impacts to all agricultural land and agricultural holdings where significant effects may arise from the Proposed Development. The percentage of agricultural land taken from agricultural holdings should also be calculated and provided in the ES, as well as the total area so that impacts can be clearly understood. | The soils and agriculture assessments provided within Volume 2, Chapter 17 and Chapter 10 of Volumes 3 to 9 of the ES present an assessment of the effects of the proposed development on agricultural land and agricultural holdings and include the percentage of agricultural land affected by the project. The criteria relating to the assessment on agricultural holdings is included within Volume 1, Appendix 6M . |
| Project-Wide | Soils and Agriculture | 4.9.7 | Justification should be given within the ES for any development on agricultural land. In the absence of a complete baseline being available it is not known if any Best and Most Versatile (BMV) land will be affected. Alternatives to avoid development on BMV agricultural land should also be explored and discussed within the ES. | <p>As far as possible, ALC surveys have been undertaken, in accordance with published guidelines, to identify all areas of Best and Most Versatile (BMV) Land within the proposed development site boundaries. Where access to land was not granted, all un-surveyed land is treated as being potentially BMV land for the purposes of the assessment in order to assess a worst-case scenario.</p> <p>As part of the design process, SZC Co. has sought to minimise the impact of the proposed development on Best and Most Versatile Land and optimise the site layout to reduce land take. Volume 1, Chapter 4, Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 of the ES provide a summary of main alternatives considered by SZC Co., which includes consideration of environmental factors.</p> |

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| Project-Wide | Geology and Land Quality | 4.10.1 | <p>The Scoping Report proposes to scope out effects on geology as a valuable resource due to no statutory designated geological sites being identified within the study area (500m from the main development site). However, a clear definition of geology as a valuable resource has not been clearly defined in the Scoping Report.</p> <p>As the Scoping Report fails to provide a clear definition of geology as a valuable resource, the Inspectorate does not agree that geology as valuable resource can be scoped out of the assessment. This definition should be provided in the ES and an assessment made of effects on geology as a valuable resource where these could result in significant effects.</p> <p>However, the Inspectorate notes that as no statutory designated geological sites have been identified within the study area (500m from the main development site), effects on statutory designated geological sites within 500m from the main development site can be scoped out of the ES.</p> | <p>Volume 1, Appendix 6N, defines the effects on geology as a valuable resource has been as the effects of the proposed development on mineral resource sterilisation, loss or damage to regionally important geological sites, geological Sites of Special Scientific Interest (SSSIs).</p> <p>In line with the Scoping Opinion, the proposed main development site and proposed associated developments are unlikely to impact on important geology sites as no geological SSSIs or Local Geological Sites have been identified within the study areas, and have been scoped out of the EIA. However, given the revised Scoping Opinion, an assessment of the effects on mineral resources (i.e. mineral reserves which have a potential to be extracted for economic purposes) has been scoped in to the geology and land quality assessment.</p> <p>Details of the assessment methodology have been included in Volume 1, Appendix 6N, and summarised in the geology and land quality ES Chapter; Volume 2, Chapter 18 and Volumes 3 to 9, Chapter 11.</p> |
| Other Rail Improvements | Geology and Land Quality | 4.10.2 | <p>Table 6.17 of the Scoping Report proposes to scope out an assessment of the effects that may arise from minor railway upgrade works and level crossing works. However, as the Scoping Report has not provided details of the works or evidence that the works will not result in significant effects to geology and land quality, the Inspectorate does not agree that this matter can be scoped out of the ES. The ES should describe the minor works require to level crossings and assess any likely significant effects that may occur.</p> | <p>Consideration has been given to the need for a detailed assessment of level crossing works within the geology and land quality assessment provided in Volume 9, Chapter 11. This chapter provides a screening assessment of each of the level crossing upgrade works and provides justification as to why a detailed assessment is, or is not required.</p> |
| Off Site Associated Development | Geology and Land Quality | 4.10.3 | <p>Paragraph 6.11.9 defines the assessment study area in regard to paragraph 7.10.7 of Appendix 1A (the Scoping Report incorrectly references 1A instead of 1B) which only refers to the main development site and the coastline between Southwold to Orford Ness. Paragraph 6.11.9 states the study area is the area "within/500m from the red line boundary" but does not clearly state whether this includes all off-site associated development sites, or just the main development site. The ES should concisely describe the study areas for the main development site and off-site associated development sites.</p> <p>The Inspectorate also notes that the study area for the main development site has been reduced from 1km to 500m based on the surveys and investigations undertaken. The study areas should extend to the extent of anticipated likely significant effects and any evidence gathered to inform the study area chosen should be provided in the ES. The Inspectorate advises that effort is made to agree the study area with relevant consultation bodies.</p> | <p>The definition of the study area is provided in Volume 1, Appendix 6N, with further details of the study areas for each site provided in Volume 2, Chapter 18 and Chapter 11 of Volumes 3 to 9. In summary, the study area for the consideration of effects on human receptors, controlled waters, ecological receptors and property receptors for both main development site and the associated developments includes the site and land immediately beyond it to a distance of 500 metres (m). If the presence of mobile contaminants and pathways within the study area is confirmed, then the study area may be extended to identify additional receptors forming PCLs, and has been considered on a site by site basis.</p> <p>Volume 1, Appendix 6N also summarises the consultation undertaken with Suffolk County Council and the Environment Agency with regards to the scope of the assessment and the size of the study area.</p> |
| Project-Wide | Geology and Land Quality | 4.10.4 | <p>The Scoping Report states that "limited testing data is available for the temporary construction area and the LEEIE" (Land East of Eastlands Industrial Estate) and omits reference to chemical tests being completed or proposed for the off-site associated developments. The assessment in the ES should be based upon relevant and up to date information, including chemical testing at all relevant locations. If chemical tests will not be undertaken at off-site associated development sites, the ES should justify this approach, state the assumptions/ uncertainties resulting from not undertaking chemical tests for the entirety of Proposed Development, and seek to agree this approach with the relevant consultation bodies.</p> | <p>As part of previous investigations undertaken for the MDS, chemical testing has been carried out which includes more extensive testing across the MCA and limited testing within the TCA and LEEIE. Further details are provided in Volume 2, Chapter 18, Appendix 18A.</p> <p>No chemical testing has been undertaken within the off-site associated development sites. Ground investigations are proposed to be undertaken within the associated development sites as part of the design phase prior to the commencement of construction works to confirm ground conditions, contamination status and other ground related risks. Further details are provided in Volumes 3 to 9, Chapter 11.</p> <p>As part of ongoing consultation for the Sizewell C Project, the Phase 1 Desk Studies Reports (associated development sites) and Phase 2 Ground Investigation Report (MDS) have been provided to the Local Authorities and Environment Agency for information and comment. These reports include recommendations for future works including chemical testing.</p> |

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| Off Site Associated Development | Geology and Land Quality | 4.10.5 | No evidence has been provided within the Scoping Report to support the conclusion that off-site associated development sites are at low risk from ground contamination. The ES should include evidence-based conclusions, and where no evidence is available, a robust justification that explains and accounts for uncertainty and assumptions applied in the assessment. | <p>The EIA has considered the effects on geology and land quality arising from the proposed off-site associated development in Chapter 11 of Volumes 3 to 9 of the ES.</p> <p>The geology and land quality assessment includes a study to establish the baseline conditions for the study areas with respect to geology, ground stability, hydrology, hydrogeology, contaminated land (including the potential for unexploded ordnance and ground gases) and historical uses. This includes a detailed desk based assessment supported by existing data, previous desk study and ground investigation reports, groundwater monitoring data, and historical records where available, as well as site visits.</p> <p>Any general assumptions or limitations are set out within Volume 1, Appendix 6N, and site specific assumptions or limitations set out within the ES Chapter.</p> <p>Following establishment of the baseline, the potential impacts on identified resources and receptors from the construction, operation and removal and reinstatement phases (where applicable) of the proposed development are identified and an assessment of likely effects undertaken including the consideration of mitigation measures.</p> |
| Off Site Associated Development | Geology and Land Quality | 4.10.6 | The Inspectorate notes that Figure 7.10.1 of Appendix 1B depicts the locations of Phase 2 intrusive boreholes. The figure clearly shows that the boreholes are located within the proximity of the Sizewell C nuclear power station. As no ground investigations have been undertaken for the off-site associated development sites and no further ground assessments are proposed, there is no evidence to support the statement in Paragraph 6.11.14 of the Scoping Report that "the existing baseline is robust for the purpose of the assessment". The ES should include a robust baseline assessment that provides an accurate representation of the study area and seek to agree the ground investigation methodology with the relevant statutory body. | <p>Volume 1, Appendix 6N, sets out the approach undertaken for the geology and land quality assessment.</p> <p>The baseline conditions for the study area for the associated development sites with respect to geology, ground stability, hydrology, hydrogeology, contaminated land (including the potential for unexploded ordnance and ground gases) and historical uses has been informed through examination of existing data, previous desk study and ground investigation reports, groundwater monitoring data, and historical records where available, as well as site visits. The baseline assessment for the associated development site is presented within Chapter 11 of Volumes 3-9.</p> <p>Volume 1, Appendix 6N also summarises the consultation undertaken with Suffolk County Council and the Environment Agency with regards to the scope of the assessment and the size of the study area. Both Suffolk County Council and the Environment Agency were provided with the Phase 2 Geo-Environmental Interpretative Report for the site for comment. The Environment Agency and Suffolk County Council are in general agreement with the proposed scope of the assessment and study area.</p> |
| Project-Wide | Geology and Land Quality | 4.10.7 | The ES should assess impacts to soil and address the need for a Soil Management Plan (SMP) to establish how soil will be stripped, stored, handled and treated/ remediated. The SMP should include sufficient detail regarding the methods to be applied and to give confidence as to the likely efficacy of such measures. The ES should state how the SMP will be secured, for example through a requirement in the dDCO. | An Outline Soil Management Plan has been produced and is included as Volume 2 Appendix 17C and establishes how soil would be stripped, stored, handled and treated/ remediated. Measures included within the Outline Soil Management Plan have been included within the CoCP (Doc Ref. 8.11). The mitigation route map (Doc Ref. 8.12) provides a summary of mitigation measures relied upon in the ES and sets out the proposed securing mechanisms. |
| Project-Wide | Geology and Land Quality | 4.10.8 | Any anticipated maintenance activities which could significantly affect geology and soils should be described and assessed in the ES. | The ES considers the potential impacts associated with anticipated maintenance activities which could significantly affect geology and soils in Volume 2, Chapter 18 and Volumes 3 to 9, Chapter 11 . |
| Project-Wide | Geology and Land Quality | 4.10.9 | <p>The ES should include a full assessment of the removal and reinstatement of the temporary works and associated land stating the anticipated significant effects and any required mitigation measures.</p> <p>If mitigation measures are required, the ES should state how the measures will be secured through the draft DCO or other suitable legal mechanism.</p> | <p>The geology and land quality assessment assesses the likely effects of the reinstatement of land required temporarily at the end of construction and during the removal and reinstatement phase for each temporary development site (where relevant) in Volume 2, Chapter 18 and Volumes 3 to 9, Chapter 11.</p> <p>The mitigation route map (Doc Ref. 8.12) provides a summary of mitigation measures relied upon in the ES and sets out the proposed securing mechanisms.</p> |

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| Project-Wide | Geology and Land Quality | 4.10.10 | <p>The aspect chapter states no secondary mitigation measures (as defined by Scoping Report paragraph 5.4.4) are proposed at this stage of the process. If secondary mitigation measures are to be required, the ES should include a description of the measures, the anticipated efficacy of the measures, the resultant effects prior to, and post, implementation of the mitigation measures, and how the measure will be secured through the draft DCO or other legal mechanism.</p> <p>The ES should include a full description of any remediation which may be required and confirm how this is to be secured. The ES should assess any likely significant effects which could occur as a result of remediation. Any assumptions in this regard (for example, traffic movements, waste handling, and contaminated land) should be clearly stated in the ES.</p> | <p>Secondary mitigation measures required to reduce or avoid significant effects have been included where relevant within the geology and land quality assessment and further discussion is provided for each site in Volume 2, Chapter 18 and Volumes 3 to 9, Chapter 11. The mitigation route map (Doc Ref. 8.12) provides a summary of identified secondary mitigation measures and sets out the proposed securing mechanisms.</p> <p>As the majority of the construction works would be undertaken on land with no or limited historic contamination sources, it is considered that no significant remediation activities would be required. However, further ground investigation would be undertaken to confirm ground conditions, contamination status and other ground related risks prior to commencement of construction. Where the ground investigation and subsequent generic risk assessments identifies unacceptable levels of contamination and ground related risks, further detailed quantitative risk assessment followed by, where necessary, and the remediation of soil and groundwater contamination prior to construction may be required.</p> |
| Project-Wide | Groundwater and Surface Water | 4.11.2 | <p>The study area is stated as being unchanged from that described in Appendix 1A for the ground water assessment. The Scoping Report does not clarify if the study area sufficiently accounts for the new boundary of the Proposed Development, although it does state that the off-site associated development will be included. The Applicant should ensure that the groundwater study area for the Proposed Development, includes the off-site associated development sites and is sufficient to capture the full extent of the anticipated likely significant effects.</p> <p>No updated version of Figure 7.11.1 has been provided showing the spatial extent of the groundwater monitoring survey work. The ES should justify the locations of the monitoring sites and explain how the monitoring sites robustly record and monitor groundwater applicable to the study area.</p> | <p>The study area of the groundwater and surface water assessment does account for the new boundary of the Proposed Development including the off-site associated development sites. Details of the groundwater study areas are provided within each of the surface water and groundwater assessments presented within Volume 2, Chapter 19, and Chapter 12 of Volumes 3 to 9 of the ES. The groundwater and surface water assessment utilises the existing data and site visit information presented in the geology and land quality ES Chapters (Volume 2, Chapter 18, and Chapter 11 of Volumes 3 to 9, and associated appendices) to inform the assessment.</p> <p>Volume 2, Figure 19.3 shows the location of the groundwater monitoring locations, and Volume 2, Chapters 18 and 19 provides a summary of the conclusions of the groundwater quality data.</p> |
| Off Site Associated Development | Groundwater and Surface Water | 4.11.3 | <p>The 2014 study area (Appendix 1A) is referenced for the surface water assessment, however no updated information or figures are provided despite the changes to the Proposed Development.</p> <p>The Applicant should ensure that the surface water assessment study area for the Proposed Development, includes the off-site associated development sites and is sufficient to capture the full extent of the anticipated likely significant effects.</p> <p>The ES should clearly explain the approach taken to determine the level of survey effort relevant to characterise and assess impact to surface water receptors. If significant effects to surface water are identified the ES should explain how effects will be mitigated and address the extent to which monitoring and subsequent remedial action is necessary.</p> | <p>The study area of the assessment does account for the new boundary of the proposed development including the associated development sites. Details of the surface water study areas are provided within each of the surface water and groundwater assessments presented within Volume 2, Chapter 19, and Chapter 12 of Volumes 3 to 9 of the ES. The groundwater and surface water assessment utilises the existing data and site visit information presented in the geology and land quality ES Chapters (Volume 2, Chapter 18, and Chapter 11 of Volumes 3 to 9, and associated appendices) to inform the assessment, with further river corridor surveys having been undertaken as appropriate.</p> <p>The surface water and groundwater assessments presented within Volumes 2 to 9 of the ES sets out the primary and tertiary mitigation measures considered to be inherent in the design when assessing the likely environmental effects and the required secondary mitigation and monitoring requirements to reduce or avoid any identified significant effects.</p> |
| Project-Wide | Groundwater and Surface Water | 4.11.4 | <p>The locations of the further surveys/ studies should be stated in the ES and/ or presented on a figure and the results of the surveys/ studies should be included in the ES.</p> | <p>The locations of the surveys/ studies are detailed in the ES, and monitoring locations presented on figures as appropriate. The results of the surveys/ studies included in the ES.</p> |
| Project-Wide | Groundwater and Surface Water | 4.11.5 | <p>An assessment of potential changes to agricultural drainage regimes in surrounding agricultural holdings that may arise from the Proposed Development's alteration of ground and surface water should be included in the ES, with cross reference to other chapters where applicable.</p> | <p>All potential receptors have been identified in terms of changes to surface water and groundwater, and potential impacts assessed in the surface water and groundwater assessments presented within Volumes 2 to 9 of the ES.</p> |
| Project-Wide | Groundwater and Surface Water | 4.11.6 | <p>In addition to the potential effects described in Paragraphs 6.12.21 and 6.12.22 of the Scoping Report, the potential for construction activities to create new or exacerbate existing contamination pathways should be assessed and included in the ES.</p> | <p>The assessment considers the risks to various receptors from contamination and the change in this risk profile during construction, operation and, where relevant, removal and reinstatement. The assessment considers the potential for new contamination pathway and existing pathways.</p> |

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| Project-Wide | Groundwater and Surface Water | 4.11.7 | The Scoping Report refers to Paragraph 7.12.28 of Appendix 1A for a description of construction impacts. The design of the Proposed Development has since evolved. The ES should clearly state where existing ditches will be re-aligned and any proposals for the creation of drainage systems (including sustainable drainage systems (SuDS)) should be provided. The Inspectorate considers that the ES should include a figure to depict where re-alignment of drains and SuDS is required. | An outline drainage strategy has been prepared for the main development site and associated development sites and is included as Volume 2, Appendix 2A . The effects associated with the realignment of drainage systems is considered within relevant surface water and groundwater assessments presented within Volumes 2 to 9 of the ES . |
| Project-Wide | Groundwater and Surface Water | 4.11.8 | The Scoping Report references the use of Water Management Zones (WMZ) to control flows as a potential mitigation measure but has not stated where the WMZs will be located. The locations of the WMZs should be included in the ES and presented on a figure, and if attenuation ponds are to be incorporated in the WMZs, the dimensions and locations of the attenuation ponds should also be included in the ES. Paragraph 6.12.28 of the Scoping Report states that "a control structure" is proposed in the realigned Sizewell Drain. No further information regarding the "control structure" is included in this chapter or in the project description in the Scoping Report. The ES should describe the control structure in the project description including where it will be located, how it will operate, and include environmental assessments where relevant within the technical assessments. | The outline drainage strategy is been included as Volume 2, Appendix 2A . The strategy includes details of the water management zones, including details of the locations. The assessment of the likely effects associated with the realignment of drains, including the incorporation of a new control structure, is addressed in the relevant ES chapter (Volume 2, Chapter 19).The water management zones are considered in the ES and represented in the numerical modelling that underpins the assessment. |
| Project-Wide | Groundwater and Surface Water | 4.11.9 | The ES should have regards to recognised industry standard guidance to inform the assessment of the effect that the construction of new roads and re-alignments of existing roads will have on surface and groundwater e.g. that contained in the Design Manual for Roads and Bridges (DMRB). The Applicant should make every effort to agree the approach taken with relevant consultation bodies. | The ES is cognisant of standard guidance and follows best practice including Design Manual for Roads and Bridges and Network Rail guidance. Further details are provided in Volume 1, Appendix 6O . |
| Project-Wide | Groundwater and Surface Water | 4.11.10 | The Scoping Report does not address the potential for the Proposed Development to result in hydrological impacts to Minsmere – Walberswick Heath and Marshes SSSI. The ES should address whether impacts to this receptor are likely and assess any significant effects that may occur. The ES should also address whether monitoring of this sensitive receptor is necessary to enable ground and surface water changes to be identified and if necessary, determine the appropriate remedial measures. | The potential for change to occur in groundwater and surface water at Minsmere – Walberswick Heath and Marshes SSSI is assessed within Chapter 19 of Volume 1 . The assessment is based on consideration of proposed works and conceptual understanding of the groundwater and surface water supported by an extensive baseline monitoring dataset. |
| Project-Wide | Groundwater and Surface Water | 4.11.11 | The ES should consider the information included in the Leiston surface water management plan and explain the extent to which the Proposed Development is or is not compatible with it. | Suffolk County Council's Leiston Surface Water Management Plan (SWMP) has been specifically considered in the development of the Main Development Site Flood Risk Assessment (Doc Ref. 5.2). The findings of the SWMP, and the associated concerns of SCC, have been considered throughout stakeholder workshops during the development of the Outline Drainage Strategy (Volume 2, Appendix 2A), and specifically informed the stormwater management approach for the LEEIE (Land east of Eastlands Industrial Estate) proposed development site. |
| Project-Wide | Groundwater and Surface Water | 4.11.12 | The Scoping Report does not include information on the water requirements for the Proposed Development. The ES should state the source of the required water and assess adverse effects on water availability, including potable water where significant effects are likely. | Chapter 4 of Volume 2 of the ES identifies that, subject to SZC Co. obtaining formal agreement with Essex and Suffolk Water, freshwater for industrial systems, demineralisation plant and potable water would be provided via a connection to the mains water supply operated by Essex and Suffolk Water. Further information on the operational water supply options is provided in the Planning Statement (Doc Ref 8.4). The Site Water Supply Strategy, included as Appendix 8.4K of the Planning Statement identifies that during construction of the Sizewell C Project would entail many activities that would require water supply, both potable and non-potable. The strategy identifies the additional water supply options during construction and outlines the delivery approach and characteristics of those that have been shortlisted. The groundwater and surface water assessment for the main development site (Volume 2, Chapter 19) assesses effects from the temporary water storage area during construction |

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| Project-Wide | Flood Risk | 4.12.2 | The Scoping Report does not state the study area for the flood risk model boundaries used in the assessment. The ES should state the study area used and ensure the study extends to the extent of the anticipated significant effects. For clarity, the Applicant should consider including a figure depicting the study areas used for the flood risk assessment in the ES. | A flood risk assessment has been undertaken for the main development site and associated development sites; these are provided in Doc Ref. 5.2 to 5.9. The main conclusions from the FRAs with relevance to the potential flood sources affecting the site, and the impacts that the proposed development would have on altering the flood risk levels relating to the surrounding surface water receptors are summarised in groundwater and surface water ES chapters for the main development site (Volume 2, Chapter 19) and associated developments (Volumes 3 to 9, Chapter 12). |
| Project-Wide | Flood Risk | 4.12.3 | The 'site locations' for elements of the Proposed Development listed in Table 6.19 are not listed individually or clearly defined. The ES should accurately state which flood zones the development sites are located and provide a figure with the DCO application boundary mapped in relation to those flood zones. | Surface water and groundwater assessments presented within Volumes 2 to 9 of the ES clearly identify which flood zone the development sites are located within, supported by figures showing the flood zones. A flood risk assessment has been undertaken for the main development site and associated development sites; these are provided in Doc Ref. 5.2 to 5.9. The main conclusions from the FRAs with relevance to the potential flood sources affecting the site, and the impacts that the proposed development would have on altering the flood risk levels relating to the surrounding surface water receptors are summarised in groundwater and surface water ES chapters for the main development site (Volume 2, Chapter 19) and associated developments (Volumes 3 to 9, Chapter 12). |
| Project-Wide | Flood Risk | 4.12.4 | The Scoping Report states that hydraulic monitoring will be undertaken for sites located or partly located in Flood Zones 2 and 3. The ES should list the sites where hydraulic modelling has been undertaken. | Hydraulic modelling has been undertaken at the main development site, two village bypass, and Sizewell link road. Further details are provided within the relevant flood risk assessments (Doc Ref. 5.2, 5.5 and 5.6 respectively) and associated appendices. The main conclusions from the FRAs with relevance to the potential flood sources affecting the site, and the impacts that the proposed development would have on altering the flood risk levels relating to the surrounding surface water receptors are summarised in groundwater and surface water ES chapters for the main development site (Volume 2, Chapter 19) and associated developments (Volumes 3 to 9, Chapter 12). |
| Off Site Associated Development | Flood Risk | 4.12.5 | The Scoping Report states that channel surveys will be undertaken in relation to the Two Village Bypasses proposed, Sizewell Link Road and Theberton as these sites cross a "main river". The Scoping Report does not clearly state if any other development sites cross "main rivers". The Applicant should undertake channel surveys at all main river crossing locations. The ES should include a figure that depicts these locations. | Where appropriate, in channel surveys have been undertaken for watercourse crossings. |
| Project-Wide | Flood Risk | 4.12.6 | The ES should explain the extent to which other reasonable alternatives to compensatory flood storage have been considered and set out reasons for or against implementation. If compensatory flood storage is required, the locations of the compensatory flood storage sites should be stated in the ES and presented on a figure. Furthermore, an assessment determining whether potential significant effects may arise from the creation of compensatory flood storage should be undertaken and included in the ES. If raising finished floor levels of structures is required to mitigate flood risk, the new floor level should be stated in the ES and included in assessments for all ES aspect chapters. | A flood risk assessment has been undertaken for the main development site and associated development sites; these are provided in Doc Ref. 5.2 to 5.9. The requirement for any compensatory flood storage is considered therein. |
| Project-Wide | Flood Risk | 4.12.7 | The Scoping Report makes very limited reference to coastal or fluvial flood defences eg Paragraph 3.3.6 of the Scoping Report states that "flood defences and coastal protection measures" will be a permanent element of the Proposed Development. The ES should describe any flood defence structures or measures relied upon in the assessment. The ES should include a figure to depict their location and assess any significant effects that may arise from in respect to flooding. The Scoping Report does not state what or how coastal protection measures will be implemented. The ES should describe all coastal protection measures and any potential effects likely to arise from the construction and operation of the coastal protection measures to flooding and other relevant aspect chapters. | The ES chapters in Volume 2 , describes flood defence structures or measures relied upon in the assessment. Further detail on how coastal protection measures are implemented are set out in Chapter 19 and Chapter 20 of Volume 2 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Off Site Associated Development | Flood Risk | 4.12.8 | Although nuclear power stations are exempt from the sequential/ exemption test, the ES should undertake a sequential test approach for the associated infrastructure to demonstrate that no reasonable alternative location in a lower risk flood zone are could be utilised for the associated developments. | This point is noted. Sequential testing has been undertaken and is discussed in further detail in each of the FRAs as relevant. The flood risk assessments are provided in Doc Ref. 5.2 to 5.9. |
| Main Development Site | Flood Risk | 4.12.9 | The ES should state whether the Proposed Development would be required to remain open and operational through a worst case flood event; and if so, the ES should demonstrate that the Proposed Development can safely remain open and operational during a worst case flood event. | The Main Development Site Flood Risk Assessment (Doc Ref. 5.2) demonstrates that there is no significant residual risk of flooding of the main platform. Safety and emergency procedures for the operation of Sizewell C in the event of flooding would be agreed as part of the Nuclear Site Licencing process. |
| Off Site Associated Development | Coastal Geomorphology and Hydrodynamics | 4.13.1 | The Scoping Report states that off-site associated development is too remote from the marine environment and although theoretical pathways exist the potential impacts would be negligible. This statement is not supported by evidence in the Scoping Report. Accordingly, the Inspectorate cannot agree to scope these matters out. The ES should assess impacts from off-site developments on coastal geomorphology and hydrodynamics where significant effects are likely to occur. | As described in Appendix 6P of Volume 1 and Chapter 20 of Volume 2 , the Zone of Influence (Zol) for the coastal geomorphology assessment has been defined in agreement with the Marine Technical Forum as the Greater Sizewell Bay (GSB). The off-site associated development sites, reported in Volumes 3 to 9 , are located further inland and outside this Zol. It is considered that these sites would not result in any impacts on coastal geomorphology and hydrodynamics. |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.2 | Thermal plumes are proposed to be scoped out of the assessment as they are considered not to affect coastal geomorphology or hydrodynamics, however, the Scoping Report provides no evidence to support this. The ES should assess impacts to geomorphology and hydrodynamics from the introduction of thermal plumes where significant effects are likely to occur. The ES should also address impacts that may occur as result of Sizewell B and Sizewell C operating together. | As described in Appendix 6P of Volume 1 , thermal plumes are not assessed because there is no pathway to impact upon coastal geomorphic receptors. The plume trajectory is upward, and the plume is buoyant, meaning that thermal changes occur in the water column and at the surface, distant from coastal geomorphic receptors. The thermally mixed plume would have degraded substantially before it can interact with the bed some kilometres downstream. Furthermore, sediment transport, and therefore geomorphic change, is insensitive to the range of temperature changes that can be induced as a result of thermal plumes. |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.3 | The Scoping Report provides limited detail on the surveys that have informed the assessment, the study area/ Zol and knowledge of baseline conditions to date. The ES must provide all details of the surveys undertaken including (but not limited to) the methodology, locations, temporal scope, results and any modelling that has been used. | <p>The evidence base for each of the geomorphic receptor elements (baseline and predicted response to the marine activities and infrastructure associated with the proposed development) is contained in the geomorphology and hydrodynamics synthesis report (Appendix 20A of Volume 2 of the ES).</p> <p>Methods used to establish environmental baselines include:</p> <ul style="list-style-type: none"> • desk-based literature studies of existing data and development studies extending back over several decades, and up to 150 years in the case of mapping and marine charts; • in-situ data collection, including topographic surveys (RTK- GPS and drone photogrammetry), hydrographic measurements (via buoys and short-term instrument deployments in the nearshore), maritime bathymetry surveys, nearshore feature detection and tracking via radar and camera images; and • computational modelling to establish representative regional forcing and environmental responses using established modelling platforms - of marine hydrodynamics and sediment transport (using Telemac, Tomawac, Artemis and Sisyphé), and beach profile change and shoreline evolution (using X-beach and UNIBEST). |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|-----------------------|---|---------------------------|---|--|
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.4 | The Scoping Report does not explain how the study area will incorporate changes that are identified in the Flood Risk Assessment in relation to storm events. There is also no explanation as to why the seaward extent should be 4km in relation to engineering studies. Additionally, it is unclear whether the spring tide excursion and sediment cell account for storm events or potential future changes and future baselines. The landward extent should also consider future baselines and functionality of coastal habitats and species and therefore the study area is likely to reach beyond the Mean High Water Spring Tide. The ES must clearly define and justify the study area accounting for storm events and their potential reach along the coast. The impacts of climate change on the future baseline should also be considered. | <p>The coastal geomorphology assessment presented in Volume 2, Chapter 20 reports future impacts of the landward translation of the Mean High Water Spring (MHWS) Tide with rising sea levels and shoreline erosion. This includes an assessment of effects on future geomorphic features that would be landward of the present MHWS and geomorphic features influenced by coastal processes that are above or landward of MHWS, such as supra-tidal shingle which is affected by infrequent storm events and/or high water levels.</p> <p>In defining the future baseline, the coastal geomorphology and hydrodynamics assessment (Volume 2, Chapter 20) considers the following factors :</p> <ul style="list-style-type: none"> •future sea level •future wave climatology •future regional sediment supply <p>These have been identified because the main factors influenced by climate change that could affect the geomorphology or hydrodynamics of the Greater Sizewell Bay are:</p> <ul style="list-style-type: none"> • increased relative sea level, which is likely to increase overtopping, breaching, beach/cliff erosion and may increase rates of longshore transport; and • a consequent increase in sediment supply if the Minsmere – Dunwich cliffs were eroded and/or due to the expected increase supply from the Easton/Covehithe/Benacre cliffs. |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.5 | The Scoping Report defines the rates of shoreline change as 'low' however, it is unclear on what scale this is defined. The ES must clearly describe the degree and extent of geomorphic and hydrodynamic processes within the study area in relation to an appropriate scale and provide details of the surveys or other evidence used to establish the baseline conditions | Details of the assessment criteria are provided within Volume 1, Appendix 6P . The evidence base for each of the geomorphic receptor elements (baseline and predicted response to the marine activities and infrastructure associated with the proposed development) is contained in the geomorphology and hydrodynamics synthesis report (Appendix 20A of Volume 2 of the ES) and assessment is presented in Volume 2, Chapter 20 . |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.6 | The Scoping Report mentions scour due to 'other elements of the marine and cross-shore infrastructure would be assessed'. It is unclear which elements would be included in assessment from this definition. The ES must include and clearly define project elements (permanent and temporary) in the assessment with inclusion of the treatment of any waste arisings (such as from the proposed tunnel boring associated with the proposed cooling water intake and outfall structures). | Details of permanent and temporary project elements are described in Volume 2 Chapter 2 to 4 . Waste from tunnel boring would be taken onshore and treated on site within a slurry treatment plant. Where treated effluents from tunnel boring are discharged to the marine environment, these have been assessed within Volume 2, Chapter 21 Marine Water Quality. |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.7 | With reference to Table 4.12 above, the ES should assess any significant effects on coastal geomorphology and hydrodynamics arising from the construction and existence of the proposed flood defence and coastal protection measures. The Inspectorate considers that the implications of climate change, in respect of increased surface water run-off, higher sea levels, and roposed/existing coastal defences, should also be carefully considered in the ES. | <p>The coastal and geomorphology and hydrodynamics assessment presented in Volume 2, Chapter 20 has reported the individual project design features and activities separately over construction and operational phases. Subsequently, the potential for the effects of individual project features and activities to combine and result in significant inter-relationship effects is considered.</p> <p>A future baseline scenario, where ongoing shoreline recession is likely to expose the HCDF embedded within the proposed development, is also assessed separately at the end of this chapter.</p> |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.8 | With reference to comment 4.13.4 above the receptors identified within the defined study area should include any heritage and ecological receptors, including designated sites, which could be significantly affected by the Proposed Development. Agreement should be sought to agree the receptors to be assessed with the relevant consultees. | Volume 2, Chapter 20 identifies and ecological receptors located within the study area and considers these as part of the assessment. The assessment of effects on historic environment is presented in Volume 2, Chapter 16 and Volume 2, Chapter 23 . |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.9 | The Scoping Report does not mention the proposed modelling of shoreline change and detailed modelling around proposed structures. The ES must assess significant effects associated with these matters and explain the approach that has been taken to modelling shoreline changes. | Further details of shoreline change are provided within Volume 2, Chapter 20 . However, there is no current computational modelling platform able to accurately integrate the numerous environmental processes that drive shoreline change, and there is no published evidence that shoreline change models can be reliably applied over the multi-decadal timescale that is required. Therefore, the future environmental baseline has been determined by Expert Geomorphological Assessment. Appendix 20A of Volume 2 , section 7 provides more detail on the future shoreline baseline, as well as monitoring, mitigation and potential post-mitigation impacts. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|---------------------------------|---|---------------------------|---|--|
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.10 | The Scoping Report determines that detailed modelling is not needed to inform the assessment of impacts on coastal geomorphology however, there is no justification to support this. The assessment in the ES should be underpinned by relevant baseline information and modelling where required. The ES should explain the approach to establishing the baseline and predicting the anticipated effects. If detailed modelling is required to support and inform this assessment it should be undertaken. The Applicant should make effort to agree the necessary baseline information and modelling with relevant consultation bodies. | This point is noted and has been considered in the preparation of the ES. Where relevant this information is provided within Volume 2, Chapter 20 and associated appendices. |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.11 | The Scoping Report explains that dredging and the ploughing of sediment would lead to changes in bathymetry however, there is no mention of the potential resultant impacts on wave regimes. The ES must assess the impacts of bathymetric changes on wave regimes and any consequential impacts to geomorphology and hydrodynamics. | The evidence base for each of the geomorphic receptor elements (baseline and predicted response to the marine activities and infrastructure associated with the proposed development) is contained in the geomorphology and hydrodynamics synthesis report (Appendix 20A of Volume 2 of the ES). |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.12 | It is not clear in the Scoping Report whether significant effects associated with the capital and maintenance dredging required to enable large loads will be. For the avoidance of doubt the ES should include this in the assessment. | Volume 2, Chapter 21 identifies that the capital and maintenance dredging of the berth bed and approaches for deliveries to the Beach Landing Facility would not have significant impacts. Numerical modelling shows that non significant localised increases in suspended sediment will occur temporarily during and immediately following dredging activities but soon return to normal equilibrium with baseline coastal processes. |
| Main Development Site | Coastal Geomorphology and Hydrodynamics | 4.13.13 | Beach nourishment and recycling would be required during operation of the Proposed Development to protect the hard coastal defence, yet they are not listed under the potential operational impacts. The ES must assess impacts from beach nourishment on coastal geomorphology and hydrodynamics where significant effects are likely. | A robust monitoring and mitigation plan would be developed in accordance with any conditions attached to an approved Marine Licence deemed within the DCO approval (Deemed Marine Licence; DML). This monitoring and mitigation plan would facilitate appropriate management and impact avoidance or minimisation, up until mitigation cessation. At that stage, the same evidence base would be used in the assessment of any residual significant impact and, were there to be one, the compensation needed. The monitoring and mitigation plan, and its reporting throughout the station life, would be evidence based, scientific and require approval from the MMO in consultation with the regulatory Marine Technical Forum stakeholders. Further details are provided the coastal geomorphology and hydrodynamics assessment (Volume 2, Chapter 20). |
| Off Site Associated Development | Marine Water Quality and Sediment | 4.14.1 | The Scoping Report states that off-site associated development is too remote from the marine environment and although theoretical pathways exist the potential impacts would be negligible. This assertion is not supported by evidence in the Scoping Report. Accordingly, the Inspectorate cannot agree to scope these matters out of the ES. The ES should assess impacts from off-site developments on marine water quality and sediment Where significant effects are likely. | The geographical extent of the marine water quality and sediment study area was determined by the potential zone of influence (ZoI) Sizewell C Project. The spatial extent of potential impacts from the Sizewell C Project are dependent on the tidal regime and the transmission and persistence of the pressure. The ZoI for marine water quality and sediment have been informed by the largest-scale potential impacts associated with the main development site. The off-site associated development sites, reported in Volumes 3 to 9 , are located further inland and outside this ZoI. It is considered that these sites would not result in any impacts on marine water quality and sediment. |
| Main Development Site | Marine Water Quality and Sediment | 4.14.2 | The Scoping Report references Appendix 1A stating that the study area is largely unchanged but highlights the changes to the cooling water infrastructure proposed and the replacement of a jetty with a proposed Beach Landing Facility (BLF). Given the changes to the Proposed Development the Applicant should ensure that the study area remains appropriate with respect to the extent of sediment resuspension, transport and cooling water effluent impacts and chemical and thermal plumes. The Applicant should make effort to agree the approach with relevant consultation bodies. The ES should provide evidence of the level of agreement reached in this regard. | The scope of the assessment has also been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process. To facilitate engagement with statutory stakeholders on the marine assessments, the Sizewell C Marine Technical Forum was established on 26 March 2014. The ZoI for marine water quality and sediment assessment has been informed by a comprehensive programme of engagement with regulators / statutory consultees and is based on the largest-scale potential impacts associated with the proposed development. These include: <ul style="list-style-type: none"> • results from suspended sediment plume modelling associated with dredging and drilling activities; • thermal plume modelling of the in-combination impacts of Sizewell B and Sizewell C cooling water discharges (applying the 2°C mean excess temperature contour at the seabed). |
| Main Development Site | Marine Water Quality and Sediment | 4.14.3 | The Scoping Report provides an outline of the water quality surveys that have been completed and are proposed. A full account of the background sediment conditions and chemicals assessed is not included. Furthermore, there is a discrepancy between the dates of the surveys in paragraphs 6.15.6 and 6.15.10. The ES should avoid any such discrepancies. The ES should also detail the characteristics/substances assessed, methodologies, locations, timings and results of surveys in order that a robust picture of the baseline conditions can be understood. | Volume 2, Chapter 21 , and associated appendices (Appendices 21A to 21E) provides further detail the characteristics/substances assessed, methodologies, locations, timings and results of surveys. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|---------------------------------|-----------------------------------|---------------------------|---|--|
| Main Development Site | Marine Water Quality and Sediment | 4.14.4 | The Scoping Report identifies, in paragraph 6.15.34, that maintenance of the BLF will require maintenance dredging which could cause changes in suspended sediment, however, there is no reference to impacts that may occur as a result of marine traffic associated with the BLF, either during construction or operation. The ES must assess the potential for vessel pollution to impact marine water quality during construction and operation where effects could be significant. | <p>Volume 2, Chapter 21 sets out a number of measures would be implemented to mitigate potential effects of vessel traffic at the site. These measures are detailed in the CoCP (Doc Ref. 8.11):</p> <ul style="list-style-type: none"> vessel waste management procedures and Site Waste Management Protocols would be in place to mitigate impacts of marine litter; the potential for chemical and oil spills whilst recognised would be mitigated by compliance with International Maritime Organisation regulations and the Marine Licence; transport of chemicals in line with the International Maritime Dangerous Goods Code (Ref. 21.49); storage of chemicals in line with the Control of Substances Hazardous to Health Regulations (COSHH) 2002 (Ref. 21.50); the REACH Enforcement Regulations 2008 (Ref. 21.51), the Classifying, labelling and packaging of substances (CLP) Regulation (European Regulation (EC) No 1272/2008) (Ref. 21.52); and Health and Safety Executive (HSE) guidance on offshore storage of chemicals (Offshore Chemicals Management guidance note 8) (Ref. 21.53); in addition to applicable manufacturer's guidance on storage. |
| Main Development Site | Marine Water Quality and Sediment | 4.14.5 | The Scoping Report identifies that groundwater and treated sewage effluent will discharge to the marine environment during the construction periods via a construction drainage system but this does not include site drainage discharge and other effluents prior to completion of the Combined Drainage Outfall (CDO) nor does it explain what environmental impacts are anticipated. The ES must include an assessment of significant effects associated with any discharges prior to the completion of the CDO. | <p>Volume 2, Chapter 21 sets out the assessment scenarios in the marine water quality and sediment assessment, and describes the marine components relevant to each phase of the construction. The Combined Drainage Outfall would be constructed early in the construction phase to allow construction discharges into the GSB, subject to the requirements of an environmental permit granted by the Environment Agency. Prior to establishment of the CDO, wastewater would be tankered off site for appropriate licensed disposal.</p> |
| Off Site Associated Development | Marine Ecology | 4.15.1 | The Scoping Report states that off-site associated development is too remote from the marine environment and although theoretical pathways exist the potential impacts would be negligible. This assertion is not supported with evidence in the Scoping Report. Accordingly, the Inspectorate does not agree to scope this matter out. The ES should assess impacts from off-site developments on marine ecology where significant effects are likely to occur. | <p>The scope of the assessment has also been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process. To facilitate engagement with statutory stakeholders on the marine assessments, the Sizewell C Marine Technical Forum was established on 26 March 2014.</p> <p>The spatial extent of potential impacts from the proposed development are dependent on the tidal regime and the transmission and persistence of the pressure. The ZOI has been informed by the largest-scale potential impacts associated with the proposed development, which include:</p> <ul style="list-style-type: none"> Results from underwater noise modelling during construction activities (impact piling, dredging, drilling); Results from suspended sediment plume modelling associated with dredging and drilling activities, and; Thermal plume modelling of the in-combination impacts of Sizewell B and Sizewell C cooling water discharges (applying the 2°C mean excess temperature contour at the seabed). <p>The consultation process identified the need to consider receptor specific effects beyond the ZOI, particularly for highly mobile marine species. Effects on marine ecological receptors are dependent on the distribution, mobility and ecology of the species being considered relative to the impact. Therefore, assessments determine the receptor-specific spatial scale within the 'Impact Magnitude' narrative.</p> <p>The off-site associated development sites, reported in Volumes 3 to 9, are located further inland and outside this ZOI. It is considered that these sites would not result in any impacts on marine water quality and sediment.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|-----------------------|----------------|---------------------------|---|--|
| Main Development Site | Marine Ecology | 4.15.2 | Paragraph 6.4.4 states that an assessment of noise and vibration impacts to fish and other marine species will be presented in the Marine Ecology ES aspect chapter, however, there is no mention of vibration impacts in Section 6.16 of the Scoping Report. The ES should assess vibration impacts to fish and other marine species where significant effects are likely to occur, both alone and cumulatively with other developments. The assessment methodology and any necessary mitigation measures should be described, and effort made to agree the approach with relevant consultation bodies. | <p>The marine ecology assessment (presented in Volume 2, Chapter 23) of construction and operational phase impact on marine receptors is based on a wide range of evidence sources specific to the proposed development including existing data, onshore and offshore surveys, modelling and a comprehensive programme of stakeholder engagement over a decade preceding the ES. Sizewell C Project-specific impact assessments consider changes in coastal processes, changes in water and/or sediment quality, introduction of noise and vibration, and cooling water abstraction resulting in impingement and entrainment pathways.</p> <p>The assessment on noise vibration impacts to fish and other marine species cumulatively with other development is reported in Volume 10, Chapter 4 and Volume 10 Appendix 4B.</p> |
| Main Development Site | Marine Ecology | 4.15.3 | <p>A proposed assessment methodology for the assessment of underwater noise has not been provided in the Scoping Report, although paragraph 6.16.19 indicates that it may involve use of acoustic thresholds.</p> <p>The ES should set out the potential sources of underwater noise, explain how underwater noise levels would be calculated and set out the criteria for assessment. Where appropriate, species-specific methodologies should be utilised and the assessment should take into account the seasonality of potentially affected species. Any likely significant effects to sensitive marine ecology receptors should be assessed, both alone and cumulatively with other developments.</p> <p>Any measures to mitigate impacts from underwater noise should be described in the ES.</p> | <p>The marine ecology and fisheries assessments draw on a range of guidance documents including but not limited to chemical standards, underwater noise assessment threshold and mitigation guidelines and cooling water infrastructure best practice guidance.</p> <p>Appendix 22L of Volume 2 provides the underwater noise effects assessment at Sizewell C and includes details of the noise criteria used to inform the assessment.</p> <p>The assessment on noise vibration impacts to fish and other marine species cumulatively with other development is reported in Volume 10, Chapter 4 and Volume 10 Appendix 4B.</p> |
| Main Development Site | Marine Ecology | 4.15.4 | Although some sensitive receptors are identified in the Scoping Report it is not explicitly stated what sensitive receptors will be considered for assessment in the ES. The ES should identify all sensitive receptors to be assessed and clearly identify the impact pathways; this should include marine ornithology. | Direct effects on marine ornithological receptors are considered in an ES context within the Terrestrial Ecology and Ornithology assessment, provided in Volume 2, Chapter 14 of the ES. Indirect effects on marine ornithological receptors, including effects on prey species or effects on supporting habitat, are considered with the Marine Ecology chapter (Volume 2, Chapter 23) and within Coastal Geomorphology and Hydrodynamics chapter (Volume 2, Chapter 20). |
| Main Development Site | Marine Ecology | 4.15.5 | The Inspectorate notes that some impacts only refer to a limited number of potential marine receptors and exclude others. For example, operational chemical discharge 'will be assessed in detail relative to potentially sensitive species in the ES' which excludes assessment of impacts on habitats. It is also not always clear what receptors are being referred to, for example in Paragraph 6.16.41 it refers to a 'primary receptor' which is not defined in the Scoping Report. The ES should assess impacts to marine sensitive receptors where significant effects may occur. | The marine ecology assessments clearly identifies the receptors considered within Volume 2, Chapter 22 . |
| Main Development Site | Marine Ecology | 4.15.6 | Construction and operation of the Proposed Development will lead to an increase in marine traffic. No impacts to marine ecology receptors have been considered in terms of potential displacement, noise and vibration, anchor and collision risk, suspended sediment and pollution in relation to this increase although this is referred to in section 6.17 on Marine Navigation. An assessment of potential impacts from vessels on marine ecology must be included in the ES. | The marine ecology assessments presented in Volume 2, Chapter 22 identifies marine ecology receptors that have been considered in terms of potential displacement, noise and vibration, anchor and collision risk, suspended sediment and pollution in relation to the increase in marine traffic. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|-----------------------|----------------|---------------------------|---|--|
| Main Development Site | Marine Ecology | 4.15.7 | It is stated in the Scoping Report that construction and management activities include flood defence and coastal protection; these activities and structures are not mentioned in the potential construction and operational impacts on marine ecology. Definition of what these measures are and an impact assessment on marine ecology from the construction and maintenance of these protection measures must be included in the ES. | A description of the coastal defence features are provided in Volume 2, Chapter 2 . The marine ecology assessment presented in Volume 2, Chapter 22 considers the potential effects of these on marine ecology. |
| Main Development Site | Marine Ecology | 4.15.8 | The Scoping Report states that 'work is underway in 2019 to predict impingement effects on fish species' however, no details of this further work are provided. The ES must provide details for all surveys that have informed the assessment including methodologies, timings, and spatial extent. | Details on the impingement assessment undertaken is provided in Volume 2, Appendix 22I . |
| Main Development Site | Marine Ecology | 4.15.9 | No information is provided on maintenance activities and whether/what potential impacts these might have on marine ecological receptors. The ES must define what maintenance activities will be necessary for the Proposed Development and assess any significant effects which arise from potential impacts on marine ecological receptors. | A description of the proposed maintenance activities is provided in Volume 2, Chapter 4 . The marine ecology assessment presented in Volume 2, Chapter 22 considers the potential effects of these on marine ecology. |
| Main Development Site | Marine Ecology | 4.15.10 | Reference is made to proposals to deliver embedded mitigation to reduce fish mortality. The Inspectorate advises that all mitigation relied on in the ES must be adequately secured via the draft DCO or other legal mechanism. | Two fish recovery and return (FRR) tunnels would be constructed, one for each reactor, as described in Volume 2, Chapter 2 . The FRR tunnels comprise the following features: <ul style="list-style-type: none"> • construction of subterranean tunnels connecting the outfalls to the main development site, which would have no impact for coastal geomorphology; • provision of small outfall heads (≤3 x 3 m) and their siting on the deeper seaward flank of the outer longshore bar to minimise impact on sediment transport or bar morphology. <p>The mitigation route map (Doc Ref. 8.12) provides a summary of mitigation measures relied upon in the ES and sets out the proposed securing mechanisms.</p> |
| Main Development Site | Marine Ecology | 4.15.11 | The Scoping Report does not address the proposed approach to the assessment of impacts from the fish recovery and return system although this has the potential to result in mortality and indirect effects on other species groups (e.g. birds). The ES should include an assessment of impacts from the fish recovery and return system on sensitive receptors where significant effects are likely to occur. | The assessment of effects on marine ecology (Volume 2, Chapter 22) considers the potential impacts from the fish recovery and return system on sensitive receptors. |
| Main Development Site | Marine Ecology | 4.15.12 | The Scoping Report proposed to assess impacts from impingement and entrainment separately. It is considered that this may underestimate the total potential population loss for any given species. The ES should present the assessment of effects combining these impacts to ensure a robust assessment of entrainment which accounts for biomass and abundance of relevant species populations. The Applicant should make effort to agree the approach with relevant consultation bodies. | The marine ecology assessment presented in Volume 2, Chapter 22 considers the impacts from impingement and entrainment separately. The assessment of impingement is supported by Volume 2, Appendix 22I and the entrainment assessment is supported by Volume 2, Appendix 22G . |
| Main Development Site | Marine Ecology | 4.15.13 | The Scoping Report explains that an Unexploded Ordnance (UXO) Disposal Campaign has not been ruled out in relation to preparation of marine activities. The ES should therefore assess potential impacts on marine ecology from UXO during construction applicable to the anticipated disposal campaign. | In the case UXOs were identified on site, and alternative disposal methods or relocation are not possible, underwater detonations may be required. Appropriate management actions and mitigation measured would be implemented to minimise impacts. Such measures would be highly dependent on the location of the UXO and would require review on a case-by-case basis. The underwater noise modelling results are considered as indicative, worst-case scenarios for unmitigated impact ranges, provided in Appendix 22L of Volume 2 . |
| Main Development Site | Marine Ecology | 4.15.14 | Seasonal jellyfish blooms and ctenophores occur in the Sizewell area bringing potential risk to blocking the cooling water system. An assessment of the likely significant effects relating to the Proposed Development and impacts to jellyfish/ctenophores should be carried out in the ES. | An assessment of the likely significant effects relating to the Proposed Development and impacts to jellyfish/ctenophores is presented within the marine ecology assessment in Volume 2, Chapter 22 . |
| Main Development Site | Marine Ecology | 4.15.15 | The ES should assess the duration of impacts in relation to the ecological cycles (eg life cycles, breeding seasons) of the receptors being assessed. | The marine ecology assessment presented in Volume 2, Chapter 22 considers ecological cycles when identifying the duration of impacts, as relevant. |
| Main Development Site | Marine Ecology | 4.15.16 | Whilst it is appropriate to assess the impacts of the Proposed Development on fish as an ecological receptor, impacts on commercial fisheries is considered to also represent a socio-economic matter to be addressed through assessment. The ES should assess impacts on fish and commercial fisheries as in terms of both their ecological and socio-economic value. | Volume 2, Chapter 22 presents the findings of the commercial and recreational fisheries assessment for the construction and operational phases of the proposed development. The assessment identifies and describes potential significant effects arising from development activities, with consideration of their socio-economic value. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
|---------------------------------|-------------------------|---------------------------|---|--|
| Off Site Associated Development | Marine Navigation | 4.16.1 | The Scoping Report states that the off-site associated development of the Proposed Development do not have the potential to impact the marine environment and is therefore scoped out of assessment. In the case of effects on marine navigation the Inspectorate considers that significant effects are unlikely to result from the off-site associated development and agrees to scope this matter out of the ES. | It is considered that as the associated development sites (described and assessed in Volumes 3 to 9 of the ES) would not result in any vessel movements as construction materials for these sites would be delivered by road or rail. |
| Main Development Site | Marine Navigation | 4.16.2 | The ES should identify the anticipated type and number of vessel movements generated by the development during the construction and operation phases and assess the potential impact to other existing vessel movements in the area. Cross-reference also should be made to the Transport section of the ES. | Volume 2, Chapter 24 , informed by the data presented in Navigational Risk Assessment included in Appendix 24A of the same volume, identifies the anticipated type and number of vessel movements generated by the development during the construction and operation phases and assesses the potential impact to other existing vessel movements in the area. |
| Main Development Site | Marine Navigation | 4.16.3 | The operation of the BLF has potential to cause disturbance to fishing and recreational activities through collision and displacement. These impacts must be assessed where a likely significant effect would occur. | The assessment presented in Volume 2, Chapter 24 , has considered the potential impacts arising from the operation of the BLF on disturbance to fishing and recreational activities. |
| Main Development Site | Radiological Assessment | 4.17.1 | The Scoping Report does not provide adequate information to support a decision to scope this matter out. The ES should describe the proposed approach to manage disposal and/or discharge to groundwater and measures employed to protect groundwater resources. Any significant effects associated should be assessed, and any mitigation measures proposed should be appropriately defined and secured | <p>Chapter 7, Volume 2 of the ES describes the proposed approach to managing spent fuel and radioactive waste, including disposal and/or discharge and measures to protect the environment. The disposal of radioactive wastes would be permitted and monitored by the Environment Agency under the Radioactive Substances Regulations permit.</p> <p>As described in Chapter 25 (Radiological considerations) of Volume 2, there would not be any disposal of radioactive effluents to groundwater during construction or operation, therefore no radiological impact assessment on groundwater has been undertaken.</p> <p>Chapter 25 of Volume 2, does present an assessment of radiological considerations including: dredging for construction radiological impact assessment; a human radiological impact assessment, non-human radiological impact assessment; and transport radiological impact assessment. This includes consideration of the radiological impacts from direct radiation and gaseous and liquid discharges to the atmosphere and the marine environment respectively resulting from routine operations, and the transportation off-site of radioactive materials and wastes to members of the public.</p> <p>Furthermore, there would be no radioactive materials used during the construction process prior to fuel loading and as such there is no source of contamination.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
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| Main Development Site | Radiological Assessment | 4.17.2 | The Scoping Report states that the management of solid radioactive waste or spent fuels is not assessed in this aspect and is instead described in Paragraphs 3.12.7 to 3.12.14 of the Scoping Report. However, these paragraphs do not describe where this matter will be assessed in the ES. The Inspectorate does not agree that this matter can be scoped out of the ES and should be addressed in either the ES radiological assessment chapter or elsewhere. | <p>SZC Co. has applied the principles of waste minimisation, so far as is reasonably practicable, in the design of the Sizewell C power station. Wherever reasonably practicable, measures would be taken to prevent materials either becoming radioactively contaminated or activated, or as being classified as radioactively contaminated due to the inadvertent placement of inert material adjacent to radioactive material. Waste processing systems have also been specified to treat radioactive liquid and gaseous effluents and discharges and solid wastes, in order to reduce the environmental impact to as low as reasonably achievable prior to disposal. The activity and volume of radioactive wastes discharged and disposed of shall be minimised through the application of Best Available Techniques (BAT), and the use of the waste hierarchy. Furthermore, the disposal of radioactive wastes would be permitted and monitored by the Environment Agency under the Radioactive Substances Regulations permit.</p> <p>Chapter 7 (Spent fuel and radioactive waste management) of Volume 2 presents an overview of the proposed arrangements for the management of radioactive wastes and spent fuel arising during operation of the Sizewell C power station. The operation and decommissioning of the Sizewell C power station would result in the unavoidable generation of quantities of radioactive waste and spent fuel. This is a known and justifiable consequence of nuclear power generation and the UK regulatory permissions regime for nuclear power stations defines precise regulatory requirements and expectations for the management of this waste.</p> <p>Chapter 25 (Radiological considerations) of Volume 2 then presents an assessment of radiological considerations including: a human radiological impact assessment, non-human radiological impact assessment; and transport radiological impact assessment. This includes consideration of the radiological impacts from direct radiation and gaseous and liquid discharges to the atmosphere and the marine environment respectively resulting from routine operations, and the transportation off-site of radioactive materials and wastes to members of the public.</p> |
| Main Development Site | Radiological Assessment | 4.17.3 | The Scoping Report states that the assessment remains broadly unchanged from Section 7.17 of Appendix 1A. Appendix 1A states that the radiological impacts from decommissioning "are assumed to be bounded by the routine operational activities and therefore not detailed further." As the Scoping Report has not provided evidence that radiological impacts from decommissioning will bound by operational activities; the Inspectorate does not agree this matter can be scoped out of the ES and an assessment of the radiological impacts from decommissioning should be assessed included in the ES. | <p>Before the decommissioning of a new nuclear power station can take place, there is a requirement for the operator to undertake an Environmental Impact Assessment (EIA) and prepare an Environmental Statement under the relevant EIA Regulations, such as Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations.</p> <p>Chapter 5, Volume 2 of the ES outlines the overall approach that SZC Co. is adopting to decommission the proposed UK European Pressurised Reactor (EPRM) units, and the associated buildings and infrastructure at Sizewell C. The chapter includes commentary on radiological effects, however, radiological effects from decommissioning will be covered by the EIA for decommissioning.</p> |
| Main Development Site | Radiological Assessment | 4.17.4 | The Scoping Report states that the assessment remains broadly unchanged from section 7.17 of Appendix 1A. Appendix 1A states that "there are no radiological impacts expected with any of the off-site associated development sites" as "no radioactive disposal will take place from these locations during construction or operation". The Inspectorate agrees to scope out radiological impacts from these areas; on the understanding that effects arising through the transportation of radioactive material will be assessed as part of the assessments associated with the main development site as stated in Paragraph 6.18.1 of the Scoping Report. | The assessment presented in the radiological considerations chapter (Volume 2, Chapter 25) includes consideration of the potential radiological impact from the transportation off-site of radioactive materials and wastes to members of the public. The scope of the assessment includes consideration of the impacts to the general public potentially exposed to radioactive materials and waste from road and rail transport to and from the Sizewell C main development site. |
| Main Development Site | Radiological Assessment | 4.17.5 | The Scoping Report states that the assessment remains broadly unchanged from section 7.17 of Appendix 1A. Appendix 1A states that health implications will be assessed in the Health Impact Assessment aspect chapter. The Inspectorate is satisfied that this matter can be scoped out of the radiological assessment chapter of the ES on the basis that the assessment will be included within the Health and Wellbeing ES chapter, as described in Section 6.22 of the Scoping Report. | The assessment of health and wellbeing presented in Volume 2, Chapter 28 of the ES draws from and builds upon data from the Radiological Assessment. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
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| Main Development Site | Radiological Assessment | 4.17.6 | The study area used for the assessment is unclear. Appendix 1A states the surveys undertaken to inform the assessment baseline is "around the Sizewell C Main Development Site" but does not provide a concise definition of the study area. The ES should state the study areas used to inform the assessment baseline surveys. For surveys that will be undertaken to assess potential radiological effects, the study area should extend to the extent of the likely significant effects. | The study area for the assessment of radiological considerations is defined in Chapter 25, Volume 2 and detailed methodology is provided in Appendix 6U . The baseline assessment has relied on existing data, previous desk studies and reports, using the data collected from other assessments regarding groundwater and geology monitoring, see Volume 2, Chapter 18 of the ES for further information on radiochemical data assessment for existing soils, groundwater and surface water. The study area and data used in the assessment is considered sufficient to identify the likely significant radiological effects of the proposed development. |
| Main Development Site | Radiological Assessment | 4.17.7 | The Scoping Report makes no reference to undertaking updated baseline surveys. If new baseline surveys are not required, the ES should demonstrate that the existing surveys are sufficient to result in a robust baseline assessment. | SZC Co. has undertaken surveys and monitoring programmes in order to obtain a more detailed understanding of the background radioactivity levels around the Sizewell C main development site and of the potential implications of any planned radiological discharges. See Volume 2, Chapter 18 of the ES for further information on radiochemical data assessment for existing soils, groundwater and surface water. A review of cumulative schemes has been undertaken to confirm whether there are any new planned radiological discharges to be introduced within the study area before the start of construction and operation of the proposed development. No new schemes have been identified and therefore, future baseline radiation levels have been assumed to be equivalent to the current baseline for the purposes of the radiological assessment (Volume 2, Chapter 25). |
| Main Development Site | Radiological Assessment | 4.17.8 | Paragraph 6.18.4 of the Scoping Report states that the radiological impact assessment will be undertaken having regard to the legally established and recognised protection standards but has not stated which standards will be used. The ES should state which legally established and recognised protection standards will be used to inform the radiological assessments. | The radiological assessment has been undertaken in accordance with current legislation, standards and guidance as detailed in radiological considerations ES chapter (Volume 2, Chapter 25) and the legislation and methodology appendix (Volume 1, Appendix 6U). |
| Main Development Site | Radiological Assessment | 4.17.9 | The methodology followed for the radiological assessment should include overall radiological impact taking into account historical, present and future discharges and direct radiation to the surrounding environment, including human health and ecological effects. The Applicant should make effort to agree the approach to the assessment with relevant consultation bodies including Public Health England (PHE). | SZC Co. has undertaken surveys and monitoring programmes in order to obtain a more detailed understanding of the background radioactivity levels around the Sizewell C main development site and of the potential implications of any planned radiological discharges. As set out in the Volume 1, Appendix 6U , the scope of the radiological assessment has also been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process. The Environment Agency were consulted on the human and non-human biota radiological impact assessments to inform the preparation of the Radioactive Substances Regulation environmental permit application and the assessment. The methodology adopted for the radiological assessment is in accordance with the Environment Agency's guidance document for prospective dose assessment (2012) and adopts international accepted methodologies including application of PC-CREAM 08, ERICA and R&D-128. The assessment of dredging doses uses the internationally accepted IAEA methodology. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Project-Wide | Major Accidents | 4.18.2 | The reference in Article 14 of the Directive is to 'Community' rather than 'community'. Article 15 of the Directive is also relevant and should be referred to in the ES. Article 15 refers to 'vulnerability (exposure and resilience)' which should be taken into account in the preparation of the assessment. | The Major Accident and Disasters Assessment presented in Chapter 27 of Volume 2 of the ES considers the provisions made within both Article 14 and Article 15 of the EIA Directive. In response to Article 14, consultation has been undertaken with ESC and SCC to align the assessment criteria with the provisions made within the Civil Contingencies Act which places a duty on the local responders to have an accurate understanding of the risks they face in light of local circumstances and priorities through a risk assessment and emergency planning process. As such, similarities can be drawn from the requirements of the EIA regulations and the CCA in assessing and minimising risk. With regard to Article 15, the major accidents and disasters assessment considered the both the vulnerability of the Sizewell C Project to existing hazard and threat sources as well as the potential for the Sizewell C Project to increase risk or create new hazard or threat sources. As part of the assessment process, reasonably foreseeable worst-case environmental consequences (i.e. the likely significant effects) are identified within the project environmental risk record (included as Appendix 27A of Volume 2 of the ES). The assessment the considers the likelihood of the consequences arising following the identification of relevant mitigation measures. Article 15 also states that "In order to avoid duplications, it should be possible to use any relevant information available and obtained through risk assessments carried out pursuant to Union legislation, such as Directive 2012/18/EU of the European Parliament and the Council and Council Directive 2009/71/Euratom, or through relevant assessments carried out pursuant to national legislation provided that the requirements of this Directive are met". Having regard to that context, it has been agreed with the ONR, Environment Agency, SCC and ESC that with the regulatory processes in place surrounding the safety and security of the UK EPRTM reactors and the operation of the site, a detailed assessment of nuclear safety and security risks is not required to be presented as part of the EIA. Instead, it is considered that compliance with existing regulatory regimes would reduce nuclear safety and security risks to be tolerable if ALARP (not significant). The major accident and disasters assessment therefore provides a summary of the types of hazards covered by the GDA, nuclear site licensing, and other regulatory regimes, their reasonably foreseeable worst-case environmental consequence, and a summary of the required mitigation, in the form of regulatory requirements, to reduce these risks to ALARP. This is to ensure that the processes for mitigating nuclear safety and security risks are transparent and understood by all. |
| Project-Wide | Major Accidents | 4.18.3 | The ES should refer to relevant local planning policies as well as national policies. | Reference to local planning policy relevant to the major accidents and disasters assessment are included within the Legislation, Policy and Guidance section of Volume 1 Appendix 6X , and summarised in Volume 2, Chapter 27 . |
| Project-Wide | Major Accidents | 4.18.4 | The outcome of the stakeholder engagement should be summarised in the assessment in the ES, which should also demonstrate how these outcomes have informed the assessment. | A summary of consultation is provided within Volume 1, Appendix 6X and also provides a summary of the topics discussed and how they have informed the EIA assessments. |
| Project-Wide | Major Accidents | 4.18.5 | Where professional judgement is applied in the assessment, this should be made clear in the ES, and the implications of any limitations to the assessment should be discussed. | Reference to the use of professional judgement is made, where relevant, within the major accidents and disasters assessment (Volume 2, Chapter 27), and limitations of the assessment discussed as relevant. |
| Project-Wide | Major Accidents | 4.18.6 | The baseline information presented within other technical assessments may not be sufficient to undertake the assessment of major accidents and disasters, and the Inspectorate expects the Applicant to undertake an analysis of any gaps in the information and carry out any further studies and surveys if required. The details of any further studies should be provided in the ES. Factors influencing potential changes to the baseline in the future should also be considered and reported in the ES. | The Major Accidents and Disasters assessment presented in Chapter 27 of Volume 2 of the ES considers the baseline information presented within other technical assessments when identifying sensitive environmental receptors and geological hazards (such as ground instability). The baseline information presented in the Major Accident and Disasters assessment also includes discussion on meteorological hazards (such as flooding and droughts), other natural hazards (such as wildfires) and existing major accident hazard sources (such industrial sites and unexploded ordnance). The future baseline as relevant to the Major Accidents and Disasters assessment considers natural population growth and how predicted climate change might affect existing conditions on site in addition to any additional critical infrastructure identified within the short list schemes provided in Volume 10, Appendix 1B that could introduce new receptors and/ or hazards to be considered as part of the baseline during the construction and operation of the Sizewell C Project. It is considered that new population receptors identified in the short-list are unlikely to result in a substantial increase of population within the study area. |
| Project-Wide | Major Accidents | 4.18.7 | The ES should include criteria against which impacts will be assessed to establish the worst case scenario for each risk. | Assessment criteria to determine the worst case consequence of an effect have been established and is detailed within Volume 1 Appendix 6X and summarised within Volume 2 Chapter 27 , Major Accidents or disasters. |
| Project-Wide | Major Accidents | 4.18.8 | To avoid the need for cross referencing to other topics, the definition of as low as reasonably possible (ALARP) should be included within the aspect chapter or in a glossary. | A definition for as low as reasonably possible (ALARP) has been included within the major accidents and disasters assessment (Volume 2, Chapter 27) and is included to the Glossary provided in Volume 1, Appendix 1A . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Project-Wide | Major Accidents | 4.18.9 | The Scoping Report provides a definition of a significant adverse effect but also refers to 'tolerability criteria of MA&D hazards established within existing guidance documents to conclude whether an effect is considered to be significant.' In this regard, the Inspectorate expects that guidance documents referred to will be relevant to the particular hazards under consideration. The Applicant should make effort to agree the approach to defining significance with relevant consultation bodies in this regard. | Reference is made to guidance documents that have been used to inform the development of the assessment criteria. Consultation with stakeholders has been undertaken on the assessment methodology including with ONR, Environment Agency, ESC and SCC with regards to the hazards considered within the assessment and the assessment criteria used to determine significance of risk. Details of the consultation undertaken is provided within Volume 1, Appendix 6X . |
| Project-Wide | Major Accidents | 4.18.10 | For both construction and operation, incidents from surrounding land uses are defined as risks in the Scoping Report. However, major hazards may arise from uses more distant from the site and should also be taken into account. The lists of potential construction and operational impacts cannot be regarded as conclusive at this stage and the potential for further impacts should not be discounted in the assessment. The ES should take into account incidents and accidents at relevant similar facilities that have occurred both in the UK and abroad (as required by the Control of Major Accident Hazard Regulations 2015) to ensure that lessons learned are incorporated in the assessment (where appropriate). | These aspects have been considered within the major accidents and disasters assessment presented within Chapter 27 of Volume 2 of the ES . |
| Project-Wide | Major Accidents | 4.18.11 | The approach to the preparation and maintenance of the Community Safety Management Plan should explained in the ES and be appropriately secured through the DCO or other legally binding mechanism. | Details of the community safety management plan are set out within Chapter 9 (Socio-economics) of Volume 2 of the ES . The Community Safety Management Plan has been prepared as part of the application for development consent (Doc Ref. 8.16). |
| Project-Wide | Waste Management | 4.19.2 | The ES should quantify the anticipated volumes of waste by type (including the potential hazardous waste arising) and explain how these figures have been determined. | Volume 2, Chapter 8 quantifies the anticipated volumes of waste by type (including the potential hazardous waste arising) associated with the Sizewell C Project and, with reference to the Conventional Waste Management Strategy (Volume 2, Appendix 8A), explains how these figures have been determined. The chapter provides an assessment of the potential effects on existing waste infrastructure and resource availability associated with anticipated volumes of waste. |
| Project-Wide | Waste Management | 4.19.3 | It is stated that impacts would be mitigated through the use of a Construction Environmental Management Plan (CEMP), Site Waste Management Plan (SWMP) and a Materials Management Plan (MMP). Draft/ outline copies of these documents including the minimum details necessary to demonstrate efficacy should be appended to the ES. The ES should state how material and waste management measures included in the CEMP, SWMP and MMP will be secured with reference to specific dDCO requirements or other legally binding agreements. | SZC Co. has prepared a Conventional Waste Management Strategy (Volume 2, Appendix 8A), Code of Construction Practice (Doc. Ref. 8.11) and a Material Management Strategy (Volume 2, Appendix 3A) as part of the submission for development consent. |
| Project-Wide | Waste Management | 4.19.4 | The SWMP should set out the arrangements that are proposed for managing any waste produced that cannot be recycled or reused on site. The SWMP should include information on the proposed waste recovery and disposal system for all waste generated by the Proposed Development, including details of the alternatives considered. It should demonstrate that the options chosen are the most sustainable for the waste stream. | The Conventional Waste Management Strategy (Volume 2, Appendix 8A) identifies the type, nature and predicted volumes of waste and describes arrangement for waste storing, handling, transferring and collecting during the various phases of construction, operation and removal and reinstatement. It also provides a waste options appraisal to consider the capabilities and sustainability of various waste facilities in the surrounding area. |
| Project-Wide | Waste Management | 4.19.5 | As identified in Table 4.2 (comment 4.2.19) above, the ES should assess any likely significant effects which could occur as a result of the transport of waste. The waste management assessment within the ES should clearly explain any assumptions made, for example the estimated quantities and types of materials required to be transported. Cross reference should be made to the Transport chapter of the ES, as appropriate. | An assessment of material demand and waste arisings as a result of the Sizewell C Project is presented in Chapter 8 of Volume 2 . The assessment of waste generation considers the impacts of waste which may be exported to waste management infrastructure which are suitable for accepting the types of waste from the Sizewell C Project, and considered the impacts on the utilisation and depletion of the remaining local landfill capacity; and suitability and occupation of available waste management infrastructure. An assessment of effects associated with the transportation of waste and materials is provided in the transport (Volume 2, Chapter 10), air quality (Volume 2, Chapter 11) and noise and vibration (Volume 2, Chapter 12) chapters of the ES . |
| Project-Wide | Waste Management | 4.19.6 | The ES should assess the potential for cumulative impacts with other developments where significant effects are likely (including the Scottish Power Renewables developments), particularly in terms of the transport and disposal of construction waste. | An assessment of cumulative effects is presented within Volume 10 of the ES. A summary of the assessment process and the identification of schemes to be considered within the cumulative effects assessment is provided within Chapter 1 of Volume 10 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Site | Topic/Chapter | Scoping Opinion paragraph | Comment | Response |
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| Main Development Site | Climate Change | 4.20.1 | The Scoping Report states that the decommissioning of the main site is scoped out of the GHG assessment due to being covered in a separate ES. The Inspectorate agrees that this matter can be scoped out of the ES on the basis that an ES for decommissioning of the main site is secured through the DCO or other suitable legal mechanism. | As set out within Volume 2, Chapter 5 , in order to decommission a nuclear reactor, it is necessary to obtain consent from the ONR and undertake an EIA under the Nuclear Reactors Environmental Impact Assessment for Decommissioning Regulations 1999 (as amended) or equivalent EIA Regulations at the time of submission. This would require the submission of an ES, and a period of public consultation prior to gaining approval for the commencement of decommissioning. A high-level assessment of the potential environmental effects (including those associated GHG emissions) associated with the decommissioning of the Proposed Development is provided within Chapter 5 of Volume 2 of the ES . |
| Project-Wide | Climate Change | 4.20.2 | The Inspectorate agrees that emission sources of >1% can be excluded from the GHG assessment due to this approach being in accordance with guidance PAS 2050:2011. | Emission sources of <1% are excluded from the GHG assessment. |
| Off Site Associated Development | Climate Change | 4.20.3 | The Scoping Report proposes to scope out the reinstatement of parts of the off-site associated development to their existing land use from the CCR. However, as the Proposed Development has the potential to alter flood risk to off-site associated development locations due to the change in land use and surface and groundwater flows, the Inspectorate does not agree that this matter can be scoped out of the ES, and the CCR should include an assessment of the reinstatement of parts of the off-site associated development. | An assessment of the effects associated with reinstatement of the temporary associated development sites has been provided in Chapter 26 of Volume 2 of the ES . |
| Project-Wide | Climate Change | 4.20.4 | The CCR future baseline should take into consideration future changes to coastal erosion and the effect this could have on flooding and storm surges affecting the Proposed Development. | Future changes to coastal erosion and the impact this may have on the proposed development is provided as part of the Climate Change Resilience (CCR) assessment and is detailed in Appendix 26A of Volume 2 . |
| Project-Wide | Climate Change | 4.20.5 | The abbreviations in Plate 6.1 have not been defined or included within the abbreviation list in the Scoping Report. The ES should ensure all abbreviations are written out in full. Where mitigation/ adaption measure are required, a full description of the measures and their efficacy should be included in the ES. | A glossary and abbreviation list for terms used within the ES is provided in Appendix 1A of Volume 1 . A description of adaption and mitigation measures related to the climate change assessment is provided in Chapter 26 of Volume 2 . |
| Project-Wide | Climate Change | 4.20.6 | The potential sources of GHG emissions should include the emissions released by the temporary worker campus including the associated CHP plant and the temporary worker accommodation caravan site as defined in Scoping Report Paragraph 3.2.10 and 3.2.11 respectively. | Emissions from the worker accommodation campus(included associated CHP plant) and caravan site, welfare and site compounds have been included in the GHG assessment presented in Chapter 26 of Volume 2 . |
| Project-Wide | Health and Wellbeing | 4.21.2 | A number of references within this chapter appear to be broken, showing "Invalid Source Specified". It should be ensured that the references within the ES work and link to the correct document. | References within the ES have been checked prior to finalisation. |
| Project-Wide | Health and Wellbeing | 4.21.3 | All of the health determinants which may be impacted should be listed, and these should be shown on separate plans. The ES should outline how the study areas of the health assessment have been arrived at and what information the assessment has been based on. The information gathered to inform the assessment must be presented comprehensively within the Health and Wellbeing Chapter, with appropriate cross-reference to the supporting technical information associated with other assessments where applicable. | Health determinants and the study area considered in the Health and Wellbeing assessment are set out in Chapter 28 of Volume 2 and detailed in Volume 1, Appendix 6Y of the ES . Chapter 28 of Volume 2 sets out the study areas used and what information the assessment is based on, with appropriate cross-references to supporting data, as relevant. |
| Project-Wide | Health and Wellbeing | 4.21.4 | The Inspectorate notes that qualitative information and quantitative information will be used in the assessment but advises that the temporal scale (clearly defined), geographical scale, and relative magnitude of all impacts must be clearly described in the ES as part of the assessment of significance of effects. | The health and wellbeing assessment methodology is detailed in Volume 1, Appendix 6Y of the ES . The assessment of health and wellbeing effects is presented in Volume 2, Chapter 28 of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Project-Wide | Health and Wellbeing | 4.21.5 | New energy infrastructure may affect the composition, size and proximity of the local population, and in doing so have indirect health impacts, for example if in some way affects access to key public services, transport or the use of open space for recreation and physical activity. The impacts of the Proposed Development from these matters should also be assessed in the ES where significant effects are likely. | <p>The socio-economics assessment presented in Chapter 9 of Volume 2 considers the potential effects of the Sizewell C Project on public services such as childcare and education services, social services, other county and district level services, sports and leisure facilities, and emergency services.</p> <p>Indirect effects on the local population such as those referred to in the Scoping Opinion have been assessed and are presented in Volume 2, Chapter 28 (Health and wellbeing) of the ES. The assessment of health and wellbeing draws from and builds upon data and outputs from a wide range of supporting assessments contained in Volumes 2 to 9 of the ES to establish the potential magnitude, distribution and significance of impacts upon health and wellbeing, most notably:</p> <ul style="list-style-type: none"> • Socio-economics. • Transport. • Noise and Vibration. • Air Quality. • Radiological Assessment. |
| Project-Wide | Inter-relationships and Cumulative Effects | 4.22.1 | The Inspectorate notes the intention to exclude negligible residual effects from the assessment of inter-relationship effects and questions this approach. The Inspectorate considers that two or more negligible effects could combine to result in more severe effects and that this should be addressed within the ES. The methodology applied should be fully explained in the ES with clear cross-referencing to the relevant technical assessment chapters. | <p>Where more than one effect on a particular receptor/ resource has been identified, the potential for combined effects has been qualitatively assessed. As identified in Volume 10, Chapters 1 and 2 these effects are termed inter-relationship effects and are typically considered within each of the technical assessments in Volumes 2 to 9 as relevant to that assessment. Volume 10, Chapter 2 provides an overview of the potential inter-relationship effects that could occur during the construction and operation of the Sizewell C Project and presents an assessment of those that are not inherently considered within the technical assessments in Volumes 2 to 9. These potentially new and or different environmental effects are then assessed against the following criteria (which includes consideration of negligible effects).</p> <p>High potential - Where a receptor or receptor group is likely to experience one or more significant environmental effect.</p> <p>Low potential - Where a receptor or receptor group is likely to experience one or more not significant, but no significant, environmental effects.</p> <p>No potential - Where a receptor or receptor group is likely to experience environmental effects have only been identified for one topic area and there is no identified inter-relationship.</p> |
| Project-Wide | Inter-relationships and Cumulative Effects | 4.22.2 | These interactions are not mentioned in Section 5.5; however, the Inspectorate considers them to be of high relevance given the nature of the Proposed Development. Notwithstanding the advice in 3.3.4 of this opinion regarding assessment of the Proposed Development as a whole, the assessment of cumulative effects within the ES should include an assessment of separately consented components of the Proposed Development as well as 'other' development. Further information is provided on Page 6 of the Inspectorate's Advice Note Seventeen: Cumulative effects assessment (2015). | Chapter 3 of Volume 10 presents an assessment of project wide effects which includes the consideration of cumulative effects associated with the main development site (described and assessed within Volume 2 of the ES) and other associated development (described and assessed within Volumes 3 to 9 of the ES). |
| Project-Wide | Inter-relationships and Cumulative Effects | 4.22.3 | The Scoping Report does not identify whether cumulative effects may arise with the works to relocate facilities associated with Sizewell B, described in Paragraphs 3.2.6 to 3.2.8 of the Scoping Report. The Scoping Report states that the construction periods of the Sizewell B Relocated Facilities works and the Proposed Development will overlap. Accordingly, the potential exists for effects to combine and therefore the ES must assess the likely significant cumulative effects of these works with the Proposed Development. | <p>The Sizewell B Relocated Facilities proposals are instead included within Volume 2, Chapters 2 to 4. Each of the topic chapters present the assessment of Sizewell B Relocated Facilities in the context of the works proposed in the Sizewell C Project DCO application. Where there is the potential for the environmental effects described within the Sizewell B Relocated Facilities ES to alter as a result of the proposed Sizewell C Project proposals, these are detailed in the chapters.</p> <p>The Sizewell B Relocated Facilities proposals are not therefore not considered within the cumulative effects assessment presented in Volume 10 of the ES.</p> |
| Project-Wide | Inter-relationships and Cumulative Effects | 4.22.4 | The Scoping Report does not provide a scope for the cumulative assessment, and therefore it is not clear whether the decommissioning of Sizewell A will be considered. The ES should set out how this project interacts with the Proposed Development and make an assessment of the likely significant cumulative effects. | As decommissioning activities at Sizewell A are not considered within the cumulative effects assessment. Instead, the decommissioning activities at Sizewell A are considered to form part of the baseline and future baseline as these activities are current and ongoing. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Project-Wide | Inter-relationships and Cumulative Effects | 4.22.5 | <p>The Inspectorate advises that inter-relationships between aspects (for example but not limited to: radiological effects and human health; changes to air quality and ecological effects; soils and geology and flood risk; visual effects and effects on heritage assets) are assessed within each aspect chapter with cross reference to other technical assessments as appropriate. In line with Advice Note 17, the cumulative effects assessment should focus on cumulative effects arising from other development (and other components of the Proposed Development which are to be consented separately).</p> <p>The Inspectorate notes the definition of inter-relationship effects provided and advises that the ES make it clear how effects may combine together eg how multiple effects may act together on an individual receptor.</p> | <p>Inter-relationships between aspects are considered within each technical assessment presented within Volume 2 to 9 of the ES in line with advice published by the Planning Inspectorate (Advice Note 17). However, a summary of inter-relationship effects associated with the proposed development is presented within Chapter 2 of Volume 10.</p> |
| Project-Wide | Inter-relationships and Cumulative Effects | 4.22.6 | <p>The Inspectorate notes the information in this section and has no specific comments on the criteria provided, however it will be important for the ES to document the screening process adopted. It is not entirely clear from the Scoping Report where this exercise fits into the four-stage approach recommended in Advice Note Seventeen, and this should be clarified in the ES.</p> <p>With reference to Paragraphs 5.5.9 and 5.5.10 the Inspectorate advises that every effort is made to agree both the long list and short list of 'other' development with the local planning authorities and other statutory consultees.</p> | <p>Volume 10 of the ES presents the cumulative and transboundary effects assessment. Chapter 1 of Volume 10 sets out the methodology and summarises the process followed to identify the short list of other plans and projects. The long list (Volume 10, Appendix 1A) and short list (Volume 10, Appendix 1B) of identified plans and projects has been prepared in conjunction with ESC. Details of consultation undertaken in relation to the long list and short list is provided within Chapter 1 of Volume 10.</p> <p>Consultation has also been undertaken with regard to the Transport Assessments (Doc Ref. 8.5) and Shadow Habitat Regulations Assessments (Doc Ref. 5.10) submitted as part of the DCO and summarised within the ES where relevant.</p> |
| Project-Wide | Inter-relationships and Cumulative Effects | 4.22.7 | <p>The ES should include a list of the other plans or projects taken forward into the detailed assessment of cumulative effects. Figures at an appropriate scale, with appropriate cross-referencing to this list would be a useful inclusion in the ES and the Inspectorate recommends that these are included. The Inspectorate recommends that the scope of the assessment is discussed with the local planning authorities and effort is made to seek agreement with them on the list of plans and projects to be included.</p> | <p>Volume 10 of the ES presents the cumulative and transboundary effects assessment. Chapter 1 of Volume 10 sets out the methodology and summarises the process followed to identify the short list of other plans and projects taken forward for consideration within the cumulative effects assessment presented within Chapter 4 of the same volume. This included a detailed description of the scheme identification process and details consultation undertaken with ESC and the Marine Technical Forum (which has an independent chair, together with nominated technical representatives from Natural England, the Environment Agency and the Marine Management Organisation (MMO)).</p> <p>A list of other plans or projects taken forward into the detailed assessment is included within the ES as Appendix 1B of Volume 10. A figure is presented in Chapter 1 of the same volume showing the location of the plans and projects within the short-list.</p> |



3 Response to comments received from other consultation bodies

Table 1.2: Response to comments received from other consultation bodies

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
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| 1 | ES Preparation | The proposed development | Anglian Water | Reference is made to the diversion of statutory undertaker's equipment being one of the assumptions for the EIA process. There are existing waste water pipes in Anglian Water's ownership which potentially could be affected by the development. It is therefore suggested that the Environmental Statement should include reference to existing assets in Anglian Water's ownership. | Utilities have been identified through consultation with statutory undertakers and land owners. Where relevant the descriptions of development presented in Chapter 3 of Volume 2 and Chapter 2 of Volumes 3 to 9 identify those within the Sizewell C Project site and those within the close vicinity. Existing utilities which cross the Sizewell C Project site may require diversion. Discussions with utility providers are underway to confirm whether utility infrastructure would need to be protected or diverted (where asset protection measures are not suitable) or whether there would be sufficient clearance from the works that they would not be affected. An appropriate approach would be agreed with the relevant statutory undertaker (i.e. the utility company) through a formal application and would include appropriate protective measures where required. |
| 2 | ES Preparation | The proposed development | Anglian Water | In particular, near to the proposed development is the Yoxford – Middleton Water Recycling Centre . The Applicant is aware of this asset. The Applicant must ensure there is no disruption to the access to this site during or after the construction phases. Access is required at all times in order to operate and maintain this asset in accordance with our Statutory duty. It is therefore suggested that the Environmental Statement should include reference to this asset and any other associated pumping stations, rising mains and outfalls | Volume 7 of the ES presents the assessment of likely effects on nearby receptors arising from the construction and operation of the proposed Yoxford roundabout. This includes consideration of the sewage works at Yoxford. As stated in Chapter 2, Volume 7 , the roundabout would be largely constructed offline, avoiding the need for long-term temporarily road closures or the diversion of the A12 in this location. Whilst, traffic management measures would be required during construction of the tie-ins back to the A12 and B1122 once the roundabout is constructed, access to the sewage works would be maintained at all time. |
| 3 | ES Preparation | The proposed development | Anglian Water | In particular it would be helpful if we could discuss the following issues: <ul style="list-style-type: none"> • Wording of the Draft DCO, including protective provisions specifically for the benefit of Anglian Water. • Requirement for any waste water connections. • Adequate protection of access to the Yoxford Water Recycling Centre during construction phases. • Impact of development on any other of Anglian Water's assets and the need for mitigation. • Pre-construction surveys. | Consultation with Anglian Water on the DCO has been undertaken. |
| 4 | Project-Wide | Ground Conditions and Hydrology | Anglian Water | Consideration should be given to all potential sources of flooding including sewer flooding (where relevant) as part of the Environmental Statement and related Flood Risk Assessment. We would suggest that reference is made to any relevant records in Anglian Water's sewer flooding register as well as the flood risk maps produced by the Environment Agency. This information can be obtained by contacting Anglian Water's Pre-Development Team. The e-mail address for this team is as follows: (planningliasion@anglianwater.co.uk). | Consideration is given to all forms of flooding within the Flood Risk Assessments that have been prepared for the main development site and each of the associated developments (Doc Ref. 5.02 to 5.09). A summary of the findings of the site specific Flood Risk Assessments is provided within the Groundwater and Surface Water assessments presented within Volumes 2 to 9 of the ES . |
| 5 | Main Development Site | Ground Conditions and Hydrology | Anglian Water | Anglian Water is responsible for managing the risks of flooding from surface water, foul water or combined water sewer systems. At this stage it is unclear whether there is a requirement for a connection(s) to the public sewerage network for the above site or as part of the construction phase. Discussions with Anglian Water should be undertaken relating to any potential or intended connections to the public sewerage network of surface water. Anglian Water understands that the intention is for the Applicant to manage the disposal and treatment of waste water via its own private, on site water recycling centre. If, there is a requirement for a connection to the Anglian Water waste water network for waste water treatment, a pre planning application should be made to Anglian Water, via this same e mail address, (planningliasion@anglianwater.co.uk) to determine the ability to provide such connections, without network reinforcement and to ensure that a connection is provided based upon the specifics of the Applicant's drainage strategy | During construction of the DCO the intention is that temporary surface water drainage systems would be provided as part of the standard construction measures on each construction site or phase of the DCO to manage flood risk and drainage. In addition, it is intended that all foul water would be managed via a separate system not connected to the public sewerage system for the main works on the power station. The disposal and treatment of waste water is intended to be via a private, on site water recycling centre. However, the requirements for each phase of works would be confirmed as part of the detailed construction design process for each phase of the DCO. |
| 6 | Project-Wide | The proposed development | Cadent Gas | Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works. | Existing utilities which cross the Sizewell C Project site may require diversion. Discussions with utility providers are underway to confirm whether utility infrastructure would need to be protected or diverted (where asset protection measures are not suitable) or whether there would be sufficient clearance from the works that they would not be affected. An appropriate approach would be agreed with the relevant statutory undertaker (i.e. the utility company) through a formal application and would include appropriate protective measures where required. |
| 7 | Project-Wide | The proposed development | Darsham Parish Council | The report appears to be largely based on the contents of the EDF stage 3 consultation document. However, EDF has not to our knowledge made any response to the consultation replies and the EIA scoping report has therefore been based on a document (the stage 3 consultation) that was widely criticised in terms of lack of detailed content. The EIA scoping report does not appear to take account of any of the responses to that consultation. | A Consultation Report (Doc Ref. 5.1) has been prepared to summarise the consultation process. |
| 8 | Main Development Site | The Proposed Development | Defence Infrastructure Organisation | With respect to the offshore element of the proposed development, it is noted that the scheme will feature the installation of subsea coolant intake and discharge infrastructure. The MOD would wish to review the plans for any such installations and associated marine works to ensure they will not impact on generic maritime defence interests. | SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals. The Defence Infrastructure Organisation have been consulted as part of this consultation on the emerging design. Further detail on the formal consultation undertaken by SZC Co. is provided within the Consultation Report (Doc Ref. 5.1). |
| 9 | Main Development Site | The Proposed Development | Defence Infrastructure Organisation | The submission indicates that the new power station will now be connected to the National Grid via new overhead powerline infrastructure. The MOD would wish to review the plans for any such installation(s) in relation to military low flying activities that may be conducted in the area and ensure that new overhead powerlines are accurately marked on aviation charts. | This point is noted and will be discussed with the MOD at an appropriate time. |
| 10 | Project-wide | The Proposed Development | Defence Infrastructure Organisation | It should be noted that the development site does occupy an area that is used for generic military low flying training activities. Subject to verifying the precise location and height of structures that will be featured in the development scheme, the MOD may request that certain tall and narrow profile structures (temporary and permanent) are fitted with aviation warning lighting. It may be appropriate for the applicant to consider the potential implications of this upon visual amenity as part of their impact assessment. | A small number of red aviation warning lights on the tops of the largest cranes may be required for the reasons outlined. It is judged unlikely that this would change the approach to the night-time appraisals or the conclusions of the LVIA presented within Volume 2, Chapter13 of the ES . The need for aviation warning lights on cranes would be discussed with the MOD at an appropriate time. |
| 11 | Project-wide | Health and Wellbeing | East Suffolk Council | Within the report there is no mention of early years provision. This is an area that the Councils would like to discuss further to review the potential impacts locally. We note that further work needs to be considered regarding the impacts on children's services. This includes further consideration of using a family liaison officer approach to support workers' families, accommodation impacts for care leavers and support for schools to deliver preventative work, as well as impacts on school places and early years capacity. We suggest that it would be helpful for EDF Energy to set up a short meeting with a range of relevant officers on one of the socio-economic workshop days to agree a way forward on these issues. | SZC Co. has been working closely with SCC's Adult and Childrens Services and Education departments to consider all of the potential risks of the Project, test the potential scale of effects/risks against existing pressures in service delivery, and discuss mitigation measures (such as a Public Services Contingency Fund) that is proportionate and suitably flexible to respond to effects. In addition, in developing an Accommodation Strategy and Housing Fund, SZC Co. has considered the potential for effects to be exacerbated on accommodation sectors currently used by the most vulnerable people and those at greatest risk to housing need and homelessness. A suite of measures has been set in place that aligns with East Suffolk Council's priorities in this regard. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|----------------|-------------------|----------------------|---|--|
| 12 | Project-wide | Transport | East Suffolk Council | With regards to the sensitivity of receptors, consideration needs to be given to the need for all vulnerable road users, including cyclists and equestrians. Consideration should be given regarding the ability of vulnerable road users to cross the road and the level of provision of crossing facilities. Major and Moderate receptor types should consider residential properties and their level of footway provision. Whilst the Councils accept the categorisation of facility types in general, consideration needs to be given to the scale and intensity of movement associated with any site. As an example, tourist attractions are categorised with a receptor sensitivity of minor but may have significant pedestrian movement especially that of young children associated with it. | Vulnerable road users, including cyclists and equestrians, their ability to cross the road and the level of provision of crossing facilities have been fully assessed within the Transport ES Chapter (Volume 2, Chapter 10). |
| 13 | Project-wide | Transport | East Suffolk Council | With regards to the environmental impacts associated with traffic from the site, it is unclear whether the 'worst case' will be assessed. As set out in the IEMA document 'Guidelines for the Assessment of Road Traffic', it should be the aim of the assessor to assess the period of greatest change, rather than greatest impact, without quantifying the relative impact of traffic during each hour of the day and across the life of the development, the risk remains that certain impacts will not be fully assessed. For instance, it may be that relative increase in HGVs during the interpeak periods are far greater than those during the peak hours, or that the impacts associated with Early Years construction are proportionally greater than those associated with peak construction and confirmation is sought that this has been considered. | A representative hour has been calculated to be considered within the assessments and present the hour of greatest change. To calculate the representative hour, the average traffic flows across all links in the network have been reviewed, for each reference case and with the Sizewell C Project, for each hour. The percentage change in each hour has then been calculated and the hour with the highest percentage change identified. The representative hour assessment is presented alongside the overarching assessment and any additional effects have been identified and mitigated. The representative hour for each phase of development is presented below: <ul style="list-style-type: none"> • Early years: 7-8am; • Peak construction (busiest day): <ul style="list-style-type: none"> - Across 'daytime hours' (7am-11pm): 10-11pm; - Between 7am-6pm: 7-8am; and • Operational: 4-5pm. For peak construction the representative hour initially was identified as 10pm – 11pm when hours are 'daytime hours' of 7am – 11pm. Given the assessments are to assess impact on vulnerable road users it is important that the representative hour is a reflection of when vulnerable road users are likely to be on the network. As such, the representative hour for peak construction when the hours are restricted to 7am – 6pm is 7am – 8am. |
| 14 | ES Preparation | Future Baseline | East Suffolk Council | With regard to the future environmental baseline, it should be noted that all non-agricultural land within the Main Development Site is managed by Suffolk Wildlife Trust on behalf of EDF Energy. Consequently, the ES should not underestimate the environmental quality of the future baseline without development, and thus underestimate the impacts of the development. Furthermore, the ES should recognise that the projected future baseline case includes consideration of how the Sizewell A and B sites will change under decommissioning over the construction life of Sizewell C. | Methodology appendices included within Volume 1, Appendices 6D to 6Y establish how the future baseline considered within the technical assessments presented in Volumes 2 to 9 of the ES has been developed. This includes consideration of changing conditions as well as the introduction and/or removal of features that are currently absent or present in the environmental baseline. The future baseline considered within each technical assessment is clearly defined and, where relevant, explains how it differs from the existing baseline that is described in detail |
| 15 | Project-wide | Transport | East Suffolk Council | With reference to paragraph 6.3.40, the Councils do not accept that SPR should be included in the reference case transport models and believe that the cumulatively impact associated with East Anglia 1 North and East Anglia 2 with regards to transport effect should be assessed as part of a sensitivity test, sitting outside of the reference case model. We would recommend that the method is submitted to and agreed with the Councils prior to submission. | Further detail on the transport model, including which committed developments have been considered, is provided within the Transport Assessment (Doc Ref. 8.05) and reported in the Transport ES Chapter (Volume 2, Chapter 10). |
| 16 | Project-wide | Air Quality | East Suffolk Council | Where road transport is the main emission source of concern the applicant should present modelled concentration for the following pollutants; NOx, NO2 PM10 and PM2.5. | Emissions of NO _x , NO ₂ , PM ₁₀ and PM _{2.5} from road transport are assessed in the ES and reported in Volume 2 Chapter 12 . |
| 17 | Project-wide | Air Quality | East Suffolk Council | Where possible local information should be used to develop information on mix of different vehicle types, euro standards and weight categories for existing baseline emission calculations. For future baseline fleet mixes, should local data be used, it should be projected using NAEI's fleet turnover assumptions. http://naei.beis.gov.uk/data/ef-transport . A sensitivity test for the future baseline and construction and operation scenarios should be undertaken. Which demonstrates what the potential concentrations could be if fleet projections and associated emission standards are not achieved. The fleet mix for construction scenarios should as accurately as possible reflect the proposed construction vehicles fleet. | The air quality assessment has been undertaken to a proportionate level of detail to support robust decision making and the methods used are set out clearly in the Volume 1, Appendix 6H of the ES . |
| 18 | Project-wide | Noise & Vibration | East Suffolk Council | Where noise or vibration from site construction working is projected or anticipated to have adverse effects on occupiers of nearby residential properties, based on the prevailing background noise levels, utilising BS:5228:09+A1:2014 and BS:4142:14; the EIA should detail the construction and demolition works (e.g. diggers, excavators, piling, riveters, mixers, explosives, pneumatic breakers, drills, dewatering pumps, boring equipment, compressors, generators etc.) and indicate which properties are to be affected, the duration of the impact and the mitigation measures proposed to be taken either: a) At source, a) By way of barrier or shielding, c) Any other form of mitigation or compensation. | It is considered that BS4142 would not be relevant for the sources listed within this comment. However, details of mitigation have been provided within the noise and vibration assessments within Chapter 11 of Volume 2 and Chapter 4 of Volumes 3 to 9 of the ES as required.. |
| 19 | Project-wide | Socio-economics | East Suffolk Council | When actually setting baseline assumptions other sources including 'Employment by occupation' and 'Qualification Levels' from the ONS Annual Population Survey should be used. | The socio-economics assessment presented in Volume 2, Chapter 9 considers 'Employment by occupation' and 'Qualification Levels' when defining baseline conditions. These are presented in tables and accompanied by supporting narrative within section 9.4 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|----------------|-----------------|----------------------|--|--|
| 20 | Project-wide | Socio-economics | East Suffolk Council | We would like to see some analysis carried out of the supply chain capacity to service the development within the County – so that we can better understand the scale of the economic opportunity for Suffolk and the wider eastern region. | <p>The Economic Statement includes an overall assessment of the likely supply chain value retention that the Sizewell C Project could bring to the area, and is supported by a Supply Chain Strategy to deliver measures to enhance this; this is provided at Doc Ref 8.9.</p> <p>The Supply Chain Strategy identifies lessons learnt from previous experience, and sets out a range of initiatives that would enable the region to capture economic benefits generated by the goods and services needed for the delivery of the Sizewell C Project. These include:</p> <ul style="list-style-type: none"> • A Sizewell C supply chain team, partnering with the Suffolk Chamber of Commerce. The team would assist local and regional businesses in winning contracts on the Sizewell C Project through management of a supply chain website with project information, details of work packages and professional standards, signposting to relevant support, details of events and examples of success. • A Sizewell C Supply Chain Portal capturing details and core capabilities of regional businesses and mapping them against requirements of the Sizewell C Project, brokering business support and matching suppliers with SZC Co. and Tier 1 contractors. • Contractor engagement including senior leadership commitments from Tier 1 contractors to engage with the local and regional supply chain, including attendance at 'meet the buyer' events. • Monitoring and reporting in order to compare and contrast local and regional levels of engagement. <p>Sizewell C's strategy is to integrate employment, skills, and education with the supply chain development activity in order to help jobseekers find roles on the Sizewell C Project and to help backfill vacancies that may become harder-to-fill within the supply chain, using the Sizewell C Jobs Service.</p> |
| 21 | ES Preparation | Alternatives | East Suffolk Council | <p>We welcome the intention to review alternatives for land required during construction (taken to mean not just the laydown land, but also all the associated development) – this consideration should of course not just include layout, but overall scale and location. With particular regard to sea defences, consideration also needs to be given to the north and south of the site, if coastal erosion and flooding affect these areas as may be predicted. The Intermediate Low Level Waste Store is taken to be included on this list under Main Development Site.</p> <p>With reference to the construction laydown land adjacent to the main site, particular regard should be had to alternative options which reduce the impact on the AONB, for example using existing employment land in the vicinity. Similarly, the alternative of siting the Visitor Centre outside the AONB will need to be considered.</p> <p>The Councils are concerned that in some cases EDF Energy has not sufficiently justified its preferred option and is therefore prematurely curtailing more detailed assessment of alternatives. Of particular relevance are the proposals for freight management which are a recent addition to proposals but not yet in a confirmed location.</p> | <p>SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals.</p> <p>A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4, together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects.</p> <p>Volume 2, Chapter 6 provides a description of the main development site-specific alternatives considered by SZC Co.</p> |
| 22 | Project-wide | Air Quality | East Suffolk Council | We request that engines used for rail movements are low emission. | The aspiration is noted, but it is unclear what East Suffolk Council consider to be a low emission locomotive. |
| 23 | Project-wide | Air Quality | East Suffolk Council | We request that air quality monitoring is undertaken at agreed locations during the works in order to confirm modelled pollutant concentrations. This should start 1 year prior to any early construction works in order to obtain a baseline and continue for the duration of the construction period. | As set out in the CoCP (Doc Ref. 8.11), monitoring of specific activities and of baseline dust levels would be undertaken to demonstrate that mitigation measures are effective and that residual impacts would be not significant. Volume 2, Chapter 12 identifies the locations for which monitoring is proposed for meteorological conditions, and dust and particulate emissions from certain activities. No further monitoring beyond this is proposed for air quality or dust. |
| 24 | ES Preparation | Alternatives | East Suffolk Council | We are concerned that alternatives are being scoped out of the process at an early stage, without a full appreciation of the effects of EDF Energy's preferred option. Alternatives should be appraised having regard to the respective socio-economic and environmental effects alongside consideration of operational requirements. The ES should clearly articulate how alternatives have been evaluated in a balanced way. | <p>SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals.</p> <p>A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4, together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects.</p> <p>Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 provide a description of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co.</p> |
| 25 | Project-wide | Air Quality | East Suffolk Council | To account for concerns that the 50mph speed limit sign location change has not altered driving behaviour. It is requested that the speed between 30mph and 50mph with the highest NOx emissions is assumed for roads in and near the Stratford St Andrew AQMA. The annual daily average speed calculation should be weighted by the varying vehicle types. | It is understood that East Suffolk Council are requesting that the air quality assessment assumes unlaw driving practices by all users of the A12 at some locations. In line with custom and practice for roads assessments, it is assumed that driver behaviours are consistent with the stated speed limits on roadside signage. The assessment method at the AQMAs and other locations, include a procedure to calibrate (verify) the model performance against local measurement data for nitrogen dioxide. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------------|----------------------|----------------------|---|---|
| 26 | Sizewell Link Road | Noise & Vibration | East Suffolk Council | This would essentially bypass the villages of Theberton and Middleton Moor, and significantly reduce traffic movement through Yoxford village. Construction works undertaken to form this new link road should again be limited to normal working hours where possible. The new road scheme should provide effective noise and vibration reduction by way of; quiet road surfacing, speed limits, banking or screening so as to minimise impact on nearby residential property. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this link road to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009. | <p>Construction working hours and methods associated with the Sizewell link road are provided within Volume 6, Chapter 2. In summary the working hours for this site would be 07:00 to 19:00 weekdays and Saturday, although some night time working may be required (for example for the construction of the bridge over the East Suffolk line to minimise disruption to passenger services) and East Suffolk Council would be notified in advance.</p> <p>The noise and vibration assessment (Volume 6, Chapter 4) identifies the likely significant noise effects associated with the construction and operation of the Sizewell link road. The assessment also provides a summary of the primary and tertiary mitigation measures that would be included to mitigate construction and operational noise.</p> <p>Exact working methods and plant to be used would not be determined until a contractor is appointed and therefore precise details of noise mitigation measures cannot yet be established. As set out in the CoCP (Doc Ref. 8.11), mitigation measures that could be implemented during construction to minimise construction noise include selection of alternative plant or working methods, barrier screening and/or stand-off margins and/or alternative plant. Contractors will be required to identify mitigation to avoid significant construction noise and vibration effects, as far as reasonably practicable. Construction mitigation measures may include additional screening or changing working methods and times, including limiting noisy activities on Saturday afternoons. Where appropriate, mitigation measures which would reduce adverse effects are identified.</p> <p>SZC Co. has established a voluntary 'Noise Mitigation Scheme' which seeks to mitigate residual significant effects on properties from construction or operation of the proposed development, subject to eligibility criteria, as set out in Volume 2, Appendix 11H. Where specified noise criteria is exceeded, noise insulation or temporary rehousing may be provided. SZC Co will undertake further assessment and engage with stakeholders to further understand the affected receptors and their use.</p> <p>No additional mitigation measures are currently proposed to further reduce noise levels. However, once the contractor has been appointed and as part the detailed design, further consideration will be given to measures that could be implemented to further reduce traffic noise.</p> |
| 27 | Two Village Bypass | Noise & Vibration | East Suffolk Council | This is proposed to take 24 months to construct and will greatly reduce noise and vibration for properties in both villages but will introduce increased noise to some residential properties surrounding the new road. Construction works undertaken to form this new bypass should again be limited to normal working hours where possible. As with the Sizewell Link Road, consideration should be given to provide effective noise and vibration reduction by way of; quiet road surfacing, speed limits, banking or screening so as to minimise impact on nearby residential property. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this new bypass to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered is proportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009. | <p>Construction working hours and methods associated with the two village bypass are provided within Volume 5, Chapter 2. In summary the working hours for this site would be between 07:00 to 19:00 weekdays and Saturday, although some night time working may be required and East Suffolk Council would be notified in advance. The noise and vibration assessment (Volume 5, Chapter 4) identifies the likely significant noise effects associated with the construction and operation of the two village bypass. The assessment also provides a summary of the primary and tertiary mitigation measures that would be included to mitigate construction and operational noise. The assessment also identifies the potential requirement for secondary mitigation and in accordance with the CoCP (Doc Ref. 8.11).</p> <p>Exact working methods and plant to be used will not be determined until a contractor is appointed and therefore precise details of noise mitigation measures cannot yet be established. However, as set out in the CoCP (Doc Ref. 8.11), mitigation measures that could be implemented during construction to minimise construction noise include selection of alternative plant or working methods, barrier screening and/or stand-off margins and/or alternative plant. Contractors will be required to identify mitigation to avoid significant construction noise and vibration effects, as far as reasonably practicable. Construction mitigation measures may include additional screening or changing working methods and times, including limiting noisy activities on Saturday afternoons. Where appropriate, mitigation measures which would reduce adverse effects are identified.</p> <p>SZC Co. has established a voluntary 'Noise Mitigation Scheme' which seeks to mitigate residual significant effects on properties from construction or operation of the proposed development, subject to eligibility criteria, as set out in Volume 2, Appendix 11H. Where specified noise criteria is exceeded, noise insulation or temporary rehousing may be provided. SZC Co will undertake further assessment and engage with stakeholders to further understand the affected receptors and their use.</p> <p>No additional mitigation measures are currently proposed to further reduce noise levels. However, once the contractor has been appointed and as part the detailed design, further consideration will be given to measures that could be implemented to further reduce traffic noise.</p> |
| 28 | Project-wide | Noise & Vibration | East Suffolk Council | This Council may consider control of construction site noise by the implementation of Section 60 of the Control of Pollution Act 1974 or by prior consent (if applied for) under Section 61 of the Control of Pollution Act 1974. Details of noise and vibration; supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA. | Details of noise and vibration monitoring are specific to each of the site. Details are provided, where necessary, within the noise and vibration assessments presented in Volumes 2 to 9 of the ES . As set out in the CoCP (Doc Ref. 8.11), a Noise Monitoring and Management Plan will be developed and implemented. SZC Co. would implement a programme of noise monitoring around the site at a number of strategically important locations, where appropriate, agreeing the locations with the local planning authority as part of a Noise Monitoring and Management Plan. Reports containing results of attended measurements would be made available in accordance with the CoCP and arrangements within an approved Noise Monitoring and Management Plan. |
| 29 | Project-wide | Noise & Vibration | East Suffolk Council | This Council may consider control of construction site noise by the implementation of Section 60 of the Control of Pollution Act 1974 or by prior consent (if applied for) under Section 61 of the Control of Pollution Act 1974 | This point is noted. As outlined in Chapter 2 of Volumes 3 to 9 of the ES , construction work at the associated development sites would take place during Monday to Saturdays. 07:00 to 19:00 hours, with no working on Sundays or bank holidays. However, some activities may require work outside of these hours. Where this is the case, East Suffolk Council would be notified in advance. |
| 30 | Project-wide | Health and Wellbeing | East Suffolk Council | There is still a lack of consideration of the community anxiety and stress that the construction may cause in the latest report. | <p>As detailed in the Health and Wellbeing assessment (Volume 2, Chapter 28), there are a number of factors which influence an individual's quality of life, which include emotions such as stress and anxiety. From the beginning of the planning process (i.e. pre-application), nuclear development proposals can generate stress and anxiety within local communities due to perceived health risks. If left unaddressed, risk perception, and any associated stress or anxiety, can continue throughout construction and operation.</p> <p>The tangible aspects associated with the proposed development which underly local community risk perception have been investigated and addressed within the Health and Wellbeing chapter which provides a robust assessment supported by an appropriate scientific evidence base for a range of health pathways. The assessment is therefore intended to help address local community concerns and perceived risk in addition to informing decision making.</p> <p>The intangible and more subjective aspects which are often not possible to assess, have been explored and addressed through meaningful consultation during the planning application process. In the instance where consent is granted, engagement with local communities would be maintained during construction and operation to investigate, address, and respond to concerns.</p> |
| 31 | Project-wide | Transport | East Suffolk Council | There is some concern over the large proportion of effects that will rely on the application of "Professional Judgement" within Table 6.3.2 of the report. To inform this judgement and assist in reaching agreement, it is proposed that the assessment is informed and supported by quantifiable (evidence-based) analysis as detailed below. Where possible, effects should be quantified. EDF Energy should be aware that where 'Professional Judgement' is relied upon, without such data to support it, it is open to challenge by the Councils and other interested parties. | Where guidance is available, either IEMA or DMRB, it has been used in conjunction with professional judgement within the Transport ES chapter (Volume 2, Chapter 10). The methodology for the assessment of transport effects included as Volume 1, Appendix 6F identifies the guidance that has been followed for each part of the assessment. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------------|--------------------------|----------------------|---|---|
| 32 | Project-wide | Health and Wellbeing | East Suffolk Council | There is mention of vulnerable groups and the requirement of suitable services within the EIA. This needs to be further agreed and considered as there is not enough detail to comment fully on any mitigation(s). Likewise, ongoing, positive education arrangements through Schools, Colleges and local youth groups to further possible apprenticeship options and development of STEM subjects especially with girls. | The socio-economic ES chapter (Volume 2, Chapter 9) includes an assessment on the delivery of public services and a review of engagement with SCC and ESC regarding potential risks and vulnerabilities, taking into account the existing baseline of service provision. This has been used to identify the appropriate mitigation measures to avoid or reduce effects should they arise. This includes provision of an Accommodation Management System, Housing Fund and Public services Contingency Fund. |
| 33 | Freight Management Facility | Noise & Vibration | East Suffolk Council | There is little to choose between the two options except that there is a residential property close to option 2 at Innocence Farm which is likely to be impacted by noise and vibration from this facility. Construction works undertaken to form this freight management facility should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this facility to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009. | Construction working hours and methods associated with freight management facility are provided within Volume 8, Chapter 2 . In summary the working hours for this site would be limited to 07:00 to 19:00 weekdays and Saturday, unless agreed otherwise. The noise and vibration assessment (Volume 8, Chapter 4) states that given the level of noise and vibration sources and distance between the closest noise and vibration sensitive receptors, adverse effects are not predicted. However, this chapter presents a summary of the noise and vibration effects during the worst-case construction, operational and removal and reinstatement phases, in order to demonstrate this. |
| 34 | Project-wide | Air Quality | East Suffolk Council | There is an appropriate level of detailing provided for a scoping stage report. In general, good practice air quality assessment guidance has been proposed by the applicant. However, in view of the unique nature of this development, it is recommended that the study should go beyond these standard good practice guidelines. These recommendations are not specified because of insufficient detail, but rather reflect aspects which will become increasingly important as the scheme matures. The principal area of concern is ensuring that the full extent of air quality impacts associated with traffic changes due to the construction and operation of the proposed development are captured. | The methods used to capture the full extent of impacts associated with emissions from road and rail movements due to the construction and operation of proposed development, are set out in a single Transport Emissions Report (Volume 2, Appendix 12B) for the whole study area. |
| 35 | Main Development Site | The Proposed Development | East Suffolk Council | There is a particular case to consider whether the impacts of the campus development (wrapped in to the 'Main Development Site') need to be specifically isolated within the ES, because of the particular sensitivities, environmentally and socio-economically, associated with EDF Energy's preferred site, and the potential existence of alternative site locations. While the campus offers mitigation in some respects, it will give rise to other impacts of its own making. In particular, the ES should assess the impact on nearby residential properties and mitigation easures included as necessary. | The potential environmental impacts associated with the accommodation campus are considered within the technical assessments of Volume 2 of the ES . |
| 36 | Project-wide | Historic Environment | East Suffolk Council | There is a need to use National Planning Policy Framework (NPPF) terminology – substantial/less than substantial – mapping of terms could be useful - 6.9.22 not addressed | The assessment methodology set out at 6.9.25 specifically refers to EIA significance assessment. Harm is discussed at Section 6.9.30 and a statement of whether harm to significance would arise is made in each of the Terrestrial Historic Environment assessment of Volumes 2 to 9 of the ES in accordance with the Terrestrial Historic Environment Assessment Methodology (Volume 1, Appendix 6L). |
| 37 | Project-wide | Historic Environment | East Suffolk Council | There is a need to assess the impact on Leiston CA - 6.9.13 not addressed | Effects on Leiston Conservation area have been assessed within the Main Development Site Terrestrial Historic Environment Chapter (Volume 2, Chapter 16). |
| 38 | Project-wide | Historic Environment | East Suffolk Council | There is a need for individual assessments as well as assessment of inter-relationships and cumulative effects for Grade I/II* and Scheduled Ancient Monuments (SAM) – not addressed | Individual assets are discussed within each site of the Terrestrial Historic Environment ES chapters in Volumes 2 to 9 , with sections detailing heritage significance and contribution of setting for individual assets, before setting out the impact, and significance of effect. The assessment of inter-relationships and cumulative effects considers effects on Grade I/II* and Scheduled Ancient Monuments and is presented within Volume 10 of the ES . |
| 39 | Project-wide | Historic Environment | East Suffolk Council | The two-village bypass is missing from the list of new sites. | The two villages bypass is identified in the first bullet point at 9.6.13 (end of first line), and is included within the assessment as Volume 6, Chapter 9 of the ES . |
| 40 | Project-wide | Socio-economics | East Suffolk Council | The timing of any potential mitigation needs to be carefully considered as part of the ES. In order to realise many of the positive economic benefits of the development, detailed planning and investment will be required well in advance of construction. This is especially important in relation to the development of skills and training provision and for building and enabling local supply chain capacity. | The need for 'lead-in' for mitigation to be effective is a critical consideration for the implementation strategies including the Employment, Skills and Education Strategy and Accommodation Strategy, and would be reflected in terms of financial mitigation measures set out in the Section 106 Agreement with regard to socio-economic effects. |
| 41 | Project-wide | Historic Environment | East Suffolk Council | The structures on Orford Ness are now Grade II listed so need to be considered - 6.9.13 not addressed | Effects on the group of designated heritage assets at Orford Ness have been assessed within the Main Development Site Terrestrial Historic Environment Chapter (Volume 2, Chapter 16). |
| 42 | Project-wide | Health and Wellbeing | East Suffolk Council | The sections in the ES on air quality and noise and vibration will be particularly relevant to the HIA. | The health and wellbeing assessment (Volume 2, Chapter 28) has been informed by the air quality and noise and vibration assessments presented in Volumes 2 to 9 . |
| 43 | Yoxford Roundabout | Noise & Vibration | East Suffolk Council | The roundabout is located further away from residential property and should lessen existing road noise and vibration. However, the additional Sizewell C construction traffic is likely to impact some nearby residential property. Construction works undertaken to form this new roundabout should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this roundabout to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009. | Construction working hours and methods associated with Yoxford roundabout are provided within Volume 7, Chapter 2 . In summary the working hours for this site would be between 07:00 to 19:00 weekdays and Saturday, although night-time working may be required and East Suffolk Council would be notified in advance. The noise and vibration assessment (Volume 7, Chapter 4) identifies the likely significant noise effects associated with the construction and operation of the Yoxford roundabout. The assessment also provides a summary of the primary and tertiary mitigation measures that would be included to mitigate construction and operational noise. The assessment also identifies the potential requirement for secondary mitigation and in accordance with the CoCP (Doc Ref. 8.11) additional construction mitigation measures could include screening and changing working methods and times, including limiting noisy activities on Saturday afternoons. In addition, a noise mitigation scheme, provided in Volume 2, Appendix 6H is proposed as part of the Development Consent Order (DCO) Section 106 obligations, so that noise insulation or temporary rehousing may be provided where specified noise criteria are exceeded. No additional mitigation measures are currently proposed to further reduce noise levels. However, once the contractor has been appointed and as part the detailed design, further consideration would be given to measures that could be implemented to further reduce traffic noise. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|-------------------------------|----------------------|--|--|
| 44 | Project-wide | Landscape & Visual | East Suffolk Council | <p>The proposals methodology and scope for Landscape and Visual Impact Assessment set out in the scoping report are broadly acceptable. However, the Councils note the following:</p> <ol style="list-style-type: none"> The scoping report identifies a chain of technical agreement between the applicant and officers, it would be helpful if the applicant could organise and collate this material such that it can contribute to future discussions. Although many technical matters have been resolved the extent and or location of all associated development has not yet been finalised, for example offsite habitat creation works and the extent and location flood alleviation works both of which can be expected to produce landscape and visual effects that will require assessment. It is therefore anticipated that additional discussions will be required regarding assessment of these aspects of the scheme to ensure they are properly and fully included. Finally, it is proposed that the re-location of facilities works for Sizewell B is appended to the ES rather than integral to it. However given the intimate relationship between this development, the Sizewell C proposal and the existing stations (A and B) it is essential that the cumulative, or project wide effects (if these works form part of the DCO) in terms of landscape and visual impacts are accurately and fully assessed. | <ol style="list-style-type: none"> Volume 2, Appendix 13H to the main development site landscape and visual assessment includes a full report of consultation undertaken and areas or methodology agreed with consultees. Further reference is made within individual landscape and visual chapters where relevant. Volume 2, Appendix 13G provides an assessment of the landscape and visual impacts of the proposed off-site developments. Although no additional consultation has been undertaken in relation to landscape and visual matters, these are all relatively minor proposals. Volume 2, Chapter 13 includes consideration of the interaction with the re-location of facilities for Sizewell B. |
| 45 | Project-wide | Health and Wellbeing | East Suffolk Council | The production of an HIA is welcome, and we expect it to maximise the potential positive health and wellbeing impacts on the proposed development. We expect it to identify all significant impacts on health. | The health and wellbeing assessment (Volume 2, Chapter 28) has explored both potential health issues and opportunities associated with the construction and operation of the proposed development. This has provided the means to both inform and support more health conscious planning and development, but also forms the basis to the final assessment. |
| 46 | Project-wide | Major Accidents and Disasters | East Suffolk Council | The potential mitigation of major accident effects paras (6.19.53 to 6.19.58) do not mention the main legislation that covers public protection from an incident at a nuclear site involving radiation, i.e. REPP19. This section must also link with emergency arrangements made for other risks under CCA regulations. | The mitigation detailed within the Major Accidents and Disasters Assessment (Volume 2, Chapter 27) makes reference to the provisions made by REPP19 and also includes a discussion on both on and off-site emergency arrangements. |
| 47 | Project-wide | Transport | East Suffolk Council | The magnitudes of impact are set out under "Types of Impact" within the report, where the impacts are allocated to one of four categories: Negligible, Minor, Moderate and Substantial. These categories relate to those suggested in the IEMA guidelines and the DMRB, where the impact referred to here as "Minor" is termed "Slight". | Magnitudes of impact have been aligned within the EIA methodology set out within Volume 1, Chapter 6 . As such the following categories are used to define magnitude of impacts: very low, low, medium and high. The following categories are used to define the classification of effects: negligible, minor, moderate and major. |
| 48 | Project-wide | Transport | East Suffolk Council | <p>The magnitude of impact criteria remains consistent with the 2014 scope.</p> <p>The use of a threshold of 1,400 vehicles per hour is supported by IEMA guidelines, though unilaterally applying these guidelines should be avoided – regard should be had to the health impacts on reducing pedestrian amenity or increasing delays in travel. We expect the figure of 1,400 vehicles per hour to relate to an exceedance in any hour, and not to represent an average. To assist in some quantification of impacts above this threshold, DMRB 11.3.8.7 figure 1 should be referred to where mean pedestrian delays associated with different road crossing situations are presented in graphical form</p> | <p>A representative hour has been calculated to be considered within the assessments and present the hour of greatest change. To calculate the representative hour, the average traffic flows across all links in the network have been reviewed, for each reference case and with the Sizewell C Project, for each hour. The percentage change in each hour has then been calculated and the hour with the highest percentage change identified.</p> <p>The representative hour assessment is presented alongside the overarching assessment and any additional effects have been identified and mitigated.</p> <p>The representative hour for each phase of development is presented below:</p> <ul style="list-style-type: none"> • Early years: 7-8am; • Peak construction (busiest day): <ul style="list-style-type: none"> - Across 'daytime hours' (7am-11pm): 10-11pm; - Between 7am-6pm: 7-8am; and • Operational: 4-5pm. <p>For peak construction the representative hour initially was identified as 10pm – 11pm when hours are 'daytime hours' of 7am – 11pm. Given the assessments are to assess impact on vulnerable road users it is important that the representative hour is a reflection of when vulnerable road users are likely to be on the network. As such, the representative hour for peak construction when the hours are restricted to 7am – 6pm is 7am – 8am.</p> <p>DMRB 11.3.8.7 Figure 1 has been referenced in relation to the assessment of pedestrian delay with the transport effects assessment methodology within Volume 1, Appendix 6F and has informed the assessment.</p> |
| 49 | Project-wide | Major Accidents and Disasters | East Suffolk Council | The key document that must be used to inform the EIA is the Suffolk Community Risk Register (para 6.19.26). | The Suffolk Community Risk Register has been used to inform the Major Accidents and Disasters assessment through the identification of hazards and threats relevant to the site and surrounding area. |
| 50 | Project-wide | Historic Environment | East Suffolk Council | The ES will need to refer to conservation principles rather than the Design Manual for Roads and Bridges (DMRB) – 6.9.16 | The scoping report refers to Conservation Principles at 6.9.16. The significance-based assessment approach is based on that set out in NPS EN-1 which is, in itself a development of the approach set out in Conservation Principles. Reference is made to the Conservation Principles within the Terrestrial Historic Environment Assessment Methodology (Volume 1, Appendix 6L). |
| 51 | Project-wide | The Proposed Development | East Suffolk Council | <p>The ES should, as far as is possible detail a programme for the decommissioning of the site. This should include;</p> <ul style="list-style-type: none"> • The types of works that will be undertaken, • The removal of existing structures, • The disposal of all remaining waste material, • The suitability of the site for restoration or future use. | Before the decommissioning of a new nuclear power station can take place, there is a requirement for the operator to undertake an Environmental Impact Assessment (EIA) and prepare an Environmental Statement under the relevant EIA Regulations, such as Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations. Chapter 5, Volume 2 of the ES outlines the overall approach that SZC Co. is adopting to decommission the proposed UK European Pressurised Reactor (EPR) units, and the associated buildings and infrastructure at Sizewell C. The chapter includes commentary on radiological effects, however, radiological effects from decommissioning will be covered by the EIA for decommissioning. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|---------------------------------|------------------------------------|----------------------|--|---|
| 52 | ES Preparation | Construction Phasing | East Suffolk Council | <p>The ES should provide a phasing programme for construction so it is clear which activities are occurring when, and when mitigation will be delivered – for example the park and ride sites, Two Village Bypass, rail routes, beach landing facility, and accommodation campus. The timing of these will have a significant bearing on the impacts of the development and the Councils suggest very careful thought will be needed to ensure that they are delivered at the optimum time in the construction programme.</p> <p>We note that the main construction could take nine to twelve years (including site preparation works) The ES should ensure that the full duration of activity is reported accurately.</p> <p>Along with the phasing, the ES will need also need to detail the location of all major engineering tasks to be carried out (for example excavation work, dredging, dewatering, piling, stockpiling of soil/peat, road building, demolition of existing buildings, use of explosives, construction of new buildings, borrow pit workings et cetera). It should be clear where engineering works are contingent on offsite constraints, a worst case in terms of the need for stockpiling should be assumed.</p> <p>The ES will need to detail the hours of working both onsite and at any offsite facilities and the timing of all anticipated transportation movements to and from the site or to any offsite facilities. It is noted that 24 hour working shift patterns are likely to be used and consideration will need to be given to mitigating noise from night time and weekend works.</p> | <p>The overarching construction programme for the Sizewell C Project is presented within Volume 1, Chapter 2, which includes information on the relationship between the phasing of the main development site and associated development, as well as Sizewell B Relocated Facilities works.</p> <p>More detailed descriptions of the construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES.</p> <p>An assessment of combined project-wide effects is presented in Chapter 3 of Volume 10.</p> |
| 53 | ES Preparation | EIA Methodology | East Suffolk Council | <p>The ES should clearly distinguish between temporary impacts and permanent impacts and also be consistent with how the duration of impact relates to significance of effect. While Table 5.2 is described as generic guidelines it could better reflect the specific circumstances of the project. Above all, the ES should be consistent on how these terms are used or explain very clearly why any inconsistencies do arise.</p> <p>The ES, for example Table 5.1 uses these terms synonymously, whereas this may not be the case. It is possible for sites to be designated for their landscape or ecological value, i.e. be of high value, but nevertheless have capacity to accommodate change (i.e. low sensitivity). The ES should recognise this – in particular because, as written, the ES will not focus on impacts on receptors of low value, for example local nature reserves – which may nonetheless be very sensitive.</p> | <p>Chapter 6 of Volume 1 sets out the overarching methodology for the assessment which aligns to that set out in the 2019 Scoping Report. Volume 1 Appendices 6D to 6Y then sets out the topic specific assessment methodology and criteria used to determine the effects likely to arise from the proposed development, identifying any deviations from the overarching methodology.</p> <p>For clarity and ease of the reader, the assessment methodology is also summarised in the technical chapters in Volumes 2 to 9.</p> |
| 54 | ES Preparation | Incombination & Cumulative Effects | East Suffolk Council | <p>The ES should clearly articulate the cumulative effects of all individual elements of the project as many receptors will be impacted by separate developments. This needs to be fully acknowledged.</p> | <p>Volume 10 of the ES presents details of the different cumulative effects assessments of the Sizewell C Project. This includes consideration of project-wide effects (intra-project): Effects that occur when environmental impacts from different components of the Sizewell C Project combine (for example, the combination of road traffic noise of one component of the proposed development and road traffic noise of another component of the proposed development on a residential receptor). The assessment of project-wide effects is reported in Volume 10, Chapter 3.</p> |
| 55 | Project-wide | The Proposed Development | East Suffolk Council | <p>The ES should be clear on the duration of effects for which it is assessing – does the 'lifetime of the site' include the decommissioning phase? How does this also relate to the dry fuel store and their respective design lives? The design life for the long term storage should also be clarified.</p> | <p>A detailed assessment of the decommissioning phase is not presented within the ES. However, a high level assessment of the potential impacts or impact sources is provided within Chapter 5 of Volume 2. Clarification has been included within the ES when considered the duration of effects.</p> |
| 56 | ES Preparation | EIA Methodology | East Suffolk Council | <p>The ES should address the wider environmental implications of development elsewhere necessitated in whole or in part by the Sizewell C project.</p> | <p>The ES is structured to consider and assess the likely environmental effects associated with the Sizewell C Project. This includes both the main development site and associated development. These elements are considered in Volume 2 and Volumes 3 to 9 of the ES respectively.</p> |
| 57 | ES Preparation | EIA Methodology | East Suffolk Council | <p>The ES should acknowledge the scale and the geographic extent of the development is such that it will have very wide ranging environmental effects over a large area, particularly when one considers:</p> <ul style="list-style-type: none"> • The environmental effects of the offsite associated development sites. • The environmental effects of transport movements, terrestrially and at sea (although it is noted that a Marine Off-Loading Facility is no longer proposed. • The environmental effects associated with the deflection or displacement of recreational users to wider/alternative areas. <p>Consequently, we would not wish the environmental impacts to be presented in such a way that the full scale of effects is not readily appreciable. In addition to interactions with other projects or programmes Volume 10 (Cumulative and transboundary assessment) therefore needs to consider the cumulative effect of all the individual elements of the project, particularly where they impact on the same receptor (for example the rail line extension, site entrance works and the campus will all separately impact on Leiston Abbey). It would also, in this vein, be useful for the ES to explain the interrelationship with the Habitats Regulation Assessment.</p> | <p>The ES has been structured such that the assessments of the main development site and associated development sites are generally provided within separate volumes (Volume 2 - Main development site; Volume 3 - Northern park and ride; Volume 4 - Southern park and ride; Volume 5 - Two village bypass; Volume 6 - Sizewell link road; Volume 7 - Yoxford roundabout and other highway improvements; Volume 8 - Freight management facility; Volume 9 - Rail).</p> <p>In addition, there are a number of project-wide technical environmental assessments, within which the impacts of the Sizewell C Project as a whole are considered. These include socio-economics; transport; radiological, conventional waste management; climate change; health and wellbeing; and major accidents and disasters, and are presented in Volume 2 of the ES.</p> <p>Volume 10 - Cumulative and transboundary effects, presents the assessment of cumulative effects, and includes consideration of:</p> <ul style="list-style-type: none"> • Inter-relationship effects: Effects that occur when different environmental impacts interact with one another with the potential to result in significant effects on a resource and/or receptor (for example, noise, dust and visual effects on a particular receptor, or changes to hydrology on ecological receptors). • Project-wide effects (intra-project): Effects that occur when environmental impacts from different components of the proposed development combine (for example, the combination of road traffic noise of one component of the proposed development and road traffic noise of another component of the proposed development on a residential receptor). • Effects with other plans, projects and programmes: Effects that occur when environmental impacts from the proposed development combine with impacts from other planned/potential third party projects, plans and programmes (normally in the vicinity of the site) <p>In addition to the assessment of inter-relationship effects, project-wide effects and effects with other plans, projects and programmes, the scope of the Environmental Impact Assessment (EIA) includes an assessment of and transboundary effects. Transboundary effects occur when the impacts of the proposed development extend beyond the United Kingdom (UK) to another European Economic Area State.</p> |
| 58 | Project-wide | The Proposed Development | East Suffolk Council | <p>The EIA will need to detail the hours of working both onsite and at any offsite facilities and the timing of all anticipated transportation movements to and from the site or to any offsite facilities. Where 24 hour working shift patterns are likely to be used additional consideration will need to be given to mitigating noise from night time and weekend works.</p> | <p>A detailed description of the construction of the proposed development, including details of the hours of working both onsite and at any offsite facility and the timing of all anticipated transportation movements to and from the site or to any offsite facilities, development is presented within Chapter 3 of Volume 2 and Chapter 2 of Volumes 3 to 9 of the ES.</p> |
| 59 | Off-site Associated Development | The Proposed Development | East Suffolk Council | <p>The EIA should provide a working programme, detailing the plant and infrastructure to be utilised for the construction of the transportation elements together with the likely time scales to complete each task;</p> <ol style="list-style-type: none"> a) Green Rail route in the event that the rail led strategy is chosen, b) Other rail line improvements, c) Rail facility at LEEIE or Sizewell Halt, d) Theberton bypass, in the event that the rail led strategy is chosen e) Two village bypass, f) Yoxford roundabout, g) Sizewell link road in the event that the road led strategy is chosen, h) Other highway improvements, as part of the road led strategy. | <p>A detailed description of the construction of the proposed development is presented within Chapter 3 of Volume 2 and Chapter 2 of Volumes 3 to 9 of the ES.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|---------------------------------|--|----------------------|---|---|
| 60 | Off-site Associated Development | The Proposed Development | East Suffolk Council | <p>The EIA should provide a working programme, detailing the plant and infrastructure to be utilised for the construction of the off-site developments together with the likely time scales to complete each task;</p> <p>a) Campus accommodation construction, b) LEEIE, plus changes to Sizewell Halt, c) Park and ride construction, d) Freight management facility.</p> | <p>An indicative construction programme for the Sizewell C Project is included within Volume 1, Chapter 2. This includes indicative timescales for the completion of the tasks requested in points a) to d). It is estimated that the construction of the Sizewell C Project pursuant to the DCO would last between nine to twelve years.</p> |
| 61 | Project-wide | Water Quality | East Suffolk Council | <p>The EIA should identify the magnitude and any potential impact on hydraulic continuity caused by: dewatering, coffer dam construction, spoil heap/stockpile leachate, runoff or infiltration, which may adversely affect private water supply quality in the area and specify proposed measures to protect the aquifer source.</p> | <p>An assessment of the effects associated with dewatering and cofferdam activities at the main development site is provided within the groundwater and surface water assessment for the main development site (Volume 2, Chapter 19). Effects on hydraulic continuity at the associated developments sites are discussed where relevant in the groundwater and surface water assessments presented in Chapter 12 of Volumes 3 to 9 of the ES.</p> |
| 62 | Project-wide | Landscape and Visual & Terrestrial Ecology and Ornithology | East Suffolk Council | <p>The EIA should detail; the location, height, design, sensors and luminance of all construction site floodlighting and all permanent site lighting, together with details of any mitigation measures used to;</p> <p>a) Limit obtrusive glare to nearby residential properties including the extent of light reduction achieved, b) Reduce light spread and sky-glow, c) Minimise the loss of tranquillity and impact on wildlife.</p> <p>Details of lighting; supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA.</p> | <p>A Lighting Management Plan is provided at Volume 2, Appendix 2C for the main development site. Lighting management plans have not been prepared for the associated development sites.</p> <p>Night-time appraisals have been prepared for the main development site (Volume 2, Appendix 13B) and those associated developments considered in Volumes 2 to 9 of the ES that include a notable lighting element. These are included as appendices to the landscape and visual chapter and cross referenced in the main text as relevant.</p> |
| 63 | Main Development Site | The Proposed Development | East Suffolk Council | <p>The EIA should detail the programme of civil engineering works which are to be undertaken on site during the 'Constructional Phase' and provide the following information;</p> <p>a) The location of all major engineering tasks to be carried out (e.g. excavation work, dredging, tunnelling, de-watering, piling, stockpiling of materials, road building, demolition of existing buildings, construction of new buildings, site drainage, flood protection works, use of explosives, concrete batching plant, mobile generators etc.), b) The likely timing of these tasks (e.g. start and end dates where possible), c) Approximate quantities of all excavated materials to be; stored or stockpiled on site, at lay-down areas, within borrow pits or at offsite facilities, including how this material will be transported, d) Approximate quantities of all incoming inert materials to be stored on site or at offsite facilities, including how this material will be transported, e) Where multiple forms of transportation are anticipated, information on how these facilities will be used (e.g. beach landing facility, rail sidings, road deliveries etc.) f) The proportions of materials to be moved via each facility should also be indicated.</p> | <p>Volume 2 Chapter 3 and Chapter 2 of Volumes 3 to 9 provide a description of the construction phase of the Sizewell C Project.</p> |
| 64 | Project-wide | Materials and Waste Management | East Suffolk Council | <p>The EIA should detail the extent of the northern mound, all proposed stockpiles and borrow pits. It should indicate the; location, height, width, quantity of material utilised, times of operation and duration of use. Reuse of materials for bunding and site levelling should be indicated together with details of all imported materials. Control methods against; surface water run-off and dust deposition should be specified together with supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA.</p> | <p>Volume 2 Chapter 3 and Chapter 2 of Volumes 3 to 9 provide a description of the construction phase of the Sizewell C Project.</p> <p>A Materials Management Strategy (Volume 2, Appendix 3B) to demonstrate how SZC Co. intends to manage excavated materials generated by the proposed development. The Materials Management Strategy only considers the management of excavated materials generated on-site and does not consider materials imported to the proposed development nor the management of wastes.</p> <p>A Code of Construction Practice (Doc Ref. 8.11) has been prepared to provide a clear and consistent approach to the control of Sizewell C construction activities on the main development site and associated development sites to maintain satisfactory levels of environmental protection, and limit disturbance from construction activities as far as reasonably practicable.</p> |
| 65 | Project-wide | Noise & Vibration | East Suffolk Council | <p>The EIA should detail the degree of noise and vibration reduction likely to be achieved by any mitigation measures by way of comparison with the existing background and ambient noise and vibration levels. Where no mitigation is feasible details of a compensation scheme should be indicated</p> | <p>The degree of reduction achieved by mitigation measures is stated where applicable but the reduction achieved by mitigation is more relevant in the context of the assessment criteria rather than the background/baseline levels.</p> |
| 66 | Project-wide | Materials and Waste Management | East Suffolk Council | <p>The EIA should detail all non radioactive wastes stored or disposed of on site, identifying and categorising material so as to indicate 'Best Environmental Practice' is being taken, (e.g. fuel oil stored in double-bunded tanks etc.)</p> | <p>The Material and Waste ES Chapter (Volume 2, Chapter 8) details the main non-radioactive wastes proposed to be stored on site and to be removed. The Conventional Waste Management Strategy (Volume 2, Appendix 8A) provides information on the storage and handling of waste during construction. This is detailed in the CoCP (Doc Ref. 8.11) rather than the ES. However, reference to this has been made within the mitigation section.</p> |
| 67 | Project-wide | Decommissioning | East Suffolk Council | <p>The EIA should detail a programme for the decommissioning of the site, as far as possible. This should include;</p> <p>a) The types of works that will be undertaken, d) The removal of existing structures, c) The disposal of all remaining waste material, d) The suitability of the site for restoration or future use.</p> | <p>A description of the anticipated activities (including the requested information) for the decommissioning of the Sizewell C power station, including a summary of the types of environmental effects likely to occur is provided in Volume 2, Chapter 5.</p> |
| 68 | Project-wide | Noise & Vibration | East Suffolk Council | <p>The EIA should also detail the degree of noise reduction likely to be achieved by the mitigation measures by way of comparison with the existing background and ambient noise levels. Methods of noise or vibration attenuation should be specified for each specific construction activity so as to achieve 'Best Environmental Practice'.</p> | <p>The ES considers noise and vibration effects in relation to assessment criteria, rather than existing background and ambient levels and, although these are sometimes derived with reference to existing levels, this is not always the case. BEP is not directly relevant but appropriate mitigation measures, in accordance with guidance and good practice would be used to control noise and vibration.</p> |
| 69 | Project-wide | Incombination & Cumulative Effects | East Suffolk Council | <p>The EIA should also detail all potential cumulative impacts which might arise from other major projects in the vicinity, in particular the Scottish Power Renewables and other off shore projects which are proposed to use similar road networks.</p> | <p>All potential cumulative effects with non-Sizewell C plans, projects and programmes are considered within Volume 10, Chapter 4. This includes the consideration of Scottish Power and other offshore projects proposed to use similar road networks.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|------------------------------------|----------------------|--|---|
| 70 | Project-wide | Incombination & Cumulative Effects | East Suffolk Council | The EIA should also detail all potential cumulative impacts which might arise from other major projects in the vicinity, in particular the Scottish Power and other off shore projects which are proposed to use similar road networks. | All potential cumulative effects with non-Sizewell C plans, projects and programmes are considered within Volume 10, Chapter 4 . This includes the consideration of Scottish Power and other offshore projects proposed to use similar road networks. |
| 71 | Project-wide | Air Quality | East Suffolk Council | The EIA shall detail all potential construction site works which may give rise to dust (e.g. excavation, demolition, use of explosives, movement of vehicles, loading and stockpiling of soil and rubble, crushing of material, concrete batching, production of asphalt). These shall be specified together with the location and the particular methods of dust suppression to be used for each specific activity. | The ES details the activities with the potential to generate emissions of dust, their locations and associated measures to control the magnitude and frequency of those emissions. Measures will be included and managed through the CoCP (Doc Ref. 8.11) |
| 72 | Project-wide | Major Accidents and Disasters | East Suffolk Council | The EIA Regulations 2017 require that: Any significant effects arising from vulnerability to major accidents and disasters are identified, described and assessed. Within the GB, the statutory responsibility for assessing natural and man made risks falls to the Local Resilience Forum (LRF) under CCA legislation, specifically CCA Regulations 2005 (Regs 13-15). The EIA does not mention this statutory process and it must do, especially in Stage 1 Identification of Risk (p.222). Stakeholder engagement on major accident risks must be via the Suffolk LRF and not just local authorities and emergency services (para 6.19.19). The Emergency Services Working Group referenced in this para. does not focus on major accidents but on business as usual 999 responses. The group that needs to be engaged as the key stakeholder for major accident risks is the Suffolk LRF. | The Major Accidents and Disasters Assessment (Volume 1, Appendix 6X and Volume 2, Chapter 27) provides the details of consultation undertaken with SCC (including members of the Suffolk LRF) as well as other consultees. |
| 73 | Project-wide | Major Accidents and Disasters | East Suffolk Council | The EIA identifies a lot of references relating to controlling radiological risks and managing any exposure in the event of an incident. However, it does not mention the main regulation related to nuclear emergency preparedness (REPP19) and it must do. | The Major Accidents and Disasters Assessment (Volume 1, Appendix 6X and Volume 2, Chapter 27) makes reference to the provisions made by REPP19. |
| 74 | Project-wide | Transport | East Suffolk Council | The driver stress section of the DMRB 11.3.9 should be consulted as the use of the DMRB Driver Stress methodology would allow a more detailed assessment with respect to driver delay and road safety. DMRB 11.3.9.4 should inform the process of professional judgement. The results of the local junction modelling should be considered when assessing the impact on delay. | It should be noted that DMRB Volume 11, Section 3, Part 9 is superseded by LA112 - DMRB 11, Section 3, part 6. Within the transport ES chapter (Volume 2, Chapter 10) effects associated with driver delay and road safety utilise judgement based on analysis detailed in the Transport Assessment (Doc Ref 8.5). |
| 75 | Project-wide | Transport | East Suffolk Council | The driver stress section of the DMRB 11.3.9 should be consulted as the use of the DMRB Driver Stress methodology would allow a more detailed assessment with respect to driver delay and road safety. DMRB 11.3.9.4 should inform the process of professional judgement. | It should be noted that DMRB Volume 11, Section 3, Part 9 is superseded by LA112 - DMRB 11, Section 3, part 6. Within the transport ES chapter (Volume 2, Chapter 10) effects associated with driver delay and road safety utilise judgement based on analysis detailed in the Transport Assessment (Doc Ref 8.5). |
| 76 | Project-wide | Major Accidents and Disasters | East Suffolk Council | The criteria for a major accident (para 6.19.42) should also reflect UK references and not just EU as the UK has implemented EU directives via UK legislation. Major accidents, or emergencies, are defined by statute (CCA 2004) and are amplified by statutory guidance. | The Major Accidents and Disasters Assessment (Volume 2, Chapter 27) makes reference to the CCA 2004 and Volume 1 Appendix 6X provides an explains how the assessment criteria has been informed by guidance provided under the CCA 2004. |
| 77 | Project-wide | The Proposed Development | East Suffolk Council | The Councils understand that there remains some potential for changes associated with the transport strategy, particularly transporting materials to/from the site, and associated minor works, including local junction improvements. It needs to be determined whether any such further minor improvements would be brought into the scope of this assessment or would be subject to their own Environmental Assessment, dependent on scale. | SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals. A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4 , together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects. The ES considers the Sizewell C Project as a whole. A project description, and therefore a description of those elements considered within the EIA, is provided within Volume 1, Chapter 2 and within the relevant volume of the ES . The ES is structures as follows: <ul style="list-style-type: none"> • Volume 2: Main development site • Volume 3: Northern park and ride at Darsham. • Volume 4: Southern park and ride at Wickham Market. • Volume 5: Two village bypass. • Volume 6: Sizewell link road. • Volume 7: Yoxford roundabout and other highway improvements. • Volume 8: Freight management facility. • Volume 9: Rail. |
| 78 | Project-wide | Noise & Vibration | East Suffolk Council | The Councils remain concerned about the movement of trains at night and would emphasise all efforts should be made to schedule train movements between 07:00 and 23:00 hours. Where train movements are required between these hours then the EIA should identify all receptors that are likely to be significantly affected. | Volume 9, Chapter 4 identifies the likely significant effects associated with the operation (during both early years and peak years) of the rail proposals including the movement of freight vehicles along the East Suffolk Line between Westerfield junction and Saxmundham junction. |
| 79 | Project-wide | Historic Environment | East Suffolk Council | The Councils previously requested that Leiston conservation area (7.5.20 of the 2014 report) and the designated heritage assets on Orford Ness were added to the baseline. | Effects on Leiston Conservation area have been assessed within the main development site Terrestrial Historic Environment Chapter (Volume 2, Chapter 16) |
| 80 | LEEIE | Noise & Vibration | East Suffolk Council | The Councils preference would be to keep all the unloading in one location at the LEEIE where noise and vibration mitigation can be more easily achieved and negate the need for an overhead conveyor. Construction works undertaken to form this new facility should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this new facility to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. | Volume 2, Chapter 3 provides details on the construction arrangements at LEEIE, including information on material deliveries proposed working hours. An assessment of the noise effects associated with construction works at LEEIE are included within Volume 2, Chapter 11 , effects associated with the rail freight movements into LEEIE during the early years are assessed in Volume 9, Chapter 4 . Exact working methods and plant to be used would not be determined until a contractor is appointed and therefore precise details of noise mitigation measures cannot yet be established. As set out in the CoCP (Doc Ref. 8.11), mitigation measures that could be implemented during construction to minimise construction noise include selection of alternative plant or working methods, barrier screening and/or stand-off margins and/or alternative plant. Contractors would be required to identify mitigation to avoid significant construction noise and vibration effects, as far as reasonably practicable. Construction mitigation measures may include additional screening or changing working methods and times, including limiting noisy activities on Saturday afternoons. Where appropriate, mitigation measures which would reduce adverse effects are identified. SZC Co. has established a voluntary 'Noise Mitigation Scheme' which seeks to mitigate residual significant effects on properties from construction or operation of the proposed development, subject to eligibility criteria, as set out in Volume 2, Appendix 11H . Where specified noise criteria is exceeded, noise insulation or temporary rehousing may be provided. SZC Co would undertake further assessment and engage with stakeholders to further understand the affected receptors and their use. In addition, SZC Co. would develop a Rail Noise Mitigation Strategy in consultation with Network Rail and the rail freight operator, informed by the further detailed assessments, to establish the package of measures to be implemented to mitigate noise impacts on the Saxmundham to Leiston branch line. |

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|-----|--------------------|-------------------------------|----------------------|--|--|
| 81 | Project-wide | Surface Water and Groundwater | East Suffolk Council | The Councils note that 6.11.14 refers to no additional testing in 2019. We are of the understanding that they will be testing infiltration rates at all sites. This is a test of the geology. We would therefore expect it to be detailed in the geology chapter. This directly conflicts the statement made in 6.11.14. We have not seen any mention of proposed infiltration testing elsewhere in the document. The principle of whether infiltration will be used for each site should be established as part of the ES as this could ultimately dictate potential receptors and impacts. | As identified in the Outline Drainage Strategy (Volume 2, Appendix 2B) Infiltration testing on the main development site has been carried out as part of previous investigations in 2014 and 2017, through both trial pits and boreholes. The Outline Drainage Strategy also identifies that infiltration testing would be undertaken at the northern and southern park and rides sites as well as the freight management facility to confirm the acceptability of the solutions being proposed. |
| 82 | Project-wide | Water Supply | East Suffolk Council | The Councils note point 3.95 of the Planning Inspectorate's Scoping Response makes reference to water resources (potable water). We did not see anywhere in the revised scoping opinion that would cover this. We have an interest in this in terms of reusing surface water and we would therefore expect it to be covered in the EIA, it is worth noting at this point that the SoS suggested Utilities and Infrastructure Assets chapter has not been included by EDF Energy. | Consultation has been undertaken with stakeholders, including public water supply companies and the Environment Agency, to establish a robust supply strategy. This included an assessment of potential environmental impacts and associated mitigation measures. |
| 83 | Project-wide | Socio-economics | East Suffolk Council | The Councils need to underline the importance of the sensitivity test which is not mentioned at all in chapter 6 (on socio-economics) or more specifically in section 6.2.32 which sets out EDF Energy's overall approach and assumptions on the workforce profile. This is critical to our negotiating position for mitigation but is decidedly (and perhaps unsurprisingly) below the radar in the scoping document. | The Socio-economic ES Chapter (Volume 2, Chapter 9) takes a precautionary approach to assessment with a peak workforce of 7,900 workers and the effects that is likely to bring. Where there is uncertainty within this total - for example in temporal or spatial scope - mitigation measures have been designed to be flexible and responsive, with strong governance principles. |
| 84 | Project-wide | Socio-economics | East Suffolk Council | The Councils consider that we still need to establish and agree the details in relation to a potential Housing Fund with regards to potential mitigation proposals such as grants, bringing empty homes back into use etc. However, in order to appreciate what the Fund will need to mitigate, we need to understand the impacts arising from the Environmental Impact Assessment (EIA). The Fund will also need to be available early enough to enable the Councils to get some control over the market, especially the Private Rented Sector, and to ensure an adequate supply of affordable accommodation for our traditional customer base before Sizewell C gets underway and the impact of 1000+ workers is felt. It is important to note that it is not just workers for the Sizewell C project that will have an impact on the housing market; there is a wider strategic impact on the overall housing market that must be considered and not just what to do with workers during the construction phase. The Councils have yet to see any altered proposals on the site at Land East of Eastlands Industrial Estate (LEEIE) since we fed-back to EDF Energy on their original proposal and layout for it. (This relates to the Scoping doc, para 4.3.4), this would need to be adjusted / agreed with the Councils. | The Socio-economic ES Chapter (Volume 2, Chapter 9) and Accommodation Strategy set out the quantitative assessment of potential likely effects on housing capacity and need, identifying the potential for significant effects in areas local to the main development site. The latter sets out the measures proposed to mitigate these effects including a Housing Fund and Accommodation Management System. Proposals for Land East of Eastlands Industrial Estate have since been revised and are set out within the DCO application. |
| 85 | Project-wide | Air Quality | East Suffolk Council | The assessment should include the consideration of explicitly modelling emissions from engine starts and movement. In addition, impacts from stationary cars through 'hot soak' should also be considered in assessing local air quality concentrations of benzene. | The ES includes justification for the methods used to assess emissions from road and rail vehicles within Volume 2, Appendix 12B . |
| 86 | Project-wide | Historic Environment | East Suffolk Council | The assessment needs to include Non-designated Heritage Assets (NDHAs) – 6.9.11 | Non-designated assets, such as the Coastguard Cottages on Dunwich Heath and Southwold Pier have been considered within the Terrestrial Historic Environment assessments within Volume 2 to 9 of the ES as appropriate. |
| 87 | Project-wide | Transport | East Suffolk Council | The assessment includes a number of assumptions which impact on the routing of traffic to/from the site most notably this relates to the number, timing and directional split of HGVs, which will need to be conditioned, the phasing of development and the origin and travel mode of staff. In order to ensure that the environmental impacts do not exceed those assessed, suitable conditions will need to be agreed through the DCO process (e.g. demand management of HGVs, requirement to achieve staff car share, travel planning, occupancy and delivery of the accommodation campus). As a result of the number of assumptions, and risks that these present, consideration should be given towards any necessary sensitivity tests. | This is correct and has been undertaken. The assumptions are robustly justified within the Transport ES Chapter (Volume 1, Appendix 6F) and the Transport Assessment (Document Reference 8.05). These include that the daily construction HGV temporal profile of the Sizewell C Project is based on the construction programme proposed for the Sizewell C Project, since this is influenced by prevailing traffic conditions in order to optimise delivery times |
| 88 | Project-wide | Socio-economics | East Suffolk Council | The approach proposed does not take any account/provide any analysis of the cumulative economic impacts that are likely to occur due to other major energy and construction projects that are expected to be taking place in the region at the same time as the proposed development of Sizewell C. We believe that there are significant challenges and opportunities that may well result from this simultaneous development (e.g.) increased demand for labour and skills shortages on the negative side/ the opportunity to develop a world class clean energy cluster/specialism on the positive side. | Cumulative effects of the Sizewell C Project alongside other developments as part of the wider 'Energy Coast' have been considered in terms of the labour market and public services and accommodation as part of the Cumulative Impacts assessment presented in Volume 10 of the ES . It is noted that the Employment, Skills and Education Strategy is set up in order to complement the region's aspirations for sectoral growth beyond the Project itself. |
| 89 | Project-wide | Socio-economics | East Suffolk Council | The approach adopted needs to include an adequate analysis of how the economic impacts of the development (both positive and negative) will be spatially distributed. This is important because negative impacts such as congestion and labour market displacement tend to be concentrated close to the development site, whilst positive impacts tend to be much more widely dispersed. The Councils need to have a proper understanding of how many jobs and how much economic value the development might bring about within our own areas and within each locality, so that we can plan and invest accordingly and so that we can work with EDF Energy to develop appropriately targeted mitigation strategies. This is particularly important in relation to the gravity model approach and the labour market analysis used – both of which need to be capable of indicating what the economic impacts of the development are likely to be at County and ideally District level. Presenting key data on employment and the labour market simply in terms of the Construction Daily Commuting Zone (CDCZ) which incorporates three county council areas, two LEP areas and multiple local authority districts as set out on section 6.2.10 – 12 is not sufficient. | The Socio-economic ES Chapter (Volume 2, Chapter 9) sets out the relevant socio-economic effects at spatial scales depending on the availability of data, policy requirements and likely significant effects, and detail related to the Sizewell C Project assumptions. Where risk of localised effects are identified but may not be quantifiable, SZC Co. has taken a precautionary approach to mitigation. |
| 90 | Project-wide | Air Quality | East Suffolk Council | The applicant should use IAQM's more stringent assessment thresholds for HGV movements within AQMAs. | The Councils preferred approach is consistent with the approach proposed for the assessment of impacts from road and rail emissions, as detailed in Volume 2, Appendix 12B , which uses IAQM's more stringent assessment thresholds for HGV movements within AQMAs. |
| 91 | Project-wide | Air Quality | East Suffolk Council | The affected road network within a street canyon should reflect this with dispersion modelling. It would be satisfactory to include street canyons through zonal verification or in a dispersion model canyons module. Street canyon locations shared by the local authority should be considered within the applicant's assessment. | The ES includes details of where and how potential street canyon effects have been taken into account in the dispersion modelling of emissions from road traffic (Volume 2, Appendix 12B). |
| 92 | Two Village Bypass | Air Quality | East Suffolk Council | The "Two-village bypass" is proposed under both the rail-led and road-led transport strategy. The bypass could provide valuable mitigation of potential air quality impacts from 2022 onwards, when construction traffic associated with Sizewell B facilities re-location is programmed to start using the road network and 2024 for the off-shore windfarms. Consequently, it is recommended that construction of this bypass should be completed by 2022 to enable diversion of construction vehicles away from the Stratford St Andrew and Air Quality Management Area (AQMA). It is unknown at this point whether increases in HGVs through villages on the A12 would be substantial enough to affect the risk of exceeding the annual mean and 1-hour NO2 AQOs. The applicant has stated that they will share their preliminary dispersion modelling results before the final EIA submission. These preliminary results will inform a view on whether a bypass is required for the other villages from an air quality point of view. | Preliminary assessment of likely effects at receptors on the A12 have been completed and were shared with relevant consultation bodies. The final assessment are reported in the air quality assessments presented in Volumes 2 to 9 of the ES including any feedback from the consultation exercise. |
| 93 | Project-wide | Air Quality | East Suffolk Council | Tables 6.6 and 6.7 where receptors which are predicted to experience a beneficial or adverse change, bordering receptors should be included until the maximum extent of perceptible impacts have been considered. This is important to ensure that conclusions of significance and subsequent mitigation are thoroughly informed. | The air quality assessments presented in Volumes 2 to 9 of the ES report the magnitude of impacts at sufficient receptors for the conclusions on significance of effects to be thoroughly informed. The air quality receptors were identified through a combination of desk studies, consultations and site visits. The assessment uses representative receptor locations that are located such that they would experience the same impact or a greater impact than other relevant receptors in the vicinity. The representative receptors are detailed in Volume 2, Appendix 12B of the ES . Potential future air quality receptors have been identified through examination of short list of non-Sizewell C plans, projects and programmes identified as part of the cumulative impact assessment, as detailed in Volume 10, Appendix 1B of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|-----|--------------------|--------------------------|----------------------|---|---|
| 94 | Project-wide | Historic Environment | East Suffolk Council | Table 6.13 – confusing having adverse and beneficial impacts in one table – the Councils suggest these are separated out. | Within the Terrestrial Historic Environment assessment in Volumes 2 to 9 of the ES , these effects have been presented together to minimise the number of tables within text. Presenting these effects together also shows how they relate to each along a spectrum of effect magnitude, receptor sensitivity and effect significance. |
| 95 | Project-wide | Historic Environment | East Suffolk Council | Table 6.12 High should also include non-designated assets of demonstrably schedulable quality (as per the NPPF). | Table 6.12 has been amended accordingly where it appears in the ES (Volume 1, Appendix 6L) to clarify. |
| 96 | Project-wide | Historic Environment | East Suffolk Council | Table 6.12 – does there need to be an extra category? E.g. very high for Grade I/II* and SAMs? | As set out at 6.9.30, the NPS EN-1 distinction in terms of when harm should be weighed in the balance is between heritage assets and designated heritage assets. It is not considered appropriate that an additional category of significance should be defined. |
| 97 | Project-wide | Air Quality | East Suffolk Council | Receptor locations shared by the Councils should be considered within the applicant's assessment. | Where receptors locations have been provided by the Council, they have been considered as relevant within the relevant air quality assessment within Volumes 2 to 9 of the ES . |
| 98 | Sizewell Link Road | The Proposed Development | East Suffolk Council | Proposal is described as crossing 11 public rights of way and that solutions such as gates, stiles or diversions are likely to be used where demand for these crossings from vulnerable road users is necessary. SCC repeats its comments from the combined SCC/SCDC Stage 3 consultation response 29th March 2019 para 1008 that the level of current usage must not dictate whether a safe crossing point should or should not be provided. We do accept that demand might influence the design of the safe crossing point that is provided. We also repeat that where public rights of way meet any new road, there must be safe, well designed crossing points with no fences, barriers, stiles or gates obstructing the PROW access. | The Sizewell C Project would have an impact on various public rights of way (PROW), including temporary and permanent closures and diversions. SZC Co. has therefore developed an Rights of Way and Access Strategy (Volume 2, Appendix 15I) to inform the relevant Footpath Implementation Plan which would be prepared by SZC Co. and submitted to the highway authority for agreement pursuant to the Draft DCO (Doc Ref. 3.1). As part of this strategy, during the construction phase any temporary or permanent closures and diversions of PROW would minimise road crossing points and, where unavoidable, carry out relevant road safety audits and implement recommendations to ensure user safety. For both construction and operation diversions and closures would apply and maintain best practice in terms of on-site signage and other information provision, and to enhance visitor enjoyment and safety. |
| 99 | Project-wide | Noise & Vibration | East Suffolk Council | Projected noise levels for the proposed 'Stand-by Diesel Generator's' shall be calculated and represented as a LAeq(5 minute) value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitation's on testing times should be specified to achieve 'Best Environmental Practice'. | Routine testing of emergency generators has been considered in detail in the operational noise assessment presented in Volume 2, Chapter 11 . The time period used is taken from BS4142, so is not 5 minutes as requested in this comment. However in this case, since the noise is constant, the 5 minute value would be the same as a the one hour value presented in the assessment. |
| 100 | Project-wide | Noise & Vibration | East Suffolk Council | Projected noise levels for grid reconnection's following reactor trips and outages shall be calculated and represented as a LAeq (5 minute) value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitation's on reconnection should be specified to achieve 'Best Environmental Practice'. | Noise from test runs of generators following outages has been considered within the ES . The time period used in the noise assessment presented in Volume 2, Chapter 11 is taken from BS4142, so is not 5 minutes as requested in this comment. However in this case, since the noise is constant, the 5 minute value would be the same as a the one hour value presented in the assessment. |
| 101 | Project-wide | Noise & Vibration | East Suffolk Council | Projected levels for general site noise from the newly constructed Sizewell C power station shall be calculated and represented as a LAeq (1hour) value during daytime hours and LAeq (5 minute) value during night time hour's at all nearby noise sensitive properties. If noise from the site is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation should be specified to achieve 'Best Environmental Practice'. | 'Best Environmental Practice' is not directly relevant to the noise and vibration assessment. The assessment methodology for the noise and vibration assessment is provided in Volume 1, Appendix 6G and identifies that construction noise levels are calculated and represented as a LAeq (1hour) value during daytime hours and LAeq (5 minute) value during night time. |
| 102 | Project-wide | Air Quality | East Suffolk Council | Preventative mitigation has already been suggested, to minimise impact of emissions from construction vehicles and plant, so far as practicable with current technology. The applicant may demonstrate that there is no risk of exceeding air quality objectives with more polluting construction vehicles and plant than those recommended. This is an acceptable approach, although efforts are being made at this stage to request the lowest emission technology available for use with Sizewell C. From an air quality perspective, a rail-led strategy would be preferable in avoiding adverse air quality impacts due to road traffic. | The Council's view and preference is noted. |
| 103 | Project-wide | Health and Wellbeing | East Suffolk Council | Monitoring and evaluation of possible health impacts should be conducted to inform ongoing assessment of the health impact. | Monitoring would be undertaken to inform the effectiveness of any mitigation. Further detail is provided in Volume 2, Chapter 28 . |
| 104 | Project-wide | Socio-economics | East Suffolk Council | Models used to forecast accommodation supply need to take account of recent changes to the taxation of second homes and the tax treatment of rental income which has already led to a 20% reduction in private rented sector dwellings. | The assessment of potential effects on accommodation sectors set out in the Socio-economic ES Chapter (Volume 2, Chapter 9) is based on public datasets and surveys and reflects the most up-to-date position in terms of potential capacity. However, SZC Co. recognise there is potential for localised and policy-related changes to occur and has therefore developed a flexible and responsive strategy for mitigation including a Housing Fund set up to deliver additional supply and support resilience in Housing services should effects arise. |
| 105 | Project-wide | Transport | East Suffolk Council | It is worth noting that gaps remain in the information that has been provided to date, this includes information relating to the LEEIE, proposed highway mitigation and uncertainty remains over the proposed bridleway / costal path diversion, all of which may affect the exact nature of the proposals and the Environmental assessment. | The transport ES chapter (Volume 2, Chapter 10) includes additional information of the proposed highway mitigation (in the form of a package of highway improvement works, including the two village bypass, Sizewell link road, Yoxford roundabout and other highway improvement schemes) and details proposed bridleway diversions. Further details on access arrangements relating to the construction phase are provided in Volume 2, Chapter 3 . Full details of any proposed bridleway / coastal path diversions are described in Rights of Way and Access Strategy in Volume 2, Appendix 15I . |
| 106 | Project-wide | Noise & Vibration | East Suffolk Council | It is understood that a background noise and vibration measurement survey of road side and rail side locations is currently being undertaken to form a baseline survey from which noise and vibration criteria in the form of (LOAEL) and (SOAEL) are to be agreed. The EIA should present this noise and vibration monitoring data together with an assessment of magnitude of impact and sensitivity of receptors. Details of noise and vibration; supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA. | The Noise and Vibration assessments presented in Volumes 2 to 9 of the ES present the results of noise and vibration modelling where relevant. Details of supervision and monitoring are contained within the CoCP (Document Reference 8.11). |
| 107 | Project-wide | Air Quality | East Suffolk Council | It is recommended that the applicant demonstrates that no more than 3 trains are stationary for more than 15 minutes per day. In addition, it should be demonstrated that concentrations of NO2 annual mean are below 22µg/m3 at areas of exposure within 30 metres of trains, thereby fully meeting assessment requirements within LAQM.TG(16). | The assessment method applied in the air quality assessment in Volumes 2 to 9 of the ES does meet the screening criteria in LAQM TG(16) but has been assessed in full in combination with emissions from road traffic. |
| 108 | Project-wide | Air Quality | East Suffolk Council | It is recommended that all roads which meet IAQM assessment thresholds with the construction phase car parks should be assessed. The mitigation that Suffolk County Council and Suffolk Coastal Council (as was) have recommended in paragraph 81 of our previous scoping opinion would be sensible to minimise these impacts. Nevertheless, a worst-case approach to ensure a conservative assessment is recommended with the assumption that there will be no electric vehicles in emission calculations. | The air quality assessments in Volumes 2 to 9 of the ES are based on emission factors in tools published by Central Government at the time of the assessment. The current data does not include for the presence of electric vehicles. The assessment of road traffic emissions as relevant to the Sizewell C Project as a whole is presented in Volume 2, Appendix 12B |
| 109 | Project-wide | Transport | East Suffolk Council | It is proposed that this will be assessed using professional judgment on links where there is an increase of more than 100% in either total or HGV flows. The use of a threshold of 100% does not appear consistent with the other thresholds. Using this criterion for assessing impact and risks will result in almost all of the impacts being dismissed as "Negligible". It is proposed that the percentage criteria adopted for "Severance" should be used to inform the assessment of pedestrian amenity. This would mean adopting a threshold of 30% above which impacts would be assessed as Minor/Slight, Moderate or Substantial. The 10% threshold should also be used for specifically sensitive areas. The existing levels of pedestrian amenity on the network should be assessed using DMRB 11.3.8.4 | As set out in Volume 1, Appendix 6F , IEMA guidance has been followed during the assessment of transport effects presented in Volume 2, Chapter 10 . In addition the approach taken (100%-150%, 150%- 200% and >200%) is consistent with that used in other DCO submissions. All Transport Assessments and ES chapters rely on a level of professional judgement to interpret the modelling and assessment output. It is not a wholly mechanical process. Quantifiable analysis is included in the assessment based on the traffic modelling and assessment criteria. |

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|-----|-----------------------|-------------------------------|----------------------|---|--|
| 110 | ES Preparation | Structure | East Suffolk Council | It is proposed that the ES is structured around the main development sites and then the identified associated development sites. We are pleased to see that there has been a move away from topic based subject areas but in doing so the project-wide considerations such as socio-economics and transport and environmental matters may be lost. | The ES has been structured such that the assessments of the main development site and associated development sites are generally provided within separate volumes (Volume 2 - Main development site; Volume 3 - Northern park and ride; Volume 4 - Southern park and ride; Volume 5 - Two village bypass; Volume 6 - Sizewell link road; Volume 7 - Yoxford roundabout and other highway improvements; Volume 8 - Freight management facility; Volume 9 - Rail). In addition, there are a number of project-wide technical environmental assessments, within which the impacts of the Sizewell C Project as a whole are considered. These include socio-economics; transport; radiological, conventional waste management; climate change; health and wellbeing; and major accidents and disasters, and are presented in Volume 2 of the ES . As stated above, an assessment of project-wide effects (intra-project) is also presented in Volume 10, Chapter 3 . |
| 111 | Project-wide | Air Quality | East Suffolk Council | It is likely that spreading emissions over a 24hr period, regardless of when emission activity occurs, is conservative for assessment against air quality standards with an averaging time of 24hr or longer. There are key areas where programming dispersion models to release emissions at actual time of activity would be preferred to confirm whether 24hr emission spreading is conservative. These key areas are AQMAs within East Suffolk and Suffolk County Council and the areas with suggested street canyon locations. It is requested that predicted 1-hour mean concentration due to construction traffic should be specifically modelled for comparison against the objective for the 99.79th percentile of 1-hour mean concentrations. Because of the specific nature of planned construction programme, LAQM TG(16)'s screening guideline of annual mean 60 µg/m3 as a proxy for risk of achieving compliance with the 1-hour objective should not be used. | Where relevant, the air quality assessments in Volumes 2 to 9 of the ES considers the likely impacts on 1-hour mean nitrogen dioxide concentrations at receptors with AQMAs, as part of the dispersion modelling study. However, a more detailed justification of the Council's conclusion that the nature of the construction programme invalidates the empirical relationship used in LAQM TG(16) would be welcomed. |
| 112 | Project-wide | Transport | East Suffolk Council | It is expected that furthermore detailed assessment of the transport impacts of the scheme, especially in relation to severance, road safety and delay would be picked up within the Transport Assessment. | The Transport ES chapter (Volume 2, Chapter 10) presents a summary of the findings of the Transport Assessment (Doc Ref 8.5) and assess them against the criteria set out within Volume 1, Appendix 6J to identify any significant effects. This includes consideration of effects on severance and road safety and delay. |
| 113 | Main Development Site | Decommissioning | East Suffolk Council | It is expected that a separate Flood Risk Assessment (FRA) will be produced for the decommissioning phase; any mitigation actions arising from this FRA may have implications for the design of the Sizewell C site – so thought needs to be given at this stage to the decommissioning FRA. | The Main Development Site Flood Risk Assessment (Document Ref. 5.02) presents an assessment of the decommissioning stage of the Sizewell C Project. |
| 114 | Project-wide | Health and Wellbeing | East Suffolk Council | In the report the main element of health is covered in Section 6.22. Further engagement through the Health Working Group to enable an open dialogue to inform the HIA is important. There is still the requirement of understanding the occupational health (O/H) provision on site and what this extends to. Once this is known then further work with existing health services can be undertaken within the community, primary care as well as secondary care providers. Once an O/H service has been procured, we would welcome the opportunity to link with this to ensure that local health campaigns, promotions and work placed offers are extended to the workforce. The establishment of the Health Working Group (comprising of health stakeholders) is a key step forward in the working relationship and will continue to evolve as the project moves forward. It is acknowledged that continued engagement is key to "design out" as many possible impacts that may be felt by the immediate and wider communities and on existing services. In section 6.22.3 – the Councils would welcome further engagement through the Working Group to help supply specific information that may help in the provision of services. | The Sizewell Health Working Group has iteratively informed both the scope and focus of the health and wellbeing assessment (Volume 2, Chapter 28), and the development and refinement of health design features, mitigation and support initiatives, including the occupational health care provision. The value of the Sizewell Health Working Group is that the group would monitor throughout the operational phase of the Sizewell C Project the effectiveness of proposed mitigation, and align health programmes and initiatives to benefit the health of the local community. |
| 115 | Project-wide | Major Accidents and Disasters | East Suffolk Council | In summary, the EIA is very EDF Energy project specific focused and ignores key nuclear emergency preparedness and civil contingency legislation. The Councils would seek to see this section changed. | This comment has been managed through ongoing discussion with ESC and the Major Accidents and Disasters Assessment (Volume 2, Chapter 27) makes clear reference to key nuclear emergency preparedness and civil contingency legislation. |
| 116 | Project-wide | Health and Wellbeing | East Suffolk Council | In section(s) 6.22.28, 6.22.29, 6.22.30 - it is commented on the impact of the construction workforce to the local community facilities, economic impacts as well as impacts to local healthcare systems. These will need to fully be considered once the O/H provision on site has been established and then the way it will interact with the existing services. This includes a full understanding of the drug and alcohol testing and treatment arrangements, as well as sexual health screening, testing and treatment arrangements that may or may not include contract tracing. Where there are deficits in the onsite provision, then suitable mitigation will need to be discussed for those workers who may require access to the community service(s). | Whilst discussion on the topics in question have been held within the Sizewell Health Working Group, the discussions are still ongoing. Further details on the discussions held to date are summarised in Volume 1, Appendix 6Y |
| 117 | Project-wide | Health and Wellbeing | East Suffolk Council | In section 6.22.21 - We would welcome the opportunity to help feed specific information into these studies given the local knowledge held and the ability of the Councils knowledge and intelligence team within Public Health. | East Suffolk Council have fed specific information into these studies given the local knowledge through the Sizewell Health Working Group. |
| 118 | Project-wide | Health and Wellbeing | East Suffolk Council | In section 6.22.17 and 6.22.18 of the report, a full understanding of the study area for each determinant needs to be established. We would like to see this work undertaken as quickly as possible to allow for suitable mitigation to be established. | Due to the multidisciplinary nature of health, and the varying geographic distribution of certain health pathways (air quality, noise, transport, socio-economic etc), the geographic scope of the health assessment was tailored to the individual health pathway being investigated, and the associated community exposure characteristics therein. A broad geographic baseline was therefore applied, and refined to the individual health pathway assessed. |
| 119 | Project-wide | Socio-economics | East Suffolk Council | In section 6.2.26, 6.2.27, 6.2.28 - The need for ongoing engagement to look to design out or mitigate through appropriate measures or funding the need to address the potential socio-economic impacts of the construction force as highlighted in table 6.2.4 of the report (p36). | Ongoing engagement has been critical to the creation of mitigation and implementation strategies that recognise the scale of effects on local resources and this has been reflected in the content of all socio-economic documents produced for the DCO application including the Accommodation Strategy (Doc Ref. 8.10), Community Safety Management Plan (Doc Ref. 8.16) and Employment, Skills and Education Strategy (Appendix A of the Economic Statement (Doc Ref.8.9). |
| 120 | Project-wide | Air Quality | East Suffolk Council | In section 3.3.41 the operational emissions to the air refers to the range of emissions including SO ₂ , NO _x , PM ₁₀ , PM _{2.5} as well as "discharge of radioactive gaseous effluents". However, there is no indication of the way these will be monitored, mitigated or treated (see air quality comments). | An assessment of air quality effects associated with operational emissions is provided within the air quality assessment for the main development site (Volume 2, Chapter 12). An assessment of radiological gaseous emissions associated with in the operation of Sizewell C is provided within Volume 2, Chapter 25 and has been prepared to support the environmental permit application for radioactive substance regulation. |
| 121 | Project-wide | Sustainability | East Suffolk Council | In section 3.2.10 - The worker accommodation highlights a range of diversionary activities that is welcomed to reduce risk taking behaviours. This should be easily accessible for those outside the campus, including those residing at the LEEIE Caravan Site. Suitable transport between the two main accommodation sites should be considered for social activities. There should also be included a range of travel options between the two locations to promote sustained and active travel. The Councils would also expect to see some form of electric charging spaces within the workers car parking with promotion of moving to less polluting forms of personal transport. The ratio mentioned indicates that there will be 1.6 beds per parking spaces. That equates to a 900 parking space difference. We acknowledge that this is a modelling assumption however how will the potential overspill be managed. Likewise, in section 3.2.11 – there is no reference to the number of parking spaces for those residing at the LEEIE Caravan site. We would also like to see the Park and Ride locations make provision for a suitable number of charging points to promote EV use – see also environmental protection comments. | A range of travel options would be available between the accommodation and main development site, including, the provision of a full off-road bridledway linking the accommodation LEEIE, accommodation campus and main development site. Further details are provided within the draft Construction Worker Travel Plan (Doc Ref 8.8) Details of park and ride facility at LEEIE are presented in Volume 2, Chapter 3 . Proposals for electric vehicle charging for the main development site and park and rides are set out within Volume 2, Chapters 2 to 3 and Volumes 3 and 4, Chapter 2 . A gravity model has been used to estimate the residential distribution of the peak construction workforce, as well as the assumed car share ratio and shift pattern and has informed the proposed sizing of the park and ride facilities. Further details are provided in the Transport Assessment (Doc Ref. 8.05). |
| 122 | Project-wide | Transport | East Suffolk Council | In addition to the IEMA Guidelines, a more detailed scale of impacts is set out in DMRB 11.3.8.7 Table 1, distinguishing between Built-Up and Rural areas and providing more detail as to their application. It is recommended that reference is made to this table. Areas where a 10% change in traffic flows is considered to be significant should be identified. It is noted that the categories adopted relate to changes in traffic flows along existing roads and are not related to any absolute measure of existing levels of severance. | Reference is made to Volume 11 of the DMRB. Rural area calculation has been used for all as these are considered to represent a worse case assessment. The assessment of transport effects is provided within Chapter 10 of Volume 2 of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|----------------|-------------------------------------|----------------------|---|---|
| 123 | Project-wide | Air Quality | East Suffolk Council | Impacts upon Ozone concentrations should be assessed at areas with the largest increases in NOx. | Consideration has been given to beneficial or adverse effects on ozone concentrations where any locations are identified to be at risk of large increases in NOx. Where relevant these are discussed within the air quality chapters of Volumes 2 to 9 of the ES . |
| 124 | Project-wide | Historic Environment | East Suffolk Council | how does this relate to the NPPF requirement that great weight is given to the assets conservation? Low level of harm is still harm and should not automatically be considered acceptable without the need for mitigation – mitigation should be considered for any level of harm as it has the possibility of removing harm | In line with NPS EN-1, and as set out at 6.9.27, appropriate recording of the archaeological interest of heritage assets that would be lost as a result of the proposed development has been provided for. |
| 125 | Project-wide | Air Quality | East Suffolk Council | he applicant should submit a construction dust nuisance assessment in accordance with the IAQM guidance, which presents all the information the guidance requests, including mitigation measures to offset impacts within the EIA. If features of the proposed development go beyond the scope of the IAQM guidance (e.g. coastal location; extended duration of construction programme; extensive storage of materials), this should be reflected in the applicant's assessment and proposed mitigation of dust impacts. | The IAQM guidance referred to is not prescriptive, but sets out a suggested assessment framework and examples of how information might be presented. The ES adopts the approach proposed by the current IAQM guidance and adapted to represent the nature of the proposed activities. A dust risk assessment has been appended to and is summarised within the air quality assessments presented in Chapter 12 of Volume 2 and Chapter 5 of Volumes 3 to 9 of the ES . |
| 126 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | General comment – Whilst the HRA will assess the impacts of displaced recreational activity on European designated sites, the ES must assess such impacts on other designated sites (both statutory and non-statutory). | The Terrestrial Ecology and Ornithology assessments within Volumes 2 to 9 of the ES consider the potential for the Sizewell C Project to impact both statutory and non-statutory designated sites. |
| 127 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | General comment – There is considerable crossover between the terrestrial ecology and ornithology topic and several other topic areas (e.g. surface water/groundwater and recreation). It must be ensured that this is adequately addressed in the EIA, particularly where it relates to designated sites (i.e. hydrological impacts of Sizewell Marshes SSSI and displacement of recreational pressure to designated sites (both statutory and non-statutory)). | Volume 1, Appendix 6J identifies the assessments that the terrestrial ecology and ornithology assessment draws upon in assessing the effects of the Sizewell C Project. In addition the inter-relationships between the terrestrial ecology and ornithology assessment and other environmental topics considered within the ES is presented within each of the Terrestrial Ecology and Ornithology Assessments in Volumes 2 to 9 of the ES . This includes a description of what the potential inter-relationship effects are and where they are considered within the ES , if it is not included within the terrestrial ecology and ornithology assessment. |
| 128 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | General comment – In addition to the ecological receptors identified in the EIA Scoping report, the DCO must also include a shadow Habitats Regulations Assessment (HRA) which considers impacts on the SPAs, SACs and Ramsar sites within the identified study area. | A Shadow Habitats Regulation Assessment Report (Document Reference 8.10) has been prepared as part of the DCO submission. |
| 129 | Project-wide | Health and Wellbeing | East Suffolk Council | Furthermore we would welcome involvement with the workers code of practice and workers induction paperwork and what is expected on and off site as well as other areas such as links to include health promotion opportunities. | A Community Safety Working Group has been meeting regularly during the application process, and will continue to meet and review effects and effectiveness of mitigation measures, secured by a Section 106 Agreement. This would include collaboration on the Workers Code of Conduct – SZC Co. has secured the WCoC through a S. 106 Agreement and would work with stakeholders to develop its content, where practicable. |
| 130 | Project-wide | Transport | East Suffolk Council | Further information is required on the origin of the magnitude of impact criteria in order for it to be agreed with the Councils. | The scope of the transport effects assessment (Volume 2, Chapter 10) has also been informed by ongoing consultation and engagement with statutory consultees, including Suffolk County Council, Suffolk Coastal District Council (now East Suffolk Council) and Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), throughout the design and assessment process. Volume 1, Appendix 6J provides a summary of the assessment methodology for transport effects. |
| 131 | ES Preparation | EIA Methodology | East Suffolk Council | Further discussions are required with EDF Energy in describing the magnitude of impacts, in particular the spatial extent and duration of effect that are used to derive the corresponding magnitude. As currently described, the ES is likely to underreport localised impacts of significant duration. A better acknowledgement of the longevity of the temporary, but long-term construction period is required. | SZC Co. have undertaken formal and informal consultation with East Suffolk Council on the development proposals and scope of the assessment undertaken in the EIA. A summary of the consultation undertaken is provided in the Consultation Summary Report (Doc Ref. 5.1), Volume 1, Appendices 6D to 6Y and, where relevant for a specific site, within the individual topic chapters in Volumes 2 to 9 . |
| 132 | Project-wide | Air Quality | East Suffolk Council | For the avoidance of doubt, emissions from all potentially relevant sources should be assessed in the EIA using appropriate screening and/or detailed assessment methods. | Assessment of effects associated with emissions from relevant sources are included in the air quality assessments in Volumes 2 to 9 of the ES . The methodology and approach to the assessment is set out in Volume 1, Appendix 6H of the ES . |
| 133 | Project-wide | Historic Environment | East Suffolk Council | For all new scheme elements since 2014, or any other areas where archaeological fieldwork has yet to be completed, the Councils are not able to rule out the presence of significant archaeological remains therefore further archaeological fieldwork is needed to enable an informed assessment. | Findings of archaeological fieldwork undertaken to date are reported as appendices to the relevant Terrestrial Historic Environment ES chapters in Volumes 2 to 9 , and the results are incorporated into the ES assessment as appropriate. Any limitations, such as those arising from restrictions on land access, are noted. |
| 134 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | Finally, in relation to potential mitigation measures, a Construction Environment Management Plan (CEMP) should form part of the construction mitigation for the Main Development Site (they are only listed as required for the AD sites). | A Code of Construction Practice (Document Reference 8.11) is submitted with the application for development consent. The Code of Construction Practice provides details of construction mitigation for the main development site (Part B) and all associated development sites (Part C). |
| 135 | Project-wide | Transport | East Suffolk Council | DMRB 11.3.8.6 defines three categories of severance; Slight, Moderate and Severe. Although technically these relate to new severance, i.e. new highway schemes, they provide one possible way of quantifying severance in absolute rather than relative terms. To quantify existing levels of severance, it is suggested that reference is made to these categories and consideration given to reducing the thresholds of Impact for each level of categorisation. | As set out in Volume 1, Appendix 6F , factors relevant to the prediction of severance include road width, traffic flow, speed, the presence of crossing facilities and the number of movements across the affected route. IEMA guidelines refer to the DfT's 'Manual of Environmental Appraisal', which suggests that changes in traffic flow of 30%, 60% and 90% would be likely to low, medium and high magnitude of impact on severance, respectively. It is knowledge that these broad indicators should be used with care and regard paid to specific local conditions |
| 136 | Project-wide | Contaminated Land and Soils | East Suffolk Council | Details of any material (e.g. soil, peat, contaminated material etc.) removed from site for disposal purposes or safely encapsulated on site shall be notified to both the Environmental Protection Team at East Suffolk Council and the Environment Agency. Validation shall be required following this remediation action to indicate the site is suitable for its new specified use. | The materials management strategy (Volume 2, Appendix 3B) which is submitted as part of the application for development consent, sets out how SZC CO. would manage excavated materials generated by the proposed development that is not considered to be waste. Materials considered waste are addressed in the waste management strategy. This document provides the framework for managing waste which would be produced during the construction, operational and, where relevant, the removal and reinstatement phases for the various elements of the Sizewell C Project. The relevant authorities would be notified. |
| 137 | Project-wide | Materials and Waste Management | East Suffolk Council | Details of all temporary and permanent foul water drainage should be indicated within the EIA and the sea water disposal discharge should be agreed so as to; a) Prevent ground contamination, b) Minimise any harmful effect on sea life diversity, c) Control temperature and turbidity which may encourage algae blooms. | Details of temporary and permanent foul water drainage are provided within the Outline Drainage Strategy (Volume 2, Appendix 2A). Details of the operation of cooling systems and operational liquid discharges from the main development site are provided in Volume 2, Chapter 4 . An assessment of the environmental effects of the temporary and permanent foul water drainage for the Sizewell C Project are assessed within the groundwater and surface water assessments in Volumes 2 to 9 of the ES and within the marine water quality and sediments assessment (Volume 2, Chapter 21). The locations of the combined drainage outfall and the main cooling water outfall have been specified to minimise effects on marine ecology and water quality, as described within Volume 2, Chapter 6 . |
| 138 | Project-wide | Contaminated Land and Soils | East Suffolk Council | Detailed evidence in the form of certification to 'CLEA standard' will need to be supplied to indicate the source and suitability of all imported material used on site. | Due to the strict requirements for nuclear standard concrete, the approach taken for sourcing concrete supply is likely to replicate that used for Hinkley Point C, which sourced most material from within the UK. Other imported material would need to meet EDF Energy standards before they can be used on site. |
| 139 | ES Preparation | Transport / Socio-economics | East Suffolk Council | Conversely, we would not wish the localised transport and socio-economic impacts to be underplayed. For example, the campus will have localised impacts by virtue of its proximity to other communities which may be presented in such a way that other socio-economic impacts on the labour market or accommodation availability take dominance. | The transport ES Chapter (Volume 2, Chapter 10) and the socio-economics Chapter (Volume 2, Chapter 9) of the ES consider the potential impacts of the Sizewell C Project as a whole. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| 140 | Theberton Bypass | Noise & Vibration | East Suffolk Council | Construction works undertaken to form this new bypass should again be limited to normal working hours where possible. The new road scheme should provide effective noise and vibration reduction by way of; quiet road surfacing, speed limits, banking or screening so as to minimise impact on nearby residential property. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this new bypass to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009. | Theberton bypass does not form part of the Sizewell C Project as identified in Volume 1, Chapter 2 . No further response provided. |
| 141 | Park and Ride | Noise & Vibration | East Suffolk Council | Construction works undertaken to form these park and ride sites should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of these sites to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009. | <p>Construction working hours and methods associated with northern and southern park and rides are provided within Volumes 3 and 4, Chapter 2. In summary the working hours for this site would be limited to 07:00 to 19:00 weekdays and Saturday, unless agreed otherwise. The noise and vibration assessment (Volume 3 and 4, Chapter 4) identifies the likely significant noise effects associated with the construction, operation and removal and reinstatement of the northern and southern park and ride site. The assessment also provides a summary of the primary and tertiary mitigation measures that would be included to mitigate construction and operational noise.</p> <p>Exact working methods and plant to be used would not be determined until a contractor is appointed and therefore precise details of noise mitigation measures cannot yet be established.</p> <p>As set out in the CoCP (Doc Ref. 8.11), mitigation measures that could be implemented during construction to minimise construction noise include selection of alternative plant or working methods, barrier screening and/or stand-off margins and/or alternative plant. Contractors would be required to identify mitigation to avoid significant construction noise and vibration effects, as far as reasonably practicable. Construction mitigation measures may include additional screening or changing working methods and times, including limiting noisy activities on Saturday afternoons. Where appropriate, mitigation measures which would reduce adverse effects are identified.</p> <p>SZC Co. has established a voluntary 'Noise Mitigation Scheme' which seeks to mitigate residual significant effects on properties from construction or operation of the proposed development, subject to eligibility criteria, as set out in Volume 2, Appendix 11H. Where specified noise criteria is exceeded, noise insulation or temporary rehousing may be provided. SZC Co would undertake further assessment and engage with stakeholders to further understand the affected receptors and their use.</p> <p>No additional mitigation measures are currently proposed to further reduce noise levels. However, once the contractor has been appointed and as part the detailed design, further consideration would be given to measures that could be implemented to further reduce traffic noise.</p> |
| 142 | ES Preparation | Incombination & Cumulative Effects | East Suffolk Council | <p>Consistency in terminology is particularly important to facilitate the measurement of in-combination effects. We are concerned that the ES could underreport these effects if it does not acknowledge the potential for accumulation of effects of minor significance. The ES should explain how the significance of an in-combination effect will be determined – for example, for a given receptor, is the significance of a moderate noise impact plus a moderate air quality impact moderate or major?</p> <p>We would also expect the ES not to overlook opportunities to mitigate effects of minor significance so that they rather become 'negligible'.</p> | <p>The majority of potential inter-relationship effects associated with the proposed development are either inherently considered or clearly identified and assessed within the technical assessments in Volumes 2 to 9 of the ES (Doc Ref. 6.3 to 6.10). For example, where there is the potential for a receptor to be impacted by an effect reported in another technical chapter, this is identified and assessed as appropriate in the receptor chapter, such as the Terrestrial Ecology and Ornithology assessment presented in Chapter 14 of Volume 2 of the ES (Doc Ref. 6.3) considers how impacts associated with construction works on groundwater and surface water described in Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) affect ecological resources and receptors.</p> <p>Where potential inter-relationship effects were not considered within the technical chapter, such as on residential receptors, commercial facilities and schools further assessment has been undertaken in Volume 10. There is no established methodology for assessing the effects on sensitive receptors or resources resulting from the interaction or inter-relationship of different effects, and therefore the methodology applied to identify such inter-relationship effects is set out in Chapter 1 of Volume 10, with the assessment provided in Chapter 2 of the same volume.</p> |
| 143 | Project-wide | Health and Wellbeing | East Suffolk Council | Considering the 2017 legislative changes as mentioned above, the comments submitted following the 2014 submission are still accurate and relevant, these being those highlighted in Table 6.45 (p264). There is insufficient detail on mitigation contained within the latest report to provide an assurance that these have been considered in full. | The Health and Wellbeing assessment presented in Volume 2, Chapter 28 of the ES identifies that engagement with health stakeholders has run since the outset of the Sizewell C Project. Appendix 6Y of Volume 1 of the ES sets out a summary of the most recent comments raised during consultation with Sizewell C Health Working Group. Membership of the working group currently includes Suffolk County Council (SCC), East Suffolk Council (ESC), Public Health Suffolk; Suffolk National Health Service (NHS); Suffolk, Ipswich, East Suffolk, and Great Yarmouth and Waveney Clinical Commissioning Groups (CCGs)). The working group has provided a collaborative platform to explore, discuss, and iteratively inform the health and wellbeing assessment undertaken, while informing the development of features and initiatives relevant to supporting local health needs, objectives and priorities. |
| 144 | Project-wide | Air Quality | East Suffolk Council | Consideration to the mitigation of personal transport to reduce emission source pollutant(s) as well as methods to encourage active transport measures should be undertaken with the workforce. We would also like to see that the buses involved in the Park and Ride are suitably procured to be of a higher emissions class, ideally Class VI (see environmental protection comments). | <p>A draft Construction Worker Travel Plan (Doc Ref 8.8) has been prepared to contain the measures which would 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 phase.</p> <p>SZC Co. acknowledges the benefits of low emission bus transfers from nearby settlements and will continue to explore this and other opportunities in line with the three principles set out in the sustainability strategy.</p> |
| 145 | Project-wide | Transport | East Suffolk Council | Consideration needs to be given to whether counts of pedestrian movement need to be undertaken at relevant locations, especially along the A12 and B1122. | Details and results of surveys undertaken are provided within Volume 2, Appendices 15A to 15D of the ES . |
| 146 | Project-wide | Noise & Vibration | East Suffolk Council | BS:8233:14 has been agreed as the design criteria for the new campus accommodation any changes to this should be outlined within the EIA. | As detailed in Volume 2, Chapter 3 the accommodation campus design would include noise controls as recommended in BS8233. |
| 147 | Project-wide | Air Quality | East Suffolk Council | Assessment of nuclear island stacks – formaldehyde and carbon monoxide should be assessed further in the air quality assessment. If they are scoped out, clear justification for why should be provided. Formaldehyde and carbon monoxide emissions should be formally screened using a method such as the Environment Agency's risk assessment method (https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit). | As discussed in Volume 2, Appendix 12C: Combustion Activities , during start-up of the reactors, emissions of formaldehyde and carbon dioxide can be liberated from the nuclear auxiliary building stack (the main stack) and emissions of ammonia can occur from the steam relief valves. These are listed in Volume 2 Appendix 4C (Operational Gaseous Emissions). As the emissions only occur during start-up (assumed to occur twice a year) and only for a few hours at that time, and are released from a 70m high stack, these have been screened out as having insignificant effects on air quality and have not been assessed further in the air quality assessment presented in Volume 2, Chapter 12 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| 148 | Off-site Associated Development | Alternatives | East Suffolk Council | <p>As set out at paragraph 4.3.5 the EIA will describe the main alternatives considered as part of the design evolution process for off-site associated development, it is worth noting that:</p> <ul style="list-style-type: none"> The Councils expect the impacts of the marine led strategy referenced at Stage 2, but omitted at Stage 3, to be considered and evidenced as part of this process. Mitigation measures should be applied to those impacts which cannot be designed out of the proposals. The impact of the mitigation measures is as a result of the number of HGV movements on the highway network, which again is as a result of the lack of a sustainable transport strategy for transporting materials to the site. Suffolk County Council remain unconvinced that the proposed route for the Sizewell Link Road provides the greatest legacy benefit and are of the opinion that a more southerly route would reduce vehicle mileage associated with the site. We would expect a detailed assessment of the final route choice and main alternatives to strongly evidence that the submitted route choice provides the overall greatest benefit. The EIA should include a description of the alternatives considered with regards to the proposed diversion and closures of any Public Right Of Ways. | <p>SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals.</p> <p>A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4, together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects.</p> <p>Chapter 3 of Volumes 3 to 9 provide a description of associated development site-specific alternatives considered by SZC Co.</p> |
| 149 | ES Preparation | EIA Methodology | East Suffolk Council | As a result of the issues outlined above, we are concerned that impacts may be defined as of less than moderate/major significance and therefore not significant, when that is not the case. This table should continue to reflect the precautionary principle so that the burden of proof remains on EDF Energy demonstrating robustly that impacts will be not significant. | This point is noted and has been considered in the preparation of the ES . |
| 150 | Project-wide | Historic Environment | East Suffolk Council | Archaeological assessment and mitigation also must be scoped in for any associated works outside of the red line boundary which will be necessary in association with this scheme e.g. any new utility works. | There would be no works forming part of the Sizewell C Project that would occur outside of the identified site boundaries. |
| 151 | Project-wide | Noise & Vibration | East Suffolk Council | Any other acoustic or vibration data in respect of confined tones or low frequency noise propagation should also be made available within the EIA. | Where such information is available, this information has been considered in the preparation of the noise and vibration assessment presented within Chapter 11 of Volume 2 and Chapter 4 of Volumes 3 to 9 of the ES . |
| 152 | Project-wide | Air Quality | East Suffolk Council | Any non-road mobile machinery (NRMM) plant should meet stage IIIB engine standards from the NRMM emission standard 97/68/EC directive. | The request that NRMM plants should meet stage IIIB engine standards is noted and will be discussed as part of wider consultation that is ongoing with the affected local authorities. |
| 153 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | Also, it is noted from bullet point 11 that bat boxes have been erected as alternate roost sites in advance of construction. Given that there is outstanding survey and assessment work required for bats (as identified in paragraph 6.7.11) it should be ensured that these bat boxes are not considered to be the sole roost mitigation required for this group as the final assessment may determine that additional measures are required. | As identified in the terrestrial ecology assessment for the main development site (Volume 2, Chapter 14) alternative roost sites (bat boxes) have been erected in advance of construction within woodland least likely to be directly affected by noise and lighting disturbance, should the proposed development displace roosting bats from woodland more directly exposed to disturbance. In addition, a purpose-built 'bat house' would be constructed (or modifications made to existing buildings) to provide alternative roosting opportunities for bats. Where relevant, consideration is given to these when defining the baseline assessment presented in the main development site terrestrial ecology and ornithology assessment (Volume 2, Chapter 14). |
| 154 | Project-wide | Air Quality | East Suffolk Council | Air quality presents the single biggest environmental risk to human health and as mentioned in section 6.5.8. We welcome that the base line data will be revised and updated. We request that the results of these ongoing monitoring locations will be shared with the Councils to help provide data with regards pollutants as there may be the requirement of establishing an Air Quality Management Area (AQMA). Should an AQMA be declared then we would expect that EDF Energy will work closely with the Councils to look at suitable mitigation measures. This would include major transport routes to and from the site – see Air Quality comments. | Each Air Quality assessment presented within Volumes 2 to 9 of the ES identifies the baseline conditions as relevant to that assessment. Volume 2, Appendix 12E , document reports the method and results of the baseline dust and nitrogen dioxide surveys for the Sizewell C Project and provides details of sampling equipment, locations and dates. |
| 155 | Green Rail Route | Noise & Vibration | East Suffolk Council | A train passing loop is indicated between Ufford and Campsea Ashe. Construction work to form this new line should be limited to normal working hours. This loop is relatively close to residential property and consideration should therefore be given to minimising train waiting times during passing manoeuvres. If trains are intended to be held idling at this passing loop then noise mitigation screening is likely to be needed and should undertaken as part of the construction works. | As described in Volume 9, Chapter 2 , this passing loop is no longer proposed as part of the rail proposal. |
| 156 | Project-wide | Contaminated Land and Soils | East Suffolk Council | A site survey including samples from 150 locations across the Sizewell C site has been undertaken for the presence of Contaminated Material. This survey has not indicated any significant forms of contamination and as such the site remains in a low to very low category of potential risk for contamination. Additional sampling will need to be undertaken during site excavation and any identified contamination will need to be safely removed or encapsulation on site. | The Geology and Land Quality assessments in Volumes 2 to 9 assess the impacts of main development site and associated development sites. The assessment sets out the baseline contamination levels from existing surveys and publicly available information and assesses the potential risk of contamination at each site. The mitigation measures set out the process for removing any contamination identified in the future. Additional ground investigation would be undertaken to inform the detailed design of the development as set out in the CoCP (Doc Ref 8.11). |
| 157 | Project-wide | Noise & Vibration | East Suffolk Council | A proposed 'Complaints Procedure' detailing who will undertake investigations of noise complaints on behalf of the site operators and the scope of amelioration in the event that complaints are justified should be provided. | SZC Co. would have a system for the receipt and recording of any noise or vibration complaints from occupiers of noise sensitive receptors, and procedures for investigating and acting appropriately as necessary upon those complaints. Further details are provided in the CoCP (Doc Ref. 8.11) |
| 158 | Other Rail Improvements | Noise & Vibration | East Suffolk Council | A number of other rail works (i.e. track crossover, bridge and crossing improvements etc.) are proposed to be undertaken to facilitate freight deliveries to the LEEIE. Construction works undertaken on these improvements should again be limited to normal working hours where possible. Where any of these works are anticipated to have adverse noise or vibration impact on occupiers of nearby residential properties, based on the prevailing background noise levels the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. | Construction working hours and methods associated with the proposed other rail improvements is provided within Volume 9, Chapter 2 . In summary the working hours for this site would be limited to 07:00 to 19:00 weekdays and Saturday, unless agreed otherwise. The noise and vibration assessment (Volume 9, Chapter 4) includes an environmental screening exercise to determine which of the upgrade works are considered to be of a sufficient scale and nature to have the potential to result in significant adverse effects and therefore require further assessment. The environmental screening exercise concluded that four of the eight level crossing upgrades required further consideration. Further details can be found in Volume 9, Chapter 4 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|------------------------------------|----------------------|---|--|
| 159 | Project-wide | Transport | East Suffolk Council | <p>A full travel plan for both construction workers and operational staff should be presented within the EIA and contain both physical and behavioural measures to increase travel choices and reduce reliance on single-occupancy car travel to reduce congestion, pollution and demand for parking spaces. There is no standard format or content but it would be expected to contain (but not exclusively):</p> <ul style="list-style-type: none"> Objectives and targets, - Section 3 Priority given to non-car modes of transport or car sharing - signage, layouts, - Section 4.3 and 4.6 Controls on car parking (ensure adequate numbers of suitably designed parking spaces for disabled people; car sharing; pool cars), - Section 4.7 Nomination of a travel plan co-ordinator and associated support, Provision of improved public transport, cycling and walking facilities (e.g. lobby areas where information about public transport or car sharing can be made available, lighting, landscaping and shelters, - Section 4.2 Provision of shower and changing facilities and safe storage at convenient locations throughout the site, - Section 4.5 Well designed and conveniently located cycle routes and cycle parking areas, - Section 4.2 Electric bike and car charging points, - Section 4.2, 4.5 and 4.7 Measures to facilitate public transport (e.g. shuttle buses to stations and other key destinations, negotiation with local transport providers, discounts on tickets etc.), - Section 4.3 Interim or aspirational targets for the breakdown of transport types (including staff transport and freight movements), - Section 3 Reduced traffic speeds (particularly during development), Travel information and marketing, - Section 4.8 Monitoring and review mechanisms - Section 5 | <p>The draft Construction Worker Travel Plan (Doc Ref. 8.8) provides information on these. They are included within the following sections:</p> <ul style="list-style-type: none"> Objectives and targets, - Section 3 Priority given to non-car modes of transport or car sharing - signage, layouts, - Section 4.3 and 4.6 Controls on car parking (ensure adequate numbers of suitably designed parking spaces for disabled people; car sharing; pool cars), - Section 4.7 Nomination of a travel plan co-ordinator and associated support, - Section 6 Provision of improved public transport, cycling and walking facilities (e.g. lobby areas where information about public transport or car sharing can be made available, lighting, landscaping and shelters, - Section 4.2 Provision of shower and changing facilities and safe storage at convenient locations throughout the site, - Section 4.5 Well designed and conveniently located cycle routes and cycle parking areas, - Section 4.2 Electric bike and car charging points, - Section 4.2, 4.5 and 4.7 Measures to facilitate public transport (e.g. shuttle buses to stations and other key destinations, negotiation with local transport providers, discounts on tickets etc.), - Section 4.3 Interim or aspirational targets for the breakdown of transport types (including staff transport and freight movements), - Section 3 Reduced traffic speeds (particularly during development), Travel information and marketing, - Section 4.8 Monitoring and review mechanisms - Section 5 |
| 160 | Project-wide | Incombination & Cumulative Effects | East Suffolk Council | <p>A chapter on cumulative and transboundary assessment (Chapter 10) is required and cumulative assessment is referenced throughout the remaining chapters. It is therefore assumed that cumulative assessment between the main development site and associated developments will be assessed as well as a cumulative assessment of the whole project with other developments in the area. A long list of proposals to be cumulatively assessed as part of the ES has been produced and we will continue to work with EDF Energy on ensuring that the short list of developments can be adequately assessed cumulatively with the Sizewell C proposal.</p> <p>The ES should recognise that as a consequence of the Sizewell C development, the impact of existing development may change. For example if Coronation Wood is used (relocated facilities) this may affect the mitigation it offers for the existing Sizewell A and B developments. Consequently the assessment of the cumulative impacts should reflect any changes in the future baseline that would heighten the impact of existing development. The onshore elements of the consented Galloper and Greater Gabbard Offshore Windfarm's are also relevant in this respect.</p> | <p>Volume 10 of the ES presents the cumulative and transboundary effects assessment. Chapter 1 of Volume 10 sets out the methodology and summarises the process followed to identify the short list of other plans and projects. The long list (Volume 10, Appendix 1A) and short list (Volume 10, Appendix 1B) of identified plans and projects has been prepared in conjunction with ESC. Details of consultation undertaken in relation to the long list and short list is provided within Chapter 1 of Volume 10.</p> |
| 161 | Project-wide | Noise & Vibration | East Suffolk Council | <p>A background noise and vibration measurement protocol was previously agreed with the Environmental Protection Team at East Suffolk Council. A survey of 33 measurement locations around the development site, together with 14 road side and 9 rail side locations has been undertaken to form a baseline survey from which noise and vibration criteria are to be agreed. The EIA should present this noise and vibration monitoring data together with an assessment of magnitude of impact and sensitivity of receptors. The EIA should also detail the impact on the loss of amenity and tranquillity to the natural environment.</p> | <p>The noise and vibration assessments in Volumes 2 to 9 of the ES presents noise and vibration monitoring data together with an assessment of magnitude of impact and sensitivity of receptors to identify effects.</p> <p>An assessment of loss of amenity and tranquillity is provided within Volume 2, Chapter 15 and Appendix 15E and Volumes 5 and 6 Chapter 8 and Appendix 8A.</p> |
| 162 | Main Development Site | Coastal Geomorphology | East Suffolk Council | <p>7.13.22 of 2014 EIA states 'no limitation that could affect the robustness of the assessment has been identified to date'. The Council's believe that uncertainty over baseline shoreline evolution projections and the consequent impact of the development footprint on that evolution renders this proposition unsafe.</p> | <p>As set out within the coastal geomorphology and hydrodynamics assessment presented in Volume 2, Chapter 20 of the ES, expert Geomorphological Assessment shows that, in the absence of any additional mitigation, the shoreline is likely to retreat to, and interact with, the HCDF within the operational life of the Sizewell C station. Therefore, a future shoreline baseline is considered here and in section 20.14 of this chapter. Section 7 of Appendix 20A of Volume 2 of the ES, provides more detail on the future shoreline baseline, as well as monitoring, mitigation and potential post-mitigation impacts</p> |
| 163 | Project-wide | Historic Environment | East Suffolk Council | <p>6.9.8/6.9.12/6.9.14 The EIA should be more transparent that although Suffolk County Council Archaeological Service (SCCAS) have advised full archaeological evaluation of all scheme elements up front as best practice and the endeavour by EDF Energy to achieve this, restrictions such as land access, tree cover, ecological issues etc. mean that not all areas will be able to be assessed pre-DCO and so archaeological impacts will not have been determined for all scheme elements.</p> | <p>Individual Terrestrial Historic Environment ES chapters within Volumes 2 to 9 of the ES and supporting appendices identify any specific limitations and assumptions, such as those arising from the inability to complete archaeological fieldwork.</p> |
| 164 | Project-wide | Historic Environment | East Suffolk Council | <p>6.9.43 The landscape scale of impact upon archaeology as a result of the Sizewell project alone and also how this will be enhanced by other major schemes in the vicinity will need to be considered.</p> | <p>The effects of the Sizewell C Project on archaeological remains across the whole area affected by the project (i.e. the project alone) are considered in Volume 10, Chapter 3. An assessment of cumulative effects with other non-Sizewell C plans, projects and programmes is presented in Volume 10, Chapter 4.</p> |
| 165 | Project-wide | Historic Environment | East Suffolk Council | <p>6.9.41 Implications such as dust and spoil management during archaeological evaluation, and potential conflicts between archaeology and ecology, landscaping proposals and flood management works need to be considered.</p> | <p>Implementation of archaeological works in accordance with site-specific WSIs would be governed by the provisions of the CoCP (Document Reference 8.11) and as such would have regard to the potential environmental effects of these works and would have appropriate control measures in place. The aim of the CoCP is to provide a clear and consistent approach to the control of Sizewell C construction activities on the main development site and associated development sites to maintain satisfactory levels of environmental protection, and limit disturbance from construction activities as far as reasonably practicable.</p> |
| 166 | Project-wide | Historic Environment | East Suffolk Council | <p>6.9.40 WSIs must be based upon evaluation results and agreed with The Councils and Historic England.</p> | <p>An overarching archaeological written scheme of investigation (WSI) has been produced for the Sizewell C Project (Volume 2, Appendix 16H). Individual site WSIs produced to supplement these would be agreed with SCCAS. Publication and popular dissemination of any key results would allow any informative and historic value to be fully realised, and details of this would be set out within the WSIs. These site-specific WSIs would also set out requirements for further investigation of areas that could not be surveyed pre-consent, to allow for the agreement of finalised mitigation proposals.</p> <p>Monitoring of the agreed programme of archaeological investigation would be carried out by SCCAS during the implementation of the scheme. The details of this monitoring would be set out within the individual site WSI to be agreed with SCCAS.</p> |
| 167 | Project-wide | Historic Environment | East Suffolk Council | <p>6.9.29 – the Councils would prefer the level of harm to be described in NPPF terms and then mapped back to the magnitude of change criteria if necessary</p> | <p>This comment relates to the 2014 scoping report which was appended for information. The assessment methodology set out in the 2019 scoping report contains explicit reference to the NPPF/NPS EN-1 classification of harm. The assessment criteria is defined within the Terrestrial Historic Environment Assessment Methodology (Volume 1, Appendix 6L).</p> |
| 168 | Project-wide | Historic Environment | East Suffolk Council | <p>6.9.25 – again the language is divergent from what local authorities use day to day – the Councils suggest that you map terms throughout for more clarity</p> | <p>The assessment methodology set out at 6.9.25 specifically refers to EIA significance assessment. Harm is discussed at Section 6.9.30 and a statement of whether harm to significance would arise is made in each assessment. The assessment criteria is clearly defined within the Terrestrial Historic Environment Assessment Methodology (Volume 1, Appendix 6L).</p> |
| 169 | Project-wide | Historic Environment | East Suffolk Council | <p>6.9.22 – the Councils comments have not been taken into account – should use NPPF terminology – substantial or less than substantial or map the relevant terms clearly throughout e.g. high magnitude of change = substantial harm. While the Councils recognise the usefulness of looking at magnitude of change throughout the EIA it does not relate very well to the type of tests we apply when considering heritage impacts against the NPPF.</p> | <p>This comment relates to the 2014 scoping report which was appended for information. Harm is discussed at Section 6.9.30 and a statement of whether harm to significance would arise is made in each of the Terrestrial Historic Environment assessments within Volumes 2 to 9 of the ES.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-------------------------|-------------------------------------|----------------------|---|---|
| 170 | Project-wide | Historic Environment | East Suffolk Council | 6.9.18 – close to NPPF definition but not quite the same – we are unclear as to why it is not just quoted verbatim? | This point is noted, these definitions are set out as paraphrase of NPS EN-1. |
| 171 | Project-wide | Historic Environment | East Suffolk Council | 6.9.16. Current CIFA archaeological evaluation guidance, David Gurney's 2003 'Standards for Field Archaeology in the East of England' and SCCAS standard fieldwork requirement documents (2017) should also be referred to. | The Terrestrial Historic Environment ES Chapters in Volumes 2 to 9 and associated appendices reference this guidance as appropriate. |
| 172 | Project-wide | Historic Environment | East Suffolk Council | 6.9.14 The EIA must clearly set out where full evaluation has been completed and mitigation requirements have been identified as well as those areas where further evaluation is necessary (including the scope of remaining work required to be completed to inform mitigation strategies e.g. earthwork assessment, geophysical survey, trial trenched evaluation). Mitigation strategies will need to be covered by new Written Statements of Investigation (WSIs), which must be agreed with the Councils and Historic England. | Individual Terrestrial Historic Environment ES chapters within Volumes 2 to 9 and associated appendices set out any limitations to the surveys. An overarching Written Scheme of Investigation (WSI) (Volume 2, Appendix 16H) has been produced in consultation with SCCAS to set out project-wide objectives and generic standards, and site specific WSIs would be produced in consultation with SCCAS to set out specific workscopes for mitigation fieldwork. |
| 173 | Project-wide | Historic Environment | East Suffolk Council | 6.9.11 – arbitrary 'buffer zone' has been decreased from 'minimum of 1km' to between 500m and 1km– we cannot be sure all affected assets will be identified – we would suggest that a Zone of Theoretical Influence (ZTV) or similar is used instead. The document states that justification for the study areas will be set out in the EIA. It is considered positive that there will be a focus on the potential for undesignated heritage assets | Study areas for direct effects on heritage assets vary according to the local area, and appropriateness of the distance. An appropriate scope of assessment for change to setting has been established through the settings scoping document. Consultee requests for additional assets to be included within the assessment of effects have been incorporated into the assessment. The study area of the Terrestrial Historic Environment assessment is set out within each of the relevant chapters within Volumes 2 to 9 of the ES . |
| 174 | Other Rail Improvements | Amenity and Recreation | East Suffolk Council | 6.8.26, Table 6.11- The Councils welcome the inclusion of the level crossing works as in scope and repeat the comments from the combined response to the PEI that the assessment should consider the safety, accessibility and amenity of the proposed options as the rationale for assessing impact and not just the shortest possible diversion distance | Consideration has been given to the amenity and recreation effects associated with the works to level crossings along the Saxmundham to Leiston branch line within Chapter 8 of Volume 9 of the ES . |
| 175 | Project-wide | Amenity and Recreation | East Suffolk Council | 6.8.14 Baseline: The extended study area and the inclusion of the England Coast Path is welcomed. However, the focus of impact to date has been primarily on the main development site as evidenced by the locations of the visitor surveys that have undertaken. There appears to be little baseline information relating to the associated development proposals on the recreation and amenity, namely the proposed level crossing closures on the East Suffolk Line and the green rail route, the Sizewell Link Road, Theberton Bypass and the 4 Village Bypass. This also has a bearing on the statement that the potential for project wide effects will be considered (6.8.34) to establish if additional mitigation measures will be required. A negative impact on the rights of way and green access network will have a detrimental impact on a tourism sector that relies on this green infrastructure. | The ES provides a description of the baseline conditions at each of the Sizewell C project sites within the Amenity and Recreation Assessments presented within Volumes 2 to 9 of the ES . For the two village bypass and Sizewell link road assessments presented in Volume 5 and 6, Chapter 8 , no surveys of PRoW users were undertaken at this site. As agreed with SCC, additional PRoW surveys were not considered necessary to support the assessment. However, for the proposed rail extension route assessed in Volume 9, Chapter 8 , it is assumed that the results of the SZC Visitor Surveys 2016-2018 (Public Rights of Way and Cycle Route), provided in Volume 2, Appendix 15C of the ES , remain valid and provide an accurate representation of the use of PRoW in the vicinity of the proposed rail extension route. |
| 176 | Other Rail Improvements | Amenity and Recreation | East Suffolk Council | 6.8.13 Rail improvements are proposed to be assessed with a 0.5km study area. Clarification is needed as to whether this includes the proposals for the closures of public rights of way across level crossings on the East Suffolk line and diversion routes provided as mitigation. If so, these should be listed and a study area defined by the distance of the proposed alternative routes. | Consideration has been given to the works to level crossings along the Saxmundham to Leiston branch line within the amenity and recreation assessment for the rail proposals Chapter 8 of Volume 9 of the ES . As described in Chapter 2 of Volume 9 , it is no longer proposed to undertake works to level crossings on the East Suffolk Line. |
| 177 | Other Rail Improvements | Amenity and Recreation | East Suffolk Council | 6.8.12 The list of sites to be assessed should also include the level crossings on the East Suffolk Line that are proposed to be closed or upgraded. | Consideration has been given to the works to level crossings along the Saxmundham to Leiston branch line within the amenity and recreation assessment for the rail proposals Chapter 8 of Volume 9 of the ES . As described in Chapter 2 of Volume 9 , it is no longer proposed to undertake works to level crossings on the East Suffolk Line. |
| 178 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7.7 'field surveys to be undertaken in 2019' - the Councils are concerned that there is not the time available for EDF Energy to complete all the necessary survey work, in accordance with guidelines and best practice. | Additional field surveys undertaken in 2019, and detailed in the terrestrial ecology and ornithology assessments (where relevant) have been undertaken in accordance with published guideline and best practice. The methodology as relevant to the survey and additional details of the field survey undertaken are included within the relevant survey report appended to the terrestrial ecology and ornithology assessments of Volumes 2 to 9 of the ES . |
| 179 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7.19 refers to 'no habitat loss from designated sites....and no significant effects on habitat features of interest' the Councils expect you to have regard to the list of Suffolk Priority Habitats List from Suffolk Biodiversity Information Service, and to set out clearly how they apply the mitigation hierarchy including enhancements (Biodiversity Net Gain). | Many of the habitat types present are listed as priority habitats in the Suffolk BAP and are also habitats of principal importance for the conservation of biodiversity under the NERC Act, as such they are considered as necessary within the terrestrial ecology and ornithology assessments in Volumes 2 to 9 of the ES . Where possible mitigation has been provided to minimise effects from the Sizewell C Project. These mitigation measures are included within the environmental design and management sections of the terrestrial ecology and ornithology assessments in Volumes 2 to 9 of the ES and include design measures as well as best practice and legal requirements. Where it has not been possible to avoid or minimise effects, for example as a result of direct land take, compensation has been provided. Please refer to the terrestrial ecology and ornithology assessments in Volumes 2 to 9 of the ES for further information. In addition, biodiversity net gain assessments have been undertaken for the permanent development sites and are provided in Volume 2, Annex 14E , and Annex 7A4 of Volumes 5 to 7 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|-------------------------------------|----------------------|--|--|
| 180 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7 e) Potential mitigation (paragraph 6.7.26) – With regard to the specific embedded mitigation measures for the main development site set out in paragraph 6.7.26, bullet point 10 sets out that habitats suitable for reptile translocation have been prepared however the ES must demonstrate that these areas are suitable to support the reptile species which require translocation, and that they have not already been colonised by reptiles moving in from surrounding areas. | The approach to habitat creation and reptile translocation is provided within Reptile Mitigation Strategy included as Volume 2, Appendix 14C2A which outlines the key approaches to mitigating potential impacts to reptiles' populations. |
| 181 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7 e) Potential mitigation – This section describes potential 'mitigation' measures which will be included within the scheme, however a number of the measures listed (particularly within paragraph 6.7.26) are compensation measures, not mitigation measures. For example, habitats created at Aldhurst Farm or as part of an offsite fen meadow strategy are compensation not mitigation. Given the ecological impacts which it is already known will arise from the development as proposed (e.g. the loss of part Sizewell Marshes SSSI) it is essential that the mitigation hierarchy is robustly applied and that it is demonstrated within the ES why avoidance, then mitigation cannot be achieved before compensation measures are discussed. The information provided in the EIA Scoping Report does not give any certainty that the correct application of the mitigation hierarchy will underpin the assessments and conclusions within the ES. | Mitigation measures can be defined as those measures that are envisaged to prevent, reduce and, where relevant, offset any potential significant adverse effects. The mitigation approach adopted for the proposed development takes the form of a hierarchy, whereby priority is given to preventing significant effects. If prevention is not possible, the approach is to reduce or abate the effects followed, if necessary, by repair (restoring or reinstating) or offsetting/compensating for those effects. Each of these means of reducing potentially significant effects falls under the broad heading of 'mitigation'. The design of the proposed development has sought to avoid or prevent significant adverse effects where reasonably practicable, such as avoiding sensitive ecological sites such as avoid direct land take from the Roadside Nature Reserve 197 and Foxburrow Wood ancient woodland. Where this is not possible, mitigation measures have been included in the design where reasonably practicable. Further details of the measures are included within the environmental design and management sections of the terrestrial ecology and ornithology assessments in Volumes 2 to 9 of the ES and include design measures as well as best practice and legal requirements. Where it has not been possible to avoid or minimise effects, for example as a result of direct land take, compensation has been provided. Please refer to the terrestrial ecology and ornithology assessments in Volumes 2 to 9 of the ES for further information. |
| 182 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7 d) i. Construction – Paragraph 6.7.18 identifies that natterjack toads (Epidalea calamita) may now be affected by the proposed development and therefore will be assessed as part of the ES. However, no reference to surveys for this species is included in paragraphs 6.7.11 and 6.7.12 (Further surveys/studies) and therefore it is unclear how the assessment of impact on this species will be made in the absence of up to date survey information? | Volume 2, Appendix 14A5 of the ES provides information on baseline conditions relating to amphibians, this includes a summary of the results for natterjack toad surveys and additional information that has been used to support the baseline in relation to natterjack toad. |
| 183 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7 c) iii. Further surveys/studies (paragraph 6.7.11) – Paragraph 6.7.11 identifies that detailed internal and external inspections will be undertaken of the buildings at Lower Abbey Farm and Upper Abbey Farm to inform mitigation measures for roosting bats. Inspection surveys alone may not be adequate to provide sufficient information on the use of the buildings by roosting bats to allow appropriate mitigation measures to be identified. Emergence/re-entry surveys, in accordance with published best practice guidance, should be undertaken to better understand the use of these buildings by roosting bats (as several buildings are known to contain bat roosts). | Volume 2, Appendix 14A8, Annex 14A8.4 , provides a summary of the building inspections undertaken of the buildings at Lower Abbey Farm and Upper Abbey Farm in 2015 and 2019. Full details of the inspections at Upper Abbey Farm are provided in Annex 14A8.5 . This Annex also provides a summary of the findings of the emergency/ re-entry surveys that were undertaken for the buildings at Lower Abbey Farm and Upper Abbey Farm. Figures supporting these surveys are included as Figure 14A8.6 to Figure 14A8.8 . |
| 184 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7 c) ii. Updates to baseline (paragraph 6.7.9) – As with the comment above in relation paragraphs 6.7.4 and 6.7.5, robust justification will be required to demonstrate that the survey data used to underpin the assessments presented in the ES is fit for purpose and doesn't require further updating. (6.7.10 - detailed ecological baseline for North and South Park and Rides and Green Rail Route – we look forward to receiving this data. | The ecological baseline data for the northern and southern park and rides and the rail extension route are provided within Chapter 7, Volumes 3, 4 and 9 of the ES respectively. These are supported by technical appendices included as Appendix 7A which provides details of the surveys undertaken and provides justification of the work undertaken to demonstrate that the survey data is valid and that the baseline conditions on site have not changed. |
| 185 | Project-wide | Air Quality | East Suffolk Council | 6.5.9 The Councils recommend that the IAQM/DMRB assessment screening criteria should be applied to the whole traffic model network, with detailed dispersion modelling carried out for any areas which trigger the IAQM/DMRB criteria. The applicant should apply this criteria to traffic changes during construction and operational phases for both the rail-led and road-led options | The assessment method applied in the air quality assessments in Volumes 2 to 9 of the ES goes beyond the minimum selection criteria recommended in the IAQM or DMRB methods. Full detail of the air quality methodology is provided within Volume 1, Appendix 6H . |
| 186 | Project-wide | Air Quality | East Suffolk Council | 6.5.18 Table 6.8 Where the metric for screening overlaps between the two guidance notes IAQM criteria should be used and DMRB HA207/07 criteria should be disregarded. In brief, only speeds from DMRB should be used. | East Suffolk Council's preferred approach is consistent with the methods proposed in the Scoping Report and taken forward to the air quality assessments presented in Volumes 2 to 9 of the ES. |
| 187 | Project-wide | Transport | East Suffolk Council | 6.3.4. Transport related impacts describe impacts that include severance, pedestrian delay, pedestrian amenity, fear and intimidation, accidents and safety but omits impact on other non motorised users such as cyclists and horseriders. These users should be included in the impact assessment as there are locations where bridleways and promoted cycle routes will be affected either by creation of new road (for example Leiston BR19) or through increased traffic on other roads. The Councils would look for EDF Energy to provide evidence in the form of baseline data for all types of user affected by the main site and associated developments. Magnitude of impact 6.3.34 - Table 6.3: This table should include impact on cyclists and horseriders as mentioned above, and not just pedestrians in the context of delay and amenity. | Non-Motorised Users are considered and assessed within the Transport ES Chapter (Volume 2, Chapter 10). |
| 188 | Project-wide | Amenity and Recreation | East Suffolk Council | 6.22 Health and Wellbeing: 6.22.28 The Councils welcome the inclusion of the assessment of the potential impact on areas of open space that are important to good health and wellbeing being addressed in the recreation and amenity assessment. However, this assessment must include the wider geographical area covered by all the proposals including all the proposed level crossing closures and new roads (2 Village Bypass, Theberton Bypass & Sizewell Link Road). | Chapter 28 of Volume 2 of the ES assesses the impacts of the Sizewell C Project on Health and Wellbeing. The assessment includes details on impacts on amenity and recreation from the new road schemes, including the two village bypass and Sizewell link road. |
| 189 | Project-wide | Socio-economics | East Suffolk Council | 6.2.8: • We welcome the statement recognising that there will be significant negative effects felt locally and that this will be assessed. We will expect this to be clearly visible within the context of the wider assessments | The Socio-economic ES Chapter (Volume 2, Chapter 9) sets out the baseline and future baseline in terms of population and age structure across all Local Authority areas within the 60-minute area that may be affected by a temporary non-home-based workforce. Effects on local communities have been assessed, as presented in Volume 2, Chapter 9 . |
| 190 | Project-wide | Socio-economics | East Suffolk Council | 6.2.3: In addition to the 2014 scoping opinion referenced the following should be included when considering the effects on employment, skills and the local and wider economy The effect on all significant sectors that play a key part in economy of the local area (e.g. advanced manufacturing & construction). • An assessment of the potential effects - not only during the construction period - but post completion of the construction work packages to help us understand how best to deal with the demobilisation of the project • The estimated volumes as well as detail on the types and nature of jobs to be created • The opportunities to maximise local recruitment across all levels and especially within higher level roles • The expected/forecast split between roles that a migrant workforce new to area will fulfil and those that local people will fulfil • The duration of the works and the cumulative demands and impact of SZC and other significant construction projects happening in the same window | The Socio-economic ES Chapter (Volume 2, Chapter 9) sets out the likely effects of the Sizewell C Project and identifies the types of roles, anticipated level of home-based recruitment and duration of works. It links directly to a suite of measures to enhance local employment, skills and education in the context of developing sustainable careers and wider infrastructure to avoid perceived adverse effects of demobilisation. The Socio-economic ES Chapter (Volume 2, Chapter 9) presents an assessment of post completion of the construction work packages. Volume 2, Appendix 9A provides the estimated volumes as well as detail on the types and nature of jobs to be created. Information relating to workforce distribution is provided within Volume 2, Appendix 9C . The duration of the works and the cumulative demands and impact of the SZC Project and other significant construction projects happening in the same window is provided within Volume 10, Chapter 4 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|-------------------------------|----------------------|--|---|
| 191 | Project-wide | Socio-economics | East Suffolk Council | 6.2.13: Employment and labour market • We are unclear what unemployment data has been used or what area is being referred to in 6.2.13? Is it the CDCZ? | The Socio-economic ES Chapter (Volume 2, Chapter 9) sets out clearly the study areas and baseline data sources for employment and labour market data. In each case, the most relevant source data for each spatial scale has been selected and presented. For employment rate, the following district areas are considered: Great Yarmouth, South Norfolk, East Suffolk, Mid Suffolk, Ipswich, Babergh. These are compared to wider scales such as Norfolk, Suffolk, East and England. |
| 192 | Main Development Site | Coastal Geomorphology | East Suffolk Council | 6.14.7 States that 'the landward extent for coastal hydrodynamics assessment is Mean High Water Spring (MHWS)'. This is a repeat of the 2014 text however it is not clear if this boundary is set at a present-day (date of ES) baseline or a potential future baseline based upon shoreline projection over the site life to decommissioning (2150?). The Councils consider it should be the latter i.e. to the date of decommissioning. This position is consistent with text in 5.1.2 and 5.1.3 of the May 2019 EIA report that requires the EIA to cover short, medium, and long-term effects and for a precautionary approach to be taken where insufficient information is available to make a reasonable judgement at this stage. This definition is essential to ensure that uncertainty over potential impacts of the Hard Coastal Defence Feature (HCDF) on coastal processes over the site life to decommissioning are properly considered by the ES including consideration of the emerging EDF Energy position that, in the long term, mitigation for the exposed sea defences may become unviable and be withdrawn. | The decommissioning of the proposed development is considered within Volume 2, Chapter 5 of the ES . This chapter also identifies that in order to decommission a nuclear reactor, it is necessary to obtain consent from the ONR and undertake an EIA under the Nuclear Reactors Environmental Impact Assessment for Decommissioning Regulations 1999 and Marine Works (Environmental Impact Assessment) Regulations 2007 or equivalent EIA Regulations at the time of submission. This would require the submission of an ES, and a period of public consultation prior to gaining approval for the commencement of decommissioning. Volume 2, Chapter 5 also provides a high level description of the potential effects of decommissioning on the marine environment. |
| 193 | Main Development Site | Coastal Geomorphology | East Suffolk Council | 6.14.33 States that 'The approach described in paragraph 7.13.37 of the 2014 EIA Scoping Report regarding the engineering design and proposed mitigation has been superseded and should be as follows: Mitigation would comprise, but not necessarily be limited to, the following measures:' and lists 5 points. The Councils suggest the following amended text as point 2: <i>A soft coastal defence feature made of beach grade sediments will be provided and maintained to provide extra material to the active beach face during large storms, thereby reducing any future erosion rate (current erosion rates are very low);</i> . | This point is noted. Details of the proposed coastal defence features are provided in Volume 2 Chapters 2 and 3 . The soft coastal defence system is described as an artificial linear dune / sacrificial berm comprising largely of shingle would extend along the frontage of the sea defences at a level on the shore above extreme high water-level spring tides and rising to a height of approximately 5m AOD. The function of this feature would be to erode and release sediment to the beach face during severe storms and high water levels, thereby slowing overall erosion rates locally and maintaining the protective shingle beach in front of the hard coastal defence feature. |
| 194 | Main Development Site | Coastal Geomorphology | East Suffolk Council | 6.14.32 States that 'The new hard coastal defence features could be exposed to the marine environment some decades into the future following recession of the shoreline and cessation of any mitigation. Exposure would be slower than naturally expected due to additional sediment provided by the naturally eroding soft coastal defence feature. Monitoring and additional mitigation may be considered to avoid the beach splitting in two and subsequent disruption to longshore shingle and sand transport.' The Council view is that this text does not properly represent the consequences of exposure of the HCDF. The Council suggests the following amendment: <i>The new hard coastal defence features is predicted to become exposed to the marine environment by ~2070 following recession of the shoreline. This is relatively early in the predicted asset life to full decommissioning of ~2150. Initial exposure would be slower than naturally expected due to additional sediment provided by the naturally eroding soft coastal defence feature. Monitoring and additional mitigation will be applied to manage the impact. Effective long-term mitigation of this forecast significant impact over the asset life is essential to avoid the beach splitting in two with subsequent disruption to longshore shingle and sand transport".</i> The Councils believe this text to better reflect the 2014 EIA Scoping Opinion Comment and EDF Energy response in item 3.109 on p.50 of Appendix 1C. | This point is noted. Details of the proposed coastal defence features are provided in Volume 2 Chapters 2 and 3 . The hard coastal defence is described as a permanent sea defence in the form of a landscaped embankment built seaward of the outer security fence for Sizewell C. The soft coastal defence system is described as an artificial linear dune / sacrificial berm comprising largely of shingle would extend along the frontage of the sea defences at a level on the shore above extreme high water-level spring tides. The function of this feature would be to erode and release sediment to the beach face during severe storms and high water levels, thereby slowing overall erosion rates locally and maintaining the protective shingle beach in front of the hard coastal defence feature. As described in Volume 2, Chapter 20 , a coastal processes monitoring and mitigation plan would set out the approach for monitoring impacts and effectiveness of these features, and would include monitoring of beach elevations, bar and shoreline movement using remote sensing techniques, including the monitoring of the performance of soft coastal defence feature to confirm when replenishment is required. |
| 195 | Main Development Site | Coastal Geomorphology | East Suffolk Council | 6.14.26 States that 'timescales are unchanged from those described in paragraph 17.13.25 of the 2014 EIA Scoping Report'. EIA 2014 17.13.25 text notes that timescale for effects on receptors '... might extend several years beyond impacts occurring and monitoring and mitigation may be applied to address these effects.' The Councils suggest that this understates the potential timescale, and this should state up to decades beyond impacts occurring. The key matter of concern is the impact of a block to natural sediment movement from an exposed HCDF could alter the natural (without development) evolution of adjacent coastlines for many years after until and beyond when the development is removed. | Volume 2, Chapter 20 considers potential impacts of an exposed HCDF during the approximate Expert Geomorphological Assessment timeframe of 2053 – 2087 |
| 196 | Main Development Site | Coastal Geomorphology | East Suffolk Council | 6.14.17 States that 'In addition to the legislation and policies concerned with coastal geomorphology and coastal process listed in paragraph 7.13.16 of the 2014 EIA Scoping Report, the latest Suffolk Shoreline Management Plan (SMP7) will also be considered.' It should be noted that the SMP is now 10 years old and that some data and assumptions may need updating. | This point is noted and has been considered in the preparation of the ES . However Suffolk Shoreline Management Plan (SMP7) still forms the latest plan and is referenced throughout the assessment presented in Volume 2, Chapter 20 . |
| 197 | Project-wide | Surface Water and Groundwater | East Suffolk Council | 6.13.b.ii – there is the existing Leiston Surface Water Management Plan (SWMP) that is available for the town of Leiston and this identifies a known surface water flood risk adjacent to the LEEIE site on Valley Road. This was not available at the time of the 2014 EIA Scoping Report. The Flood Risk Assessment (FRA) for the LEEIE must include an assessment of the information contained within the Leiston SWMP. | The Main Development Site Flood Risk Assessment (Doc Ref. 5.2) presents and assessment of flood risk associated with LEEIE. The main development site FRA identifies that the Leiston SWMP was published in 2017 and used a one-dimensional hydraulic model to obtain a more accurate assessment of flood risk for the town and surrounding area. The aim of the Plan was to identify areas at risk of surface water flooding and assist with the development of capital schemes in future studies. The FRA also identified that the Leiston SWMP identified six priority areas in Leiston based on historic flood records. |
| 198 | Project-wide | Air Quality | East Suffolk Council | 5.5.7 The potential infrastructure projects of East Anglia 1 North and East Anglia 2. In addition, the EIA application of Sizewell B needs to have a reasonable worst-case representation in the assessment of Sizewell C. For the phases of construction and operation that over-lap, the corresponding peak period traffic flows should be assessed. Justification should be provided for why the peak period traffic flows were not included in the air quality assessment. | The Sizewell B Relocated Facilities proposals are included within Volume 2, Chapters 2 to 4 . Each of the topic chapters present the assessment of Sizewell B Relocated Facilities in the context of the works proposed in the Sizewell C Project DCO application. Where there is the potential for the environmental effects described within the Sizewell B Relocated Facilities ES to alter as a result of the proposed Sizewell C Project proposals, these are detailed in the chapters. Cumulative traffic flows with other non-Sizewell C Project schemes have been assessed as part of the reference case for the assessment scenarios set out above, as this presents a worst-case scenario. Quantitative cumulative traffic flows include traffic associated with the Scottish Power Renewables East Anglia One North and East Anglia Two schemes and background growth associated with the future baseline, which is considered to account for the increase in traffic associated with all other cumulative schemes identified in Volume 10 of the ES . The construction of Scottish Power Renewables East Anglia One North and East Anglia Two schemes is assumed to be complete by the start of the operational stage of the main development site. As the Scottish Power Renewables East Anglia One North and East Anglia Two schemes are not considered to generate traffic during operation, no cumulative assessment has been undertaken with Scottish Power Renewables East Anglia One North and East Anglia Two during operation (refer to Volume 10 for further information). |
| 199 | Project-wide | Historic Environment | East Suffolk Council | 3.5-3.10 Archaeology must be factored in as the first stage of site preparation work for all scheme elements. | The archaeological works set out within the overarching WSI (Volume 2, Appendix 16H) which makes it clear that these works must be completed in advance of further construction activity. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|----------------------|----------------------|--|--|
| 200 | Project-wide | Historic Environment | East Suffolk Council | 3.4.11 Phase 1- Archaeology should be included in this list. | <p>To mitigate effects on known buried archaeology, an overarching WSI has been produced for the Sizewell C Project, detailed in Volume 2 Appendix 16H. Individual site WSIs produced to supplement this would be agreed with SCCAS. These site-specific WSIs would also set out requirements for further investigation of areas that could not be surveyed pre-consent, to allow for the agreement of finalised mitigation proposals. Individual site WSIs produced to supplement these would be agreed with SCCAS. Publication and popular dissemination of any key results would allow any informative and historic value to be fully realised, and details of this would be set out within the WSIs. These site-specific WSIs would also set out requirements for further investigation of areas that could not be surveyed pre-consent, to allow for the agreement of finalised mitigation proposals.</p> <p>Monitoring of the agreed programme of archaeological investigation would be carried out by SCCAS during the implementation of the scheme. The details of this monitoring would be set out within the individual site WSI to be agreed with SCCAS.</p> |
| 201 | Project-wide | Historic Environment | East Suffolk Council | <p>3.3.9 Sufficient time will need to be factored in for the completion of archaeological evaluation and mitigation work as part of this phase, especially in scheme critical areas, in order to prevent delays. As not all evaluation will have been completed by the time the EIA is submitted, mitigation requirements will be unknown in some proposal areas; therefore a cautionary worst case scenario approach will need to be factored in.</p> <p>3.3.15 Archaeological assessment and mitigation will need to be timetabled in ahead of all other site preparation works, apart from in areas where evaluation has been completed and no mitigation is required.</p> | <p>The potential for archaeological remains to be present and their relative significance has been addressed within individual chapters.</p> <p>An overarching archaeological written scheme of investigation (WSI) has been produced for the Sizewell C Project (Volume 2, Appendix 16H). Individual site WSIs produced to supplement these would be agreed with SCCAS. Publication and popular dissemination of any key results would allow any informative and historic value to be fully realised, and details of this would be set out within the WSIs. These site-specific WSIs would also set out requirements for further investigation of areas that could not be surveyed pre-consent, to allow for the agreement of finalised mitigation proposals.</p> <p>Monitoring of the agreed programme of archaeological investigation would be carried out by SCCAS during the implementation of the scheme. The details of this monitoring would be set out within the individual site WSI to be agreed with SCCAS.</p> |
| 202 | Project-wide | Historic Environment | East Suffolk Council | 3.3.16 Archaeological work as set out in the peat strategy will also be necessary as part of this stage of work. | A Peat Strategy (Volume 2, Appendix 16G), agreed with SCCAS and Historic England, sets out appropriate investigative techniques to allow loss of archaeological interest in the peats on the main platform site to be mitigated. A WSI setting out specific details of the methodology to be adopted would be agreed with SCCAS and Historic England once the earthworks contractor is appointed. |
| 203 | Project-wide | Historic Environment | East Suffolk Council | 3.14 (and more generally) Archaeological assessment and mitigation must be scoped in for any other mitigation work (flooding, landscape, ecology etc.) involving ground disturbance, therefore the potential impacts of any proposed works upon archaeology should be identified in the EIA. | The archaeological works set out within the overarching WSI (Volume 2, Appendix 16H) which makes it clear that these works must be completed in advance of further construction activity. |
| 204 | Project-wide | Air Quality | East Suffolk Council | <ul style="list-style-type: none"> In order to facilitate use of electric vehicles for workers and contractors, the Councils request provision of electric charge points at the main site, park and ride sites, accommodation campus and freight management centre. We request that HGVs contracted to work on the Sizewell C development are specified as minimum Euro VI (or have equivalent emissions), to ensure that the cleanest vehicles are being deployed. This will be particularly important if the road-led option is chosen. We request that buses used for Sizewell C are either electric or ultra-low emission vehicles, to minimise the air quality impacts of the bus fleet. | All HGVs contracted for the main development site will be Euro VI and the availability of local contractors to supply a low emission bus fleet will be explored. In terms of EV charging points provision will be made at the main development site during construction. |
| 205 | Project-wide | Historic Environment | East Suffolk Council | 9.30 – language is finally mapped – low or medium = less than substantial, high = substantial – unsure what the phrase 'however special consideration needs to be given to the particular context in which the assessment is taking place' means? Surely the 'context' is covered in the assessment? Also NDHAs 'of equivalent heritage significance' to designated assets – if they were of equivalent significance they would be listed or put forward for listing, all NDHAs should be considered. | The assessment criteria is defined within the Terrestrial Historic Environment Assessment Methodology (Volume 1, Appendix 6L). A statement of whether harm to significance would arise is made in each Terrestrial Historic Environment assessment within Volumes 2 to 9 of the ES . It is noted that while listing is a mandatory designation, scheduling is not mandatory, and NPS EN-1 explicitly makes provision for non-designated heritage assets that may be considered of equivalent significance to scheduled monuments (NPS EN-1 5.8.4). |
| 206 | Green Rail Route | Noise & Vibration | East Suffolk Council | Where noise or vibration from rail movements on the existing branch line or new section of track is projected or anticipated to have adverse impact on occupiers of nearby residential properties, based on the prevailing background noise and vibration levels the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where no mitigation is feasible details of a compensation scheme should be indicated. | Volume 9, Chapter 4 identifies the likely significant effects associated with the operation (during both early years and peak years) of the rail proposals including the movement of freight vehicles along the East Suffolk Line between Westerfield junction. The chapter also identifies that Noise Mitigation Scheme (Volume 2 Appendix 11H) is proposed as part of the DCO Section 106 obligations, so that noise insulation or temporary rehousing may be provided where specified noise criteria are exceeded. In addition, SZC Co. would develop a Rail Noise Mitigation Strategy in consultation with Network Rail and the rail freight operator, informed by the further detailed assessments, to establish the package of measures to be implemented to mitigate noise impacts on the Saxmundham to Leiston branch line and the East Suffolk line. |
| 207 | Main Development Site | Landscape & Visual | East Suffolk Council | The applicant should assess whether visible water vapour plumes could occur, and if so, should assess their potential effects on (for example) visual amenity and road safety. Visible plumes should be taken into account in the landscape and visual assessment. | As described in Volume 2, Chapter 4 , there are no stacks within the main development site that emit a visible plume with the following exceptions: back-up diesel generators may emit a short duration of smoke upon start-up; and steam may occasionally be emitted through a silencer should a relief valve operate, which should rapidly diffuse. The are not considered within the landscape and visual assessment presented in Volume 2, Chapter 13 because any visible emissions would be intermittent and for a short duration and would diffuse rapidly. |
| 208 | Project-wide | Socio-economics | East Suffolk Council | <p>It is also understood that the health and wellbeing chapter will be one of the last to be completed due to the sensitive interaction(s) with multiple other elements contained within the EIA which it will need to draw on (i.e. Air Quality, socio-economics, recreation, amenities). This means that the Councils will not be able to consult on the health and wellbeing chapter directly prior to the DCO application being submitted.</p> <p>For this reason it is acknowledged that a full and robust engagement is needed between all health stakeholders throughout the process.</p> | SZC Co. has regularly engaged with health stakeholders throughout the consultation, scoping, assessment and development of mitigation stages of this Project. This is reflected in the Health and Wellbeing Chapter of the ES (Volume 2, Chapter 28) . A summary of the consultation undertaken as part of the health and wellbeing assessment is presented in Volume 1, Appendix 6Y . |
| 209 | Project-wide | Health and Wellbeing | East Suffolk Council | In section 6.22.45 the potential mitigation should consider each healthcare element, as such the statement should reflect the following. Mitigation will be sought to limit the impact on Primary Care (GPs, dentists, pharmacy, opticians, GP Out of Hours and 111), Emergency and Acute Care (Hospital in/outpatient and ambulance) Community Care and Mental Health provisions | Within Volume 2, Chapter 28 , an appropriate scope and focus has been applied to investigate potential health care demand directly attributable to the non home-based staff, and net additional dependants. |
| 210 | Project-wide | Health and Wellbeing | East Suffolk Council | In section 6.22.30 the residual impact on healthcare capacity should draw on additional information such as the NHS GP Five Year Forward View and the Long Term Plan, in addition to the Accommodation Strategy and Occupational Health Care provision. These additional documents detail requirements regarding healthcare capacity and the population healthcare workforce requirements. This section should also draw on national statistics that review the prevalence of particular health conditions for the anticipated construction workforce, for example cardiovascular conditions. | The health baseline set out within Volume 2, Chapter 28 has applied available information to set local health and health care context into circumstance. Due to challenges and uncertainties associated with future health care planning, a precautionary approach has been applied when setting significance, where all public health facilities and amenities are considered high value and sensitive to change. |
| 211 | Project-wide | Health and Wellbeing | East Suffolk Council | In section 6.22.23 (and Table 6.47) - the Source-Pathway-Receptor model is proposed. We would like to discuss this within the Health Working group to ensure that the model considers aggregated and cumulative effects on health as well as the wider determinants of health. | Discussions on the Source-Pathway-Receptor model were held as part of the Sizewell Health Working Group. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|-------------------------------------|----------------------|---|--|
| 212 | Project-wide | Socio-economics | East Suffolk Council | In section 6.2 – we acknowledge the additional work undertaken in the establishment of the socio-economic factors that have been undertaken since the 2014 report, however some of the data on housing market capacity is based on 2011 census data where we would have liked to see more up to date information to help inform the assumptions. We would welcome to opportunity to work with EDF Energy on this further. | SZC Co. has worked closely with ESC Housing Officers to understand the potential for more recent, locally-specific data and this has been incorporated into the assessments within Chapter 9, Volume 2 of the ES (Socio-economics) and the Accommodation Strategy. In some instances, 2011 Census data is the most robust, local-scale data. Where this is the case this has been highlighted and caveats provided on potential changes since then - particularly in the private rented sector. |
| 213 | Project-wide | Socio-economics | East Suffolk Council | In section 6.19.57 is the only reference to a Community Safety Management Plan (CSMP) within the report. We would expect that the CSMP would look to consider the impacts to the community around the proposed development and would include appropriate mitigation where a design out option is not possible. CSMP to include as many elements of community safety as is needed including but not limited to, social integration and community engagement projects. It should also look at the ways it will work with other agencies such as Suffolk Police to look at impacts and possible increases in crimes, for example, domestic violence, anti-social behaviours, spread of county lines and the "night-time economy", and looking at the impact of local employers struggling to fill vacancies caused by existing staff being recruited. The Councils would welcome further engagement in the development of the CSMP with EDF Energy through various events and meetings to look at ways to plan out potential issues and look at mitigation measures that might be required for those that cannot be resolved or which arise once construction starts. | SZC Co., Local Authorities and Emergency Services have since worked closely to develop a Community Safety Management Plan which has been submitted as part of the DCO Application. This includes measures embedded into the Project, reference to subsequent additional financial mitigation secured through a Section 106 Agreement, and a governance, reporting and monitoring process (via a Community Safety Working Group) to manage effects that arise during the construction phase. |
| 214 | Project-wide | Noise & Vibration | East Suffolk Council | All site transportation movements or essential construction works (e.g. dewatering, dredging, beach landing facility etc.) which may be adversely affect nearby noise sensitive properties during the evening or at night should be particularly highlighted as these may cause sleep loss. Mitigation or compensation will be particularly important in these circumstances. | Activities with the potential to result in sleep loss are considered within the noise and vibration assessment presented within Chapter 11 of Volume 2 and Chapter 4 of Volumes 3 to 9 of the ES . |
| 215 | Project-wide | Transport | East Suffolk Council | A sustainable travel plan has previously been presented for the construction workforce together with estimated geographical distribution maps of the home-based and non home-based workforce. Considered should also be given to linking the park and ride schemes with existing services to provide a network of access for commuters into some of the local towns and shopping centres. | The draft Construction Worker Travel Plan (Doc Ref. 8.8) contains the measures which would 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. These measures are designed to deliver confidence that the bus-based approach would be effectively delivered and that the impacts on the local transport network would be managed and mitigated as set out in the Transport Assessment (Doc Ref. 8.5). |
| 216 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7 c) ii. Updates to baseline (paragraph 6.7.8) – Paragraph 6.7.8 states that, with two exceptions, the ecological baseline for the main development site remains the same as described in the 2014 EIA Scoping Report (paragraph 7.2.6 to 7.2.10). However, this does not recognise the comments made by the Councils on the 2014 report, particularly in relation to the errors it contained or ecological receptors which were omitted. It must be ensured that the ecological baseline presented in the ES is accurate and takes account of all of the available relevant information and comments provided by consultees. In addition, the created habitat at Aldhurst Farm is not going to be able to compensate on the massive scale required to mitigate impacts of the project. One concern is that the public access to Aldhurst Farm would be too disturbing for many species; use of this site for mitigation has not been agreed by the key stakeholders. | The ecological baseline for the main development site is described within Volume 2, Chapter 14 and is supported by relevant information as provided in Volume 2, Appendices 14A and 14B (including all Annexes). Aldhurst Farm has been developed for the twin uses of compensatory habitat creation and access for recreation use. The translocation of reptiles and water voles to this area is compatible with the approach the recreation which has been developed. |
| 217 | Project-wide | Terrestrial Ecology and Ornithology | East Suffolk Council | 6.7 b) ii. Survey and Assessment (paragraphs 6.7.4 and 6.7.5) – Although it is acknowledged that a number of additional ecological surveys have been undertaken since the time of the 2014 EIA Scoping Opinion, many of these are now four or five years old (and will be even older by the time that the Environmental Statement (ES) is written/DCO submitted). Robust justification will therefore be required to demonstrate that the survey data used to underpin the assessments presented in the ES is fit for purpose and doesn't require further updating. | For the main development site, the northern park and ride site, the southern park and ride site, and the green rail route: The ecological survey work completed has provided a thorough understanding of the existing baseline and demonstrated that the ecological habitats within the site and the surrounding area are stable with little change observed over the past 12 years of surveying. Site visits were also conducted by qualified ecologists in 2018 and 2019, which further confirmed that the habitats at the site and in the surrounding area have not materially changed since these surveys were undertaken. Therefore, it is considered that sufficient survey data exists to characterise the ecological baseline of the site and the Zol of the proposed development, and that no additional ecological surveys are required to inform the EIA. It is not the case, nor is it in any way appropriate or necessary, for surveys undertaken at an early stage of a project to be repeated simply because they have reached a certain age, especially if the surveys subsequently carried out have been as comprehensive as they have been for Sizewell. It is our professional judgement that this work allows a robust understanding of the ecological situation and the use of the landscape. For all other associated development sites, relevant baseline surveys were conducted in 2019 to support the ES . |
| 218 | Project-wide | Socio-economics | East Suffolk Council | 6.2.10: Population/Demography • It is unclear why the baseline used for working-age populations has only included the areas of Suffolk Coastal, Waveney, Ipswich and Mid Suffolk? • As well as increases in working age population, there will also be increases for those of pensionable ag. Has pension age increases been considered as part of the assumption that working age population will stay broadly the same? | The Socio-economic ES Chapter (Volume 2, Chapter 9) sets out clearly the study areas and baseline data sources for employment and labour market data. The spatial extent of the study area includes the main development site, all off-site associated development sites and the surrounding area as well as administrative geography defined by each socio-economic topic. The precise areas used are partly influenced by data availability and in some cases also reflect the boundaries of relevant service planning areas. Socio-economic effects are primarily related to the size, characteristics, and distribution of the construction workforce and whether that workforce is home-based or non-home-based. As such, there are two ward-based assessment scales regularly used in this assessment. These are based on the Gravity Model, which includes inputs from the socio-economic assessments on the workforce profile, skills profile of the resident workforce, and accommodation location and availability. It then, based on travel times, allocates the expected distribution of the construction workforce across defined travel areas: • 60-minute travel time: This is a collection of wards within a defined 60-minute travel area from the main development site. It represents the estimated extent of daily travel to the construction site by NHB workers. • Construction Daily Commuting Zone: The CDCZ is defined as the wards within an approximately 90-minute commute time of the main development site. The CDCZ is used primarily to define the local (HB) labour market for the construction phase. The definition of the CDCZ involves consideration of a range of factors which affect workers' willingness to commute, including time, distance, and travel allowances; plus findings from other studies of the mobility of UK construction workers. Where data is not available at the ward-scale, best-fit local authority boundaries have been used. |
| 219 | Main Development Site | Coastal Geomorphology | East Suffolk Council | 6.14.24 Potential Impacts and effects. 7.13.23 of the 2014 EIA had two more bullets, as follows, that are removed in the 2019 update: • 'Construction and operation of flood defence and coastal protection measures'. The Councils strongly suggest that this item should be reinstated for reasons given in the Council response to item 6.14.7. • 'Construction and operation of a jetty for the import/export of materials and AILs'. The Councils accept that this relates to the temporary jetty which is now removed from the design with a caveat that the Councils have yet to receive the full justification for the abandonment of the marine led proposal. | This point is noted, the coastal geomorphology and hydrodynamics assessment presented in Volume 2 Chapter 20 considers all of elements of the proposed development (as necessary), including the coastal protection measures and the beach landing facility. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|-------------------------------------|--------------------|--|--|
| 220 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | Would the captured and treated water be discharged to sea or to a watercourse on site? The design of any SUDS features in relation to highways drainage and surface water drainage from the main development or associated development should maximise the benefits to biodiversity from these features by creating ponds with gentle sloping sides that have pooled areas to retain water through periods of dry weather with appropriately planted edges. Consideration of how this can be achieved should form part of the EIA. | <p>An Outline Drainage Strategy (Volume 2, Appendix 2A) has been prepared and submitted with the application for development consent, which provides details of the surface water management measures that will be implemented at each site.</p> <p>The Outline Drainage Strategy has been developed in such a way that it will not adversely affect the hydraulic performance of the existing environment, nor will it materially affect overland flow paths and will protect areas of Sizewell Marshes Site of Special Scientific Interest (SSSI) and other sensitive receptors. The overarching surface water drainage strategy will follow conventional Sustainable Drainage (SuDS) steps / hierarchy presented below, moving from each stage to the next only when the current stage is deemed not practicable within the Sizewell C Project:</p> <ul style="list-style-type: none"> • store rainwater for later use (e.g. rainwater harvesting); • use infiltration techniques (e.g. porous surfaces, swales, trenches); • attenuate rainwater in basins or open water features for gradual release; • attenuate rainwater by storing in tanks for gradual release through an outlet; and • discharge rainwater direct into watercourse or sea. <p>A description of the anticipated surface water drainage features included at each site, during both construction and operation, are included within the descriptions of development provided within Volume 2, Chapters 2 to 4 and Volumes 3 to 9, Chapter 2.</p> |
| 221 | Project-Wide | Air Quality | Environment Agency | We wish to draw the applicant's attention to the change in the Environment Agency's Regulatory Guidance Note 2 (RGN2) which has removed the deminis rule for aggregation of combustion plant and further, removes the exclusion of temporary plant. As a result all combustion plant, inclusive of those used during the construction phase may now require a permit under the Environmental Permitting (England and Wales) Regulations 2018 (EPR) (as amended) as a Section 1.1 Combustion Activity (i.e. combustion plant that aggregate to over 50 MW). This alteration requires consideration in the Environmental Statement (ES) where potential impacts from construction require quantification through modelling and the implementation of appropriate abatement strategies. Such strategies may include early installation of a 12V electrical ring main. | <p>The use of combustion plant during the construction phase would be controlled via the Code of Construction Practice (Doc Ref. 8.11). The use of mobile power plant including diesel or petrol powered mobile plant would be avoided where practicable and then limited to temporary functions (less than 6 months) and non-distribution functions in accordance with Environment Agency Regulatory Guidance Note 2 and the Medium Combustion Plant Directive.</p> <p>The use of temporary stationary generators would be avoided where practicable and power would be provided by the construction electricity supply for the main development site (Volume 2, Chapter 3). Stationary generators where used would be controlled through an environmental permit, if applicable, to be issued by the appropriate regulatory authority, and in accordance with the requirements of the Medium Combustion Plant Directive, or the Industrial Emissions Directive as appropriate. It is envisaged that temporary generators would largely be controlled through Standard Rules permits that do not require bespoke air impact assessments. Impacts from larger combustion plant are quantitatively assessed within the Air Quality assessment presented in Volume 2 of the ES, including the proposed Campus combined heat and power plant (Volume 2, Chapter 12). No effects have been identified for the associated development sites, based on the limited scale and use of temporary plant within these sites.</p> |
| 222 | Project-Wide | Flood Risk | Environment Agency | We are pleased to note that the Scoping Report now includes flood risk as a separate issue with greater detail on fluvial and tidal flood risk. We note a Flood Risk Assessment (FRA) will be undertaken for sites that fall within Flood Zone 3. This will consider all sources of flooding for both on site and off site flood risk over the lifetime of the development (section 6.13.7). The updated EIA scoping also references that assessment will be undertaken for actual and residual flood risk such as breach and overtopping of the mitigation mechanism/defences. It is understood an FRA will be undertaken for each site. Section 6.13.2 states that the ES will contain a summary of the FRA in the groundwater and surface water chapters, but the FRA should also be used to inform the Flood Risk section. | <p>Consideration is given to all forms of flooding within the Flood Risk Assessments (Doc Ref. 5.02 to 5.09). The Environment Agency has been issued a draft of the Flood Risk Assessments for the main development site, Sizewell link road site and two village bypass site prior to submission of the DCO for comments.</p> <p>A summary of the Flood Risk Assessment is provided within the Groundwater and Surface Water assessments presented within Volumes 2 to 9 of the ES.</p> |
| 223 | Project-Wide | Waste Management | Environment Agency | We are engaging with EDF Energy regarding the production of their Waste Management Strategy, and the Scoping Report reflects the requirements that we would expect to be included in the ES. | SZC Co has undertaken formal and informal consultation on the assessment of material demand and conventional waste, as well as in the production of the waste management strategy. A summary of the general comments raised and SZC Co's responses are provided in Volume 1, Appendix 6D . |
| 224 | Project-Wide | Flood Risk | Environment Agency | We agree with Table 6.19 which details the sites that are at risk of flooding and which Flood Zones they fall within. However as noted in our response to the Stage 3 consultation we note the Yoxford roundabout site boundary abuts onto the Minsmere River which is designated a main river. There is therefore potential to impact the main river and a flood risk activity permit may be required depending on what the work entails. Some of the sites that fall under the minor rail and road improvements are also near to main rivers or areas of flood risk. It is noted these are described as minor works but it is not clear what the works will entail and if they will impact the main river or require a permit. Please see the flood risk activity permit section below for further advice. | A flood risk assessment has been prepared for the proposed Yoxford roundabout and other highway improvements site, and is provided at Doc Ref. 5.7. The Environment Agency has been issued a draft of the Flood Risk Assessments prior to submission of the DCO for comments. |
| 225 | Project-Wide | Marine Ecology | Environment Agency | We advise that the Countryside Rights of Way (CRoW) Act is not referenced in the Scoping Report as legislation that needs to be considered. Many SSIs are included within SAC/SPA boundaries and impacts will be assessed under HRA legislation, but this is not the case for all SSIs within the SZC zone of impact. Those outside of SAC/SPA boundaries will need to be assessed under the CRoW Act. Without acknowledging CRoW there is a risk that the information will not be supplied in the ES that we will need to assess permit applications with regard to potential for damage to SSIs. | The marine ecology assessment presented in Volume 2, Chapter 22 references the CRoW act and the provisions that are made. Volume 2, Chapter 22 provides a summary table explaining where the assessment of statutory and non-statutory designated sites with marine features is considered within the ES . This includes cross reference to Volume 2 Chapter 14 and Chapter 20 of the ES as well as the Shadow HRA Report (Doc Ref. 5.10) |
| 226 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | Under part 4 of Eels Regulations 2009 the following requirements exist: - The requirement to notify the Environment Agency of the construction, alteration or maintenance of any structure likely to affect the passage of eels -Where any such structure exists, the requirement to construct and operate an eel pass to allow the free passage of eels - The removal of any obstruction, if deemed necessary | An Eels regulation compliance assessment has been undertaken and is included within Volume 2, Appendix 22O . This Eels Regulations Compliance Assessment ensures the Eels Regulations have been fully considered for Sizewell C regarding the protection and safe passage of the European eel and their life cycle. |
| 227 | Project-Wide | Radiological Assessment | Environment Agency | This section of the Scoping Report is brief, and notably contains less technical detail than the 2014 Scoping Report. It is unclear whether this is because the 2014 Report remains valid and will be included when preparing the ES, or whether the robustness of the proposed radiological assessment has intentionally been reduced. The radiological assessment has been scoped in, and we expect the ES to cover this topic in a comprehensive manner. We welcome reference to the inclusion of the final radiological impact assessment results in the ES. | Volume 2, Chapter 25 presents an assessment of the potential radiological effects arising from the construction and operation Sizewell. In addition to the assessment of radiological impacts on human and non-human species, the chapter also includes the assessment of the radiological impacts associated with the transport of radioactive waste from the proposed development during the operational period. A construction related dredging assessment has also been completed. |
| 228 | Project-Wide | Groundwater and Surface Water | Environment Agency | There appears to be an assumption that additional monitoring, incorporated into the model, has resulted in a 'fit for purpose' calibrated model which can be used to assess groundwater and surface water impacts associated with construction. However, agreement of whether or not the model is 'fit for purpose' has not yet been concluded. | Following the EIA Scoping Report, the Environment Agency has been consulted on the approach to the numerical model used for the purposes of assessing impacts on ground and surface water. The Environment Agency confirmed on 11th October 2019 that the numerical model used in the assessment is fit for purpose. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|-------------------------------------|--------------------|---|--|
| 229 | Project-Wide | Water Quality | Environment Agency | The Secretary of State advised in their 2014 Scoping Opinion that the ES must detail the proposed foul water management strategy. The 2019 Scoping Report does not indicate that this approach will be taken, and the response given states that the management of foul water will form part of the outline Drainage Strategy which will accompany the ES. The Drainage Strategy should address the construction and operational phases of development for the main site and where applicable associated development sites. There are a number of potential options for disposing of foul water which will require detailed consideration and consultation with relevant organisations, including the Environment Agency. The potential impacts associated with each option will need to be assessed and therefore we maintain our view that this needs to be scoped into the ES. | The Outline Drainage Strategy (included at Volume 2, Appendix 2A) describes the proposed management of foul water, including treatment to an appropriate standard to discharge. |
| 230 | Project-Wide | Flood Risk | Environment Agency | The FRA will consider flood risk during construction and operation of Sizewell C. It is understood that a separate planning application will be required for the decommissioning phase of development. Section 6.13.27 details the potential mitigation that may be required as a result of the flood risk impacts arising from the proposed development, such as compensatory flood storage. It is possible that other mitigation may need to be considered depending on the flood risk impacts shown by the flood modelling for both fluvial and tidal flood risk. It is not limited to compensatory storage. | A Flood Risk Assessment has been prepared for the main development site (Doc Ref. 5.2) and for each of the associated development sites (Doc Ref. 5.3 to 5.10). The FRAs consider the construction, operation and removal and reinstatement phases (where necessary) of the associated development site and the construction, operation and decommissioning of the main development site. These assessments have been informed by the Outline Drainage Strategy included as Volume 2, Appendix 2A . A summary of the surface water drainage features that have been incorporated into design are included within the relevant description of development provided as Chapter 2 to 4 of Volume 2 and Chapter 2 of Volumes 3 to 9 of the ES . As identified within this comment the decommissioning phase of the Sizewell C power station would be covered by a separate planning application which would require an Environmental Impact Assessment, however, a high level summary of the potential effects of decommissioning are included within Chapter 5 of Volume 2 of the ES . This includes the consideration of surface water effects. In addition, the main development site FRA (Doc Ref. 5.2) considers the decommissioning phase. |
| 231 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | The ES should identify opportunities for net biodiversity gain which can be implemented as part of the overall development. | A biodiversity net gain assessment has been undertaken for the permanent development sites and is provided in Volume 2, Annex 14E , and Annex 7A.4 of Volumes 5 to 7 . |
| 232 | Project-Wide | Flood Risk | Environment Agency | The approach to considering climate change has been identified in section 6.13.19 and 6.13.20. We note this has identified the latest climate change guidance available including UKCP18. We are also pleased to note that the latest flood mapping and modelling available has been referred to including the new Essex Norfolk and Suffolk Coast Model completed in 2018. | We confirm that the approach to considering climate change considers the latest climate change guidance available including UKCP18 and the latest flood mapping and modelling including the Essex Norfolk and Suffolk Coast Model completed in 2018. |
| 233 | Project-Wide | Marine Ecology | Environment Agency | The 2014 Scoping Report includes reference to low velocity side entry (LVSE) intakes, fish recovery and return (FRR) and acoustic fish deterrent (AFD) as mitigation measures. These measures are not included in the 2019 Scoping Report. It is therefore unclear whether this mitigation is still proposed and section 6.16.3 does not include reference to a change in approach if they are no longer proposed. Section 6.16.46 refers to the need for impingement assessments. Impinged and entrained organisms must be considered to be two parts of one whole, which is entrapment. Biomass and abundance of loss to a population must be considered together. Otherwise there is the potential to underestimate the loss and the full impact of entrapment will not be understood. We advise that a complete entrapment assessment should be undertaken to inform the ES. | Two fish recovery and return (FRR) tunnels would be constructed, one for each reactor, as described in Volume 2, Chapter 2 . The FRR tunnels comprise the following features: <ul style="list-style-type: none"> • construction of subterranean tunnels connecting the outfalls to the main development site, which would have no impact for coastal geomorphology; • provision of small outfall heads (≤3 x 3 m) and their siting on the deeper seaward flank of the outer longshore bar to minimise impact on sediment transport or bar morphology. The marine ecology and fisheries chapter presented in Volume 2, Chapter 22 presents the assessment of effects, with further detail on the impingement assessments being provided in Volume 2, Appendix 22I . |
| 234 | Project-Wide | Radiological Assessment | Environment Agency | Section 6.18.3 discusses the work undertaken to date, and makes reference to data such as Habitat Surveys in addition to the preliminary radiological impact assessment. Habitat Surveys and Habits Surveys are two separate matters which can easily be confused with each other due to their similar names. In this instance it is likely that Habits Surveys are being referred to and care must be taken in the preparation of the ES to avoid this error to ensure the technical credibility of the report. | This point is noted and has been considered in the preparation of the ES . |
| 235 | Project-Wide | Marine Ecology | Environment Agency | Section 6.16.58 states that the scale of assessment of cumulative ecological impacts will vary dependent upon the scale of movement of the receptor organism, giving the example of harbour porpoise being assessed at the scale of the Southern North Sea SAC. We welcome this change in approach from the 2014 Scoping Report which proposed to assess cumulative ecological impacts within a 20km radius of the DCO boundary. | The assessment of cumulative effects on marine ecology is presented within Volume 10, Chapter 4 and Volume 10, Appendix 4C . |
| 236 | Project-Wide | Marine Water and Sediment Quality | Environment Agency | Section 6.15.24 refers to the discharge of groundwater and treated sewage effluent during the construction period. However, it is unclear what will happen to site drainage and other effluents prior to completion of the Combined Drainage Outfall (CDO), or what the impact of these effluents will be on the environment. We advise that a separate assessment will be required for any discharges made prior to the completion of the CDO. | Volume 2, Chapter 21 clarifies that the Combined Drainage Outfall would be constructed early in the construction phase and act as the construction site discharge outfall. Prior to completion of the Combined Drainage Outfall, station effluents would be reused where possible or tankered offsite for managed disposal. |
| 237 | Project-Wide | Groundwater and Surface Water | Environment Agency | Section 6.12.9 States that all monitoring data has been completed with respect to surface and groundwater baseline conditions. However, the EA are aware that EDF have not finished baseline assessment and intend to undertake further groundwater tests. It would seem sensible to include details of those ongoing tests within the EIA. Dewatering is now a licensable activity under the Water Abstraction and Impounding (Exemptions) Regulations 2017. The ES should seek to identify impacts associated with dewatering and whether the activity is exempt or requires permits for abstraction and/or discharge; these concerns should be fully addressed. | A cut-off point has been identified to allow granting of the EIA. The data collected prior to this point has been collated and has been submitted as an appendix to Volume 2, Chapter 19 Groundwater and Surface Water. The EIA has considered the potential impacts associated with dewatering and has proposed measures either through management activities or embedded into the design to minimise impacts associated with dewatering as appropriate. Discussions held with the Environment Agency about application for appropriate permissions (including an abstraction licence) for the dewatering works. |
| 238 | Project-Wide | Flood Risk | Environment Agency | Our previous response to the 2014 EIA Scoping refers to Flood Defence Consents (FDC's). FDC's now fall under the Environmental Permitting (England and Wales) Regulations 2016. Under these regulations the applicant may need an environmental permit for flood risk activities rather than a flood defence consent. A flood risk activity permit may be required for work in, under, over or within 8 metres of a fluvial main river, flood defence structure or culvert or within 16m of a tidal main river, flood defence structure or culvert. A permit may also be required for works beyond 8 or 16 meters which are on a floodplain, if the activity is likely to divert or obstruct flood water, damage river control works or affect drainage. Please note this is a separate permission to any planning permission. | SZC Co. will apply for all necessary permits and consents. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|-------------------------------------|--------------------|--|--|
| 239 | Project-Wide | Groundwater and Surface Water | Environment Agency | <p>No consideration has been given to the assessment of the requirement of new water resource. Our comments submitted in response to the previous 2014 Scoping Opinion are unchanged and have yet to be considered fully.</p> <p>There is no clear indication of how water will be sourced - either for construction, or operation. The availability of water resources is an important consideration for the proposed development. We will have to agree to the water supply strategy, which will be presented alongside the ES. We refer the applicant to our earlier general comments on water resources made in 2014.</p> <p>The infrastructure associated with construction (for example concrete batching plants) will require significant volumes of water. Furthermore, there is no indication of how water will be sourced for the large number of workers who would be resident on the accommodation campus. There will presumably also be a potable water supply requirement for the operational power station. Given the local environmental setting, and the scarcity of water resources in Eastern England, this is an important consideration and may directly affect design proposals. It is therefore our view that the issue of water resources must be scoped into the EIA.</p> <p>Any effect of a proposed abstraction on licenced and unlicensed abstractions and the environment should be considered. Further, any additional groundwater abstraction needs to be considered against the local Water Framework Directive (WFD) status of both groundwater and surface water. No new abstraction will be permitted from non-compliant WFD bodies and no new resource will be permitted if it is shown that it will result in deterioration of WFD status of a groundwater or surface water body. We recommend these points are addressed as soon as possible given the scarcity of water resources in the vicinity of Sizewell C and the potential restrictions which may occur.</p> | Consultation has been undertaken with stakeholders, including public water supply companies and the Environment Agency, to establish a robust supply strategy. This includes an assessment of potential environmental impacts and associated mitigation measures. |
| 240 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | More detail of the proposed work and mitigation is requested to be able to assess the effectiveness of these mitigation measures for legally protected species. | SZC Co. will consult with Natural England on the requirement for protected species licences. Draft mitigation strategies and method statements have been submitted with the application. |
| 241 | Project-Wide | Major Accidents and Disasters | Environment Agency | It is noted that this section has been included as required following the amendments in the EIA regulations in 2017 and therefore this was not included in 2014 Scoping Report. We welcome its inclusion and consideration within the ES and we are further pleased to see the extent of legislation that will be considered in the preparation of this chapter. We also commend the applicant in their intention to undertake an engagement strategy which includes relevant local authorities as part of the development of this chapter. We would also encourage the applicant to consider incidents and accidents at relevant facilities that have occurred both in the UK and abroad (as required by the control of major accident hazard regulations 2015) to ensure that lessons learned are incorporated. | <p>Consultation and engagement with statutory consultees as informed the scope of the major accidents and disasters assessment. A summary of the general comments raised and SZC Co's responses is provided in Volume 1, Appendix 6X.</p> <p>The Major Accidents and Disasters Assessment (Volume 2, Chapter 27) identified resources that have been used to inform the assessment. This includes the consideration of available records of other accidents and incidents.</p> |
| 242 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | It is important to ensure that the receptor sites created cater for all life stages of all the species that will be relocated to them, and that opportunities for net biodiversity gain are incorporated into their design. Pond features should be included in all relocation sites for this reason. | Noted. The approach to relocation, where relevant, is set out in the ecology mitigation strategies appended to the relevant ES volume. A biodiversity net gain assessment has been undertaken for the permanent development sites and is provided in Volume 2, Annex 14E, and Annex 7A.4 of Volumes 5 to 7 . |
| 243 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | <p>In table 7.2.1 as listed in the 2014 Scoping Report no mention is given to fresh water ecology as an ecological resource and study area. Due to the potential impacts on protected species on several watercourses both on the main development site and associated development sites the following study areas should be included: freshwater fish, freshwater invertebrates, and freshwater plant communities.</p> <p>Baseline surveys should be undertaken at all sites where construction on or near, or modification of watercourses will take place. Appropriate fishery surveys should be undertaken to assess for the presence of eels (<i>Anguilla anguilla</i>) which are protected under the Eels Regulations 2009 and are a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006. Appropriate macrophyte surveys should be undertaken to check for the presence of greater water parsnip (<i>Sium latifolium</i>) which is a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006 and listed as a red list GB endangered species. A record of presence exists for greater water parsnip on Sizewell Marshes. Aquatic invertebrate surveys should be undertaken to assess the presence of mud pond snail (<i>Omphiscola glabra</i>) which is a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006 and has accepted records of presence in Suffolk both to the north and south of Sizewell. Surveys should also be undertaken for Desmoulin's whorl snail (<i>Vertigo moulinsiana</i>) which is a wetland dependant snail listed as a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006 and an annex II species under the Habitats Directive. Accepted records of presence in Suffolk both to the north and south of Sizewell exist for this species</p> | Where relevant, fish, invertebrates, and aquatic vegetation are considered within the Terrestrial Ecology and Ornithology assessments for the main development site only (Volume 2, Chapter 14). |
| 244 | Project-Wide | Marine Water and Sediment Quality | Environment Agency | In response to the 2014 Scoping Report we advised that the impacts from Sizewell C needs to be assessed with Sizewell B in operation as the overlap in operation is potentially significant. No response has been provided for this comment, and section 6.15.4 does not clearly state the baselines to be considered. | <p>The Sizewell B Relocated Facilities proposals are included within Volume 2, Chapters 2 to 4. Each of the topic chapters present the assessment of Sizewell B Relocated Facilities in the context of the works proposed in the Sizewell C Project DCO application. Where there is the potential for the environmental effects described within the Sizewell B Relocated Facilities ES to alter as a result of the proposed Sizewell C Project proposals, these are detailed in the chapters.</p> <p>The ES for the Sizewell B Relocated Facilities is included within the ES as Volume 1, Appendix 2A.</p> |
| 245 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | Further surveys are required to assess the impacts to habitat features of interest at the proposed associated development sites as insufficient evidence has been supplied to assume no significant effects at this point. | A suite of ecological surveys have been undertaken to establish the baseline across the proposed development sites. A summary of the baseline surveys undertaken is provided within the Terrestrial Ecology and Ornithology ES chapter (Volume 2, Chapter 14 and Chapter 7 of Volumes 3 to 9), with further details provided in the accompanying appendices which includes details on the location, timings and findings of the surveys. |
| 246 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | <p>Detailed information is requested on all proposed crossing options to date for all watercourses affected, both on the main development site and associated off-site development sites. We generally oppose the culverting of watercourses and viaducts/open span bridges should be the default choice where new or replacement watercourse crossings are required. Culverting watercourses should be avoided unless no reasonably practical alternative is available. The cumulative effects to the connectivity of habitats cannot be accurately assessed without knowledge of the impacts of crossings on the surrounding watercourses.</p> <p>It is important that the crossing of all watercourse considers the need for this mitigation measure to allow the free passage of otters and water voles at any time of the year and to not impede the passage of eels and freshwater fish.</p> | <p>SZC Co has undertaken formal and informal consultation with the Environment Agency on the proposed development sites, including the design of the watercourse crossings. The design of the proposed watercourse crossings have evolved as part of the design development process, with consideration of the comments raised through this engagement.</p> <p>The design of or measures included within any culvert structures for watercourse crossings would protect maintain connectivity, and maintain the safe passage of species.</p> <p>Further details of the proposed watercourse crossing points are provided in the Volumes 2 to 9 as relevant to the site.</p> |
| 247 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | Clarification is sought regarding the reinstatement of the natural substrate in front of the SZC site after construction has finished. Is the plan to only reinstate once, or to reinstate when needed due to the loss of material from coastal processes? We would like to ensure this habitat which is utilised by specific coastal vegetation communities is not lost in the long term with consideration given to compensation options. This issue should be fully addressed as part of the EIA. | <p>A coastal processes monitoring and mitigation plan would be prepared that would set out the approach for monitoring impacts and effectiveness of mitigation and would include (but not limited to):</p> <ul style="list-style-type: none"> • monitoring of beach elevations, bar and shoreline movement using remote sensing techniques, including the monitoring of the performance of soft coastal defence feature to confirm when replenishment of the soft coastal defence feature is required; • terrestrial and bathymetric surveys of the re-profiled beach landing facility approach and grounding pocket, and over all areas where scour is expected as a result of the installed marine structures; • surveys of seabed to quantify pre-and post-installation seabed scour for all marine structures; • measures for beach maintenance in the scenario that hard coastal defence feature is eroded. |
| 248 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | Careful consideration needs to be given to potential impacts on watercourses from highways runoff from operational use and during the construction phase to prevent a deterioration in water quality. The design of any SUDS features in relation to highways drainage and surface water drainage from the main development or associated developments should maximise the benefits to biodiversity from these features by creating ponds with gentle sloping sides that have pooled areas to retain water through periods of dry weather with appropriately planted edges. | An Outline Drainage Strategy has been prepared and is included in Appendix 2A of Volume 2 . The strategy sets out the construction and operational drainage strategy for the main development site, as well as the operational drainage for the associated development sites. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|---------------------------------|-------------------------------------|--------------------------|---|---|
| 249 | Project-Wide | Flood Risk | Environment Agency | Bullet point 2 of section 6.13.27 refers to EA Flood Risk Standing Advice it should be noted that this advice only applies to certain development vulnerabilities, within Flood Zone 2 and minor extensions in Flood Zone 2 and 3. Although it is a useful guide it cannot be applied to all development types and Flood Zones. | The Environment Agency Standing Advice is referenced where appropriate in the ES . |
| 250 | Project-Wide | Terrestrial Ecology and Ornithology | Environment Agency | Assessment of barriers to migration needs to be fully considered for physical barriers in any watercourse and the impacts of culverting watercourses as this will also prevent the movement of fish, eel, invertebrate and mammal communities. | Volume 2, Chapter 14 , identifies that during the construction and operational phase of works, the main impact pathways would be associated with fragmentation and obstruction of passage for migratory fish. However, the culvert crossing of the Leiston Drain would be of sufficient dimensions to leave the bed and bank of the Leiston Drain unmodified and the proposed control structure on the realigned Sizewell Drain would incorporate a fish pass so no obstruction to migratory fish and eels is anticipated |
| 251 | Off-site Associated Development | The Proposed Development | Essex County Council | The development site is extensive and includes not only the application site but extensive off site associated development including park and ride schemes; village bypasses; park and ride facilities; a new dedicated access road extensions and changes to the existing rail lines; a large construction area; construction campus and associated major development. This response seeks to cover this associated development as well and considers the impact on the same. It is considered that there are a number of key potential scoping topics which need to form the ES, including the following: <ul style="list-style-type: none"> • Socio economic • Transport and highways • Skills and Employment • Terrestrial ecology and ornithology • Biodiversity and Geology • Historic Environment • Ground and Surface Water • Marine Water Quality and Ecology • Coastal geomorphology and hydrodynamics • Tourism and Recreation • Construction Environmental Management Plan • Decommissioning Environmental Management Plan • Waste Management, Spent fuel, and radioactive waste management • Minerals Supply and Management Plan • Supply chain • Habitat assessment • Landscape and visual impact • Flood Risk Assessment • Flood defences and coastal protection • Water quality and waste water disposal • Soils, Geology and Agricultural Land Quality • Amenity including Noise and vibration, Air quality, Light pollution, etc • Community and In-combination Impact • Recreation Impact • Tourism and Leisure | The ES is structured to consider and assess the likely environmental effects associated with the proposed development. This includes both the main development site and associated development. These elements are considered in Volume 2 and Volumes 3 to 9 of the ES respectively. The EIA has been undertaken in accordance with the Scoping Opinion issued by PINS in July 2019, and the ES presents the summary of the assessment of likely effects. Some of the additional topics listed within this comment do not form a separate standalone chapter of the ES . However, they are considered the assessments of other topic chapters. For example, the socio-economics assessment has considered the impact on tourism and recreation as well as on skills and employment within the local area. |
| 252 | Project-Wide | The proposed development | Essex County Council | It is noted that there appears to be no reference to any minerals supply chain. The proposed development will require a significant amount of construction materials as will the significant other infrastructure projects in the south east not least of which is the planned increase of 180,000 dwellings in Essex, associated road improvements and DCO applications for roadworks coming forward. In order to plan for and provide for the supply of materials the supply chain needs to be explained. | Volume 2, Chapter 8 presents an assessment of the likely effects on material demand and waste infrastructure. Further detail on the geographical extent of the study area used within the assessment to examine the use of material resources and the generation and management of waste is described in Volume 1, Appendix 6D of the ES . |
| 253 | Project-Wide | Terrestrial Ecology and Ornithology | Essex County Council | Essex County Council also notes that it will be necessary to carry out additional assessments not least of which would be one under the Conservation of Habitats and Species Regulations 2010. | A Shadow Habitat Regulations Assessment has been prepared and submitted with the application for development consent (Doc Ref. 5.10) |
| 254 | Project-wide | Transport | Hacheston Parish Council | Whilst the mitigation measures have been proposed to reduce the impact from traffic on the local road network, no figures have been produced to show the increase in impact from traffic in and around the SPR which will be considerable. | The Transport Assessment (Doc Ref. 8.5) is submitted with the application for development consent. The assessment of likely effects is reported in the Transport ES chapter (Volume 2, Chapter 10), which provides further detail on the mitigation proposed. |
| 255 | Project-wide | Transport | Hacheston Parish Council | There is no explanation of the whereabouts of specifically sensitive areas in the Scoping Report, or elsewhere, and it is considered that Hacheston village, in relation to the SPR, should be considered as a specifically sensitive area. | The study area for the assessment of transport effects has been defined based on the area where there is likely to be a transport impact resulting from the Sizewell C Project. This includes routes along which heavy goods vehicles (HGVs), light goods vehicles (LGVs), buses, and construction worker cars would travel. The study area covers parts of the east of Norfolk extending to Lowestoft in the north, Ipswich to the south and the A140 to the west. The geographic extent of the traffic model has been agreed with SCC. The extent of the study area is further described in Volume 1, Appendix 6F . Due to the size of the study area, the study area has been summarised by reference to sub areas (Sub Area A - North, Sub Area B – East, Sub Area C – South and Sub Area D – West, as shown on Figure 10.1 in Volume 2). Wickham Market and surrounding roads are situated within Sub Area C. |
| 256 | Project-wide | Lighting | Hacheston Parish Council | The measures to be taken to reduce the light spill at night at the SPR should be detailed in the ES. | Volume 4, Chapter 2 provides a description of the lighting arrangements at the Southern Park and Ride site including how light spill would be minimised as far as reasonably practicable. |
| 257 | Project-wide | Transport | Hacheston Parish Council | The June 2014 Scoping Opinion sets out in paras 3.30 to 3.37 the need for the Transport Assessment to be up to date and robust. The last traffic counts were carried out in 2015 (see para 6.3.20 of the 2019 Scoping Report), and EDF have yet to comply with this requirement. Since 2015 the traffic on all roads has increased substantially due to high levels of housing development. | An extensive range of information has been sought and tasks undertaken to define the baseline environment for the Sizewell C Project and likely receptors, including but not limited to: <ul style="list-style-type: none"> • desk-based review of existing published data; • data and reports provided by consultees; and • field surveys and site investigation information. Data collection has been undertaken over the course of the last five years with initial data being collected during 2015 and continuing through 2016, 2017, and 2019 as the area of impact and assessment requirements from Suffolk County Council were further established. This is considered sufficient to inform the Transport Assessment (Doc Ref. 8.5). |
| 258 | Project-wide | Community Impact Report | Hacheston Parish Council | The Community Impact Report should include any impact of the Sizewell C development proposals on Wickham Market. | The Community Impact Report (Document Reference 5.13) summarises any significant effects on community receptors identified in the ES. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|------------------------|---|--------------------------|--|--|
| 259 | Project-wide | Transport | Hacheston Parish Council | The affected local roads to be considered within the Transport Assessment must include the impact the proposals will have on the B1116 in and around Hacheston, the B1078 as it passes through Wickham Market, and Glevering Bridge with Easton Road. | <p>To assess the impacts of Sizewell C traffic on the surrounding highway network, two forms of traffic modelling have been undertaken:</p> <ul style="list-style-type: none"> • strategic highway assignment modelling; and • standalone modelling: this includes junction modelling; and micro-simulation modelling. <p>The result are summarised in the Transport Assessment (Doc Ref. 8.5) is submitted with the application for development consent, and the assessment of likely effects is reported in the Transport ES chapter (Volume 2, Chapter 10).</p> <p>The study area for the assessment has been defined based on the area where there is likely to be a transport impact resulting from the Sizewell C Project. This includes routes along which heavy goods vehicles (HGVs), light goods vehicles (LGVs), buses, and construction worker cars would travel.</p> <p>The study area covers parts of the east of Norfolk extending to Lowestoft in the north, Ipswich to the south and the A140 to the west. The geographic extent of the traffic model has been agreed with SCC. The extent of the study area is further described in Volume 1, Appendix 6F. Due to the size of the study area, the study area has been summarised by reference to sub areas (Sub Area A - North, Sub Area B – East, Sub Area C – South and Sub Area D – West, as shown on Figure 10.1 in Volume 2). Wickham Market and surrounding roads are situated within Sub Area C.</p> |
| 260 | Project-wide | Proposed Development (accommodation Strategy) | Hacheston Parish Council | Table 6.2 (page 76) This tabulates Housing Market Capacity which includes 'Caravan, Holiday and Touring Park Bed Spaces'. No reference is made to some of this type of accommodation having planning restrictions limiting occupation to periods shorter than one year, i.e. 11 months. Such accommodation cannot therefore be used continuously over the construction period. | <p>An Accommodation Strategy (Doc Ref. 8.10) is submitted with the application for development consent. It sets out the demand for accommodation from non-home-based workers; the project accommodation proposed as part of the associated development for Sizewell C; the potential for worker use of existing local accommodation; and measures to avoid or reduce significant effects on households and the operation of the housing markets.</p> <p>The purpose of this Accommodation Strategy is to represent a balanced solution for meeting the temporary increase in local accommodation demand which the Sizewell C Project would generate – offering construction efficiencies and supporting the project's aspirations for zero harm; delivering economic benefits for the local area and mitigating impacts during the construction phase.</p> |
| 261 | Southern Park and Ride | Proposed Development | Hacheston Parish Council | On completion of the Proposed Development the SPR will be returned to agricultural use. The East Suffolk District Council must impose a condition in the development consent, via the Planning Inspectorate, that no alternative use can be considered for the site once it has been returned to the land owner. | Chapter 2 of Volume 3 of the ES describes that the proposed Southern Park and Ride site would be returned to existing use following completion of construction of the Sizewell C power station. |
| 262 | Southern Park and Ride | Noise & Vibration | Hacheston Parish Council | Noise sensitive dwellings within 1 km of the proposed new road schemes will include The Rookery, Hacheston in respect of the SPR. This property should be included in any monitoring. | <p>Baseline sound level surveys have been undertaken, for the most part, at locations representative of residential receptors in the study area. Baseline sound survey locations were discussed with Suffolk County Council and Suffolk Coastal District Council (now East Suffolk Council) in March 2019.</p> <p>Three locations were surveyed for the southern park and ride site. Baseline sound data was captured at these sites during daytime and night-time periods at positions representative of the nearest residential properties. A summary of the noise monitoring undertaken within the study area for the proposed southern park and ride is provided in Volume 4, Chapter 4. Further details on noise monitoring undertaken is provided Volume 2, Appendix 11A.</p> |
| 263 | Project-wide | Transport | Hacheston Parish Council | 3.4.2 This states that the temporary park and ride facilities will reduce additional traffic generated by the construction workforce on local roads and through local villages. Whilst this may be true in respect of some roads and villages, the SPR will create a dramatic increase in traffic volumes in and around Hacheston and Wickham Market. No details of this impact have been provided. | <p>The traffic flows are considered within the Transport Assessment (Doc. Ref. 8.5) and the Transport ES Chapter (Volume 2, Chapter 10) consider all elements of the Sizewell C Project.</p> <p>The geographic extent of the traffic model has been agreed with SCC and is described in Volume 1, Appendix 6F. Due to the size of the study area, the study area has been summarised by reference to sub areas (Sub Area A - North, Sub Area B – East, Sub Area C – South and Sub Area D – West, as shown on Figure 10.1 in Volume 2). Wickham Market and surrounding roads are situated within Sub Area C.</p> |
| 264 | Project-wide | Transport | Hacheston Parish Council | 2.3.9 to 2.3.11 These paragraphs refer to a Traffic Assessment, which has as yet, not been produced to HPC, and it is considered that this should form part of the ES. | The Transport Assessment (Doc Ref. 8.5) is submitted with the application for development consent. |
| 265 | Project-Wide | Historic Environment | Historic England | We do however broadly support the approach taken in Chapter 6.9 (Historic Environment) and in general, the mitigation strategy appears to be sensible and appropriate in relation to both the on- and off-shore (marine) historic environment. The WSI and reporting protocol that is to be developed, will address this issue, but additional detail will be required in terms of what this specifically entails. We have set out some additional comments below. | <p>An overarching archaeological written scheme of investigation (WSI) has been produced for the Sizewell C Project (Volume 2, Appendix 16H). Individual site WSIs produced to supplement these would be agreed with SCCAS. Publication and popular dissemination of any key results would allow any informative and historic value to be fully realised, and details of this will be set out within the WSIs. These site-specific WSIs would also set out requirements for further investigation of areas that could not be surveyed pre-consent, to allow for the agreement of finalised mitigation proposals.</p> <p>Monitoring of the agreed programme of archaeological investigation would be carried out by SCCAS during the implementation of the scheme. The details of this monitoring will be set out within the individual site WSI to be agreed with SCCAS.</p> |
| 266 | Project-Wide | Historic Environment | Historic England | We did note that in the LVIA Chapter (6.6) there is no mention of the assessment of historic environment as receptors in terms of visual impact, and how this will be cross referenced to the heritage chapter. A summary of the result of the historic environment assessment would be appropriate and as noted before we recommend the delivery of a cross referenced LVIA and Historic Environment chapter as part of the ES. We also note and support the proposal to update to the sea scape character assessment, and to update the cumulative impact assessment in light of new development proposals. The recently proposed offshore wind farms are particularly important with in relation to cumulative impacts upon Leiston Abbey (1st Site). Where relevant, the cultural heritage should be cross-referenced to other chapters or technical appendices; for example LVIA, noise, light, traffic and landscape. We advise that all supporting technical information (desk-based assessments, geophysical surveys, evaluation and post-excavation reports etc.) are included as appendices. | <p>Appropriate cross-referencing has been made to the landscape and visual assessments in the assessment of effects on the historic environment presented within Volumes 2 to 9 of the ES. It should be noted that the landscape and visual assessments has considered landscape and visual effects in line with Guidelines for Landscape and Visual Impact Assessments (GLVIA, 3rd Edition), and does not provide an assessment of change to setting as defined by NPS EN-1, which is considered in the Historic Environment Assessment in line with Historic England best-practice guidance.</p> <p>Where relevant the historic environment chapter cross references to other technical chapters of the ES, such as noise and vibration, in considering the setting effects on heritage assets.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|--|-------------------------|--|---|
| 267 | Project-Wide | Historic Environment | Historic England | We acknowledge and confirm our view is that the impact upon the historic environment is likely to be significant in EIA terms, and agree that the Historic Environment should be scoped into the Environmental Statement and the approach set out here builds on previous assessments. We have also commented on the EIA scoping report in 2014, and our response is acknowledged here in this report. Our comments in relation to previous PEIR stages would also need to be taken into account | Historic England's responses to PEIR and previous stages of informal consultation have informed the development of the method and scope of the assessment presented in the Volume 1, Appendix 6L of the Environmental Statement. Responses to the 2014 EIA Scoping Report were appended to the updated 2019 EIA Scoping Report (included within Volume 1, Appendix 6A of this ES). |
| 268 | Project-Wide | Historic Environment | Historic England | In terms of the Scoping Report, we broadly support the approach set out by the applicant, in relation to the historic environment, we have set out some more specific points below in relation to the various chapters. We also accept the Rochdale envelope approach is an appropriate approach for major developments such as this (see for example Chapter 3.1.2 - 12), it is however of concern in relation to our statutory remit that certain elements of the projects have still not been finalised, for example the delivery of the project via either a road or a rail led strategy. We feel greater clarity is still needed on this to ensure we can deliver and appropriate responses, and to enable a position can be developed and explored in relation to the impact upon Leiston Abbey (2nd site), and other historic environment receptors. We are concerned that options are still being considered at this stage. | Following EIA Scoping in 2019, the integrated transport strategy was consulted on in the Stage 4 Consultation which combines elements of both road and rail access strategies. SZC Co. has chosen the integrated transport strategy as the transport strategy for the Sizewell C Project, and this strategy has been assessed by the EIA. Further details on the transport strategy are provided in the Transport Assessment (Doc Ref. 8.05). |
| 269 | Project-Wide | Historic Environment | Historic England | Chapter 6.9.3 – We are pleased to see that the applicants have taken previous comments on board regarding assessment matrices and will provide a non-technical narrative argument to support the assessments. | Narrative argument to support the assessments presented is included in the appropriate Terrestrial Historic Environment assessments presented within Volumes 2 to 9 of the ES. |
| 270 | Project-Wide | Historic Environment | Historic England | Chapter 6.9.12 and 6.9.13 – We note this summarises the survey and assessment works that will be carried out, building on assessments carried out to support the 2014 Scoping Report. It is stated that the geophysics and evaluation trenching work will be undertaken in accordance with the WSI that was previously agreed. We would appreciate it if the applicant can ensure the DBA, WSI and baseline documents are appended to the main ES for reference. | The Desk Based Assessments (DBA) and fieldwork reporting documents are been included as appendices to the relevant Terrestrial Historic Environment ES chapters assessments presented within Volumes 2 to 9 of the ES for reference. An overarching archaeological written scheme of investigation (WSI) has been produced for the Sizewell C Project (Volume 2, Appendix 16H). Individual site WSIs produced to supplement these would be agreed with SCCAS. Publication and popular dissemination of any key results would allow any informative and historic value to be fully realised, and details of this will be set out within the WSIs. These site-specific WSIs would also set out requirements for further investigation of areas that could not be surveyed pre-consent, to allow for the agreement of finalised mitigation proposals. Monitoring of the agreed programme of archaeological investigation would be carried out by SCCAS during the implementation of the scheme. The details of this monitoring will be set out within the individual site WSI to be agreed with SCCAS. |
| 271 | Main Development Site | Historic Environment / Coastal Geomorphology | Historic England | Chapter 6.14 - The Coastal Geomorphology and Hydrodynamics chapter discusses issues that may be of relevance to any heritage located in the coastal or nearshore areas. Any changes to coastal processes can have either positive or negative impacts on any heritage located in these areas, eroding/exposing or covering buried remains, or potentially contributing to the damage or risks facing any standing remains. We would therefore recommend that Cultural Heritage is included in the discussions of potential impacts and included in the relevant heritage chapters in subsequent documents (Section 6.14.34). | Consideration has been given to the potential for the Sizewell C Project to give rise to coastal processes that would affect survival of archaeological remains in the marine (Volume 2, Chapter 23) and terrestrial historic environment (Volume 2, Chapter 16). |
| 272 | Project-Wide | Historic Environment | Historic England | Chapter 3.3.2 – 6 - We note changes the outlined here, including new permanent elements, changes and new additions to the temporary development. Please also see our comments on the last PEIR stage in relation to on and -offsite works | Historic England's responses to PEIR and previous stages of informal consultation have informed the development of the method and scope of the assessment presented in the Volume 1, Appendix 6L of the ES. |
| 273 | Project-Wide | Historic Environment | Historic England | Although our remit is primarily in relation to scheduled monuments and highly graded designated heritage assets, we are concerned with direct impact upon non-designated heritage assets within the development area, and have previously supported the LPA archaeological advisors in developing appropriate strategies to mitigate these impacts. We will continue to provide support in this as required. We are content however that all these matters would be fully addressed in the emerging Environmental Statement (ES). | The matters raised by Historic England (scheduled monuments, highly graded designated heritage assets and direct impacts on non-designated heritage assets within the development area) are fully addressed in the ES in the terrestrial historic environment chapter in Volumes 2 to 9 of the ES. The Marine historic environment assessment is included as Volume 2, Chapter 23 of the ES. |
| 274 | Project-Wide | Historic Environment | Historic England | A number of guidance documents were taken into account when the assessment methodology was defined (summarised in 6.9.16) We would recommend that the methodology should also make reference to the following guidance documents: - Schmidt et al. (2016) EAC Guidelines for the use of Geophysics in Archaeology (http://old.european-archaeological-council.org/files/eac_guidelines_2_final.pdf). - Historic England (2011) Environmental Archaeology (https://historicengland.org.uk/images-books/publications/environmental-archaeology-2nd/) - Historic England (2015) Geoarchaeology (https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/) | Appropriate guidance has been referenced within the relevant Historic Environment Chapters within Volumes 2 to 9 of the ES, supporting appendices and Volume 1, Appendix 6L |
| 275 | Project-Wide | Air Quality | Ipswich Borough Council | This assessment should include necessary mitigation such as low emission bus transfers for staff from Ipswich/Westerfield Railway Stations | SZC Co. acknowledges the benefits of low emission bus transfers from nearby settlements and will continue to explore this and other opportunities in line with the three principles set out in the sustainability strategy. |
| 276 | Project-Wide | Amenity and Recreation | Ipswich Borough Council | The scope of the ES study area should include Ipswich with regard to the impact upon air quality. | Whilst the transport emissions assessment within Volume 2, Appendix 12B considers air quality effects in Ipswich, the ES does not consider amenity and recreation effects for Ipswich as it located outside of the study area for the amenity and recreation assessment as defined in Volume 1, Appendix 6K . Where relevant, the amenity and recreation assessments presented within Volumes 2 to 9 of the ES consider the impacts of air quality. |
| 277 | Project-Wide | Air Quality | Ipswich Borough Council | The scope of the ES study area should be extended to include Ipswich. | The study area for the road traffic-related pollutants is inclusive of 200m from the individual road links comprising the affected road network including the A12 between Ipswich and Lowestoft. Full details are provided in Volume 2, Appendix 12B and its associated figures. |
| 278 | Project-Wide | Study Area | Ipswich Borough Council | The scope of the Environmental Statement needs to extend the study area to include Ipswich. The majority of the chapter topics set out in the scoping report exclude Ipswich as a study area. However the nature and scale of the proposed development has the potential for significant adverse impacts both alone and in combination with other developments upon Ipswich during the construction and operational phases of development and these should be fully assessed within the Environmental Statement. | The study areas are set out within the technical assessments presented within the Volumes 2 to 9 of the ES (and within Volume 1, Appendices 6D to 6Y). In accordance with the 2019 Scoping Opinion, the technical topics define their study areas to incorporate the areas in which environmental effects from the proposed development are likely. For the majority of the technical topics, due to the distance between the proposed development site and Ipswich, they do not consider that environmental effects on receptors or resources within Ipswich are likely and therefore exclude the area from their assessment. However, where there is the potential for effects on Ipswich, such as through changes in transport, and in turn changes in noise levels and emissions from transport, the study area covers a larger area. For example the study are for the Transport Assessment (Doc Ref. 8.05) covers a wide area encompassing Felixstowe and Ipswich to the south, Diss to the west and Lowestoft and Beccles to the north. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|------------------------------------|-------------------------|--|---|
| 279 | Project-Wide | Transport | Ipswich Borough Council | The scope of study area should be extended to include Ipswich. The ES should fully assess the impacts of all vehicular movements from the construction and operational phases of the development (HGVs, LGVs, Buses, Cars) upon Ipswich's road network, including junction capacity and driver delay and the effects that this will have upon air quality. | Ipswich is covered within the Transport Assessment (Document Reference 8.05) Study Area for Zone C. The Transport Chapter of the ES (Volume 2, Chapter 10) assesses the construction and operational phases of the Sizewell C project including assessment of capacity and driver delay. |
| 280 | Project-Wide | Incombination & Cumulative Effects | Ipswich Borough Council | The PEI has failed to include or have regard to the planned Ipswich Garden Suburb in the assessment of the impacts of the development alone or in the combination effects. Ipswich Garden Suburb is a strategically planned urban extension to the north of Ipswich of 3,500 dwellings with supporting infrastructure and is an allocation within the adopted Ipswich Local Plan. The Environmental Statement should have full regard to this allocated site which would be developed during the construction and operation of the proposed development. | Volume 10, Appendix 1A provides a long list of schemes that have been considered as part of the cumulative effects assessment. This list comprises all schemes that are located within the defined Zone of Influence where impacts could likely occur in accordance with the Planning Inspectorate Advise Note 17. Only where there is likely to be a cumulative impact is a project taken forward to the Short List (Volume 10, Appendix 1B). |
| 281 | Project-Wide | Transport | Ipswich Borough Council | The ES, notwithstanding whether it is the rail or road strategy, must fully assess the traffic impact of the development having full regard to IBC's Strategic Housing allocation of 3,500 dwellings on the Ipswich Garden Suburb (IGS) and other planned development within the 2017 adopted Local Plan. The construction of the IGS will be alongside the construction of Sizewell C and it is unlikely that there will be a northern relief road available for use. This large strategic site has not been considered as part of the PEI. | Within the Transport Assessment (Doc Ref 8.05) the Ipswich Garden Suburb has been included as a committed development in all forecast years, with the indicative level of build-out provided by Ipswich Borough Council. The northern relief road has not been included. |
| 282 | Project-Wide | Socio-economics | Ipswich Borough Council | The ES study area should extend to include Ipswich. | The study area for the socio-economics assessment (Volume 2, Chapter 9) is informed by the spatial effects of the Sizewell C Project, including the distribution of workforce effects and supply chain, which includes Ipswich. |
| 283 | Project-Wide | Transport | Ipswich Borough Council | The ES should include any necessary mitigation for adverse impacts upon Ipswich's road network. | Ipswich is covered within the Transport Assessment (Doc Ref. 8.5) Study Area for Zone C. The Transport Chapter of the ES (Volume 2, Chapter 10) identifies whether any mitigation is required to minimise an adverse effect. |
| 284 | Project-Wide | Incombination & Cumulative Effects | Ipswich Borough Council | The ES should have full regard to the Ipswich Garden Suburb in the cumulative impacts of the development. | Volume 10, Appendix 1A provides a long list of schemes that have been considered as part of the cumulative effects assessment. This list comprises all schemes that are located within the defined Zone of Influence where impacts could likely occur. Only where there is likely to be a cumulative impact is a project taken forward to the Short List (Volume 10, Appendix 1B). Within the Transport Assessment (Doc Ref. 8.05) the Ipswich Garden Suburb has been included as a committed development in all forecast years, with the indicative level of build-out provided by Ipswich Borough Council. The northern relief road has not been included. |
| 285 | Project-Wide | Alternatives | Ipswich Borough Council | The ES should fully justify why the marine led transport strategy was not discounted for the transport strategy. The ES should fully justify why either the road-led or rail led strategy was not discounted for the transport strategy. | Several transport strategies were consulted through Stages 1 to 4 of consultation. A 'marine led strategy', a 'road led strategy', a 'rail led strategy', and later in Stage 4 consultation an 'integrated strategy'. Local authorities advocated for both the rail and marine led scenarios in their response to consultation Stages 1 to 3. However a 'marine led' strategy was discounted early in the design process as the scale of the required jetty would result in severe underwater noise during construction due to piling, loss of habitat associated with the footprint of the jetty and its piles; changes to the alignment of the shore line, and the length of time it would require to construct the jetty. However, a smaller beach landing facility could be provided, which would facilitate the delivery of abnormal indivisible loads to remove heavy and oversized loads from the road network. Whilst the local authorities preference was then for rail-based transport, as there were concerns that a road-led approach would lead to a significant increase in construction traffic on local roads, Network Rail's response to consultation identified a number of risks to the rail-led option that could potentially impact the Sizewell C programme. Therefore, the integrated strategy was developed that would maximise the use of rail by committing to those rail works, where there was sufficient programme certainty that the works could be undertaken in time. The integrated strategy would allow for up to three trains per day (six movements) on a new temporary green rail route that extends into the temporary construction area and includes upgrades and level crossing works on the Saxmundham to Leiston branch line. There is a clear preference in National Policy Statements for Energy and Nuclear Power Generation for the use of rail infrastructure over road transport for the movement of freight during construction. SZC Co. has decided, therefore, to promote the integrated strategy as part of the DCO application. Volume 1, Chapter 4 of the ES provides a summary of main alternatives considered by SZC Co. |
| 286 | Project-Wide | Transport | Ipswich Borough Council | The ES should fully assess the routes for LGVs, which currently are unknown and uncontrolled and could have a significant adverse impact upon traffic and air quality within Ipswich. | Ipswich is covered within the Transport Assessment (Doc Ref. 8.5) Study Area for Zone C. The effects of LGVs on the road network are assessed in the Transport Chapter of the ES (Volume 2, Chapter 10) . |
| 287 | Project-Wide | Accommodation | Ipswich Borough Council | The ES should fully assess the potential adverse impacts upon Ipswich, including the impact on the local private sector rental market. The rental sector is already in high demand and prices are the highest in the area when measured against local incomes. With an unknown level of workforce the ES needs to consider the level of demand and the impact upon Ipswich's private sector rental market and existing and future residents should landlord's choose to offer their accommodation to the Sizewell C workforce at a guaranteed higher rent. | Volume 2, Chapter 3 provides details on the expected workforce. For the purposes of the EIA, during the peak year a total of 7,900 construction workers are assumed to work on the main development site at any one time and 600 construction workers are assumed to work on the associated development sites The socio-economics assessment presented in Volume 2, Chapter 9 considers the effects on owner occupied accommodation, private rented accommodation and tourist accommodation. Ipswich is considered to form one of the Strategic Housing Market Area. |
| 288 | Project-Wide | Transport | Ipswich Borough Council | The ES should fully assess the impacts of the diversion strategy for HGVs and LGVs, should the Orwell Bridge be closed at any time and for any reason, with regard to the impact upon Ipswich road network. It is unclear what the contingency routing of HGVs would be if the Orwell Bridge were to be closed. | The draft Traffic Incident Management Plan (TIMP) (Doc Ref. 8.6) plan sets out for the management of the Sizewell C construction traffic during an event or incident occurring on the HGV routes to the main development site. The TIMP would help minimise potential impacts of traffic associated with Sizewell C construction on response times and delivery of emergency services in the event of an incident. A draft TIMP has been submitted with the application (Doc Ref. 8.6). Measures are likely to include: <ul style="list-style-type: none"> • Delivery Management System • Live Travel Information • HGV Tracking and communication • Use of designated HGV routes • Use of freight management facility and park and ride facilities • Communication with HGVs and bus drivers • Divert vehicles on permitted HGV routes or diversionary routes directed by or agreed with SCC or Suffolk Constabulary. |
| 289 | Project-Wide | Socio-economics | Ipswich Borough Council | The ES should fully assess the impact the development during the construction and operational phase on Ipswich with the potential for supply chain opportunities, training and jobs. | The study area for the socio-economics assessment (Volume 2, Chapter 9) is informed by the spatial effects of the Sizewell C Project, including the distribution of workforce effects and supply chain, which includes Ipswich. The Socio-economics assessment also identifies that the development of Sizewell C would create supply chain opportunities, however it does not consider these on a ward level. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|--------------------|-------------------------|--|--|
| 290 | Project-Wide | Accommodation | Ipswich Borough Council | The ES should fully assess the impact of the development on Ipswich and the Ipswich housing market should be part of the Accommodation Strategy both in terms of the impact on the Ipswich rental market, and the likely need for workers who may be living in Ipswich. | The socio-economics assessment presented in Volume 2, Chapter 9 considers the effects on owner occupied accommodation, private rented accommodation and tourist accommodation. Ipswich is considered to form one of the Strategic Housing Market Area. |
| 291 | Project-Wide | Accommodation | Ipswich Borough Council | The ES should expand upon the estimated level of mitigation should this forecast be underestimated. | <p>Mitigation measures can be defined as those measures that are envisaged to prevent, reduce and, where relevant, offset any potential significant adverse effects. The mitigation approach adopted for the proposed development takes the form of a hierarchy, whereby priority is given to preventing significant effects. If prevention is not possible, the approach is to reduce or abate the effects followed, if necessary, by repair (restoring or reinstating) or offsetting/compensating for those effects. Each of these means of reducing potentially significant effects falls under the broad heading of 'mitigation'.</p> <p>Mitigation opportunities have been identified throughout the evolution of the proposed development, through four formal consultation stages, informal engagement with statutory and non-statutory stakeholders and the EIA process. Potential significant adverse effects have fed back into the design process to establish whether they can be avoided or otherwise mitigated in accordance with the mitigation hierarchy.</p> <p>The technical topic chapters of Volumes 2 to 9 of the ES categorise mitigation under three main headings in accordance with the IEMA EIA Guide to Shaping Quality Development:</p> <ul style="list-style-type: none"> • Primary mitigation • Secondary mitigation • Tertiary mitigation <p>Primary and tertiary mitigation (i.e. embedded and good practice measures) are considered to form part of the proposed development and therefore, the initial assessment of effects reported in the technical topic chapters of the ES takes account of these measures. If significant adverse effects are identified despite the implementation of primary and tertiary mitigation, the need for secondary mitigation has been considered, developed and proposed within the technical topic chapters before determining residual effects. Some secondary mitigation measures are also detailed, and implementation secured through the CoCP (Doc Ref. 8.11), these are differentiated from the good practice measures.</p> |
| 292 | Project-Wide | Air Quality | Ipswich Borough Council | The ES must fully assess the impact of the development upon the air quality within Ipswich as a result of the increased traffic related emissions, which should include workers living in Ipswich commuting to the development and all forms of construction and workforce traffic (cars/LGVs/HGVs/Buses) and should also include any construction vehicles diverting through the town. This ES will need to consider and assess the impact upon the current declared AQMAs and whether the proposed development would create any further need for new AQMAs to be declared. | Construction and operational traffic effects on Ipswich is assessed within Volume 2, Appendix 12B and are summarised in Volume 2, Chapter 12 of the ES . The assessment includes the consideration of potential impacts upon the currently declared AQMAs. |
| 293 | Project-Wide | Cumulative effects | Ipswich Borough Council | Specific assessment of the impact upon the proposed development at the Ipswich Garden Suburb (3,500 dwellings) where the Felixstowe Railway line runs through and has potential to have significant affect upon amenities by reason of noise and disturbance. | <p>Volume 10, Appendix 1A provides a long list of schemes that have been considered as part of the cumulative effects assessment. This list comprises all schemes that are located within the defined Zone of Influence where impacts could likely occur. Only where there is likely to be a cumulative impact is a project taken forward to the Short List (Volume 10, Appendix 1B).</p> <p>Within the Transport Assessment (Doc Ref 8.05) the Ipswich Garden Suburb has been included as a committed development in all forecast years, with the indicative level of build-out provided by Ipswich Borough Council. The northern relief road has not been included.</p> |
| 294 | Project-Wide | Transport | Ipswich Borough Council | Road Led - To ensure the air quality in Ipswich is not affected IBC do not wish for any approved HGV route for Sizewell C to be diverted through Ipswich. | This point is noted however, SZC Co. are proposing an integrated strategy as described within Volume 1, Chapter 4 of the ES . The effects of HGVs used during construction on air quality, including those in Ipswich where relevant, is assessed in Volume 2, Chapter 12 and Appendix 12B of the ES . |
| 295 | Project-Wide | Transport | Ipswich Borough Council | Road Led - The ES must fully assess the impact of only having a Freight Management Facility to the east of the Orwell Bridge and not also a Freight Management Facility west of the Orwell Bridge. | SZC Co. are proposing an integrated transport strategy, including a single freight management facility near Seven Hills. Volume 8 of the ES provides an environmental assessment of the proposed freight management facility. |
| 296 | Project-Wide | Transport | Ipswich Borough Council | Rail Led -Currently 133 trains per day passing through Westerfield on the East Suffolk Line (as set out in Preliminary Environmental Information (PEI) submitted). Whilst the 5 additional trains related to these proposals is not significant alone but when combined with the additional freight trains expected from the Felixstowe port expansion and Nacton Loop project – the total additional movements on this part of the line in the future could be substantial. | SZC Co. are not pursuing the rail-led transport strategy, and the Sizewell C Project would not affect any proposals for Ipswich Garden Suburb. |
| 297 | Project-Wide | Transport | Ipswich Borough Council | Rail Led - The proposed permanent closure of the at grade pedestrian crossing at Westerfield and diversion of the existing footpath to Westerfield Road to enable the crossing of the line at Westerfield level crossing (vehicular) must be fully assessed having specific regard to the impact upon the Ipswich Garden Suburb (see below comment). | SZC Co. are not pursuing the rail-led transport strategy, and therefore no changes to level crossings south of Saxmundham as part of the Integrated strategy are proposed. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

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|-----|--------------|---------------------|------------------------------------|--|--|
| 298 | Project-Wide | Transport | Ipswich Borough Council | <p>Rail Led - The implications of additional trains on this part of line upon the IGS must be fully considered on the basis of:-</p> <ul style="list-style-type: none"> • Traffic – The impacts of more frequent and/or longer level crossing closures on traffic delays and congestion on the local highway; • Pedestrian / Cycle access – due to the diversion of the public footpath, more frequent closures of the level crossing, delays experienced by users of the PRoW and railway station and subsequent decrease in accessibility to Westerfield Station for IGS residents. • Delays experienced by potential passengers trying to access Westerfield station as a result of more frequent and longer level crossing closures at Westerfield. • Concerns with the suitability and quality of access which could be achieved by the proposed diversion routes. All diverted route options lead to Westerfield Road where the pavement area needs to be improved/widened to ensure safe access. There are safety implications for increased pedestrians/cyclists using the level crossing and potential conflict with traffic. • All diversion routes include a link through the Network Rail compound south of the railway line. Consideration as to how safe, accessible routes will be achieved via this area of operational land. | <p>SZC Co. are not pursuing the rail-led transport strategy and therefore, no works or diversions at Westerfield are required.</p> <p>In general, level crossing delays are not represented in the strategic highway model since it reflects a 'flat' hour assignment and therefore cannot reflect the 'peakiness' of level crossing delays/queues. Consideration of impacts on level crossing closure times as a result of the proposed Sizewell C Project are reported in the 'Rail' chapter of the Transport Assessment (Doc Ref. 8.05).</p> |
| 299 | Project-Wide | Transport | Ipswich Borough Council | <p>Rail Led - Ipswich Garden Suburb is a policy allocation for up to 3,500 dwellings in Ipswich. The allocation site is located either side of the East Suffolk railway line which runs through Westerfield. As part of the infrastructure requirements for the housing allocation a cycle and pedestrian bridge has been proposed to replace the at grade public footpath over the railway line. Ipswich Garden Suburb is intended to be highly sustainable and includes a number of services and facilities within the allocation to limit external car journeys. Such provision includes primary schools, a secondary school, a Country Park and retail. As such, there is a heavy emphasis on promoting access by pedestrian /cycle users through the site, which includes providing safe routes over the railway line via this pedestrian/cycle bridge. In addition, the close proximity of Westerfield Railway station to IGS provides further opportunities for sustainable travel by residents which needs to be promoted. Easy and direct Access to the station by residents is therefore of key importance.</p> | <p>SZC Co. are not pursuing the rail-led transport strategy, and the Sizewell C Project would not affect any proposals for Ipswich Garden Suburb.</p> |
| 300 | Project-Wide | Noise and Vibration | Ipswich Borough Council | <p>Of a wider concern to IBC is the impact this would have upon existing and future residents of Ipswich as a result of the running of the additional freight trains outside of normal hours that could lead to adverse impacts on residential amenities by both noise and vibration given these would be run at unsociable hours.</p> | <p>The noise and vibration assessment presented in Volume 9, Chapter 4, considers noise, vibration and ground borne noise effects on residential receptors from additional freight trains movements on the East Suffolk Line between Westerfield junction and Saxmundham junction during the construction of the Sizewell C Project.</p> |
| 301 | Project-Wide | Air Quality | Ipswich Borough Council | <p>Mitigation proposed to mitigate impacts such as low emission buses for commuter buses between Ipswich and the main development site.</p> <p>The ES should fully assess the impact of the development in the construction and operational phases both alone and in combination upon Ipswich's air quality.</p> | <p>The air quality assessment presented in Volume 2 to 9 of the ES consider the likely significant effects associated with the construction, operation and where necessary the removal and reinstatement phases. Recommendations of appropriate mitigation are made within each of these assessments.</p> <p>SZC Co. acknowledges the benefits of low emission bus transfers from nearby settlements and will continue to explore this and other opportunities in line with the three principles set out in the sustainability strategy.</p> |
| 302 | Project-Wide | Transport | Ipswich Borough Council | <p>It has not been identified where materials will be sourced from and as such the route for the movement of vehicles carrying materials in unknown. The ES must fully assess the impact from the movement of materials as, in particular full regard must be had to the use of the Felixstowe Line where parts are only single track.</p> | <p>Assumptions made on freight movements are provided within the Transport Assessment (Doc Ref. 8.05). The Transport Chapter of the ES (Volume 2, Chapter 10) assesses the construction and operational phases of the Sizewell C project and has informed other technical assessments within the ES. These inter-relationships are clearly noted within the relevant technical chapters of Volumes 2 to 9 of the ES.</p> |
| 303 | Project-Wide | Air Quality | Ipswich Borough Council | <p>Currently 133 trains per day pass through Westerfield on the East Suffolk Line (as set out in Preliminary Environmental Information (PEI) submitted). Whilst the 5 additional trains related to these proposals is not significant alone but when combined with the additional freight trains expected from the Felixstowe port expansion / Nacton Loop– the total additional movements on this part of the line in the future could be substantial. The implications of additional trains on this part of line upon the air quality of the proposed residents air quality from the impact of additional trains and delayed traffic at level crossing.</p> | <p>As set out within Volume 9, Chapter 2, it is no longer proposed to carry out works to level crossings along the East Suffolk Line. The assessment provided in Volume 2, Appendix 12B includes a quantitative assessment of the impact of emissions from proposed train movements associated with the Sizewell C Project. No information is available on the likely changes associated with the additional freight trains expected from the Felixstowe port expansion / Nacton Loop. In addition, Volume 2, Appendix 12B identifies that the majority of the effects associated with the Sizewell C Project during the construction phase are negligible (not significant) with some beneficial effects associated with the road proposals.</p> |
| 304 | Project-Wide | Transport | Kelsale cum Carlton Parish Council | <p>within the Pre-planning Consultation(s) (including the PEI), there is little or no consideration of the fundamental environmental and ecological impacts that the substantial amount of generated SZC traffic will have on the A12 and the adjoining road networks.</p> <p>Therefore, Kelsale cum Carlton Parish Council consider it imperative that this significant omission is rectified.</p> | <p>Traffic impacts on the A12 are assessed within the Transport Assessment (Doc Ref. 8.05) and reported in the Transport ES Chapter (Volume 2, Chapter 10).</p> <p>Traffic flows and the resultant effect of traffic on the environment are assessed within Volumes 2 to 9.</p> |
| 305 | Project-Wide | Transport | Kelsale cum Carlton Parish Council | <p>With very limited public transport available, residents of Kelsale cum Carlton are very dependent on either walking, cycling or private cars as the primary methods of conducting their daily lives. As a consequence, adverse impacts on the A12 and the surrounding road network must be fully understood to enable residents to plan accordingly.</p> | <p>Traffic impacts on the A12 are assessed within the Transport Assessment (Doc Ref. 8.05) and reported in the Transport ES Chapter (Volume 2, Chapter 10).</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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|-----|-------------------------|-------------------------------------|------------------------------------|--|---|
| 306 | Project-Wide | Scope of assessment | Kelsale cum Carlton Parish Council | <p>In that connection, Kelsale cum Carlton Parish Council seek the opportunity afforded by the Scoping Opinion to emphasise the importance of full and exhaustive analysis of potential environmental and ecological impacts on the;</p> <ul style="list-style-type: none"> - A12 per se - adjoining minor roads - villages, communities and settlements alongside - A12 roadside and intermediate landscape (i.e. litter, debris, load losses, tyre losses, etc.) - flora - fauna - habitats - roadside and mid-range nature reserves - protected species - water courses - air quality - heritage assets and historic environments - enjoyment and amenity offered by the route to residents, visitors and businesses in the East Suffolk area - Public Rights of Way, Bridleways, etc. - A12 immediate and intermediate arable land and crops (dependent on propagation patterns) - A12 immediate and intermediate horticultural land (dependent on propagation patterns) - A12 immediate and intermediate livestock (dependent on propagation patterns) - A12 immediate and intermediate recreational open spaces (dependent on propagation patterns) - A12 immediate and intermediate open-air leisure businesses (dependent on propagation patterns) - aquifers and similar - A12 immediate and intermediate rivers, streams and ponds (dependent on propagation patterns and flow threats) | Traffic flows and the resultant effect of traffic on the environment are assessed within Volumes 2 to 9 , and includes consideration of the effects on noise and air quality, as well as the effects on sensitive ecology receptors, amenity and recreation receptors and historic environment receptors. |
| 307 | Project-Wide | Air Quality and Noise and Vibration | Kelsale cum Carlton Parish Council | <p>In particular Kelsale cum Carlton are concerned with the identification, quantification and proposals for the mitigation of adverse impacts arising from (but not exclusively):</p> <ul style="list-style-type: none"> - Air pollution - Traffic Noise - Extended hours of 'heavy traffic flows' - The increased HGV and LGV components in daily traffic flows - Particulates, dust and other airborne materials - The route topology and the changeable propagation patterns arising - Surface water behaviour... - ...run-off composition, treatment and in-flow management... - ...alongside the component ditches, gully's, ducts, etc. - Vehicle fuels and load seepage, loss, etc. (individually and in combination) | <p>The assessment of effects of the identified topics are considered within the following chapters.</p> <ul style="list-style-type: none"> - Air pollution - Volume 2, Chapter 12 - Traffic Noise - Volume 2, Chapter 11 - Extended hours of 'heavy traffic flows' - Volume 2, Chapter 10 - The increased HGV and LGV components in daily traffic flows - Volume 2, Chapter 10 - Particulates, dust and other airborne materials - Volume 2, Chapter 12 - The route topology and the changeable propagation patterns arising - Surface water behaviour... - Volume 2, Chapter 19 - ...run-off composition, treatment and in-flow management... - ...alongside the component ditches, gully's, ducts, etc. - Vehicle fuels and load seepage, loss, etc. (individually and in combination) - Volume 2, Chapter 18 |
| 308 | Project-wide | Landscape & Visual | Leiston-cum-Sizewell Town Council | The LVIA (6.6.5) should concentrate and accurately illustrate the increased incursion onto the foreshore from the enlarged site and extended sea defences. The LVIA should clearly show and illustrate how much further forward of SZB the proposed construction (and the site boundary) will come. | This is indicated within the main development site landscape and visual chapter (Volume 2, chapter 13) |
| 309 | Project-wide | Transport | Leiston-cum-Sizewell Town Council | The impact on useage and road safety from increased traffic on Lovers Lane around the Household waste site and a strategy and mitigation to ensure it stays fully functional and accessible throughout construction. | Lover's Lane is considered as a road link within the Transport Assessment (Doc Ref . 8.5) and the effects of usage and are summarised in Volume 2, Chapter 10 of the ES . The Transport Assessment the effects of the Sizewell C Project on road safety and identified the existing recycling centre off Lover's Lane, use of which is expected to increase. It provides further details on this stating that " <i>Whilst a 'left turn in' taper is proposed to help alleviate queuing traffic southbound into the recycle centre, a right turn ghost island is not proposed for northbound traffic wishing to turn right into the centre. The likely increase in traffic levels and the fact the recycling centre is at the summit of a hill adds to the issue. The Stage 1 RSA recommended that a right turn lane be provided to allow a safe area for vehicles waiting to turn right into the recycling centre. The designer's response to this problem advised that traffic data indicates there is very little northbound traffic turning right into the recycle centre and proposes that right turn into the recycling centre is designed out/prohibited.</i> " |
| 310 | Other Rail Improvements | Transport | Leiston-cum-Sizewell Town Council | The impact on traffic of the level crossings around Leiston | A description of the proposed works associated with level crossings around Leiston is provided within Volume 9, Chapter 2 and includes information on the likely closures and timings. Level crossing delays are not represented in the strategic highway model since it reflects a 'flat' hour assignment and therefore cannot reflect the 'peakiness' of level crossing delays/queues. Consideration of impacts on level crossing closure times is made in the 'Rail' chapter of the Transport Assessment (Doc Ref. 8.5). |
| 311 | Main Development Site | Transport | Leiston-cum-Sizewell Town Council | The impact and implications for safety on Valley Road east (Kemps Hill) from the pedestrian traffic expected from LEEIE (caravan park) | This is not considered within the ES . Further details on the road links considered in the vicinity of the identified road link can be found in Volume 2, Chapter 10 and Appendix 10A . |
| 312 | Project-wide | Amenity and Recreation | Leiston-cum-Sizewell Town Council | The full impact on the coastal path throughout construction and a mitigation strategy to ensure it stays open throughout. | <p>The amenity and recreation assessment has considered the impact on the Suffolk Coastal Path during construction and operation (see Volume 2, Chapter 15) and the Rights of Way and Access Strategy (Volume 2, Appendix 15I) has been prepared and sets out the strategy for PRoW, permissive paths, long distance walking routes, cycle routes, open access land and the beach during the construction and operational phases, for the main development site.</p> <p>All mitigation is listed within the ES chapter with the aim to keep the Suffolk Coast Path open for as much of the construction period as possible. Any times where closures are unavoidable, an alternative route would be available.</p> |
| 313 | Main Development Site | Terrestrial Ecology and Ornithology | Leiston-cum-Sizewell Town Council | The actual impact on the SSSI and the foreshore of the nuclear platform itself. This should be reflective of the increased size and encroachment that the platform may make on its surrounds to accommodate the two reactors as this is still unclear. | The terrestrial ecology and ornithology assessment for the main development site considers the impact on Sizewell Marshes SSSI. Further details are provided in Volume 2, Chapter 14 . |
| 314 | LEEIE | Air Quality | Leiston-cum-Sizewell Town Council | That the LEEIE be scoped into the EIA for air quality | The air quality assessment for the main development site (Volume 2, Chapter 11) considers the potential effects of works at LEEIE during the construction phase. |
| 315 | Project-wide | Transport | Leiston-cum-Sizewell Town Council | That Leiston Town Centre be scoped into the EIA for traffic – this should include baselines, expected increase in use of the town centre for SZC and also SZB workers during construction. Effects on traffic delays in Cross Street and Sizewell Road should be extrapolated from the predictions. There will be significant traffic bleed from major routes. It should also address mitigation for this | Traffic flow impacts in Leiston town centre have been assessed within the Transport chapter of the ES (Volume 2, Chapter 10) . Full details of the screening assessment for road links is provided within Volume 2, Appendix 10A |
| 316 | Project-wide | Air Quality | Leiston-cum-Sizewell Town Council | That Leiston Town Centre (by traffic lights) be scoped into the EIA for air quality | The spatial scope of the air quality impact assessment considered in the ES includes roads within Leiston. The assessment can be found within Volume 2, Chapter 12 |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

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| 317 | Main Development Site | Air Quality | Leiston-cum-Sizewell Town Council | That King George Avenue be included in a traffic and air quality EIA under the LEEIE section as it is still unclear what the effects will be on this important route through town and what the proposed mitigations are. | The spatial scope of the air quality impact assessment considered in the ES includes roads within Leiston. The assessment can be found within Volume 2, Chapter 12 |
| 318 | ES Preparation | Non-Technical Summary | Leiston-cum-Sizewell Town Council | That an effort be made to produce a document for local people that is half way between the EIA and the non-technical summary to accompany the DCO. | In accordance with the EIA regulations, a non-technical summary is submitted as part of the ES (Doc Ref. 6.1). |
| 319 | P | Transport | Leiston-cum-Sizewell Town Council | That Abbey Lane be included in the EIA for traffic. Again, baseline, SZC traffic, SZB traffic and freight. It should also address mitigation for this. | Abbey Lane has not been modelled as part of the Transport Assessment (Document Reference 8.05) and therefore not considered within the Transport ES Chapter (Volume 2, Chapter 10). The extent of network was agreed with SCC at Stage 1 Consultation. |
| 320 | Project-Wide | Amenity and Recreation | Leiston-cum-Sizewell Town Council | That a clear and understandable reason be given for not allowing continued access to the beach from Kenton Hills under the bridge between the platform and Goose Hill. (In the form of an impact assessment of retaining a pedestrian thoroughfare perhaps) | As set out in Volume 2, Chapter 3 , rights of way would be subject to disruption and change as a result of construction and would include measures to minimise any reductions in accessibility and amenity to the Suffolk Coast Path, Sandlings Walk and the future England Coast Path. Volume 2, Chapter 15 identifies that a portion of Sandlings Walk on a permissive footpath through Goose Hill would be realigned, to provide connectivity to the coast, to ensure that the long distance walking route remains open permanently. Where any closures are required, alternative route would be provided. |
| 321 | Project-Wide | Water | Leiston-cum-Sizewell Town Council | Clear work on quantity, use and supply of potable water. | Consultation is being undertaken with stakeholders, including public water supply companies and the Environment Agency, to establish a robust supply strategy. This includes an assessment of potential environmental impacts and associated mitigation measures. |
| 322 | Project-Wide | Various | Little Bealings Parish Council | To recommend that the following surveys and impact assessments should be required in respect of the impact of the road and rail strategies on the parish: <ul style="list-style-type: none"> • wildlife • public access along rights of way • traffic, including the impact of traffic displaced from other roads by the increased volume of traffic to/from the development site • noise assessment in respect of both railway line and crossing construction works and as a result of the increased train movements proposed. | These are considered within the ES within relevant technical assessment within Volumes 2 to 9 . Wildlife, is considered within the Terrestrial Ecology and Ornithology chapters (Volumes 2 to 9) and the Marine Ecology chapter presented in Volume 2 only. An assessment of traffic related effects is presented within Chapter 10 of Volume 2. Effects on public rights of way are considered within the Amenity and Recreation assessments presented in Volumes 2 to 9 of the ES . An assessment of the noise associated with the operation of the railway line are presented within Volumes 2 and 9 of the ES . |
| 323 | Main Development Site | The Proposed Development | Marine Management Organisation | With regards to the CDF, although designed to be above MHWS and therefore outside of the jurisdiction of the MMO, we anticipate that with rising levels it may fall below MHWS during the operational lifetime of the project. We will continue to engage with EDF Energy NNB to provide recommendations on how this be considered within the DML. | Part 3 of the Deemed Marine License included within the Draft Development Consent Order (Doc Ref. 3.1) provides details of conditions in relation to the hard and soft coastal defence features. |
| 324 | Main Development Site | Marine Navigation | Marine Management Organisation | We welcome the intention to complete an additional (14 day) marine traffic survey in June/Summer 2019. | This point is noted. A total of 28 days of Automatic Identification System (AIS) and radar data were used to inform the baseline shipping analysis provided in Volume 2, Appendix 24A . These were taken from shore-based surveys undertaken in June 2019 (14 days summer) and November 2018 (14 days winter). A study area was defined as a 12nm buffer around the proposed development. Further details of these surveys are provided in Volume 2, Chapter 24 . |
| 325 | Main Development Site | Marine Ecology | Marine Management Organisation | We understand that the requirement for an Unexploded Ordnance ('UXO') Disposal Campaign has not been ruled out (i.e. to prepare corridors for the intake and outfall headworks and potentially other marine activities). We recommend that if this cannot be ruled out, that potential UXO locations and corresponding likely marine ecology impacts be considered. | In the case where UXOs are identified on site, and alternative disposal methods or relocation are not possible, underwater detonations may be required. Appropriate management actions and mitigation measures would be implemented to minimise impacts. Such measures would be highly dependent on the location of the UXO and would require review on a case-by-case basis. The underwater noise modelling results are considered as indicative, worst-case scenarios for unmitigated impact ranges, provided in Appendix 22L of Volume 2 . |
| 326 | Main Development Site | Marine Navigation | Marine Management Organisation | We recommend the potential disruption to fishing and recreational activities also be considered within the operation phase of the development. This should include consideration of impacts arising from use of the BLF and any vessels used to undertake dredging. | The potential disruption to fishing and recreational activities are considered within the ES (Volume 2, Chapters 22 and 24) . |
| 327 | Main Development Site | Marine Water and Sediment Quality | Marine Management Organisation | This section refers to the assessment of 'thermal barriers to fish movement in an estuary'. We recommend the inclusion of an explanation of how this approach will be applied to a coastal site. | This point is noted and Volume 1, Appendix 6Q and Volume 2, Chapter 21 provide additional information on any potential thermal barriers to fish migration. |
| 328 | Main Development Site | Coastal Geomorphology | Marine Management Organisation | There is no mention of any potential effects on waves from any change in bathymetry associated with the sediment ploughed to the side or of effects of maintenance dredging of the BLF dredged area. | The evidence base for each of the geomorphic receptor elements (baseline and predicted response to the marine activities and infrastructure associated with the proposed development) is contained in the geomorphology and hydrodynamics synthesis report (Appendix 20A of Volume 2 of the ES). |
| 329 | Main Development Site | Coastal Geomorphology | Marine Management Organisation | The study area outlined for the purpose of considering longshore sediment transport has been refined since the 2014 EIA report. The 2019 document defines the limit as MHWS with a note that there might be circumstances where the boundary is at the Highest Astronomical Tide. The southern limit is also reduced (limited at Thorpeness) with a note that the sediment plumes may extend south of this. We recommend that a simplified view of the study area is considered. We also note that although the net drift, averaged over a 10 year period, is towards SZC at Thorpeness and north of Sizewell, this does not automatically exclude the possibility of their being any impacts outside of the sub cell. | The narrative assessment of future impacts in Volume 2 Chapter 20 of the ES considers of the landward translation of the MHWS with rising sea levels and shoreline erosion. This includes effects on future geomorphic features that would be landward of the present MHWS and geomorphic features influenced by coastal processes that are above or landward of MHWS, such as supra-tidal shingle (which is affected by infrequent storm events and/or high water levels). |
| 330 | Main Development Site | Marine Ecology | Marine Management Organisation | The Sizewell area experiences seasonal spring blooms of jellyfish and ctenophores. We recommend that the risk of jellyfish blocking the system be considered as well as the means to unblock it. We also recommend that the impact of high densities of jellyfish and ctenophores on fish and any crustaceans in transit be considered. | An assessment of the likely significant effects relating to the Proposed Development and impacts to jellyfish/ctenophores is presented within the marine ecology assessment in Volume 2, Chapter 22 of the ES . |
| 331 | Main Development Site | The Proposed Development | Marine Management Organisation | The MMO welcomes further information on the design of the Coastal Defence Feature (CDF), Beach Landing Facility (BLF), Cooling Water (CW) infrastructure, Fish Recovery and Return (FRR) systems and Combined Drainage Outfall (CDO). Whilst we note that discussions are ongoing between MMO and EDF Energy NNB at a technical level regarding some of these structures, we recommend that the 'Rochdale Envelope' approach should be adopted in order to assess 'worst case' impact scenarios. | Volume 2, Chapters 2, 3 and 4 provides a description of the main development site including the parameters within which the EIA has been undertaken. |
| 332 | ES Preparation | Decommissioning | Marine Management Organisation | The introductory section of the EIA scoping implies that decommissioning would be included in the assessments however there is no reference to decommissioning within any of the sections reviewed. | Details on the decommissioning of Sizewell C as well as a high-level assessment of the potential environmental effects are provided within Chapter 5 of Volume 2 . |
| 333 | Main Development Site | Marine Water and Sediment Quality | Marine Management Organisation | The baseline survey is described in 6.15.6 as occurring between February 2014 and January 2016, but in 6.15.10 as occurring between February 2014 and January 2015. The correct date should be clarified. | No further response provided. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| 334 | Main Development Site | Coastal Geomorphology | Marine Management Organisation | <p>The 2014 EIA Scoping Report proposed modelling shoreline change as well as the detailed modelling around the structures. Shoreline change modelling is no longer mentioned in the EIA scoping document although some beach modelling has been undertaken. If shoreline change modelling is no longer going to be used, an alternative approach to modelling shoreline change in the wider bay area would be expected.</p> <p>This paragraph states that detailed modelling is not needed for assessment of impacts on coastal geomorphology. Further justification should be provided to support this statement.</p> | <p>Further details of shoreline change are provided within Volume 2, Chapter 20. However, there is no current computational modelling platform able to accurately integrate the numerous environmental processes that drive shoreline change, and there is no published evidence that shoreline change models can be reliably applied over the multi-decadal timescale that is required. Therefore, the future environmental baseline has been determined by Expert Geomorphological Assessment. Appendix 20A of Volume 2, section 7 provides more detail on the future shoreline baseline, as well as monitoring, mitigation and potential post-mitigation impacts.</p> |
| 335 | Project-Wide | Scope | Marine Management Organisation | <p>Table 3.2 in section 3.11 outlines areas of development that have been introduced since the 2014 EIA scoping report. We are in agreement with the decision to scope these newly introduced offsite developments out of the coastal geomorphology and hydrodynamics, marine water and sediment quality, marine ecology and marine navigation assessments (sections 6.14, 6.15, 6.16 and 6.17 respectively).</p> | <p>This agreement is noted.</p> |
| 336 | Project-wide | Noise & Vibration | Marine Management Organisation | <p>It is noted that the potential impacts of noise and vibration on marine features are not discussed within this chapter and are instead included within section 6.16 Marine Ecology</p> | <p>Appendix 22L of Volume 2 provides the underwater noise effects assessment at Sizewell C and includes details of the noise criteria used to inform the assessment.</p> |
| 337 | Project-wide | Disposal License | Marine Management Organisation | <p>It is noted that construction of the BLF, CW infrastructure, FRR and CDO will require dredging and/or disposal, depending on the elected method. Under the convention for the Protection of the Marine Environment of the North-East Atlantic (the "OSPAR convention"), material produced during the drilling installation, seabed preparation and drilling mud, if disposed of to sea, must be disposed of within a licenced disposal site:</p> <p>a) If the material is disposed of at an existing licenced disposal site, this must be agreed in writing with the MMO and the site must be named (including reference number and coordinates) in the DML which forms part of the DCO.</p> <p>b) If the intention is to dispose of material inside the Sizewell red line boundary then the site must be characterised. This should be done by completing a site characterisation report which should;</p> <ul style="list-style-type: none"> <input type="checkbox"/> Assess the need for a new disposal site and consider alternative uses; <input type="checkbox"/> Outline the disposal volume (worst case) (including drill arisings); <input type="checkbox"/> Provide evidence of the material characteristics (i.e. % of sand/gravel/chalk/clay etc.). This can be done by providing data from geotechnical investigations; <input type="checkbox"/> Assess the impact of disposal on marine receptors i.e. impact from increases in suspended sediment concentration, sediment plume, contamination etc; and <input type="checkbox"/> Provide evidence that the material has been characterised at depth, i.e. data collected is from an equal if not greater depth than the disposal material. <p>This information must be provided in order to designate Sizewell C Nuclear Power Station as a disposal site, provide a reference code for OSPAR reporting purposes and for the disposal site to be included in the DCO/DML. It is recommended that Natural England is also consulted on this document when provided to the MMO. Early engagement with the MMO is recommended to ensure the characterisation report provides us with all the required information.</p> <p>Much of the above information may be provided in the Application to the Planning Inspectorate; however, it should also be presented in the report and described in the context of the disposal of the worst case volume of material. It should also be noted that if disposal is to be licenced under the DCO there will be a requirement to add a condition to submit biannual disposal tonnage returns forms to the MMO. There may also be additional conditions applied depending upon the outcome of the assessment.</p> | <p>Material would be disposed of inside the Sizewell C site boundary. Dredge disposal site characterisation report is included in Volume 2, Appendix 22K.</p> |
| 338 | Main Development Site | Coastal Geomorphology | Marine Management Organisation | <p>Conditions in the Sizewell Bay during the early 20th century are described in the report where wide areas in the bay experienced high rates of persistent erosion or accretion. We recommend that whilst the current geomorphological baseline is a fluctuating pattern of erosion and deposition with low transport rates, the future baseline should consider the risks of the system reverting to the previous baseline seen.</p> | <p>Details of the future baseline conditions considered within the coastal geomorphology and hydrodynamics assessment is provided within Volume 2, Chapter 20.</p> |
| 339 | Main Development Site | The Proposed Development | Maritime & Coastguard Agency | <p>There is a British Standards Institution publication on Road Lighting, BS5489. Part 8 relates to a code of practice for lighting which may affect the safe use of aerodromes, railways, harbours and navigable Inland waterways.</p> | <p>A small number of warning lights may be required for example, warning lights on the tops of the largest cranes may be required.</p> <p>The need for warning lights would be discussed with the relevant consultee at an appropriate time.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|--|------------------------------|--|--|
| 340 | Main Development Site | Marine Navigation | Maritime & Coastguard Agency | <p>The proposed development includes a permanent Beach Landing Facility. At this stage we can only generalise and point the applicant in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice. In consultation and liaison with a Harbour Master, they will need to develop a robust Safety Management System (SMS) for the project under this code</p> <p>The sections that we feel cover navigational safety under the PMSC and its Guide to Good Practice are as follows:</p> <p>From the Guide to Good Practice, section 6 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port, and a duty of reasonable care to see that the harbour is in a fit condition for a vessel to use it.</p> <p>Section 6.7 Regulating harbour works covers this in more detail and have copied the extract below from the Guide to Good Practice.</p> <p>6.7 Regulating harbour works</p> <p>6.7.1 Some harbour authorities have the powers to license works where they extend below the high watermark, and are thus liable to have an effect on navigation. Such powers do not, however, usually extend to developments on the foreshore.</p> <p>6.7.2 Some harbour authorities are statutory consultees for planning applications, as a function of owning the seabed, and thus being the adjacent landowner. Where this is not the case, harbour authorities should be alert to developments on shore that could adversely affect the safety of navigation. Where necessary, consideration should be given to requiring the planning applicants to conduct a risk assessment in order to establish that the safety of navigation is not about to be put at risk. Examples of where navigation could be so affected include:</p> <ul style="list-style-type: none"> • high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation; • high constructions, which potentially affect wind patterns; and • lighting of a shore development in such a manner that the night vision of mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous. | This point is noted. As described in Volume 2, Chapter 24 of the ES , the points raised are to be managed by the Harbour Master |
| 341 | Main Development Site | Marine Navigation | Maritime & Coastguard Agency | The overall approach to the required and updated traffic study and Navigation Risk Assessment as described in Section 6.17 is accepted | No further response provided. |
| 342 | Main Development Site | The Proposed Development | Maritime & Coastguard Agency | The applicant should consult with Trinity House Lighthouse Service for the requirements for lighting and marking of the outfalls and jetty | Trinity House Lighthouse Service have been consulted as part of the Navigation Risk Assessment included as Volume 2, Chapter 24 and Appendix 24A of the ES . Details of consultation undertaken with Trinity House Lighthouse Service and the SZC Co. response to the points raised is included in Volume 2, Appendix 24A . This includes discussions on navigation protection and the marking of structures with buoys or beacons (which are included in design). |
| 343 | Main Development Site | Marine Navigation | Maritime & Coastguard Agency | Reference to the 2014 scoping document is confusing and contains errors e.g. paragraph 6.17.3 states: "The approach to the assessment of likely significant effects on marine navigation is set out in Section 7.15 of the 2014 EIA Scoping Report.", however Section 7.15 addresses <u>Marine Ecology</u> | No further response provided. |
| 344 | Main Development Site | The Proposed Development | Maritime & Coastguard Agency | Following on from the scoping study an application for a Harbour Revision Order (HRO) may be required. If this is necessary, the MCA will need to be consulted again on any revisions we may require to enhance the initial conditions. Possible new conditions will be developed from the findings of a full Environmental Impact Assessment (EIS) report on the project. | As part of the DCO application, SZC Co are applying for a temporary harbour area to be established offshore of the development site which would establish the harbour limits and powers. A Competent Harbour Authority would be established and a harbour master would be appointed to ensure safe and efficient navigation around the marine works, in particular for deliveries to the beach landing facility. |
| 345 | Project-Wide | Incombination & Cumulative Effects | Marlesford Parish Council | The cumulative impacts of Sizewell C, other energy related developments along the coast and increasing residential development must be better addressed | Chapter 1 of Volume 10 describes the process followed to identify cumulative plans, projects and programmes. This includes consideration of other energy related development and residential developments. |
| 346 | Project-Wide | Scope | Marlesford Parish Council | EDF must be forced to properly consider the impacts of traffic and the potential development of the SPR in terms of noise, air quality, vibration, community severance and visual intrusion. | Volume 4 of the ES provides an assessment of the potential environmental effects associated with the construction, operation and removal and reinstatement of the proposed Southern Park and Ride facility. |
| 347 | Project-Wide | Terrestrial Ecology and Ornithology & Landscape and Visual | National Grid | If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances. | This point is noted and will be considered fully at the detailed design stage. |
| 348 | Main Development Site | Marine Water and Sediment Quality | Natural England | Within the EIA and HRA, EDF Energy will also need to assess the sensitivity of the receptor. | <p>This point is noted. The methodology for assigning sensitivity (or receptor value) is provided within Volume 1, Appendices 6Q and 6R. The marine water quality and sediments and marine ecology assessments presented in Volume 2, Chapters 21 and 22 then assign a sensitivity to each of the identified receptors.</p> <p>The Shadow Habitats Regulation Assessment report is provided in Book 5 of the submission documents (Doc Ref. 5.10), within which further details on the methodology used in the assessment is provided.</p> |
| 349 | Project-Wide | | Natural England | With regards to new temporary development, as a 'worst case scenario', we question whether this should also include the temporary rock jetty which may be used for construction. Clarification is therefore needed on this point. | As set out within Volume 1, Chapter 6 , a parameter approach has been followed. As established by case law, this means that some aspects of the design are detailed at the time of the Application, while others will remain outline in nature within clearly defined, fixed parameters. This approach provides flexibility for the implementation of development consent by defining parameters that present the likely worst case within which the development could be brought forward. By assuming the proposed development is constructed within the defined set of parameters, the environmental effects associated with the development would be no worse than the effects associated with the parameters, and therefore, the conclusions of the assessment would remain robust, even if the final development details changed within the set parameters. The parameters associated with the main development site, and that have been assessed within Volume 2 of the ES are set out within Volume 2, Chapters 2 and 3 . The parameters for the associated development are provided within Chapter 2 of Volumes 3 to 9 and assessed within the respective volumes of the ES . |
| 350 | ES Preparation | Decommissioning | Natural England | Welcome that the decommissioning period will be considered within the EIA. | Volume 2, Chapter 5 , provides a description of the likely activities associated with the decommissioning phase. This includes a high level discussion of the potential environmental impacts that could occur during this phase. In order to decommission a nuclear reactor, it is necessary to obtain consent from the ONR and undertake an EIA under the Nuclear Reactors Environmental Impact Assessment for Decommissioning Regulations 1999 and Marine Works (Environmental Impact Assessment) Regulations 2007 or equivalent EIA Regulations at the time of submission. This would require the submission of an ES, and a period of public consultation prior to gaining approval for the commencement of decommissioning. |
| 351 | Main Development Site | Marine Ecology | Natural England | We welcome the consideration of Conservation Objectives in terms of designated sites and species. It should be noted that there is different terminology in an EIA and HRA context as to significance of effect as this distinction should be clearly made within the EIA. | This point is noted. The term significant within the context of the marine ecology with the ES is detailed within Volume 1, Appendix 6R . |
| 352 | Main Development Site | Marine Ecology | Natural England | We welcome that the relevant assessments will consider receptor specific effects, particularly with regard mobile species such as marine birds and mammals. | The marine ecology assessment (Volume 2, Chapter 22) considers receptor specific effects. Whilst an exhaustive list is not provided here, the assessment does consider plankton, benthic ecology, fish ecology, marine mammals and the potential for indirect effects and effects on food webs. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|-----------------------------------|-------------------|--|--|
| 353 | ES Preparation | OCEMP | Natural England | We welcome that the Outline Construction Environmental Management Plan (OCEMP) will be submitted with the EIA and encourage EDF Energy to provide to the relevant statutory nature conservation bodies (SNCBs), including Natural England, for comment at the earliest opportunity to allow for frontloading prior to the examination process. | It is now proposed to prepare an Code of Construction Practice (Document Reference 8.11) alongside the EIA rather than a OCEMP. The aim of this CoCP is to provide a clear and consistent approach to the control of Sizewell C construction activities on the main development site and associated development sites to maintain satisfactory levels of environmental protection, and limit disturbance from construction activities as far as reasonably practicable. |
| 354 | Main Development Site | Marine Water and Sediment Quality | Natural England | We welcome that the FRR will be assessed using the same screening approach. However, we seek clarification within the EIA as to whether the FRR will be chlorinated as suggested in the scoping report, or not as suggested at the recent Marine Technical Forum (MTF) on the 18th June 2019. | As described in Volume 2, Chapter 4 , low level chlorination is the most commonly used and effective means of preventing untoward biological growth within cooling water circuits. The biocide may be introduced either in the form of sodium hypochlorite solution, or produced in situ by electrolysis of seawater, in order to maintain a Total Residual Oxidant (TRO) level of 0.2 milligram per litre (mg/litre) within critical land-based plant (condensers and essential cooling water systems) all year round. The point of chlorination would be downstream of the drum screens, so that no chlorination of the FRR tunnels occurs. |
| 355 | Project-wide | Amenity and Recreation | Natural England | We welcome that the ECP has been added to the baseline and that consultation with Natural England will continue on this issue. | The England Coast Path is included within the amenity and recreation baseline and the effects are assessed as part of the impact of assessment of the Sizewell C Project. Further information regarding the consultation to date can be found in Chapter 15 of Volume 2 of the ES . |
| 356 | Project-wide | Climate Change | Natural England | We welcome that the climate change chapter will include a high level environmental assessment of decommissioning. | A high-level assessment of the decommissioning of Sizewell C is provided in Volume 2, Chapter 5 rather than within the climate change chapter. |
| 357 | Project-wide | Terrestrial ecology | Natural England | We welcome that internationally and nationally important SACs, SPAs, Ramsar sites, SSSIs and AONBs are recognised as being of 'High' value/sensitivity within this table. However, we advise that this category should also include S41 Habitats of Conservation Importance under the Natural Environment and Rural Communities (NERC) Act 2006; as nationally important habitats and species, we note these are given a 'High' value elsewhere in the report (e.g. in Table 6.26) so this needs amending here to ensure consistency of approach. | As outline within the Terrestrial Ecology and Ornithology assessment methodology outline in Volume 1, Appendix 6J , 'high' value ecological features possess key characteristics which contribute significantly to the distinctiveness, rarity and character of the site/ecological feature (e.g. designated features of international/national importance, such as SACs, SPAs, Ramsar sites and SSSIs). 'Medium' value include ecological features possess key characteristics which contribute significantly to the distinctiveness and character of the site/ecological feature (e.g. designated features of regional or county importance such as CWSs and local BAP species). Based on the above habitats included within Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 are considered to be have the potential to be of either 'high' or 'medium' value within the terrestrial ecology and ornithology assessments presented in Volumes 2 to 9 of the ES . |
| 358 | Project-Wide | The Proposed Development | Natural England | We welcome that EDF Energy's preferred option for the SSSI crossing design to be taken forward into the DCO application (i.e. culvert with embankment) will be fully justified in terms of the environmental constraints where less damaging alternatives options are available in this respect (e.g. three span bridge design). See section 4.6.2 of our Stage 3 response in Annex C for further detailed advice on this issue. However, we advise that similar environmental appraisals and consideration of alternatives should also be undertaken for the: <input type="checkbox"/> Water management zone (WMZ) locations (i.e. specifically the WMZ which is close to Minsmere and an important natterjack toad population) <input type="checkbox"/> Spoil management proposals, including stockpile areas and borrow pits (see paragraphs 4.6.7.6 – 4.6.7.7 of our Stage 3 response in Annex C for further detailed advice on this issue) <input type="checkbox"/> Training building location (see paragraph 4.6.9.3 of our Stage 3 response in Annex C for further detailed advice on this issue) <input type="checkbox"/> Sizewell B relocated facilities location (see paragraph 4.6.14.3 of our Stage 3 response in Annex C for further detailed advice on this issue) <input type="checkbox"/> Length location and design of the FRR (see paragraph 4.6.3.4 of our Stage 3 response in Annex C for further detailed advice on this issue) | SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals. A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4 , together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects. Alternative options for the SSSI crossing are discussed in Volume 2, Chapter 6 of the ES . The other points raised in this comment were provided in during Stage 3 consultation. A response to these is included within the Consultation Report (Doc Ref. 5.1). |
| 359 | Main Development Site | Marine Water and Sediment Quality | Natural England | We welcome that any commissioning discharges will also be accounted for and assessed and seek clarification as to whether this will be through the CDO. | Volume 2, Chapter 21 explains that cold flush testing discharges would be directed to storage tanks and controlled releases via the combined drainage outfall. The effluent produced during hot functional testing would be diluted within the cooling water system before being discharged via the main outfall tunnel. |
| 360 | Project-wide | Climate Change | Natural England | We note that the Climate Change Risk assessment will have a temporal scope of 60 years and question whether this is appropriate considering sea level rise as a climate change hazard may present a risk for the operational and decommissioning phase of the proposed development. We note that this will be considered within Nuclear Site Licensing and defer to Environment Agency guidance on this. | The temporal scope of the climate change risk assessment has been extended to has a temporal scope of 72 years, which includes the construction period and the 60 year design life for the proposed Evolutionary Power Reactor (EPR). This aligns with NPS EN-1, Section 3.5.10 for the estimated operational design life of a nuclear power station. See Section 26.5 of Volume 2, Chapter 26 for further details. |
| 361 | Project-wide | Terrestrial ecology | Natural England | We note that some points refer to the temporal scope of the EIA as construction and operation (e.g. 5.2.2), while some aspects state will consider decommissioning (e.g. 5.2.5 and 5.2.6) . Natural England have previously advised within Expert Topic Groups (ETG) and within our Stage 3 consultation response that the decommissioning phase be included within the EIA. We would also advise that consideration is given to the potential effects of maintenance of the Interim Spent Fuel Store, which may be present beyond decommissioning. Clarification should be provided on whether decommissioning will be considered for all aspects of the projects throughout EIA. | Volume 2, Chapter 5 , provides a description of the likely activities associated with the decommissioning phase. This includes a high level discussion of the potential environmental impacts that could occur during this phase. In order to decommission a nuclear reactor, it is necessary to obtain consent from the ONR and undertake an EIA under the Nuclear Reactors Environmental Impact Assessment for Decommissioning) Regulations 1999 and Marine Works (Environmental Impact Assessment) Regulations 2007 or equivalent EIA Regulations at the time of submission. This would require the submission of an ES, and a period of public consultation prior to gaining approval for the commencement of decommissioning. |
| 362 | Project-wide | Climate Change | Natural England | We note that it is currently not proposed to assess cumulative effects relating to CCR, and question whether climate change risks to the project will be adequately considered. For example, in combination sea level rise, water temperatures and increased storminess and wave height may necessitate increased soft coastal defences for the project, and may have potential knock on effects for designated sites. | A cumulative assessment considers the cumulative impact of other developments as well as the proposed development on sensitive receptors in the surrounding environment and this is presented in Volume 10, Chapter 4 . The purpose of the Climate Change Risk (CCR) assessment is to consider the impacts of climate change on the Sizewell C Project. The CCR assessment does consider the cumulative impact of all climate hazards on the Sizewell C Project. |
| 363 | Main Development Site | Marine Water and Sediment Quality | Natural England | Waste water or sediments from drilling the horizontal tunnels, and drilling muds should be put through sediment settling tanks and screened as appropriate and their management should be clearly outlined in the EIA, HRA and CoCP. | Drilling waste water containing small volumes of drilling chemical leachate would be discharged via the combined drainage outfall. The potential for toxicological effects have been assessed as part of the CDO assessment within Volume 2, Chapter 21 . |
| 364 | Main Development Site | The Proposed Development | Natural England | These figures do not illustrate the various elements of the proposed development in the context of the significant environmental constraints within which they are proposed, including the internationally and nationally important designated sites for wildlife and landscapes (i.e. SACs, SPAs, Ramsar sites, SSSIs and AONBs). This therefore needs to be addressed and the relevant figures included in the EIA. | Environmental context plans have been prepared for the main development site and each of the associated developments. These are included in Chapter 1 of Volumes 2 to 9 of the ES and show the location of each of the components of the Sizewell C Project in the context of identified environmental constraints. |
| 365 | Main Development Site | The Proposed Development | Natural England | These figures are largely focussed on the terrestrial elements of proposed development and do not illustrate the proposed marine components of development in any detail. This therefore needs to be addressed and the relevant figures included in the EIA. | Both the marine and terrestrial components of the proposed development are described and assessed in the ES and figures accompany the ES as appropriate. |
| 366 | Main Development Site | Marine Water and Sediment Quality | Natural England | Thermal elevation, should be assessed against the future baseline and the SAC/SPA thermal criteria. | Thermal elevation is assessed against the future baseline and SAC/SPA thermal criteria within Volume 2, Chapter 21 . Further detailed analysis is provided within Volume 2, Appendix 21E |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|-----------------------------------|-------------------|--|---|
| 367 | Main Development Site | Marine Water and Sediment Quality | Natural England | There is currently no mention of inclusion of a worst case scenario with regards to water and sediment quality, for example working on two reactors. | Volume 2, Chapter 21 and its associated appendices consider the worst cast scenario of two working reactors. |
| 368 | Main Development Site | Marine Water and Sediment Quality | Natural England | The Study area should extend as far as necessary to include the worst case scenario zone of influence for thermal and chemical plumes; not just to the spatial extent of the proposed cooling water infrastructure, and the worst case sediment suspension in accordance with modelling. | Volume 1, Appendix 6Q identifies that the Zones of influence (ZoI) for marine water quality and sediment has been informed by the largest-scale potential impacts associated. |
| 369 | Main Development Site | Marine Ecology | Natural England | The Study area is identified in 6.16.9 as being the seaward boundary extending to the eastern flank of the Sizewell-Dunwich Bank, to include the spatial extent of the proposed cooling water infrastructure. However, 6.6.10 identifies a number of zones of influence which extend beyond the Sizewell Dunwich bank. Clarification and consistency is therefore needed on this point. | This point is noted and has been considered in the preparation of the marine ecology chapter of the ES (Volume 2, Chapter 22) . This includes the provision of additional information on the study areas and the zones of influence. Additional information of the zones of influence is provided within Volume 1, Appendix 6R . |
| 370 | Main Development Site | Marine Water and Sediment Quality | Natural England | The scoping identifies elevated suspended sediment levels over a period of days and therefore does not accurately represent the in combination and long-term impacts of repeated increases in SSC. | This point is noted. Further information on the period over which SCC would return to background levels after an activity is provided within Volume 2, Chapter 21 . |
| 371 | Main Development Site | The Proposed Development | Natural England | The report states that "The Interim Spent Fuel Store would be designed for a life of at least 100 years and may extend beyond the operational life and decommissioning of the other facilities on-site". Natural England advise that consideration of the Interim Spent Fuel Store is provided within the EIA in relation to potential environmental effects, in particular the coastal geomorphology of the area and future baselines. | Chapter 7 of Volume 2 of the ES presents an overview of the proposed arrangements for the management of radioactive wastes and spent fuel arising during operation of the Sizewell C power station. It does not present an assessment of the potential effects associated with the arrangements outlined but identifies, where, within the ES the effects are considered. These include, Volume 2, Chapter 5 and Chapter 25 . |
| 372 | Main Development Site | Marine Ecology | Natural England | The proposed development also needs to be assessed against future baselines, in this case potential future sea temperatures. We note that this is referred to in section 6.21.45 but advise that this should be made clear here too for consistency. | The marine ecology assessment presented within Volume 2, Chapter 22 provides a written description of the future baseline (where relevant) that has been considered within the assessment. The assessment also explains the potential implications of changes to sea temperatures. |
| 373 | Main Development Site | Coastal Geomorphology | Natural England | The locations of scour and any potential scour protection or mattress/rock dumping should be clearly identified within the EIA. | The locations of any proposed scour protection and mattress/rock dumping is included within the primary mitigation of the Coastal Geomorphology and Hydrodynamics assessment presented in Volume 2, Chapter 20 . This includes the provision of rock armour as part of the hard coastal defence system and potential to provide scour protection around each nearshore outfall. |
| 374 | Main Development Site | Coastal Geomorphology | Natural England | The landward extent for coastal hydrodynamics assessment should consider future baselines for the lifetime of the project and the functionality of coastal habitats and species. The area of assessment is therefore likely to stretch beyond the current Mean High Water Spring. | The narrative assessment of future impacts in Volume 2 Chapter 20 of the ES considers of the landward translation of the MHWS with rising sea levels and shoreline erosion. This includes effects on future geomorphic features that would be landward of the present MHWS and geomorphic features influenced by coastal processes that are above or landward of MHWS, such as supra-tidal shingle (which is affected by infrequent storm events and/or high water levels). |
| 375 | Main Development Site | The Proposed Development | Natural England | The Fish Recovery and Return (FRR) system should be included within the permanent development as part of the marine works and associated infrastructure. | The Fish Recovery and Return (FRR) system forms part of the permanent works of the proposed development and Chapter 2 of Volume 2 describes this aspect of the Project. |
| 376 | Main Development Site | The Proposed Development | Natural England | The description of the main development site permanent elements under marine works and associated infrastructure should include the soft Coastal Defence Feature (sCDF) in front of the Hard Coastal Defence Feature (hCDF) which will have to be nourished and replaced during the life time of the project (construction, operation and decommissioning). This will be a permanent aspect of the project and clarification is therefore needed on this point. | This point is noted. Details of the proposed coastal defence features are provided in Volume 2 Chapters 2 and 3 . The hard coastal defence is described as a permanent sea defence in the form of a landscaped embankment built seaward of the outer security fence for Sizewell C. The soft coastal defence feature would be eroded and release sediment to the beach face during severe storms and high water levels, thereby slowing overall erosion rates locally and maintaining the protective shingle beach in front of the hard coastal defence feature. |
| 377 | Main Development Site | Marine Ecology | Natural England | The construction phase is anticipated to last between 9 and 12 years which in this paragraph is considered to be 'short to medium term'. This conflicts with the definitions elsewhere in the report such as paragraph 6.8.23 where a construction duration of 10-25 years is considered to be 'Long-term'. We advise that duration should be considered both in relation to the effect itself and the feature's ecological cycle. For example, five years may be considered short in a human lifetime context but might span several generations for some short-lived species. The duration of an activity may differ from the duration of the resulting effect. For example, if a short-term construction impact causes disturbance to birds during their breeding period, there may be longer-term implications of their failure to reproduce that year. Clarification and consistency is therefore needed on this point. | As defined in the marine ecology assessment methodology provided in Volume 1, Appendix 6R , duration is defined in relation to ecological characteristics (such as a species' lifecycle), as well as human timeframes. The duration of an activity may differ from the duration of the resulting effect caused by the activity. Effects may be described as short, medium or long-term and permanent or temporary. Where durations of short, medium, long-term and temporary are given in this assessment, they are defined in months/years, where possible, and is often subjective to the ecological feature that is being assessed. |
| 378 | Main Development Site | Marine Water and Sediment Quality | Natural England | The assessment methodology does not currently identify the EIA and HRA guidance regarding thermal standards and does not consider whether water and sediment quality may have a likely significant effect (LSE) on European site features of interest. | Volume 1, Appendix 6Q includes reference to guidance on thermal standards. This appendix also provides details of the relationship with the Shadow Habitats Regulations Assessment (Doc Ref. 5.10) included as part of the DCO submission. |
| 379 | Main Development Site | Coastal Geomorphology | Natural England | The alternative positions of the intakes, outfalls and FRR and CDO should be presented within the EIA. | The considerations of alternative fish recovery and return outfall heads locations is provided within section 6.5 of Volume 2, Chapter 6 of the ES . |
| 380 | Main Development Site | Marine Water and Sediment Quality | Natural England | See the following sections of our Stage 3 response in Annex C for further detailed advice on the scope of this topic: □ section 4.6.3 (marine infrastructure) □ section 4.6.4 (BLF) These comments should be addressed and incorporated within the final EIA | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |
| 381 | Main Development Site | Marine Ecology | Natural England | See the following sections of our Stage 3 response in Annex C for further detailed advice on the scope of this topic: □ section 4.6.3 (marine infrastructure) □ section 4.6.4 (BLF) These comments should be addressed and incorporated within the final EIA. | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
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| 382 | Project-wide | Landscape & Visual | Natural England | <p>See the following paragraphs of our Stage 3 response in Annex C for further detailed advice on the scope of this topic:</p> <ul style="list-style-type: none"> <input type="checkbox"/> paras 4.5.58 – 4.5.62 (project as a whole) <input type="checkbox"/> paras 4.6.1.9 – 4.6.1.12 (main power station platform) <input type="checkbox"/> paras 4.6.2.28 – 4.6.2.29 (SSSI crossing) <input type="checkbox"/> paras 4.6.4.11 – 4.6.4.12 (BLF) <input type="checkbox"/> para 4.6.5.10 (coastal defence features) <input type="checkbox"/> para 4.6.6.2 (northern mound) <input type="checkbox"/> paras 4.6.7.6 – 4.6.7.8 (spoil management proposals) <input type="checkbox"/> para 4.6.8.5 (staff accommodation) <input type="checkbox"/> para 4.6.9.3 (training building) <input type="checkbox"/> para 4.6.10.3 (emergency equipment store and backup generator) <input type="checkbox"/> paras 4.6.11.5 – 4.6.11.6 (new electrical substation, with associated infrastructure) <input type="checkbox"/> para 4.6.13.2 (site entrance hub, contractor compounds and shared facilities areas, access road and haul road) <input type="checkbox"/> para 4.6.14.4 (relocation of Sizewell B facilities), 4.6.16.7 (two village bypass) <input type="checkbox"/> para 4.6.17.6 (Yoxford roundabout) <input type="checkbox"/> para 4.6.18.2 (Sizewell Halt rail terminal) <input type="checkbox"/> para 4.6.19.7 (park and ride sites) <input type="checkbox"/> para 4.7.1.8 (Sizewell Link Road (SLR)) <input type="checkbox"/> para 4.7.2.7 (freight management facility) <input type="checkbox"/> para 4.7.3.3 (railway upgrades and improvements 1) <input type="checkbox"/> para 4.8.1.8 (green rail route) <input type="checkbox"/> para 4.8.2.4 (railway upgrades and improvements 2) <input type="checkbox"/> para 4.8.3.7 (Theberton bypass) <p>These comments should be addressed and incorporated within the final EIA.</p> | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |
| 383 | Project-wide | Noise & Vibration | Natural England | <p>See the following paragraphs of our Stage 3 response in Annex C for further detailed advice on the scope of this topic:</p> <ul style="list-style-type: none"> <input type="checkbox"/> paras 4.5.40 – 4.5.47 (project as a whole) <input type="checkbox"/> para 4.6.15.3 (helipad) <p>These comments should be addressed and incorporated within the final EIA.</p> | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |
| 384 | Project-wide | Amenity and Recreation | Natural England | <p>See the following paragraphs of our Stage 3 response in Annex C for further detailed advice on the scope of this topic:</p> <ul style="list-style-type: none"> <input type="checkbox"/> paras 3.9.42 – 3.9.47 (project as a whole) <input type="checkbox"/> paras 4.6.4.13 – 4.6.4.20 (BLF and impacts on the England Coast Path (ECP)) <input type="checkbox"/> paras 4.6.8.2 – 4.6.8.4 (staff accommodation and associated recreational disturbance to designated sites) <p>These comments should be addressed and incorporated within the final EIA.</p> | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |
| 385 | Project-wide | Air Quality | Natural England | <p>See the following paragraphs of our Stage 3 response in Annex C for further detailed advice on the scope of this topic:</p> <ul style="list-style-type: none"> <input type="checkbox"/> paras 4.5.52 – 4.5.55 (project as a whole) <p>These comments should be addressed and incorporated within the final EIA.</p> | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |
| 386 | Project-wide | Terrestrial Ecology and Ornithology | Natural England | <p>See the following paragraphs and sections of our Stage 3 response in Annex C for further detailed advice on the scope of these topics:</p> <ul style="list-style-type: none"> <input type="checkbox"/> paras 3.9.1 – 3.9.41 and section 4.5 (project as a whole) <input type="checkbox"/> section 4.6 (individual elements of the project) <p>These comments should be addressed and incorporated within the final EIA.</p> | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |
| 387 | Main Development Site | Coastal Geomorphology | Natural England | <p>See the following paragraphs and sections of our Stage 3 response in Annex C for further detailed advice on the scope of this topic:</p> <ul style="list-style-type: none"> <input type="checkbox"/> paras 4.5.13 – 4.5.14 (project as a whole) <input type="checkbox"/> section 4.6.3 (marine infrastructure) <input type="checkbox"/> section 4.6.4 (BLF) <input type="checkbox"/> section 4.6.5 (coastal defence features) <p>These comments should be addressed and incorporated within the final EIA.</p> | This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1). |
| 388 | Main Development Site | Marine Ecology | Natural England | Orford Inshore MCZ was designated on the 31st May 2019. This therefore needs updating in the EIA. | This point is noted and has been considered in the preparation of the marine ecology chapter (Volume 2, Chapter 22). However, the Sizewell C Project is not considered to have any effect on the management objectives of the protected features at the site as it is situated beyond the zone of influence for development impacts. However, the mixed sediments provide nursery and spawning grounds for fish. The potential for the Sizewell C Project to affect fish species utilising the MCZ, primarily through entrapment, is considered in Volume 2, Chapter 22 . |
| 389 | Main Development Site | Coastal Geomorphology | Natural England | Operational impacts do not currently identify the beach nourishment or recycling that would be required throughout the lifetime of the project to protect the hard coastal defence as a potential impact. This will need to be assessed within the EIA/HRA/RIAA. | Volume 2, Chapter 20 identifies that mitigation in the form a beach and sediment management is proposed. |
| 390 | Main Development Site | Marine Water and Sediment Quality | Natural England | Operational discharges should be assessed against thermal elevations in relation to future baselines for the operational and decommissioning phases of the proposed development. | The assessment presents within Volume 2, Chapter 21 considers the potential effects from operational discharges. This includes the consideration of thermal elevation. There would not be any discharges during the decommissioning phase and as such these potential effects are not discussed within the high level assessment of decommissioning presented in Volume 2, Chapter 5 . |
| 391 | Project-wide | Terrestrial ecology | Natural England | Natural England seek clarification regarding 5.2.3 stating that the future baseline "will likely cover the first year of operation". We advise that the future baseline be considered against the lifetime of the project including decommissioning as discussed within the ETG. | Details of the future baseline considered within each of the assessments is clearly described within the relevant chapter. As set out in Volume 2, Chapter 5 , only a high level discussion of the potential environmental impacts that could occur during the decommissioning phase is presented in the ES. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|-----------------------------------|-------------------|--|---|
| 392 | Project-Wide | | Natural England | Natural England has fully engaged with EDF Energy throughout Stage 1 (2013), Stage 2 (2017) and Stage 3 (2019) of the pre-application process on the development of the shadow HRA/report to inform the Appropriate Assessment (RIAA) and the associated evidence/assessment process. However, we understand that we will not be provided with the opportunity to review and feed back to EDF Energy on a draft of this report ahead of the DCO application submission which is disappointing given the significant level of input from us over this period of time. | A Shadow Habitat Regulations assessment has been prepared and submitted with the application for development consent (Doc Ref. 5.10) |
| 393 | Main Development Site | Coastal Geomorphology | Natural England | Natural England advises that any mitigation should follow the mitigation hierarchy. If a measure is being introduced to avoid or reduce an effect on a European site, then it can be viewed as mitigation. We also advise that EDF Energy should assess integral features of the project, mitigation and compensation in line with current case law. | This point is noted, the mitigation hierarchy has been applied with a strong emphasis to include and embedded appropriate measures into the design (primary mitigation). As set out in Volume 1, Chapter 6 , primary and tertiary mitigation (i.e. embedded and good practice measures) are considered to form part of the proposed development and therefore, the initial assessment of effects reported in the technical topic chapters of the ES takes account of these measures. If significant adverse effects are identified despite the implementation of primary and tertiary mitigation, the need for secondary mitigation has been considered, developed and proposed within the technical topic chapters before determining residual effects A Code of Construction Practice (Doc Ref. 8.11) has been prepared to provide a clear and consistent approach to the control of Sizewell C construction activities on the main development site and associated development sites to maintain satisfactory levels of environmental protection, and limit disturbance from construction activities as far as reasonably practicable. |
| 394 | Main Development Site | Coastal Geomorphology | Natural England | National designated sites such as SSSIs with a geomorphology component are currently classified as being of 'Medium' sensitivity. Natural England advises that they should be considered as a 'High' sensitivity receptor. | As set out in Volume 1, Appendix 6P , the coastal geomorphology and hydrodynamics assessment utilises the sensitivity criteria from the marine ecology assessment presented in Volume 1, Appendix 6R . As such SSSIs are considered to be of 'High' value. |
| 395 | Main Development Site | Coastal Geomorphology | Natural England | Maintenance dredging activities would punch through both the inner and outer longshore bars, intermittently over the construction, operation and decommissioning phases of the development, which may impact upon geomorphology and bathymetry. We suggest that it is too early in the assessment to determine that this may cause a minor effect without providing further evidence. | Further evidence for the assessment of dredging activities on both the inner and outer longshore bars during the construction and operation of the Sizewell C Project are summarised in Chapter 20 of Volume 2 of the ES and supported by the Coastal Geomorphology Hydrodynamics Synthesis included as Volume 2, Appendix 20A . |
| 396 | Project-wide | Terrestrial ecology | Natural England | It should be noted that classification of the terms 'significant' and 'not significant' have a different criteria within an EIA and HRA context. This should therefore be made clear in the EIA | This point is noted. The term significant within the context of the terrestrial ecology and ornithology with the ES is detailed within Volume 1, Appendix 6J . |
| 397 | Main Development Site | Coastal Geomorphology | Natural England | It is unclear whether the capital and maintenance dredging required for bringing in large loads will be included as a potential impact. Clarification is therefore needed on this point. | The coastal geomorphology and hydrodynamics assessment presented in Volume 2, Chapter 20 considers the potential effects of dredging activities associated with the beach landing facility during operation. |
| 398 | Main Development Site | Coastal Geomorphology | Natural England | It is not currently clear why these design aspects of the project which will be required to maintain the project over its life cycle are being presented as mitigation in respect to the EIA/HRA/RIAA. | As detailed in Volume 1, Chapter 6 of the ES, several primary mitigation measures have been identified through the iterative EIA process and have been incorporated into the design and construction planning of the proposed development. There are no tertiary measures of relevance to the coastal geomorphology and hydrodynamics assessment. As the primary mitigation measures have been embedded into the design, the assessment of likely significant effects discussed in this chapter, assumes that they are in place. The primary mitigation measures are identified in Chapters 2, 3 and 4 of Volume 2 and are summarised in this section so that it is clear where and why these measures have been included, and the way in which they have contributed to the management and reduction of environmental effects. Further clarity is provided within Volume 2, Chapter 20 . |
| 399 | Main Development Site | Marine Ecology | Natural England | It is not clear whether noise and vibration will be considered in the marine ecology section as construction noise may also impact on sensitive receptors in the marine environment. Clarification is therefore needed on this point. | The assessment on noise vibration impacts to fish and other marine species is presented in Volume 2, Chapter 22 . |
| 400 | Main Development Site | Marine Water and Sediment Quality | Natural England | It is not clear from the updates to the baseline whether any further water or sediment samples have been collected and analysed since 2015. Clarification is therefore needed on this point. | Clarification is provided within the marine water quality and sediment assessment presented in Volume 2, Chapter 21 , to explain that whilst additional surveys have been undertaken they were not available to inform the preparation of the assessment. |
| 401 | Main Development Site | Coastal Geomorphology | Natural England | It is disappointing that the designated sites and features to be included within the EIA are not clearly identified and scoped in at this point. | The assessment presented within Volume 2 Chapter 20 specifically considers whether any Sizewell C Project impacts (e.g., unnatural erosion, coastal squeeze) could change features of statutory and non-statutory designated sites. |
| 402 | Main Development Site | Coastal Geomorphology | Natural England | Interrelationships should also include the impact of the temporary rock platform if installed, the CDO, FRR, dredging and scour protection. | The coastal geomorphology and hydrodynamics assessment presented in Volume 2, Chapter 20 presents and assessment of the potential inter-relationship effects are described, where two or more individual impacts from the Sizewell C Project overlap spatially and temporally. |
| 403 | Project-wide | Cumulative effects | Natural England | Inter relationship effects on a receptor should consider synergistic effects. We advise that the assessment of negligible residual effects should be in line with the Waddenzee Judgement. If a plan or project would not be likely to have a significant effect on the site alone, it should nevertheless be considered in combination with other plans and projects to establish whether there would be likely to be a significant effect arising from their combined impacts. | Volume 10 of the ES, presents an assessment of inter-relationship effects within Chapter 2 , Project-wide effects in Chapter 3 and an assessment of effects with other projects, plans and programmes in Chapter 4 . The purpose of these assessments is set out below. • Inter-relationship effects: Effects that occur when different environmental impacts interact with one another with the potential to result in significant effects on a resource and/or receptor (for example, noise, dust and visual effects on a particular receptor, or changes to hydrology on ecological receptors). With the exception of inter-relationship effects on residential properties, commercial facilities and schools, these inter-relationships are generally already assessed and presented in the site-specific technical topic chapters of Volumes 2 to 9 of the ES (Doc Ref. 6.3 to 6.10). Inter-relationship effects on residential properties, commercial facilities and schools are detailed in Chapter 2 of this volume, together with a summary of those inter-relationships identified in the technical topic-chapters of Volume 2 to 9 of the ES (Doc Ref. 6.3 to 6.10). • Project-wide effects (intra-project): Effects that occur when environmental impacts from different components of the proposed development combine, resulting in the potential for a significant effect (for example, the combination of road traffic noise of one component of the proposed development and road traffic noise of another component of the proposed development on a residential receptor). If considered in isolation, the individual environmental impacts may not lead to significant effects. • Effects with other plans, projects and programmes: Effects that occur when environmental impacts from the proposed development combine with impacts from other planned/potential third party projects, plans and programmes (normally in the vicinity of the site), resulting in a change to the overall magnitude of impact acting on a receptor and potentially resulting in a significant effect. |
| 404 | Project-wide | HRA | Natural England | In the context of the HRA, it should be ensured that the mitigation approach is in line with all relevant European case law. | The approach to mitigation in the Shadow Habitats Regulation Assessment Report (Doc Ref 5.10) reflects relevant European case law insofar as it is applicable to the assessment. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|-------------------------------------|-------------------|--|--|
| 405 | Project-wide | HRA | Natural England | In the context of the HRA, it should also be noted that monitoring is not mitigation; only when there is sufficient certainty and agreement with SNCBs that all proposed mitigation is satisfactory in terms of the key mitigation tests should monitoring be used to confirm that these mitigation measures are working and provide an early trigger for any necessary adaptation of the mitigation. If monitoring is proposed, this should include clear reference to the trigger points and mitigation. | This point is noted and understood. However, there are no specific monitoring requirements as a direct consequence of the conclusions of the Shadow HRA Report (Document Reference 5.10). |
| 406 | Project-wide | Landscape & Visual | Natural England | In the context of our remit, the landscape and visual impact assessment (LVIA) should include assessment of impacts to sensitive landscape receptors where necessary, including the nationally designated Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). | An assessment of impacts to sensitive landscape receptors is included in all landscape and visual chapters of Volumes 2 to 9 of the ES as relevant. This includes consideration of the Suffolk Coast and Heaths AONB. |
| 407 | Project-wide | Terrestrial Ecology and Ornithology | Natural England | <p>In the context of our remit, the EIA should include assessment of impacts to all relevant sensitive ecological receptors, including internationally and nationally designated sites, based on robust and up-to-date survey data.</p> <p>We advise that the surveys to inform the various impact assessments should be considered in the context of the recent Chartered Institute of Ecology and Environmental Management (CIEEM) Advice note on the Lifespan of Ecological Reports and Surveys which states that, for surveys which are more than three years old, "The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated". Where the baseline survey information is not in line with this, we advise that clear justification should be provided on how the surveys remain valid and robust enough to inform assessment conclusions.</p> <p>For example, for a major development of this scale in such a highly sensitive environment and bearing in mind the length of time the project has been under consideration, we would expect the ornithological project-specific surveys to be in line with best practice for both breeding and non breeding species.</p> <p>We welcome EDF Energy's commitment to enhance the landscape, biodiversity and recreational value of the wider EDF Energy estate, including a specific commitment to producing a long-term Landscape and Ecology Management Plan (LEMP) which, in part, plans to return arable land within the EDF Energy estate back to 'Suffolk Sandlings' acid grassland and heathland post-construction. In a wider context, we advise that the development should commit to delivering biodiversity net gain and that baseline habitat surveys should be used to inform and evidence conformity with this principle. See paragraphs 3.9.29 - 3.9.41 of our Stage 3 response in Annex C for further detailed advice on this.</p> | <p>For the main development site, the northern park and ride site, the southern park and ride site, and the green rail route: The ecological survey work completed has provided a thorough understanding of the existing baseline and demonstrated that the ecological habitats within the site and the surrounding area are stable with little change observed over the past 12 years of surveying. Site visits were also conducted by qualified ecologists in 2018 and 2019, which further confirmed that the habitats at the site and in the surrounding area have not materially changed since these surveys were undertaken. Therefore, it is considered that sufficient survey data exists to characterise the ecological baseline of the site and the Zol of the proposed development, and that no additional ecological surveys are required to inform the EIA.</p> <p>It is not the case, nor is it in any way appropriate or necessary, for surveys undertaken at an early stage of a project to be repeated simply because they have reached a certain age, especially if the surveys subsequently carried out have been as comprehensive as they have been for Sizewell. It is the professional judgement that this work allows a robust understanding of the ecological situation and the use of the landscape.</p> <p>For all other associated development sites, relevant baseline surveys were conducted in 2019 to support the ES.</p> <p>Further details are provided in the relevant terrestrial ecology and ornithology assessments in Volumes 3 to 9 of the ES.</p> |
| 408 | Project-wide | Noise & Vibration | Natural England | In the context of our remit, noise modelling should include assessment of impacts to sensitive ecological receptors where necessary, including sensitive internationally and nationally designated site features (e.g. breeding and non breeding bird features, marine mammals etc.) and protected species (bats etc.). | The noise modelling considers the potential effects on sensitive ecological receptors, both marine and terrestrial. The potential noise effects on sensitive ecological receptors are reported in Volume 2, Chapter 22 and Appendix 22L of the ES . |
| 409 | Project-wide | Terrestrial ecology | Natural England | In general, it should be ensured that all mitigation follows the avoidance-mitigation-compensation hierarchy and that these are clearly distinguished between. | The mitigation hierarchy has been applied with a strong emphasis to include and embedded appropriate measures into the design (primary mitigation). Primary and tertiary mitigation measures have been specified within the relevant ES volumes, specifying those which are of benefit to ecology, and the assessment has considered the inclusion of these. |
| 410 | Project-wide | Terrestrial ecology | Natural England | In addition to the 'national/regional' objectives, we advise that the effect descriptions here should include consideration at the International/European site level (i.e. SACs, SPAs and Ramsar sites), where adverse effects on site integrity and/or the coherence of the network may occur as a result of the proposals. | The effect descriptors, as detailed within Volume 1, Appendix 6J and applied within the terrestrial ecology and ornithology assessments in Volumes 2 to 9 of the ES consider receptors at the International level. |
| 411 | Project-wide | Terrestrial ecology | Natural England | If residual effects are identified within the EIA following consideration of mitigation, then another section on compensation should be included here as per the avoidance-mitigation-compensation hierarchy. | The mitigation hierarchy has been applied with a strong emphasis to include and embedded appropriate measures into the design (primary mitigation). Primary and tertiary mitigation measures have been specified within the relevant ES volumes, specifying those which are of benefit to ecology, and the assessment has considered the inclusion of these. Where significant effects have been identified, additional mitigation has been proposed within the terrestrial ecology and ornithology assessments in Volumes 2 to 9 of the ES . |
| 412 | Main Development Site | The Proposed Development | Natural England | Gaseous emissions does not currently include emissions from transport vehicles during construction, operation and decommissioning. Clarification is therefore needed on this point. | The air quality assessments presented within the ES consider the emissions from transport vehicles during the construction and operation of the Sizewell C Project. Further information on the methodology applied to the assessments can be found within Volume 1, Appendix 6H and Volume 2, Appendix 12B . |
| 413 | Main Development Site | Water Quality | Natural England | Further detail is required on when within the Construction Phase the Combined Drainage Outfall (CDO) would be constructed and the resultant impacts on water quality | Detail on the timing of construction of the Combined Drainage Outfall (CDO) is provided in Volume 2, Chapter 3 which states that the combined drainage outfall (CDO) would be constructed early in the construction phase and act as the site discharge outfall. The water quality impacts of the CDO and proposed development are assessed in Chapter 21 of Volume 2 . |
| 414 | Main Development Site | Marine Water and Sediment Quality | Natural England | Elevated suspended sediment concentrations (SSC) should be considered as a worst case scenario of consecutive works, against the Conservation Objectives of designated sites and species. Maintenance dredging will be required throughout the operational and decommissioning phases and so will be necessary to consider inter-project effects. | The assessment of effects with other non-Sizewell C plans, projects and programmes is presented within Volume 10, Chapter 4 of the ES . A detailed assessment of marine effects is presented in Volume 10, Appendix 4C , this includes consideration of effects relating to SSC. |
| 415 | Project-Wide | | Natural England | EDF Energy will need to apply for consents for works within an SSSI and should identify those protected species licences likely required at the earliest opportunity. | SZC Co. will apply for all necessary consents, and consult with Natural England on the requirement for protected species licences. Draft mitigation strategies and method statements have been submitted with application. |
| 416 | Main Development Site | Marine Water and Sediment Quality | Natural England | Consideration should be given to Bentonite or drilling surfactant breakout and a Breakout Management Plan provided as part of the DCO. | As detailed in Volume 2, Chapter 21 , potential for discharges of bentonite from the combined drainage outfall to affect suspended sediments concentrations is considered within the assessment. |
| 417 | Main Development Site | The Proposed Development | Natural England | Capital and maintenance dredging is not currently identified as a temporary or permanent aspect of the project under the marine works and associated infrastructure. Clarification is therefore needed on this point. | Details on dredging activities during construction associated with beach landing facility and intake and outfall headworks are provided within Chapter 3 of Volume 2 of the ES . Volume 2, Chapter 4 identifies that dredging of the navigation channel leading up to the BLF may be required prior to the deliveries to site during operation. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|--|------------------------|---|---|
| 418 | Project-wide | Geology and Land Quality. Groundwater and Surface Water and Flood Risk | Natural England | <p>As stated in our response to the 2014 EIA Scoping Consultation our ref: 119244, dated 22nd May 2014) a major omission from the scoping exercise remains the consideration of the water supply and treatment of wastewater that will be needed for the construction phase, both for the physical construction of buildings and structures using concrete and also to supply the campus site for the workforce that would be required on site. Potential activities that would potentially impact groundwater should include supply of water for construction activities, such as concrete batching, and supply of water to the campus site. This is a key consideration and needs to be addressed accordingly in the EIA. Any impacts of water supply for designated sites needs to be included, even if the source of water is remote from the application site.</p> <p>See the following paragraphs of our Stage 3 response in Annex C for further detailed advice on the scope of these topics:</p> <ul style="list-style-type: none"> <input type="checkbox"/> paras 4.5.28 – 4.5.39 (project as a whole) <input type="checkbox"/> paras 4.6.1.3 – 4.6.1.8 (main power station platform) <input type="checkbox"/> paras 4.6.2.10 – 4.6.2.20 (SSSI crossing) <input type="checkbox"/> paras 4.6.11.2 – 4.6.11.4 (new electrical substation, with associated infrastructure) <input type="checkbox"/> para 4.6.12.2 (water management zones) <input type="checkbox"/> para 4.6.16.2 (two village bypass) <input type="checkbox"/> paras 4.6.17.2 – 4.6.17.4 (Yoxford roundabout) <input type="checkbox"/> para 4.6.19.2 (park and ride sites) <input type="checkbox"/> paras 4.7.1.2 – 4.7.1.4 (Sizewell Link Road (SLR)) <input type="checkbox"/> para 4.7.2.3 (freight management facility) <input type="checkbox"/> para 4.8.1.3 (green rail route) <input type="checkbox"/> paras 4.8.3.2 – 4.8.3.3 (Theberton bypass) <p>These comments should be addressed and incorporated within the final EIA.</p> | <p>This comment was provided in during Stage 3 consultation. A response to this comment is included within the Consultation Report (Doc Ref. 5.1).</p> |
| 419 | Main Development Site | Marine Ecology | Natural England | <p>As previously mentioned, consideration should be given to the project design and embedded mitigation definitions in the context of recent Habitats Regulations4 case law.</p> | <p>A description of the embedded mitigation measures relevant to the assessment of effects on marine ecology is presented within Volume 2, Chapter 22.</p> |
| 420 | Project-Wide | | Natural England | <p>The decision on whether to adopt a rail-led or road-led transport strategy should take into account the respective environmental impacts associated with each strategy and progress with the least damaging option in this respect; until such time as this decision is made, the full impacts of each strategy must be assessed as is proposed in the EIA scoping report.</p> | <p>A transport strategy has been selected by SZC Co. The environmental effects of which have been fully assessed by the EIA as reported in Volumes 2 to 9, Volume 1, Chapter 4 of the ES provides a summary of reasonable alternatives to the final transport strategy which have been considered by SZC Co.</p> |
| 421 | Project-wide | Air Quality | Natural England | <p>In the context of our remit, the air quality section of the EIA should include assessment of impacts from increased traffic (NOx emissions) and fugitive dust to sensitive ecological receptors where necessary, including to sensitive internationally and nationally designated site features.</p> | <p>Where relevant, the ES includes the assessment of impacts from transport and dust emissions to designated ecological features.</p> |
| 422 | Project-wide | Socio-economics | Norfolk County Council | <p>While welcoming the above commitments by EDF Energy, it is felt that given the proposal's proximity to Norfolk and the likelihood of additional major construction projects in both Norfolk and Suffolk arising from the offshore wind energy sector (i.e. associated with the Hornsea Three Project; Norfolk Vanguard and Boreas; and East Anglia Offshore Wind One (North) and Two) there is a need for:</p> <ol style="list-style-type: none"> a. Wider consideration of supply chain issues to include working with neighbouring authorities particularly Norfolk; and b. Ensuring that any Education, Skills and Employment Strategy addresses/considers the wider cumulative impacts arising from other planned NSIPs in the area (i.e. covering the above offshore projects); and c. In addition there needs to clear evidence that the significant construction workforce needed will not adversely affect the delivery of other key sectors such as local house building and other employment sectors to the detriment of the local housing and business markets. | <p>The Socio-economic ES chapter (Volume 2, Chapter 9) considers the potential for effects on local businesses and supply chains, and includes reference to a Supply Chain Strategy based on the principle of delivering the region's wider aspirations for growth and the Project's operational benefits for local contracting. This includes a range of measures to support the capability of existing local firms to win work on the project, and commits to a range of engagement activities.</p> <p>The Socio-economic ES chapter (Volume 2, Chapter 9) also considers the potential for effects on labour market capacity and particular skills, and includes reference to an Employment, Skills and Education Strategy based on the principle of delivering the region's wider aspirations for sector skills growth. This includes a range of measures to support employment, skills and education.</p> <p>An assessment of cumulative socio-economic effects with other non-Sizewell C plans, projects and programmes is provided within Volume 10, Chapter 4.</p> |
| 423 | Project-wide | Socio-economics | Norfolk County Council | <p>While Norfolk County Council welcomes the employment opportunities the Power Station will have within the local/regional area both during construction and once operational, there are significant economic issues, which the proposal (ES) will need to address with regard to:</p> <ol style="list-style-type: none"> a. The potential impact on the local labour market – will the development lead to shortages of construction and other key skilled workers in other location inEast Anglia; and b. What measures will be taken to mitigate any potential impacts; c. What support and investment will be given to the training in the local area (e.g. covering the construction sectors). Norfolk County Council would especially welcome measures that will enable permanent, long term job opportunities to be taken up by local people; and d. In addition the County Council would support measures that would encourage/enable people currently excluded from the formal labour market to be supported into jobs at any level/degree of permanency which could help to ease competition for people already active in the relevant local labour market. | <p>The Socio-economic ES chapter (Volume 2, Chapter 9) considers the potential for effects on labour market capacity and particular skills, and includes reference to an Employment, Skills and Education Strategy based on the principle of delivering the region's wider aspirations for sector skills growth. This includes a range of measures to support employment, skills and education.</p> |
| 424 | Main Development Site | The Proposed Development | Norfolk County Council | <p>It is considered that as part of any the DCO application and accompanying Environmental Statement there needs to be clarification on whether there is likely to be any requirement in the wider area for either: (a) reinforcement; of the existing 400 kV network; or (b) new overhead lines (400kV).</p> | <p>A description of the works relating to electrical connections from the main platform is provided in Volume 2, Chapters 2 and 3. Electrical connections from the main platform would be made via overhead lines to the National Grid 400kV substation, which in turn would connect into the National Grid high voltage transmission system. Six monopoles and four pylons would be required to make the connections between the power transmission platforms and the substation. To facilitate these connections, modifications to the existing overhead lines would be required which would include a new pylon, modification of an existing pylon, removal of an existing pylon and the permanent realignment of a short section of the overhead line to connect to the new National Grid substation.</p> |
| 425 | Main Development Site | The Proposed Development | Norfolk County Council | <p>Given the amount of electricity coming ashore from offshore wind energy projects off the Norfolk and Suffolk Coast, the DCO application and accompanying ES will need to address the in-combination impact on the 400 kV transmission network in the wider strategic area i.e. including the potential for reinforcement and new lines in both Norfolk and Suffolk.</p> | <p>A description of the works relating to electrical connections from the main platform is provided in Volume 2, Chapters 2 and 3. Electrical connections from the main platform would be made via overhead lines to the National Grid 400kV substation, which in turn would connect into the National Grid high voltage transmission system. Six monopoles and four pylons would be required to make the connections between the power transmission platforms and the substation. To facilitate these connections, modifications to the existing overhead lines would be required which would include a new pylon, modification of an existing pylon, removal of an existing pylon and the permanent realignment of a short section of the overhead line to connect to the new National Grid substation.</p> |
| 426 | Main Development Site | The Proposed Development | Norfolk County Council | <p>As such the County Council would like to see further evidence and studies (through the ES) setting out the full implications of both the Sizewell C and the emerging offshore wind energy projects on the existing 400 kV network across the two Counties.</p> | <p>A description of the works relating to electrical connections from the main platform is provided in Volume 2, Chapters 2 and 3. Electrical connections from the main platform would be made via overhead lines to the National Grid 400kV substation, which in turn would connect into the National Grid high voltage transmission system. Six monopoles and four pylons would be required to make the connections between the power transmission platforms and the substation. To facilitate these connections, modifications to the existing overhead lines would be required which would include a new pylon, modification of an existing pylon, removal of an existing pylon and the permanent realignment of a short section of the overhead line to connect to the new National Grid substation.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|------------------------------|-----------------------------|----------------------------|--|--|
| 427 | Project-wide | Scope of assessment | Northumbrian Water Limited | <p>Specifically from our perspective, we would expect the following activities to be covered in the EIA:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Non-Potable Water Supply abstraction for construction activities (excluding de-watering); <input type="checkbox"/> Groundwater dewatering; <input type="checkbox"/> Sheet piling; and <input type="checkbox"/> Construction of the concrete curtain; and <input type="checkbox"/> Any other activity that could affect groundwater and surface water levels and water quality. <p>The EIA should therefore consider the effect of the above activities on:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The overall conservation status (condition assessment) of designated conservation sites; and <input type="checkbox"/> The WFD status of all water bodies covering the four test areas (including groundwater and surface water quality (including but not limited to salinity) and groundwater levels and groundwater discharge to wetland dependant features within all effected designated conservation sites). | <p>The ES considers the potential effects of the construction and operation of the Sizewell C Project as described in Volume 2, Chapters 2 to 4 and Volumes 3 to 9, Chapter 2. Where relevant, the groundwater and surface water assessments presented in Volumes 2 to 9 of the ES consider the potential effects during construction from the activities identified within this comment.</p> <p>The groundwater and surface water assessments presented in Volumes 2 to 9 of the ES include a summary of potential effects on WFD compliance. However, further information on WFD compliance is provided in the WFD Compliance Assessment Report (Doc Ref. 8.14) which has been submitted as part of this application for development consent.</p> |
| 428 | Wickham Market Park and Ride | Transport | Pettistree Parish Council | <p>There was no mention of an environmental assessment of the changes proposed to the Valley Farm lane (apart from maintaining roadside vegetation) and the listed narrow weak bridge over the River Deben. We have explained previously in responses to EDF that we do not think this route is a viable option anyway, and like Wickham Market have suggested that rather than using the Valley Farm Lane turn off it will be better to use a new turning at the Potsford Farm entry and then across farmland and a new crossing over the River Deben to connect with Easton Road. Obviously an environmental assessment is also needed of this new proposed route. Failure of whatever scheme is put in place to avoid congestion in Wickham Market is going to lead to "rat runs" by cars, vans and non-Sizewell lorries, with intolerable congestion in the narrow lanes of Pettistree where there are no footways.</p> | <p>A description of the proposed southern park a ride at Wickham Market is provided within Volume 4, Chapter 2 there is no proposed work on Valley Farm lane.</p> <p>The Transport Assessment (Doc Ref. 8.5) has assessed the transport impacts associated with the construction and operation of the Sizewell C Project, and informs aspects of the ES (Doc Ref. Book 6). Following an examination of the geometry of roads, visibility and the constraints to their use by Heavy Goods Vehicles (HGVs) required for the construction and operation of the Sizewell C Project, modifications have been proposed to reduce adverse transport effects, and address capacity and safety issues on the network. This does not identify any requirements for modifications on Valley Farm lane.</p> |
| 429 | Wickham Market Park and Ride | Landscape & Visual | Pettistree Parish Council | <p>Lighting is mentioned in general terms in 6.6.19 but the specific problem of loss of star visibility due to light pollution is not discussed. This is likely to be an effect seen in Wickham Market and the surrounding villages, including Pettistree, because of the constant lighting need at the Park and Ride site. This will of course go on for the 10 years of construction unless the lighting is very well designed.</p> | <p>Volume 4, Appendix 6B includes a night-time appraisal of the likely effects of lighting at night at the southern park and ride site, which is cross referenced in the main text of southern park and ride landscape and visual assessment (Volume 4, Chapter 6) as relevant.</p> |
| 430 | Wickham Market Park and Ride | Socio-economics / Transport | Pettistree Parish Council | <p>I could find no assessment of the impact of congestion caused by workers starting and finishing work shifts on the availability of resources to surrounding villages.</p> | <p>The Socio-economic ES chapter (Volume 2, Chapter 9) sets out the likely distribution of workers, and their potential to create additional demand for local public services and community facilities.</p> |
| 431 | Main Development Site | Radiological Assessment | Public Health England | <p>We note the process for considering the radiological impact of major accidents and disasters is a new requirement since the 2014 EIA scoping report. For the radiological impact, in addition to the impacts in terms of evacuation and sheltering, the requirements for provision of stable iodine should be summarised in the impact assessment. The outputs should include the estimation of doses for the impacts considered and be presented in the EIA.</p> | <p>As agreed with the local authority an assessment of the radiological impacts to inform the off site emergency plan would be undertaken in due course as part of the REPIR submission. A qualitative assessment of radiological impacts is included as part of the major accidents and disasters ES chapter (Volume 2, Chapter 27). This is in line with the NPS which states that due credit should be taken from the GDA process and nuclear site licensing regime.</p> |
| 432 | Main Development Site | Radiological Assessment | Public Health England | <p>We look forward to reviewing the radiological impact assessment of discharges of radionuclides into the environment. The applicant should note that this radiological impact assessment will need to take account of the likely combined impact of historical, current and prospective discharges and direct radiation from all relevant sites on humans and non-human biota as part of the permit application for radioactive substance activities. The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation. It is also important that the developer addresses the radiological impact associated with the decommissioning of the site and takes into consideration the Environment Agency's (EA) guidance document 'Management of radioactive waste from the decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation'.</p> | <p>Volume 2, Chapter 25 considers the combined impact of historical, current and prospective discharges and direct radiation from all relevant sites on humans and non-human biota.</p> <p>A description of the arrangements for the storage of waste is provided within Volume 2, Chapter 7.</p> <p>A high level description of the potential effects during the decommissioning phase is provided within Volume 2, Chapter 5. In order to decommission a nuclear reactor, it is necessary to obtain consent from the ONR and undertake an EIA under the Nuclear Reactors Environmental Impact Assessment for Decommissioning) Regulations 1999 and Marine Works (Environmental Impact Assessment) Regulations 2007 or equivalent EIA Regulations at the time of submission. This would require the submission of an ES, and a period of public consultation prior to gaining approval for the commencement of decommissioning.</p> |
| 433 | Project-wide | Health and Wellbeing | Public Health England | <p>This section of PHE's scoping response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:</p> <ul style="list-style-type: none"> • Access • Traffic and Transport • Socioeconomic • Land Use | <p>The health and wellbeing assessment (Volume 2, Chapter 28) applies a broad socio-economic model of health that encompasses conventional health impacts determined by environmental factors such as disease, accidents, and risk, along with wider socio-economic health determinants vital to achieving good health and wellbeing, such as employment. It considers both physical and mental health, and interfaces with the Equality Statement (Doc Ref. 5.14) to consider both population level effects and any disproportionate risk to sensitive community groups. Plate 1.1 of Volume 1, Appendix 6Y identifies both social and environmental determinants of health which are considered to include the four themes identified.</p> |
| 434 | Project-wide | Health and Wellbeing | Public Health England | <p>The scoping reports identifies the intention to identify the need for monitoring (para 6.22.3). PHE expects an assessment to identify the principles used to determine the need to monitor and subsequently the details of any monitoring strategy.</p> <p>It may be appropriate to undertake monitoring where:</p> <ul style="list-style-type: none"> • Critical assumptions have been made • There is uncertainty about whether negative impacts are likely to occur as it may be appropriate to include planned monitoring measures to track whether impacts do occur. • There is uncertainty about the potential success of mitigation measures • It is necessary to track the nature of the impact and provide useful and timely feedback that would allow action to be taken should negative impacts occur <p>Any monitoring strategy should clearly identify who is responsible for the production of the data, quality assurance/standards, frequency and data sharing arrangements</p> | <p>The health and wellbeing assessment (Volume 2, Chapter 28) considers the potential residual environmental and socio-economic impacts, and where appropriate, sets the mitigation strategy (see below). Please note that such mitigation is set to preclude health impacts, and as such, offers mitigation at a point that will identify potential risk and allow intervention before any manifest health outcome.</p> <p>Where appropriate, and as detailed in the wider technical disciplines, monitoring of environmental health determinants (air quality, noise transport etc) would be provided and set at environmental thresholds that are protective of the environment and health, thereby facilitating intervention before these thresholds are exceeded.</p> <p>The occupational healthcare provision would be monitored, as would referral rates to test effectiveness, and iteratively refine and enhance the service where required.</p> <p>The Section 106 agreement would set the terms of reference for the Sizewell C Health Working Group though the construction phase. This would include maintaining engagement throughout the construction process; reviewing the effectiveness of and aiding in the refinement of the occupational health service provision where appropriate. Such engagement would also facilitate closer collaboration and coordination of aligning health campaigns during the construction phase.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|------------------------------------|-----------------------|---|--|
| 435 | Project-wide | Health and Wellbeing | Public Health England | <p>The scale and nature of the proposed development results in the need for very clear reporting on the temporal impacts and effects on the local population. In this context "temporary" impacts can extend over long periods. The scoping report does not identify how short term effects will be segmented to more accurately reflect temporal effects.</p> <p>Recommendation: The reporting within the PEIR or ES should use the consistent definitions rather than generic temporary or permanent temporal descriptions to ensure a consistent, transparent and accurate approach to the report.</p> | <p>The Health and Wellbeing Chapter (Volume 2, Chapter 28) presents an assessment of both short term and long term impacts, pursuant with the supporting information it draws from (air quality, noise transport etc).</p> |
| 436 | Project-wide | Health and Wellbeing | Public Health England | <p>The provision and proximity of good quality accessible active travel infrastructure and open space that promotes physical activity is a key element in the promotion of a healthy weight environment, which can have positive behavioural and health outcomes, such as mobility, social connectedness, mental health and cardiovascular outcomes.</p> <p>PHE welcomes the proposals to create a Construction Worker Travel Plan. This travel plan provides an opportunity to promote active travel and also reduce vehicle usage, both on and off site. The promotion of active travel should be accompanied by an on site built and natural environment design that facilitates active travel and physical activity.</p> <p>The scoping report identifies a number of Public Right of Way (PRoW) and footpaths that will be redirected and in some cases the need for installation of bridges and crossings. It is important to ensure access to green space and opportunities for physical activity are available and accessible to individuals across the life course.</p> <p>Recommendation The draft Construction Worker Travel Plan should be included within the final Environmental Statement.</p> <p>The report identifies a number of PRoW, footpaths and cycle routes that will be effected for the construction and operation phase under both the rail and road option. These impacts must have mitigation measures identified that maintains as far as possible access to the local population across the life course and minimises any perceived barriers to use. In particular, bridges may be a perceived or actual barrier and as such they should be designed to remain accessible.</p> <p>The on site infrastructure, buildings and facilities should be designed to promote active travel and physical activity. The built and natural environment should be designed to follow guidance issued by the National Institute for Health and Care Excellence (NICE) on the design of the environment for physical activity (Physical activity and the environment - NICE guideline [NG90 -March 2018]) and Sport England Active by Design</p> | <p>A draft Construction Worker Travel Plan (Doc Ref 8.8) has been prepared to contain the measures which would 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. These measures are designed to deliver confidence that the bus-based approach would be effectively delivered and that the impacts on the local transport network would be managed and mitigated as set out in the Transport Assessment (Doc Ref. 8.5). In addition, the draft Construction Worker Travel Plan (Doc Ref. 8.8) also considers the scope for encouraging sustainable mode choice for non-work travel by the construction workforce.</p> |
| 437 | Project-wide | Incombination & Cumulative Effects | Public Health England | <p>The local community will experience impacts from a range of factors due to this and other local developments over an extended period. The range of impacts over such a long period may result in minor effects gaining increased significance to local communities and the vulnerable populations within.</p> <p>Recommendation : The PEIR should report effects at community level in order to assist the identification the overall potential effects across a range of impacts. These community level reports will also aid local communities to engage with consultations by providing relevant and accessible information.</p> <p>The scoping report covers a number of significant programmes of work necessary to deliver the overall project. Although intra-related cumulative impacts are considered on a geographic basis it would be useful for an overall timeline of events to demonstrate any temporal in combination impacts across the zone of influence. This will also aid identification of cumulative impacts should individual project timelines be extended.</p> <p>The ES should include an overall timeline of activity to allow for temporal as well as geographic assessment of impact.</p> | <p>Where possible the Health and Wellbeing assessment presented in Volume 2, Chapter 28 of the ES identifies effects that are likely to arise during the early years construction phase (2023) or peak years construction (2028). These scenarios are defined within the assessment topics from which the health and wellbeing assessment draws upon.</p> <p>An assessment of cumulative effects with non-Sizewell C plans, projects and programmes is presented within Volume 10, Chapter 4. The process that has been followed in identifying relevant non-Sizewell C plans, projects and programmes is summarised in Volume 10, Chapter 1.</p> |
| 438 | Project-wide | Health and Wellbeing | Public Health England | <p>The intention to have an integrated assessment rather than a standalone Health Impact Assessment (HIA) raises concerns and risks a lack of clarity and attention to population and human health.</p> <p>Any integrated assessment must ensure that the chapter relevant to human health is sufficiently comprehensive and not significantly reliant on cross referencing to multiple other chapters.</p> | <p>Embedding the voluntary process of HIA within the regulatory planning and assessment process strengthens the weight placed on health. The HIA team has influence on design parameters, policy and mitigation, transparency is greater, the rigour placed on the assessment is higher, and mitigation and community support initiatives become planning obligations (as opposed to recommendations from a voluntary process separate to the DCO).</p> <p>The health assessment has engaged with, drawn from, and built upon the appropriate technical disciplines to ensure it is grounded in fact, prevents needless repetition. The health assessment is provided in Volume 2, Chapter 28.</p> |
| 439 | Project-wide | Health and Wellbeing | Public Health England | <p>Table 1 lists the wider determinants, as a minimum, that should be scoped into an assessment of effects on population and human health under the broad descriptions identified within the scoping report.</p> <p>Should the applicant wish to scope out any of these determinants the PEIR must provide adequate justification in accordance with the Planning Inspectorate Advice Note Seven (Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements).</p> | <p>The health and wellbeing assessment (Volume 2, Chapter 28) identified that the health determinants associated with the construction of the Sizewell C Project which are considered in this assessment include:</p> <ul style="list-style-type: none"> • potential health and wellbeing effects from changes in emissions to air; • potential health and wellbeing effects from additional transport movements; • potential health and wellbeing effects from changes in noise exposure; • potential health and wellbeing effects associated with the introduction of a temporary non-home-based construction workforce (including social impacts and on healthcare capacity) including net additional dependants; • potential health and wellbeing benefits associated with socio-economic factors (such as direct, indirect and induced employment); and • general stress and anxiety impacting upon quality of life and wellbeing. <p>The health and wellbeing assessment (Volume 2, Chapter 28) identified that the health determinants associated with the operation phase considered in this assessment include:</p> <ul style="list-style-type: none"> • potential health and wellbeing effects from changes in radiological exposure; • potential health and wellbeing effects from changes in electromagnetic field exposure; • potential health and wellbeing effects from changes in emissions to air; • potential health and wellbeing effects from additional transport movements; • potential health and wellbeing effects from changes in noise exposure; • potential health and wellbeing benefits associated with socio-economic factors (such as direct, indirect and induced employment); and • general stress and anxiety impacting upon quality of life and wellbeing. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|--------------|----------------------|-----------------------|---|---|
| 440 | Project-wide | Health and Wellbeing | Public Health England | <p>PHE will expect the Preliminary Environmental Information Report (PEIR) and ES to set out the methodology used to assess impacts on each determinant included in the scope of the assessment. In some instances, the methodologies described may be established and refer to existing standards and/or guidance. In other instances, there may be no pre-defined methodology, which can often be the case for the wider determinants of health; as such there should be an application of a logical health impact assessment method that:</p> <ul style="list-style-type: none"> identifies affected populations vulnerable to impacts from the relevant determinant establishes the current baseline situation using the most current available data identifies the NSIP's potential direct and indirect impacts on each population if impacts are identified, evaluates whether the potential impact is significant in relation to the affected population identifies appropriate mitigation to minimise impacts or the subsequent effects on health identifies opportunities to achieve benefits from the scheme identifies the evidence base on which the impact assessment is based identifies appropriate monitoring programmes | <p>This point is noted and this approach has been followed. Volume 2, Chapter 28 is compliant with the EIA Regulations, and addresses each of these points, and the wider public health priorities raised by the Sizewell Health Working Group (SHWG).</p> |
| 441 | Project-wide | Health and Wellbeing | Public Health England | <p>PHE welcomes the proposal to produce an accommodation strategy and that the assessment of accommodation demand now includes an additional higher demand profile for planning assumptions.</p> <p>We note that some temporary worker accommodation (campus and caravans) will be used to accommodate a proportion of the work force in order to reduce the impact on local communities, but specific details of the accommodation and campus design are not considered. The built and natural environment is a key environmental determinant of health and wellbeing. Given the scale and duration of the scheme the design and operation of the temporary worker accommodation can have an effect on the health and wellbeing of the workforce. The final ES should consider the potential impacts of the design features of the accommodation and campus infrastructure that can affect health and wellbeing.</p> <p>We welcome the occupational and wellbeing facilities and services to be provided but would expect that both accommodation and catering services provide opportunities for a healthy diet. This is currently not mentioned within the PEIR.</p> <p>The accommodation demand profile for non-home based workers for both demand curves is useful, but lacks clarity on how this demand is to be met across the life of the project. The phasing of appropriate available accommodation provision must match the demand planning assumptions.</p> <p>Recommendation The draft accommodation strategy should form part of the ES to ensure it is considered as part of the assessment of mitigation measures.</p> <p>The ES should include sufficient details of the temporary accommodation and campus design to ensure that an assessment is possible of the design features that can influence mental and physical health and wellbeing outcomes; for example, through physical activity levels, travel patterns, social connectivity and access to green space. Any temporary accommodation will need to provide suitable and sufficient facilities for the storage and cooking of healthy meals. On site food outlets should cater for the provision of healthy food options.</p> <p>The existing accommodation strategy identifies a proposed registration scheme for the providers of private rented sector accommodation. The strategy should outline measures to ensure that accommodation in the tourist or private rented sector is fit for human habitation, particularly for houses in multiple occupation (HMOs). This could be through advice to property owners on their responsibilities and legal duties, advice to tenants or an approval scheme.</p> <p>The final ES and accommodation strategy should outline how the planned accommodation profile will match the demand profile for non-home based workers under both workforce profiles.</p> | <p>An Accommodation Strategy (Doc Ref. 8.10) has been prepared to represent a balanced solution for meeting the temporary increase in local accommodation demand which the Sizewell C Project would generate – offering construction efficiencies and supporting the project's aspirations for zero harm; delivering economic benefits for the local area and mitigating impacts during the construction phase. 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.</p> <p>An overview of the accommodation campus is provided within Volume 2, Chapter 3 of the ES and the design principles they are set out in the Sizewell C Main Development Site Design and Access Statement (Doc Ref. 8.1).</p> |
| 442 | Project-wide | Health and Wellbeing | Public Health England | <p>Our position is that pollutants associated with road traffic, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.</p> | <p>Air Quality assessments are provided in Volumes 2 to 9 of the ES. In addition to the dedicated air quality assessment in Chapter 12 of Volume 2, Chapter 28 of Volume 2 applies the air quality health evidence base to inform the health assessment for changes in local air quality from construction and transport emissions, but also operational back up diesel generators.</p> |
| 443 | Project-wide | Health and Wellbeing | Public Health England | <p>It is important that mental health and wellbeing is included within the HIA or population and human health assessment within the EIA. The previous third stage consultation of the draft PEIR included references to the assessment of effects on mental health of the local community and workforce.</p> <p>Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:</p> <ul style="list-style-type: none"> Enhancing control Increasing resilience and community assets Facilitating participation and promoting inclusion. <p>Monitoring of direct and indirect impacts or effects on health will also be important and can provide a detection system for the need for early interventions.</p> <p>Recommendation There should be parity between mental and physical health in the HIA, including suicide.</p> | <p>The approach to the health assessment is based on a broad socio-economic model of health that encompasses conventional health impacts such as communicable disease, accidents and risk, along with wider health determinants vital to achieving good health and wellbeing (such as employment and local amenity). The health and wellbeing assessment (Volume 2, Chapter 28) considers both physical and mental health, and also considers equality and social impacts. The assessment is therefore based on both social and environmental determinants of health. The baseline sections provided explore mental health circumstance and suicide rates, and assesses potential impacts where the evidence base permits.</p> |
| 444 | Project-wide | Health and Wellbeing | Public Health England | <p>An approach to the identification of vulnerable populations has not been provided and does not make links to the list of protected characteristics within an Equality Impact Assessment (EqIA). The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The ES and any EqIA should not be completely separated.</p> <p>The PEIR and ES should clearly identify the vulnerable populations that are being scoped into or out of any assessment and provide clear justification.</p> <p>The assessments and findings of the ES and any EqIA should be cross-referenced between the two documents, particularly to ensure the comprehensive assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive.</p> | <p>Changes in environmental and socio-economic circumstance directly attributable to the construction and operation of the proposed development does not disproportionately impact upon any protected characteristic as defined by the Equality Act. The community profile further demonstrates the relative sensitivity of local communities, and explores relative inequality. As a precautionary measure, and to ensure any pockets of inequality are sufficiently addressed, all residential receptors have been considered as uniformly sensitive to environmental and socio-economic change, and all public health facilities and services have been considered as high value and sensitive assets. Further information is provided within the health and wellbeing assessment in Volume 2, Chapter 28 of the ES.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|-------------------------------------|-------------------------|---|--|
| 445 | Project-Wide | Incombination & Cumulative Effects | Saxmundham Town Council | We are also concerned at the ecological and broader environmental impact of road traffic generated especially in the construction period, and in particular as this development intersects with the East Suffolk Council Local Plan, which makes Saxmundham a major growth point for the whole area. Yet the Sizewell Consultation failed even to mention the Local Plan proposals and impact, and this has not (as far as we have seen) been taken account in the Scoping Report. We have throughout argued for a strong rail-based approach with improved line, and the differential environmental impacts of different or rail (or combined) construction approaches need to be assessed and compared. | Several transport strategies were consulted through Stages 1 to 4 of consultation. Whilst the local authorities preference was then for rail-based transport, as there were concerns that a road-led approach would lead to a significant increase in construction traffic on local roads, Network Rail's response to consultation identified a number of risks to the rail-led option that could potentially impact the Sizewell C programme. Therefore, the integrated strategy was developed that would maximise the use of rail by committing to those rail works, where there was sufficient programme certainty that the works could be undertaken in time. SZC Co. has decided, therefore, to promote the integrated strategy as part of the DCO application. Volume 1, Chapter 4 of the ES provides a summary of main alternatives considered by SZC Co. Road traffic has been assessed within Volume 2 Chapter 10 of the ES and its resultant environmental effects have been assessed within the air quality assessment (Volume 2, Appendix 12B), the noise and vibration (Volume 2, Chapter 11) and within the relevant terrestrial ecology and ornithology, and amenity and recreation assessments in Volumes 2 to 9 of the ES and within the health and wellbeing assessment in Volume 2, Chapter 28 . An assessment of project-wide effects is presented in Volume 10, Chapter 3 . |
| 446 | ES Preparation | EIA Methodology | Saxmundham Town Council | There should be a clearer structure for delineating the short, medium and long term environmental impacts and risks; the EIA should not just assessing the impact of the construction stage and plans, but also the ongoing operations | The ES provides an assessment of the potential impacts during the construction and operation of the Sizewell C Project. Each technical disciplines provides a description of the criteria for temporal scale within Volume 1, Appendices 6D to 6Y . |
| 447 | Project-Wide | Transport | Saxmundham Town Council | The report must include some expectation of the additional traffic that the town might expect to receive during the construction work. It should include measures to be taken if the A12 Saxmundham bypass has to be closed at any time as it would be unacceptable to re-route construction traffic through the town | The transport effects of additional traffic related to the Sizewell C Project is considered in Volume 2, Chapter 10 and supporting appendices. Volume 2, Figure 10.2 identifies the links within Saxmundham that have been considered within the assessment and Volume 2, Appendix 10A identifies the sensitivity of these links. |
| 448 | Project-Wide | Terrestrial Ecology and Ornithology | Saxmundham Town Council | The development of Sizewell C will have a major detrimental impact on local ecology and biodiversity. We are for example concerned at the impact at Eastbridge of the proposed workers' campus – this is an area of huge environmental sensitivity | The assessment of effects on local ecology and biodiversity associated with the accommodation campus (described in Volume 2, Chapter 3) is considered within the terrestrial ecology and ornithology assessment for the main development site (Volume 2, Chapter 14). |
| 449 | Project-Wide | The Proposed Development | Saxmundham Town Council | Saxmundham is situated in one of the driest parts of the country and, with an increasing population, the demands on water resources are already heavy. EDF must be able to demonstrate in their environmental report that they will have access to sufficient supplies of water without damaging the local ecosystems or depriving local communities. | Chapter 4 of Volume 2 of the ES identifies that, subject to SZC Co. obtaining formal agreement with Essex and Suffolk Water, freshwater for industrial systems, demineralisation plant and potable water would be provided via a connection to the mains water supply operated by Essex and Suffolk Water. Further information on the operational water supply options is provided in the Planning Statement (Doc Ref 8.4). The Site Water Supply Strategy, included as Appendix 8.4K of the Planning Statement identifies that construction of the Sizewell C Project would entail many activities that would require water supply, both potable and non-potable. The strategy identifies the additional water supply options during construction and outlines the delivery approach and characteristics of those that have been shortlisted. |
| 450 | Project-Wide | Air Quality | Saxmundham Town Council | there is already concern in the county about the degradation of air quality and monitoring has shown high levels of Nitrogen Dioxide in some places.. EDF needs to carry out detailed surveys on the proposed access routes to the construction site and come up with realistic projections for the likely levels of Nitrogen Dioxide and Particulate Matter. It also needs to consider ways of alleviating an increase in air pollution by innovative solutions such as use of electric vehicles and the most-modern coaches and lorries. | The assessment of transport emissions is presented Volume 2, Appendix 12B and is summarised in Volume 2, Chapter 12 of the ES . This includes assessment of both Nitrogen Dioxide and Particulate Matter. Volume 2, Chapter 12 , identifies primary and tertiary mitigation related to vehicle emissions. However as no significant effects are identified, secondary mitigation measures are not proposed. All HGVs contracted for the Main Development Site will be Euro VI and the availability of local contractors to supply a low emission bus fleet will be explored. SZC Co. acknowledges the benefits of low emission bus transfers from nearby settlements and will continue to explore this and other opportunities in line with the three principles set out in the sustainability strategy. |
| 451 | Project-Wide | Climate Change | Saxmundham Town Council | Although Nuclear Power is described as 'low-carbon', it would be valuable to have information on the Carbon Dioxide emissions during the construction, operating and decommissioning phases of the project measured against the likely output from the plant during its working life. | The Greenhouse Gas assessment (Volume 2, Chapter 26) considers lifecycle emissions from the construction and operation of the main development site as well as for the associated development and decommissioning of the proposed development. Further details on the approach to the GHG assessment are provided in Volume 1, Appendix 6V . |
| 452 | Project-wide | Noise & Vibration | Suffolk County Council | With respect to the effects of noise and vibration on people and wildlife, the evidence of different noise levels on human physical and mental health, both of acute and chronic noise exposure has a robust evidence base. This potentially includes comparative studies with non-human species exposed to different noise levels. For example there is a large evidence base on the physiological and behavioural effects of different noise exposure levels on rodents (7.7.15). | The assessment of likely noise and vibration effects arising from the proposed development has informed the health and wellbeing assessment (Volume 2, Chapter 28), as well as the terrestrial ecology and ornithology assessments (Volumes 2 to 9). |
| 453 | Project-wide | Noise & Vibration | Suffolk County Council | With respect to road traffic noise impacts, an indication of whether any dwellings adjacent to new or altered lengths of carriageway and also the construction traffic routes would qualify for noise insulation under the Noise Insulation Regulations 1975(as amended), with appropriate explanations, should be included. Any other mitigation measures or mitigation schemes identified for further consideration should be outlined. | SZC Co. has established a voluntary 'Noise Mitigation Scheme' which seeks to mitigate residual significant effects on properties from construction or operation of the proposed development, subject to eligibility criteria, as set out in Volume 2, Appendix 11H . Where specified noise criteria is exceeded, noise insulation or temporary rehousing may be provided. SZC Co would undertake further assessment and engage with stakeholders to further understand the affected receptors and their use. |
| 454 | Project-wide | Socio-economics | Suffolk County Council | With respect to mitigation, measures should be put in place for the operational and construction phases. For example, the skills and training strategy should aim to maximise the opportunities for local residents at all stages - in particular enabling local people to secure the long-term operational employment opportunities. | SZC Co. has worked closely with stakeholders in the region to develop a strategy with a range of measures that combine to create an environment in which education, skills, and workforce development can flourish, to the benefit of both the Sizewell C Project and the region. The Employment, Skills and Education Strategy included as Appendix A of the Economic Statement (Doc Ref. 8.9) sets out the approach to employment, skills and education for the Sizewell C Project and has been informed by extensive consultation with regional stakeholders including Suffolk County Council, New Anglia Local Enterprise Partnership (NALEP), local colleges, and higher education and training providers. It identifies and describes measures that would be funded through financial mitigation and managed by a governance and reporting process. Both the scope and scale of financial measures and their governance processes would be secured through the Section 106 agreement (see the Section 106 Heads of Terms (provided as Appendix J to the Planning Statement (Doc Ref. 8.4)). |
| 455 | Main Development Site | Coastal Geomorphology | Suffolk County Council | With respect to assumptions and limitations (7.13.21), the ES should acknowledge that the baseline scenario and also the potential impacts of the new build and operation of the site will be difficult to predict with high confidence and so a range of potential outcomes need to be forecast and which will require ongoing monitoring to review and respond to in either a proactive or reactive fashion. The monitoring plan and associated interpretation I response liabilities are a critical issue for the local authorities. | This point is noted, there is no current computational modelling platform able to accurately integrate the numerous environmental processes that drive shoreline change, and there is no published evidence that shoreline change models can be reliably applied over the multi-decadal timescale that is required. Therefore, the future environmental baseline has been determined by Expert Geomorphological Assessment – whereby professional experts review all the available evidence (including interpretative modelling) to agree a likely future trajectory for both coastal process and shoreline (geomorphic) evolution. The Expert Geomorphological Assessment does not attempt to predict shoreline conditions at a specific date or dates over the lifetime of Sizewell C. That is, it does not define fixed (temporally and / or spatially) 'geomorphic scenarios'. Instead, the Expert Geomorphological Assessment assesses the range of plausible coastal process/change trajectories that may occur in the future, to determine the possible locations and processes that would be materially affected by the development of Sizewell C. The Expert Geomorphological Assessment considers the elements comprising the present baseline (as defined previously in this section) and examines the plausible directions and rates of change that each may experience over the lifetime of the proposed development. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|----------------|-------------------------------|------------------------|--|--|
| 456 | ES Preparation | Baseline | Suffolk County Council | With regard to the future environmental baseline, it should be noted that all non-agricultural land with the Main Development Site is managed by Suffolk Wildlife Trust on behalf of EDF Energy (7.9.15). Consequently, the ES should not underestimate the environmental quality of the future baseline without development, and thus underestimate the impacts of the development. Furthermore, the ES should recognise that the projected future baseline case includes consideration of how Sizewell A and Sizewell B sites will change under decommissioning over the construction life of SZC. | Methodology appendices included within Volume 1, Appendices 6D to 6Y establish how the future baseline considered within the technical assessments presented in Volumes 2 to 9 of the ES has been developed. This includes consideration of changing conditions as well as the introduction and/or removal of features that are currently absent or present in the environmental baseline. The future baseline considered within each technical assessment in clearer defined and, where relevant, explains how it differs from the existing baseline that is described in detail. |
| 457 | Project-wide | Geology & Land Quality | Suffolk County Council | With reference to the samples undertaken (7.10.5/13) it is not clear for which radionuclides they were tested or against what they were compared. | The radiochemical analysis undertaken as part of the previous ground investigation in 2011 included alpha-emitters, beta-emitters, gamma emitters, radionuclides (actinium, bismuth, thallium, lead, protactinium, polonium, radium, potassium, uranium, zinc and thorium), total tritium and carbon-14. Results were assessed against screening values which were derived using published radionuclide background levels and radionuclide concentration limits from the Environmental Permitting Regulations (2011). Further discussion in relation to ground contamination is provided for the main development site in Volume 2, Chapter 18 . |
| 458 | ES Preparation | Alternatives | Suffolk County Council | With reference to the construction laydown land adjacent to the main site, particular regard should be had to alternative options which reduce the impact on the AONB, for example using existing employment land in the vicinity. Similarly, the alternative of siting the Visitor Centre outside the AONB will need to be considered. | SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals. A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4 , together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects. Volume 2, Chapter 6 provide a description of the main development site-specific alternatives considered by SZC Co. |
| 459 | Project-wide | Groundwater and Surface Water | Suffolk County Council | With reference to Table 7.12.3, we suggest that watercourses in, and feeding into/adjacent to, protected sites should be assigned as being of high value. | Volume 1, Appendix 6O identifies that high value receptors are identified as "An attribute with a high quality/rarity, international or national significance that has a low capacity to accommodate disturbance or change" and a medium value receptor as "An attribute with high quality/rarity, national scale and some resilience to disturbance or change; An attribute with high quality/rarity, at a regional scale that has a low capacity to accommodate disturbance or change; An attribute with medium quality/rarity, national scale that has a low capacity to accommodate disturbance or change." As such it is considered that watercourses in, and feeding into/adjacent to, protected sites could be of high or medium value. Where relevant the value of an identified watercourse is provided within the groundwater and surface water assessments presented in Volumes 2 to 9 of the ES . |
| 460 | Project-wide | Socio-economics | Suffolk County Council | With reference to paragraph 6.2.35 and Table 6.2.4, whilst there will be a positive impact from direct and indirect job creation, there is a risk that this will create displacement elsewhere in the economy as the construction competes for the same local workforce and skills alongside other sectors, for example construction, manufacturing, engineering. This could make it more difficult for local companies to recruit and retain their workforce and this should be considered in the ES in the terms EN-1 requires. | Volume 2, Chapter 9 considers the effects of the Sizewell C Project on labour market churn and 'displacement' qualitatively in the context of existing labour market churn in the construction sector. Labour market churn (as opposed to displacement) is a normal feature of the economy, particularly in the construction sector. Even those jobs that are highly skilled can be filled by training people from the next level down, so these would generally be filled from elsewhere in the labour market. It is likely that the creation of employment at Sizewell C would increase labour market churn. |
| 461 | Project-wide | Landscape & Visual | Suffolk County Council | With reference to cumulative effects (7.3.51) Galloper Wind Farm substation will need to be included in this assessment. The existing Gabbard onshore infrastructure forms part of the baseline. | The potential for cumulative effects with galloper windfarm is considered within Volume 10, Chapter 4 of the ES . |
| 462 | Project-wide | Amenity and Recreation | Suffolk County Council | While the Scoping Report touches on deflection (7.4.22), the study area of 2km (7.4.12) does not have a clear logic and will not be sufficient to address this - it does not even include the entirety of the blue rail route - omission of Aldeburgh/Thorpeness is also particularly noticeable. | Main development site The onshore and offshore study areas were established and agreed with statutory consultees. The onshore study area is to the outer edge of the Buffer Zone shown on Figures 15.2 and 15.3 in Volume 2, Chapter 15 of the ES , comprising: <ul style="list-style-type: none">• 8km offset from the site boundary. This is the area within which there are likely to be effects on amenity and recreation receptors caused by physical changes to resources, and to their experience due to changes in views, noise, air quality and traffic and due to additional people using recreation resources; and• beyond this 8km offset specific locations may be identified within the Buffer Zone, informed by questionnaire survey results (included in Appendices 15A and 15B of Chapter 15 of Volume 2 of the ES) and analysis of the predicted construction workforce, where significant numbers of additional people are likely to recreate, affecting the recreational experience of existing users of resources at those locations. Onshore it varies from approximately 12.5km to 17km from the site boundary. The offshore study area is 8km from the onshore site boundary as shown on Figure 15.8 in Volume 2, Chapter 15 of the ES which captures the majority of cruising and recreational vessels that travel off the east coast in the vicinity of the main development site, and it is considered that this area will capture all potentially significant effects. Further information on the process through which the study area was established is described in Volume 2, Chapter 15 of the ES . Associated Development sites A 1km study areas were agreed with statutory consultees (SCC, SCDC, Suffolk Coast and Heaths AONB Partnership, Suffolk Local Access Forum (SLAF) and Natural England) for the following associated development sites: <ul style="list-style-type: none">• northern park and ride at Darsham (Volume 3, Chapter 8 of the ES (Doc Ref. 6.4));• southern park and ride at Wickham Market (Volume 4, Chapter 8 of the ES (Doc Ref. 6.5));• two village bypass (Volume 5, Chapter 8 of the ES (Doc Ref. 6.6));• Sizewell link road (Volume 6, Chapter 8 of the ES (Doc Ref. 6.7));• freight management facility (Volume 8, Chapter 8 of the ES (Doc Ref. 6.8)); and• rail proposals (Volume 9, Chapter 8 of the ES (Doc Ref. 6.10)). A 0.5km study area was agreed with statutory consultees (SCC, SCDC, Suffolk Coast and Heaths AONB Partnership, Suffolk Local Access Forum (SLAF) and Natural England) for Yoxford roundabout and other highway improvements (Volume 7, Chapter 8 of the ES (Doc Ref. 6.8)), due to the relatively small scale of works proposed. |
| 463 | Project-wide | Historic Environment | Suffolk County Council | While Table 7.5.1 refers to historic buildings (which clearly could include non-designated as well as designated heritage assets) and historic landscapes, Table 7.5.2 refers exclusively to impacts on designated heritage assets. As mentioned above, non-designated heritage assets should not be excluded from an assessment of the magnitude of change and should therefore be reflected in paragraphs 7.5.45/47/52/53. | This comment relates to the 2014 scoping report which was appended for information. Non-designated heritage assets are considered in the Terrestrial Historic Environment assessments in Volumes 2 to 9 of the ES where appropriate. |
| 464 | Project-wide | Amenity and Recreation | Suffolk County Council | While it is understood that high quality leisure facilities would be provided within the campus accommodation, with up to 3,000 bed spaces, some workers will undoubtedly make use of the high quality environment during their residency at the campus. | The amenity and recreation assessment for the main development site (Volume 2, Chapter 15) considers the effects of the residents of the campus on amenity and recreation. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|---------------------------------|------------------------------------|------------------------|---|--|
| 465 | Project-wide | Noise & Vibration | Suffolk County Council | <p>Where noise or vibration from site construction working is anticipated to have adverse effects on occupiers of nearby residential properties, based on the prevailing background noise levels, utilising BS:5228:09 and BS:4142:90; the ES should detail all such construction and demolition works (for example diggers, excavators, piling, riveters, mixers, explosives, pneumatic breakers, drills, dewatering pumps, boring equipment, compressors, generators etc.) and indicate the mitigation measures to be taken either;</p> <ul style="list-style-type: none"> • At source, • By way of barrier or shielding, • Any other form of mitigation. <p>The ES should also detail the degree of noise reduction likely to be achieved by the mitigation measures by way of comparison with the existing background and ambient noise levels, measured as part of the scoping process. Methods of noise or vibration attenuation should be specified for each specific construction activity so as to achieve 'Best Environmental Practice' within the ES. Any other acoustic or vibration data in respect of confined tones or low frequency noise propagation should also be made available within the ES.</p> <p>All site transportation movements or essential construction works (e.g. dewatering, dredging, marine landing operations etc.) which may be adversely affect nearby noise sensitive properties during the evening or at night should be particularly highlighted as these may cause sleep loss. Mitigation will be particularly important in these circumstances.</p> | <p>The construction noise and vibration assessment is based on the information provided in Chapter 3 of Volume 2, and Chapter 2 of Volumes 3 to 9. Further detail is provided in the noise and vibration ES chapters and associated appendices in Volumes 2 to 9.</p> <p>Exact working methods and plant to be used would not be determined until a contractor is appointed and therefore precise details of noise mitigation measures cannot yet be established.</p> <p>As set out in the CoCP (Doc Ref. 8.11), mitigation measures that could be implemented during construction to minimise construction noise include selection of alternative plant or working methods, barrier screening and/or stand-off margins and/or alternative plant. Contractors would be required to identify mitigation to avoid significant construction noise and vibration effects, as far as reasonably practicable. Construction mitigation measures may include additional screening or changing working methods and times, including limiting noisy activities on Saturday afternoons. Where appropriate, mitigation measures which would reduce adverse effects are identified.</p> <p>SZC Co. has established a voluntary 'Noise Mitigation Scheme' which seeks to mitigate residual significant effects on properties from construction or operation of the proposed development, subject to eligibility criteria, as set out in Volume 2, Appendix 11H. Where specified noise criteria is exceeded, noise insulation or temporary rehousing may be provided. SZC Co would undertake further assessment and engage with stakeholders to further understand the affected receptors and their use.</p> |
| 466 | Project-Wide | Incombination & Cumulative Effects | Suffolk County Council | We would also expect the ES not to overlook opportunities to mitigate effects of minor significance so they rather become 'negligible' | As set out within Volume 1, Chapter 6 , mitigation measures can be defined as those measures that are envisaged to prevent, reduce and, where relevant, offset any potential significant adverse effects. The mitigation approach adopted for the Sizewell C Project takes the form of a hierarchy, whereby priority is given to preventing significant effects. If prevention is not possible, the approach is to reduce or abate the effects followed, if necessary, by repair (restoring or reinstating) or offsetting/compensating for those effects. Each of these means of reducing potentially significant effects falls under the broad heading of 'mitigation'. Primary and tertiary mitigation (i.e. embedded and good practice measures) are considered to form part of the proposed development and therefore, the initial assessment of effects reported in the technical topic chapters of the ES takes account of these measures. If significant adverse effects are identified despite the implementation of primary and tertiary mitigation, the need for secondary mitigation has been considered, developed and proposed within the technical topic chapters before determining residual effects. |
| 467 | ES Preparation | Alternatives | Suffolk County Council | We welcome the intention (paragraph 4.2.1) to review alternatives for land required during construction (taken to mean not just the laydown land, but also all the associated development) - this consideration should of course not just include layout, but overall scale and location. With particular regard to sea defences (4.3.2), consideration also needs to be given to the north and south of the site, if coastal erosion and flooding affect these areas as may be predicted. The ILWS is taken to be included on this list under Main Development Site. | <p>SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals.</p> <p>A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4, together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects.</p> <p>Volume 2, Chapter 6 provides a description of the main development site-specific alternatives considered by SZC Co.</p> |
| 468 | Project-wide | Landscape & Visual | Suffolk County Council | We note the recognition of the risks to the purpose of the designation of the AONB identified in EN-6, Volume 2. This statement (7.3.8) and section 7.3.49 should consequently acknowledge that the need for offsetting residual impacts is highly likely, a precedent for which exists with the Sizewell B Dry Fuel Store | The landscape and visual assessments presented in the ES , consider the AONB as appropriate. |
| 469 | Project-wide | Landscape & Visual | Suffolk County Council | <p>We note and welcome that landscape should be taken also as seascape as set out in EN-1 (7.3.6) and that it is recognised that there will be offshore visual receptors (7.3.17 should therefore refer to LVIA and SVIA). An LVIA and SVIA assessment to reflect the seasonal changes, and a night time assessment in both cases, will also be needed (lighting from the Operational Service Centre is a particular concern). The ES should therefore provide an indication of the locations, height, design, sensors and luminance of all construction site floodlighting (including the jetty) and all permanent site lighting, together with details of any mitigation measures used to;</p> <ul style="list-style-type: none"> • Limit obtrusive glare to nearby residential properties including the extent of light reduction achieved, • Minimise sky-glow. | The Landscape and Visual Assessment chapter (Chapter 13) included in Volume 2 of the ES , includes an assessment of the effects of the main development site on seascape character. This includes a description of the primary mitigation measures that have been developed to minimise effects on seascape. |
| 470 | ES Preparation | The Proposed Development | Suffolk County Council | We note (3.4.7) that the main construction could take seven to nine years following site preparation - which would include main site earthworks construction of a new access road, new bridges, and a jetty (3.4.2). The ES should ensure that the full duration of activity is reported accurately. | Descriptions of the indicative construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES . |
| 471 | Project-wide | Groundwater and Surface Water | Suffolk County Council | We are particularly concerned that the potential impacts of the construction of the bridges and their ongoing impact on groundwater processes are assessed and managed. | An assessment of effects on groundwater processes during construction of the Sizewell C Project is included within the groundwater and surface water assessment in Volumes 2 to 9 of the ES . This includes consideration of all activities with the potential to impact groundwater processes. |
| 472 | ES Preparation | Alternatives | Suffolk County Council | We are concerned that alternatives are being scoped out of the process at an early stage without a full appreciation of the effects of EDF's preferred option. Alternatives should be appraised having full regard to the retrospective socio-economic and environmental effects alongside consideration of operational requirements. The ES should clearly articulate how alternatives have been evaluated in a balanced way. | <p>SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals.</p> <p>A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4, together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects.</p> <p>Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 provide a description of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co.</p> |
| 473 | Off-site Associated Development | Landscape & Visual | Suffolk County Council | Viewpoints will need to be agreed for the LVIA. Mitigation for landscape and visual effects should include advance planting and/or 'instant' hedging - else mitigation is not likely to be effective during the lifetime of the associated development. | Volume 1, Appendix 6I and its supporting Annexes set out the methodology for the landscape and visual assessment. Each landscape and visual assessment presented within Volumes 2 to 9 of the ES provides details on the identification of and agreement upon, through consultation, the number and location of representative and specific viewpoints within the study area. |
| 474 | Main Development Site | Marine Ecology | Suffolk County Council | Underwater vibration should be identified as a potential impact (7.15.25), the mitigation for which should include monitoring. | The marine ecology assessment presented in Volume 2, Chapter 22 , considers the potential underwater noise and vibration impacts on plankton, benthic ecology and fish ecology during the construction of the Sizewell C Project. |
| 475 | Project-wide | Transport | Suffolk County Council | To assist in some quantification of impacts above this threshold, DMRB 11.3.8.7 figure 1 should be referred to where mean pedestrian delays associated with different road crossing situations are presented in graphical form. | DMRB 11.3.8.7 Figure 1 has been referenced in relation to the assessment of pedestrian delay with the transport effects assessment methodology within Volume 1, Appendix 6F and has informed the assessment. |
| 476 | Project-wide | Transport | Suffolk County Council | This section of the report refers to the impact of the outage work for each reactor. Clarification is needed on whether this should also refer to Sizewell B and how the outages will be coordinated (if it is possible to do so). The ES will also need to describe how the outage staff will be accommodated and transported to/from the site -for example the level of additional parking. | <p>All future year scenarios have been modelled including traffic flows generated by an outage at Sizewell B. A scenario of an outage at Sizewell B and C occurring concurrently during the operational phase has not been assessed as the outages would be planned to not coincide. Whilst there is a possibility for unplanned outages at Sizewell B or C to coincide with a planned outage, this is highly unlikely to occur and, therefore, is not considered to be a typical or reasonable scenario to assess.</p> <p>In terms of additional parking, Volume 2, Chapter 4 identifies that 600 car parking spaces are planned for use by approximately 1,000 outage staff.. This additional car park would not be available for use by operational staff from Sizewell B and Sizewell C.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|----------------|--------------------------|------------------------|---|--|
| 477 | Project-wide | Amenity and Recreation | Suffolk County Council | These are key construction impacts that are not adequately captured (7.4.35). It should also be recognised any changes to patterns of recreational use could have wider economic consequences, given that high quality recreational opportunities are a significant driver of the local tourist economy (with trails promoted nationally). So, with displacement of recreation is potentially displacement of income. The surveys planned (7.4.16), in addition to capturing quantitative and qualitative data on the use of public rights of way, should attempt to capture information on local spending. Additionally, there may be actual physical damage to rights of way including that caused direct by the construction work itself and by possible increased level of use by construction workers. | Effects on the tourism economy are considered with the socio-economics assessment presented in Volume 2, Chapter 9 . The assessment includes a qualitative assessment based on the identification of potential perceived sensitivities to changes in visitor behaviour in the context of the existing visitor environment and characteristics of the Suffolk coast, and evidence of perceived effects versus observed effects elsewhere. |
| 478 | Project-wide | Transport | Suffolk County Council | There is some concern over the large proportion of effects that will rely on the application of "Professional Judgement" within Table 6.3.2 of the report. To inform this judgement and assist in reaching agreement, it is proposed that the assessment is informed and supported by quantifiable (evidence-based) analysis as detailed below. | Where guidance is available, either IEMA or DMRB, it has been used in conjunction with professional judgement within the Transport ES chapter (Volume 2, Chapter 10). The methodology for the assessment of transport effects included as Volume 1, Appendix 6F identifies the guidance that has been followed for each part of the assessment. |
| 479 | ES Preparation | The Proposed Development | Suffolk County Council | There is a particular case to consider whether the impacts of the campus development (Currently wrapped into the 'Main Development Site') need to be specifically isolated within the ES, because of the particular sensitivities, environmentally and socio-economically, associated with EDF's preferred site, and respects (6.3.59), it will give rise to others of its own making. In particular, the ES should assess the impact on nearby residential properties and mitigation measures included as necessary. | The assessment of effects of the campus development are included within technical assessments, where relevant, within Volume 2 of the ES . The assessments assess the impact on nearby residential properties and mitigation measures included as necessary. |
| 480 | Project-wide | Transport | Suffolk County Council | There is a further category of receptors to be considered. These are residents of dwellings likely to be affected by anxiety and intimidation from traffic passing close to their homes. This will be an issue in areas additional to the Farnham bend. The ES should identify residential dwellings that are located close to the edge of the carriageway and categorise these as a separate category of receptor. Estimates should be made of the population of communities affected by severance due to traffic, taking into consideration the location of community facilities, including schools, relative to the road causing severance. | The conceptual 'source-pathway-receptor' model approach has been used to identify potential effects, and the means by which these can manifest themselves on the environment and its sensitive receptors. A desktop study was undertaken in conjunction with site visits, field surveys and consultee engagement to identify all sensitive receptors in the study area. All road links to be used by works traffic within the study area have been assessed and assigned sensitivity, as summarised in Volume 2, Chapter 10 of the ES . In addition there are a number of links that SCC have classed as sensitive that do not necessarily follow the above table but have been included as sensitive receptors in Volume 2, Chapter 10 of the ES . The point raised is taken into consideration in following calculations and assessments: severance, pedestrian amenity and fear and intimidation. Reference is made to this within Volume 2, Chapter 10 of the ES . |
| 481 | Project-wide | Transport | Suffolk County Council | The use of a threshold of 1,400 vehicles per hour is supported by IEMA guidelines, though unilaterally applying these guidelines should be avoided - regard should be had to the health impacts on reducing pedestrian amenity or increasing delays in travel. We expect the figure of 1,400 vehicles per hour to relate to an exceedance in any hour, not to represent an average. | A representative hour has been calculated to be considered within the assessments and present the hour of greatest change. To calculate the representative hour, the average traffic flows across all links in the network have been reviewed, for each reference case and with the Sizewell C Project, for each hour. The percentage change in each hour has then been calculated and the hour with the highest percentage change identified. The representative hour assessment is presented alongside the overarching assessment and any additional effects have been identified and mitigated. The representative hour for each phase of development is presented below: <ul style="list-style-type: none"> • Early years: 7-8am; • Peak construction (busiest day): <ul style="list-style-type: none"> - Across 'daytime hours' (7am-11pm): 10-11pm; - Between 7am-6pm: 7-8am; and • Operational: 4-5pm. For peak construction the representative hour initially was identified as 10pm – 11pm when hours are 'daytime hours' of 7am – 11pm. Given the assessments are to assess impact on vulnerable road users it is important that the representative hour is a reflection of when vulnerable road users are likely to be on the network. As such, the representative hour for peak construction when the hours are restricted to 7am – 6pm is 7am – 8am. |
| 482 | Project-wide | Transport | Suffolk County Council | The types of impact should include the effects that vehicles and in particular HGV's will have on pedestrians and residents (see below). | All of the stated assessments have been completed and are considered within the Transport Assessment (Doc Ref. 8.05) and Transport ES Chapter (Volume 2 Chapter 10) |
| 483 | Project-wide | Transport | Suffolk County Council | The transport assessment (TA) will need to be prepared in line with the DfT's Guidance on Transport Assessments (2007). The TA, like the rest of the ES (as discussed above) should also pull together the cumulative impacts of the individual elements of the development, both the construction of the main development site, the associated development sites and any mitigation schemes. | Scenarios that have been assessed as part of the Transport Assessment (Doc Ref. 8.5) have been agreed with SCC. |
| 484 | Project-wide | Transport | Suffolk County Council | The TA will need to include an assessment of recreational trips made by residents of the campus accommodation. | These trips have been included in the modelling for all non-home based workers. |
| 485 | Project-wide | Transport | Suffolk County Council | The TA will also need to recognise that the benefits of highway mitigation will not apply to all stages of the development (due to the timing of their delivery) and consequently there will be phases of the development where impacts on the highway network will need to be reported in the absence of such mitigation being in place. For example, the construction of the rail line extension and MOLF will ostensibly require all HGV movements arriving by road, as opposed to later phases of the development where materials will be delivered by a combination of road, rail and sea. | The Transport Assessment (Doc Ref. 8.5) has been prepared to describe the supporting transport strategy and assess the transport impacts, and informs aspects of the ES (Doc Ref. Book 6). The following Sizewell C Project phases have been considered: <ul style="list-style-type: none"> • early years construction phase when the main development site and associated development sites are under construction; • peak construction phase when the main development site is under construction and the associated development sites are operational; and • operational phase when the Sizewell C nuclear power station is operational, the permanent associated development sites are retained and the temporary associated development sites have been removed/restored. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-------------------------|--------------------------|------------------------|--|---|
| 486 | Project-wide | Socio-economics | Suffolk County Council | The sensitivity testing should be informed by appropriate data refreshing to ensure the most up to date information will inform the application at the point of submission. | As set out in Volume 2, Appendix 9C , an initial Gravity Model for peak construction of the Sizewell C Project was produced before Stage 1 consultation, and shared with Suffolk County Council (SCC). Comments on the model were received from SCC and SCC's transport consultants AECOM. SZC Co. responded to these comments in a June 2013 paper 'Response to SCC & AECOM Gravity Model Reviews' which was provided to the socio-economic workshop held on 17 September 2013. This response included a commitment to update the initial Gravity Model in the light of 2011 Census information, and any other relevant updated sources of information (e.g. on accommodation sources). The initial Gravity Model was subsequently updated based on the proposals contained in the relevant paper submitted to a December 2013 socio-economics workshop, and has been used as an input to traffic modelling, and to inform wider strategies for transport, accommodation and other socio-economic effects. In 2019, additional workshops were undertaken between SCC, and SZC Co. in order to update the model to account for a peak of 7,900 workers. |
| 487 | Other Rail Improvements | Landscape & Visual | Suffolk County Council | The selection of viewpoints will need to have regard to the potential for soil storage alongside the rail line. Mitigation should therefore consider a means of minimising this storage. | As described in Volume 9, Chapter 2 , landscape bunds are to be provided along sections of the proposed rail extension route. These have been considered within the Landscape and Visual assessment presented in Volume 9, Chapter 6 and associated supporting figures. |
| 488 | Project-wide | Health Impact Assessment | Suffolk County Council | The sections in the ES on air quality and noise and vibration will be particularly relevant to the HIA. | The health and wellbeing assessment (Volume 2, Chapter 28) has been informed by the air quality and noise and vibration assessments presented in Volumes 2 to 9 . |
| 489 | Main Development Site | Coastal Geomorphology | Suffolk County Council | The section on mitigation (7.13.27) should acknowledge the potential for the need for the protection of the Sizewell C site (possibly A and B sites too) prior to full / final removal, requiring interventions that disrupt 'natural' sediment movement across the frontage, which produces a negative impact on adjacent shorelines i.e. Thorpeness, Aldeburgh, Orford and (less likely) Minsmere and Dunwich. These impacts may cause significant effects and require mitigation, albeit decades hence. The ES should recognise this and create a process under which this risk is assessed and appropriate mitigation planned and delivered. | The coastal protection measures proposed at the main development site are described within Volume 2, Chapter 2 . The permanent sea defence, known as the hard coastal defence feature would be in the form of a landscaped embankment built seaward of the outer security fence for Sizewell C. The baseline crest height of the embankment to protect against wave overtopping would be 10.2m AOD. As with Sizewell B, an artificial linear dune / sacrificial berm comprising largely of shingle would extend along the frontage of the sea defences at a level on the shore above extreme high water-level spring tides and rising to a height of approximately 5m AOD, known as the soft coastal defence feature. |
| 490 | Main Development Site | Radiological Assessment | Suffolk County Council | The Scoping Report does not specifically rule out the future use of Mixed Oxide Fuels (MOX) at Sizewell C. The ES should either rule out the use of MOX fuel or comment on the radiological significance and justification for this fuel if it is intended to be used. | Mixed Oxide Fuels are not proposed to be used at Sizewell C. |
| 491 | Project-wide | Transport | Suffolk County Council | The scenarios assessed within the TA should include construction, operation, decommissioning and the impact of outages, of both Sizewell C and B reactors. Tourism is an important part of the Suffolk economy and the impact of construction vehicle movements on the summertime traffic movements should be assessed. A method of assessing seasonal impacts needs to be agreed. The impact on significant local events, for example the Latitude Festival also need to be considered and measures put in place to accommodate the impact that these events have on the network. | Early Years and Peak Construction phases have been assessed, along with the Operational phase. The Decommissioning stage has not been assessed in detail. In order to decommission a nuclear reactor, it is necessary to obtain consent from the ONR and undertake an EIA under the Nuclear Reactors Environmental Impact Assessment for Decommissioning Regulations 1999 and Marine Works (Environmental Impact Assessment) Regulations 2007 or equivalent EIA Regulations at the time of submission. This would require the submission of an ES, and a period of public consultation prior to gaining approval for the commencement of decommissioning. However, Volume 2, Chapter 5 provides a description of the likely activities associated with the decommissioning phase. This includes a high level discussion of the potential environmental impacts that could occur during this phase including potential transport effects. Outage of Sizewell B is included in all forecast scenarios ('reference cases' and 'with Sizewell C'). It was agreed with SCC that since the modelling includes 'worst case' traffic inputs in many forms, and outage at both B and C reactors would be unlikely to occur together, the inclusion of Sizewell C outage would not be necessary. An assessment of the seasonality of traffic in the study area was undertaken at Stage 2 and it was considered reasonable that modelling of seasonal variability should not be required. |
| 492 | Project-wide | Socio-economics | Suffolk County Council | The report uses the level of JSA claimants as a measure of unemployment but it would also be useful to recognise that the pool of people who are economically inactive, but wanting to work, is often significantly greater than the numbers who are registered as unemployment benefit claimants. | Volume 2, Chapter 9 identifies that the number of people who are economically inactive but who want to work is significantly greater than the numbers who are registered as unemployment benefit claimants. As such, the baseline description provided considers employment rates. The chapter also identifies that Claimant count data (2019) (Department for Work and Pensions, 2019) is an experimental dataset that measures the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit, and are required to seek work and be available for work, however, it is not considered to be a national statistic. The baseline also reports on the findings of this experimental dataset |
| 493 | Project-wide | Transport | Suffolk County Council | The report suggests that the impacts of construction traffic are 'temporary'; the ES needs to fully acknowledge the likely duration of the construction period and report the effects accordingly. | The methodology for the assessment of transport effects presented in Volume 1, Appendix 6F identifies that consideration is given to duration when determining the magnitude of impact. |
| 494 | Project-wide | Transport | Suffolk County Council | The report should state the years of assessment. | The Transport Assessment (Doc Ref. 8.05), Transport ES Chapter (Volume 2 Chapter 10) and methodology appendix (Volume 1, Appendix 6J) provide details of the assessment years. |
| 495 | Project-wide | Transport | Suffolk County Council | The report sets out the types of impact that will be examined with respect to the traffic generated. These include severance, pedestrian amenity, driver delay and accidents and safety. | All of the stated assessments have been completed and are considered within the Transport Assessment (Doc Ref. 8.05) and Transport ES Chapter (Volume 2 Chapter 10) |
| 496 | Project-wide | Transport | Suffolk County Council | The report refers to using shift patters to assess the timings of commuter travel. However, no information was provided on how HGV/OGV movements would be managed to inform an assessment of impact. | Assumptions and limitations associated with HGV movements and commuter travel that are associated with the Transport Assessment (Doc Ref 8.5) are replicated in Volume 1, Appendix 6J . These assumptions apply to the assessment of transport effects presented in Volume 2, Chapter 10 . For example, the daily construction HGV temporal profile of the Sizewell C Project is based on the construction programme proposed for the Sizewell C Project, since this is influenced by prevailing traffic conditions in order to optimise delivery times and how the assessment considers the transport effects of the Sizewell C Project between 0700 and 0800 and 1700 and 1800 when the magnitude of transport effects is likely to be the highest. |
| 497 | Project-wide | Transport | Suffolk County Council | The report refers to the use of Visum modelling to determine impacts on the highway network, sec considers that the use of modelling is only one way of assessing impacts and other methods should be considered. Modelling should not be relied upon as the only method of assessment. | The model extent and methodology used in the Transport Assessment (Doc Ref. 8.5) has been agreed with SCC, including VISUM (strategic), VISSIM (micro-simulation) and junction modelling. |
| 498 | Project-wide | Transport | Suffolk County Council | The report refers to impacts on the A12 down to Ipswich; this should refer to the A12 down to its junction with the A14 (Copdock Interchange, Junction 55). The Highways Agency may have concerns around the management of HGV traffic on the A 14, in particular at the Seven Hills (Junction 58) and Copdock junctions and over the Orwell Bridge. In the case of the closure of the Orwell Bridge, methods to manage additional HGV traffic on the diversion route through Ipswich will need to be considered. | Volume 10, Appendix 10C provides details of the road link screening process. This provides full details on the road links considered within the detailed assessment include the sections of the A12 that are considered this includes the Seven Hills Junction. The A14 south of Ipswich (east of Copdock junction) has been screened out of the assessment as the predicted changes in traffic flows are less than 1%. |
| 499 | Project-wide | Transport | Suffolk County Council | The report makes no reference to the transportation of hazardous materials. The ES should clarify whether hazardous materials will be transported on the highway network to and from the site either/and during construction and operation. If hazardous material will/may be used then details need to be provided on how the impact will be assessed and mitigated. | Details of hazardous waste arisings during the construction and operation are provided within the Conventional Waste and Material Resources assessment presented in Chapter 8 of Volume 2 of the ES, Volume 2, Appendix 8A provides details on waste handling, transfer and collection strategy. In addition, Volume 2, Chapter 25 assess the potential radiological impact from the transportation off-site of radioactive materials and wastes to members of the public. |
| 500 | Project-wide | Transport | Suffolk County Council | The report does not refer to mitigation of impacts on the B1122 from its junction with the A 12 to the site entrance and then to Leiston. This was a concern raised at the Stage 1 consultation. This route should also be assessed against the sensitivity criteria discussed above to ensure the full range of possible effects are examined, as the B1122 has been identified as the primary delivery route. | These impacts have been assessed within the Transport Assessment (Document Reference 8.05) and therefore considered within the preparation of the Transport ES chapter (Volume 2, Chapter 10) |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-------------------------|--------------------------|------------------------|--|--|
| 501 | Project-wide | Historic Environment | Suffolk County Council | The proposed terminology used in assessing significance (7.5.39) could usefully reflect that used in the Section 12 of the NPPF, i.e. 'substantial' and 'less than substantial'. These are the tests that are applied on a daily basis to heritage assets and are terms in widespread use. 'Less than substantial' could be graded into differing kinds of effects that are not substantial. It is noted that there is some mapping of terms in the Ecology section (Table 7.2.8) to maintain consistency with industry-standard terminology and this could equally be applied here. | The Terrestrial Historic Environment assessment methodology set out in the 2019 scoping report contains explicit reference to the NPPF/NPS EN-1 classification of harm (section 6.9.30). This has also been reflected in the revised methodology presented in the Volume 1, Appendix 6L of the ES . |
| 502 | Project-wide | Landscape & Visual | Suffolk County Council | The proposed scope of the LVIA and the methodology is broadly acceptable, though we again emphasise the need to address terminology with respect to the duration of impact as discussed above. In particular, we welcome the three pieces of work that are ongoing - that is a) a review of the landscape seascape baseline; b) ZTV and LVIA/SVIA viewpoints and c) the development of the Landscape Strategy. We also note that discussions on the 'special qualities' of the AONB5 remain ongoing (7.3.2). | Volume 2, Appendix 13H provides a report of consultation undertaken and areas of methodology that were agreed with consultees. Appendix 13H also provides details of the bodies that were consulted on the assessment approach and methodology. The Zone of Theoretical Visibility (ZTVs) for the main development site and Associated Developments have been updated as the design of the schemes have evolved, in order to ensure that the study areas remain appropriate. Study areas are defined within each Landscape and Visual ES Chapter in the ES (Volume 2, Chapter 13 and Chapter 6 in Volumes 3 to 9) and have been agreed with the LVA consultees as set out in Volume 2, Appendix 13H . |
| 503 | Other Rail Improvements | The Proposed Development | Suffolk County Council | The proposed new rail routes into the site cross a number of Public Rights of Way. There appears to be an assumption within the report that these routes will be closed or diverted. Although this may be considered for temporary works, more sustainable mitigation will be required for the proposed construction period. Mitigation should include the potential for grade separation or combining with safe and convenient road crossings (Table 8.9). | The rail-led option is no longer being pursued by SZC Co. with the integrated strategy being promoted as the transport strategy for the Sizewell C Project. By not pursuing a rail-led option, this avoids the need for improvements at crossings along the East Suffolk line. Volume 9 of the ES reports the assessment of the likely effects arising from the proposed rail extension route and upgrades to the Saxmundham to Leiston branch line. Where appropriate or reasonably practicable, mitigation is proposed to avoid a significant adverse effect. |
| 504 | Project-wide | Health Impact Assessment | Suffolk County Council | The production of an HIA is welcome, however it should aim to maximise the potential positive health and wellbeing impacts of the proposed development, rather than solely reduce or remove potential adverse impacts on health and wellbeing (2.3.10). It will also need to identify all significant impacts on health (2.3.12). | The health and wellbeing assessment (Volume 2, Chapter 28) has explored both potential health issues and opportunities associated with the construction and operation of the proposed development. This has provided the means to both inform and support more health conscious planning and development, but also forms the basis to the final assessment. |
| 505 | Project-wide | Air Quality | Suffolk County Council | The predicted concentrations of particulate matter (PM10) and dust for each receptor should be formatted for comparison with the Local Air Quality Management Regime and the objectives included in the Air Quality (England) Regulations 2000 and Air Quality (England) Amendment Regulations 2002. The methodology as laid out in the Scoping Report for evaluating the magnitude and significance of air quality effects from construction is agreed. | No further response provided. |
| 506 | ES Preparation | Construction Phasing | Suffolk County Council | The phasing of the construction programme needs to be provided and sensitivity testing in the timing of the delivery of mitigation proposals, such as the MOLF, accommodation, campus, park and rides and rail extension undertaken so that they are delivered at the optimum time having regards to the impacts associated with their construction, and their ability to reduce impacts on local communities and the environment. | The overarching construction programme for the Sizewell C Project is presented within Volume 1, Chapter 2 , which includes information on the relationship between the phasing of the main development site and associated development, as well as Sizewell B Relocated Facilities works. More detailed descriptions of the construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES . An assessment of combined project-wide effects is presented in Chapter 3 of Volume 10 . |
| 507 | Project-wide | Transport | Suffolk County Council | The park and rides will result in a reduction of commuter traffic originating from the north, south or west of the A 12 on the local road network and to local villages east of the A 12. However, the proposed provision of a 1,000 space car park to accommodate commuters from destinations east of the A 12 will result in an increase in traffic on the local network and villages/towns east of the A 12 and this will need to be assessed thoroughly and mitigation provided as necessary. | These impacts have been assessed within the Transport Assessment (Document Reference 8.05) and therefore considered within the preparation of the Transport ES chapter (Volume 2, Chapter 10) |
| 508 | A12 Improvement | Scope of assessment | Suffolk County Council | The options presented in the report will need to be assessed in line with Section 6.3 of the report together with the additional assessment criteria identified in this response. | As described in Volume 1, Chapter 2 , the A12 improvements are no longer proposed as part of the Sizewell C Project |
| 509 | A12 Improvement | Mitigation | Suffolk County Council | The options presented in the report remain as presented in the Stage 1 Consultation. Based on the evidence presented to date, these are not considered likely to be sufficiently extensive or acceptable and the local authorities maintain their support for a bypass of the four A 12 villages of Marlesford, Little Glemham, Stratford St Andrew and Farnham. The ES will need to ensure that adequate mitigation is provided to address impacts arising in all of these locations. | As described in Volume 1, Chapter 2 , the A12 improvements are no longer proposed as part of the Sizewell C Project |
| 510 | Project-wide | Noise & Vibration | Suffolk County Council | The number of noise sensitive properties affected in each scenario should be included, so that the overall impact and scale of effects can be assessed. Rather than following the Design Manual for Roads and Bridges to the letter, which may result in the worst affected facade subject to change being counted which is not always the facade facing and closest to the route, the ES should provide a simple assessment of noise level changes for the facade that is closest to the route to allow residents the opportunity of gauging the potential direct effect. | This point is noted. A description of the noise and vibration assessment methodology is provided within Volume 1, Appendix 6G . This appendix also identifies that the approach taken has been to include all noise and vibration sensitive receptors that are potentially affected by noise or vibration from the Sizewell C Project. However, within some assessment the receptors selected are those considered to be representative of the nearest receptors to the site, for example, the receptors that would likely experience the highest levels of noise and vibration. |
| 511 | Project-wide | Noise & Vibration | Suffolk County Council | The noise level monitoring locations look to be comprehensive, though consideration should be given to the need for additional points on routes likely to be used by construction workers, such as the A 1120. Any short term monitoring of road traffic noise should be carried out strictly in accordance with the "Shortened measurement procedure" as set down in the Calculation of Road Traffic Noise methodology, and be carried out over a full three hour period within the stated hours and not over shorter snapshot periods. | Where relevant, the ES provides details of the survey work undertaken to inform the noise and vibration assessment within Volume 2 to 9 , and monitoring locations are presented on figures, as well as a full summary provided within Volume 2, Appendix 11A . |
| 512 | Project-wide | Air Quality | Suffolk County Council | The most up to date guidance available at the time of assessment should be used. A number of the relevant documents are under review at the present time. Reference could be made to the Suffolk Local Authorities Air Quality Management and New Development 2011 Planning Guidance | A full list of guidance documents that have supported the air quality assessments for the Sizewell C Project is provided within Volume 1, Appendix 6H . This includes a description of relevance of each guidance document and how it has informed the assessment. |
| 513 | Project-wide | Transport | Suffolk County Council | The magnitudes of impact are set out under "Types of Impact" within the report, where the impacts are allocated to one of four categories: Negligible, Minor, Moderate and Substantial. These categories relate to those suggested in the IEMA guidelines and the DMRB, where the impact referred to here as "Minor" is termed "Slight". | Magnitudes of impact have been aligned within the EIA methodology set out within Volume 1, Chapter 6 . As such the following categories are used to define magnitude of impacts: very low, low, medium and high. The following categories are used to define the classification of effects: negligible, minor, moderate and major. |
| 514 | ES Preparation | Alternatives | Suffolk County Council | The local authorities are concerned that in some cases EDF has not sufficiently justified its preferred option and is therefore prematurely curtailing more detailed assessment of alternatives. Of particular relevance are the proposals for freight management. Paragraph 4.4.6 indicates that EDF does not propose to consider Freight Management Site further, given it 'anticipates' HGV movements could 'potentially' be managed through electronic/camera based systems which 'could' reduce the need for further associated development sites. | Volume 1, Chapter 4 of the ES provides details of the main strategic alternatives considered by SZC Co. relevant to the Sizewell C Project, and includes details of the alternatives considered for the accommodation infrastructure, movement of people and movement of materials. In addition, Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 of the ES provide a summary of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co. including details of alternatives in respect of design and layout. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|------------------------|-------------------------------------|------------------------|--|--|
| 515 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | The issue of definition of permanent and temporary impacts has been discussed earlier, though with particular reference to this chapter, while paragraph 7.2.29 subdivides temporary impacts in to further phases, it is not clear how that is then reflected in an assessment of the magnitude of impact (Table 7.2.6). | Volume 1, Appendix 6J identifies that when determining impact magnitude duration is defined in relation to ecological characteristics (such as a species' lifecycle), as well as human timeframes. The duration of an activity may differ from the duration of the resulting effect caused by the activity. Effects may be described as short, medium or long-term and permanent or temporary. Where durations of short, medium, long-term and temporary are given in this assessment, they are defined in months/years, where possible, and often depends on the important ecological feature being assessed. |
| 516 | Project-wide | Historic Environment | Suffolk County Council | The impact on Leiston Conservation will need to be assessed - Sizewell B is clearly visible from within and adjacent to it (7.5.20). | Effects on Leiston Conservation area have been assessed within the main development site Terrestrial Historic Environment Chapter (Volume 2, Chapter 16) |
| 517 | Northern Park and Ride | Scope of assessment | Suffolk County Council | The impact of the new car park to the south of the rail station will need to be considered in any assessment. | Volume 3 of the ES presents and assessment of the likely significant effects associated with the construction, operation and removal and reinstatement of the northern park and ride facility. The potential for cumulative effects with other plans, projects and programmes is included within Volume 10, Chapter 4 . |
| 518 | Project-wide | Health Impact Assessment | Suffolk County Council | The HIA should follow a similar format to that set out in Section 5.3. In terms of mitigating the adverse effects of development, the hierarchy set out in Section 5.4, namely: 1. Prevention; 2. Reduce or abate effects, is appropriate for HIA, though repair and compensation are less relevant. The plan to seek identification of mitigation opportunities throughout the evolution of the proposed development is also applicable to health impacts. Prevention of course remains the priority for significant health impacts. | The mitigation hierarchy has been applied, such that potential environmental hazards are addressed and assessed through the regulatory planning process to prevent potential impacts to health. Appropriate mitigation is then applied within every technical discipline set to be protective of the environment and health (air quality, noise, transport etc). Equally, potential health improvement opportunities have been investigated and feature through healthy urban planning (including shared amenities and facilities), and training and employment strategy to support the uptake of potential socio-economic health benefits locally. |
| 519 | Project-wide | Transport | Suffolk County Council | The existing levels of pedestrian amenity on the network should be assessed using DMRB 11.3.8.4 | IEEMA guidance has been used within the assessment and defines pedestrian amenity as the relative pleasantness of a journey and can include fear and intimidation, if relevant. As with pedestrian delay, amenity is affected by traffic volumes and composition along with pavement width and pedestrian activity. |
| 520 | Project-wide | Amenity and Recreation | Suffolk County Council | The ES will need to present a thorough understanding of how people are using the area at the moment and how those habits are likely to change during the construction and operational phases of development. | The baseline descriptions presented within Volume 2, Chapter 15 and Volumes 3 to 9, Chapter 8 include a detailed description of the current usage of amenity and recreation resources located within the identified study area where survey information is available. The requirement for surveys was agreed with SCC. |
| 521 | Project-wide | Transport | Suffolk County Council | The ES will need to detail the assumptions it has made on the approximate quantities of all incoming materials to be stored on site or at offsite facilities, including how this material will be transported to the site and, proportionately, by which mode. | Details of approximate material quantities required to facilitate the construction of the proposed development are provided within the main developments site description of construction (Volume 2, Chapter 3) and within the associated development site descriptions of development (Volumes 3 to 9, Chapter 2). The Sizewell C Project would require around 10.1 million tonnes of material to be imported to the main development site during the construction period, of which at least 3.5 million tonnes is expected to be transported by rail facilitated by the delivery of up to three freight trains per day (six movements) directly into the main development site. The remaining 6.6 million tonnes would be transported by road. |
| 522 | Visitors Centre | Construction Phasing | Suffolk County Council | The ES will need to detail at what point the Visitor Centre will be constructed and then become operational -cumulative impacts will arise with the other associated development sites as well as the main site development. It is likely that this facility will attract more pedestrians and cyclists to the area and sufficient mitigation will be required to accommodate this increase in vulnerable road users. | An overview of the construction of the Sizewell C Project is included within Volume 1, Chapter 2 . This provides information on the construction phases at the main development site and associated development sites. Where relevant technical assessments in Volume 2 of the ES consider two phases within construction. Early Years (2023) when all components are under construction and Peak Years (2028) when the associated development is operational. |
| 523 | Project-wide | Landscape & Visual | Suffolk County Council | The ES will need to consider seascape and visual impacts associated with shipping and rail activity (i.e. not just the existence of the jetty and the rail line, but the associated transport movements), respectively, during construction. The impacts of the stacks associated with the fuel store and reactor domes along with those related to the permanent beach landing facility need to be reported. | The landscape and visual assessment for the main development site (Volume 2, Chapter 13) consider seascape and visual impacts associated with the construction and operation of the Sizewell C Project. This includes the consideration of those associated with the beach landing facility as necessary. |
| 524 | A12 Improvement | Construction Phasing | Suffolk County Council | The ES will need to assess the construction method and layout including timing of works and piling for example. Consideration should be given to noise and dust from construction works and noise from the new road layout. Mitigation measures such as screening, quiet road surfacing, speed limits that can reduce these impacts on local residents should be discussed within the ES. Air Quality modelling should also be included for this purpose and should any of the Air Quality Objectives (AQO) be predicted to be exceeded, then mitigation measures should be recommended. | The A12 improvements are no longer proposed as part of the Sizewell C Project. Instead, the two village bypass would reduce traffic flows through the villages of Stratford St Andrew and Farnham. Further detail is provided in Volume 5 of the ES. |
| 525 | Project-wide | Socio-economics | Suffolk County Council | The ES should set out how EDF Energy proposes to engage with the supply chain locally and increase its capacity to respond to the demands of the project. This will increase the proportion of labour sourced locally with significant socio-economic benefits. Leakage of benefits outside the area is a major concern of the local authorities. | SZC Co. has prepared a Supply Chain Strategy (Appendix B of the Economic Statement (Doc Ref. 8.9)) to set out the approach to engaging the local and regional supply chain for the Sizewell C Project. It has been informed by consultation with regional stakeholders, including the Suffolk Chamber of Commerce (Suffolk Chamber) which has been contracted by SZC Co. to support the Sizewell C Project by facilitating this engagement through a programme of developing activities. It identifies and describes specific measures and processes that have been or would 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. The implementation of the Supply Chain Strategy, including the proposed tertiary mitigation, would be secured through obligations contained in a Section 106 Agreement (see the draft Section 106 Heads of Terms appended to the Planning Statement (Doc. Ref. 8.4)). |
| 526 | Project-wide | Socio-economics | Suffolk County Council | The ES should recognise the potential for wider impacts on the tourism sector than just the take up of tourist accommodation. The spending patterns of, and use of local facilities by, incoming workers will be different to that of tourists, so that should be assessed. There will also be wider perceptions over the attractiveness of the area during the construction, and potentially operational, period which may have an impact on tourism. Equally, however, it is acknowledged that major construction programmes can be an attraction in themselves. | The socio-economics assessment (Volume 2, Chapter 9) considers effects on tourism from the impact of a changing influx of workers during the different construction and operation phases on the energy infrastructure. This includes effects on businesses and perception-related effects as a result of sensitivities to different aspects of the Sizewell C Project (the potential for perception of changes to for example, traffic, where this is already an influencer on propensity to visit). |
| 527 | Project-wide | Socio-economics | Suffolk County Council | The ES should recognise the barriers to employment faced by unemployed/under-employed people in the region. Early identification of these needs can lead to a more effective package of mitigation developed with relevant stakeholders. | Volume 2, Appendix 9B identifies that SZC Co. would aim to raise diversity where possible by removing barriers to work and implementing education, employment, training and recruitment activities that aim to foster a diverse workforce for the construction, and nuclear engineering sector generally |
| 528 | Main Development Site | Coastal Geomorphology | Suffolk County Council | The ES should recognise that during the lifetime of the Sizewell C project rates of erosion could be significantly different to the current era. 7.13.6 notes that there has been high periods of erosion in the past but since 1925 it has been relatively low. However, 1925 is just 90 years ago and this development will last more than 100 years into the future and therefore the implication that erosion will stay low may be misleading. In this context, full consideration should be given to the predicted impacts of climate change including the potential for acidification I chemical change to the sea over the coming decades and its impact on the protective crag rock that the site depends upon for its protection. | Volume 2, Chapter 20 of the ES outlines the proposed mitigation measures which take into account climate change over the lifetime of the proposed development. A further climate change resilience assessment and in-combination climate impacts assessment is presented in Volume 2, Chapter 26 of the ES. |
| 529 | Project-Wide | Incombination & Cumulative Effects | Suffolk County Council | The ES should recognise that as a consequence of the Sizewell C development, the impact of the existing development may change. For example if Coronation Wood is used (3.3.6/3.4.1), this may affect the mitigation it offers for the existing Sizewell A and B developments. Consequently the assessment of the cumulative impacts should reflect any changes in the future baseline that would heighten the impact of existing development. The onshore elements of the consented Galloper Offshore Windfarm are also relevant to this respect. | The assessments presented within the ES, consider both the existing and future baseline within the chapters in Volumes 2 to 9 . Volume 10 of the ES presents details of the different cumulative effects assessments of the Sizewell C Project (hereafter referred to as 'the proposed development'). This includes an assessment of effects with other plans, projects and programmes within Volume 10, Chapter 4 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
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| 530 | ES Preparation | The Proposed Development | Suffolk County Council | The ES should provide a phasing programme for construction so it is clear which activities are occurring when, and when mitigation will be delivered - for example the park and ride sites, rail routes, jetty and accommodation campus. The timing of these will have a significant bearing on the impacts of the development and the local authorities suggest very careful thought will be needed to ensure that they are delivered at the optimum time in the construction programme. | The overarching construction programme for the Sizewell C Project is presented within Volume 1, Chapter 2 , which includes information on the relationship between the phasing of the main development site and associated development, as well as Sizewell B Relocated Facilities works. More detailed descriptions of the construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES . |
| 531 | Project-wide | Amenity and Recreation | Suffolk County Council | The ES should present a fuller understanding of the likely impacts on recreational activity as a consequence of the development than the Scoping Report suggests. In particular, there needs to be a better appreciation of impacts of the incoming construction workers associated with the campus and, furthermore, the indirect effects arising from changing habits of existing recreational users in response to the development. | The assessment of amenity and recreation considers the impacts to users of existing amenity and recreation resources, and where appropriate, the use of these resources by construction workers. The Rights of Way and Access Strategy (Volume 2, Appendix 15I) sets out the strategy for PRoW, permissive paths, long distance walking routes, cycle routes, open access land and the beach during the construction and operational phases, for the main development site. This strategy is expected to inform the relevant Footpath Implementation Plan which would be prepared by SZC Co. and submitted to the highway authority for agreement pursuant to the Draft DCO (Doc Ref. 3.1). In addition, permanent off-site sports facilities would be provided in Leiston including a full-size 3G football pitch and two multi-use games areas (MUGAs). |
| 532 | Project-wide | Groundwater and Surface Water | Suffolk County Council | The ES should identify the magnitude and any potential impact on hydraulic continuity caused by: dewatering, coffer dam construction, spoil heap/stockpile leachate, runoff or infiltration, which may adversely affect private water supply quality in the area, and specify proposed measures to protect the aquifer source. | An assessment of the effects associated with dewatering and cofferdam activities at the main development site is provided within the groundwater and surface water assessment for the main development site (Volume 2, Chapter 19). Effects on hydraulic continuity at the associated developments sites are discussed where relevant in the groundwater and surface water assessments presented in Chapter 12 of Volumes 3 to 9 of the ES . |
| 533 | Project-wide | EMF | Suffolk County Council | The ES should identify any pylon or overhead power-line/cablings alterations to be undertaken in connection with this development, together with any likely increases of the Electro-magnetic radiation fields, which may adversely affect occupiers of nearby residential properties. | A description of the works relating to electrical connections from the main platform is provided in Volume 2, Chapters 2 and 3 . Electrical connections from the main platform would be made via overhead lines to the National Grid 400kV substation, which in turn would connect into the National Grid high voltage transmission system. Six monopoles and four pylons would be required to make the connections between the power transmission platforms and the substation. To facilitate these connections, modifications to the existing overhead lines would be required which would include a new pylon, modification of an existing pylon, removal of an existing pylon and the permanent realignment of a short section of the overhead line to connect to the new National Grid substation. The potential effects associated with Electro-magnetic radiation fields are considered within the health and wellbeing assessment (Volume 2, Chapter 28). |
| 534 | Main Development Site | Radiological Assessment | Suffolk County Council | The ES should identify and compare baseline/existing terrestrial and marine radiological data with any projected data for the new Sizewell C site. | The historical and current permitted discharges from the Sizewell A and Sizewell B power stations as well as the historic impacts of atmospheric weapons testing, the Chernobyl accident and naturally occurring radioactivity all contribute to the background radioactivity levels around the Sizewell C main development site. Full details of the baseline conditions (including the terrestrial and marine environment) are provided within Volume 2, Chapter 25 . |
| 535 | Main Development Site | Coastal Geomorphology | Suffolk County Council | The ES should ensure that it considers the impacts arising on a worst-case basis - for example, while the jetty is described as temporary, the ES should ensure that it assesses its maximum possible lifespan. | The assessment presented within Volume 2, Chapter 20 is based on the parameters set out within Volume 2, Chapter 3 . This is considered to present a worst case assessment. |
| 536 | Project-wide | Air Quality | Suffolk County Council | The ES should detail the atmospheric concentration of the seven pollutants included in the 'Local Air Quality Management Regime' namely; carbon monoxide; nitrogen dioxide; benzene; 1,3-butadiene; Lead; sulphur dioxide; and particulate matter (PM10) which arise from site related Combustion Processes including stand-by equipment. These pollutants shall be predicted at the nearest relevant receptor locations. The predicted concentrations for each receptor shall be formatted for comparison with the objectives included in the Air Quality (England) Regulations 2000 and Air Quality (England) Amendment Regulations 2002. Again, Sizewell Beach should be included as a relevant receptor location for the pollutant objectives with averaging times of 15 minutes and 1 hour. | Volume 2, Appendix 12C provides a detailed assessment of the potential environmental impacts of anticipated emissions to air from combustion activities. The assessment considers NO ₂ , SO ₂ , PM ₁₀ , PM _{2.5} and CO |
| 537 | Project-wide | Air Quality | Suffolk County Council | The ES should detail all potential construction site operations which may give rise to atmospheric concentrations of particulate matter (PM10) or dust (e.g. excavation, demolition, use of explosives, movement of vehicles, loading operations, stockpiling of soil and rubble, crushing of material etc.). These should be specified together with the point source location and the particular methods of dust suppression to be used for each specific activity. The study area described in 7.8.19 should reflect that dust emissions may arise from transport modes other than road - i.e. by rail too and these may arise further than 500m from the site entrance | The Air Quality ES chapters (in Volumes 2 to 9) details all potential construction site operations which may give rise to atmospheric concentrations of particulate matter (PM10) or dust. |
| 538 | Project-wide | Waste Management | Suffolk County Council | The ES should detail all non-radioactive wastes stored or disposed of on site, identifying and categorising material so as to indicate 'Best Environmental Practice' is being taken, for example storing fuel oil stored in double-bunded tanks etc. | This is detailed in the CoCP (Document Reference 8.11) rather than the ES . However, mitigation measures relating to the storage and disposal of non-radioactive wastes onsite are identified in Volume 2, Chapter 8 . |
| 539 | Project-wide | Health and Safety | Suffolk County Council | The ES should detail a health and safety risk analysis for site workers and any members of the public which may be adversely affected by the constructional phase of the works. A further health and safety risk assessment should be provided to cover public safety for all access along the shore line and public areas surrounding the site once Sizewell C is operational. | The Health and Wellbeing Assessment (Volume 2, Chapter 28) identifies the likely effects of the Sizewell C project on health and wellbeing. During construction, the contractor(s) would be responsible for setting out how health and safety matters are managed, risks are identified and reduced in accordance with the current best practices and legal requirements. The Health and Safety Plan would provide and focus on the health and safety of the contractor(s) staff and workforce and ensure the health and safety of any visitors to the site and its compounds and members of the general public in the vicinity of any activities. A safe system of work would be established, so that all steps necessary for safe working can be identified. The contractor(s) would be regularly audited on its health and safety performance. All procedures and processes would be periodically reviewed internally by the contractor(s) and by SZC Co. During operation, operators must also comply with the relevant statutory provisions of the Health and Safety at Work etc Act 1974 and other legislation surrounding health and safety. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-----------------------|------------------------------------|------------------------|---|---|
| 540 | ES Preparation | EIA Methodology | Suffolk County Council | <p>The ES should clearly distinguish between temporary impacts and permanent impacts and also be consistent with how the duration of impact relates to significance of effect. Concerns raised include:</p> <ul style="list-style-type: none"> Table 5.2 sets out generic guidelines for the assessment of magnitude. With a construction project of such magnitude, duration and geographic spread, terms such as "permanent/irreversible" and "whole development area" need to be carefully defined. A literal interpretation of the table would suggest it is not possible for a temporary (albeit of 10 year lifespan) associated development sites to result in a high magnitude effect. The table also implies a degree of rigidity in structure and conflation of the terms 'scale', 'duration' and 'certainty'. For example, wider-scale effects of temporary duration within one of the red line areas should still be able to derive a high magnitude effect. Clarity on the interpretation of likely/unlikely would also be helpful. It is noted the Ecology chapter is more quantifiable in the respect (7.2.28), but it is debatable that something with a 49% probability of occurring could be described as 'unlikely'. So, while table 5.2 is described as generic guidelines it could better reflect the specific circumstances of the project. It is noted that in some chapters, some of these definitions are refined - for example in Ecology and Surface Water chapters 'temporary' is further subdivided (Short term <2 yrs; Medium term 3-5 yrs; long-term >5yrs), though the landscape chapter uses a different scale for duration of effect (Short term <2 yrs; Medium term 3-10 yrs; long-term >10yrs). <p>The ES should be consistent on how these terms are used or explain very clearly why any inconsistencies do arise. The ES, for example Table 5.1 uses these terms synonymously, whereas this may not be the case. It is possible for sites to be designated for their landscape or ecological value, i.e. high value, but nevertheless have capacity to accommodate change (i.e. low sensitivity). The ES should recognise this - in particular because, as written, the ES will not focus on impacts of receptors of low value, for example local nature reserves - which may nonetheless be very sensitive. As a result of the issues outlined above, we are concerned that impacts may be defined as less than moderate/major significance and therefore not significant, when that is not the case. This table should continue to reflect the precautionary principle so that the burden of proof remains on EDF demonstrating robustly that impacts will not be significant</p> | <p>Chapter 6 of Volume 1 sets out the overarching methodology for the assessment which aligns to that set out in the 2019 Scoping Report. Volume 1 Appendices 6D to 6Y then sets out the topic specific assessment methodology and criteria used to determine the effects likely to arise from the proposed development, identifying any deviations from the overarching methodology.</p> <p>For clarity and ease of the reader, the assessment methodology is also summarised in the technical chapters in Volumes 2 to 9.</p> |
| 541 | Project-Wide | Incombination & Cumulative Effects | Suffolk County Council | <p>The ES should clearly articulate the cumulative effects of all individual elements of the project as many receptors will be impacted by separate developments. This needs to be fully acknowledged.</p> | <p>Volume 10 of the ES presents details of the different cumulative effects assessments of the Sizewell C Project. This includes consideration of project-wide effects (intra-project): Effects that occur when environmental impacts from different components of the Sizewell C Project combine (for example, the combination of road traffic noise of one component of the proposed development and road traffic noise of another component of the proposed development on a residential receptor). The assessment of project-wide effects is reported in Volume 10, Chapter 3.</p> |
| 542 | Main Development Site | Marine Water and Sediment Quality | Suffolk County Council | <p>The ES should clarify which radionuclides have been measured (7.14.17). Furthermore, evidence has shown that radionuclides, through the process of adsorption, will concentrate in fine sediment area, for example in mud flats and salt marshes. Therefore, in terms of sediment analysis, further studies should be undertaken within the Aide and Ore estuary to establish the monitoring baseline on contaminate build-up.</p> | <p>As detailed in Volume 2, Chapter 21, during the 2015 geotechnical survey, vibrocores were taken in the marine environment off Sizewell corresponding to areas where proposed marine infrastructure installations would occur as shown in Appendix 21D of Volume 2. An additional geotechnical Ground Investigation survey was completed in August 2019, sample results would be used in future licence applications but were not available for reference in this chapter. Samples from 2015 were analysed for chemical and heavy metal contaminants including:</p> <ul style="list-style-type: none"> heavy metals and insecticides – arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc, dichlorodiphenyltrichloroethane (DDT) and dieldrin; organotin and particle size – monobutyl-tin, dibutyl-tin, tributyl-tin and particle size analysis; organic and chlorinated compounds – PAHs, total hydrocarbon content and polychlorinated biphenyls (PCBs); and radionuclides (five core sample). <p>Radionuclide sampling show that concentrations in marine sediments at Sizewell are low (with many values below the limit of detection) and consistent with routine local radionuclide monitoring by the Environment Agency.</p> |
| 543 | Project-wide | Decommissioning | Suffolk County Council | <p>The ES should be clear on the duration of effects for which it is assessing - does the 'lifetime of the site' (for example 2.1.9) include the decommissioning phase? How does this also relate to the ISFS and ILW, and their respective design lives (section 3.8)? The design life for the ILW and LLW stores should also be clarified.</p> <p>The ES should, as far as is possible detail a programme for the decommissioning of the site. This should include;</p> <ul style="list-style-type: none"> The types of works that will be undertaken, The removal of existing structures, The disposal of all remaining waste material, The suitability of the site for restoration or future use. | <p>Before the decommissioning of a new nuclear power station can take place, there is a requirement for the operator to undertake an Environmental Impact Assessment (EIA) and prepare an Environmental Statement under the relevant EIA Regulations, such as Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations.</p> <p>Chapter 5, Volume 2 of the ES outlines the overall approach that SZC Co. is adopting to decommission the proposed UK European Pressurised Reactor (EPRTM) units, and the associated buildings and infrastructure at Sizewell C. The chapter includes commentary on radiological effects, however, radiological effects from decommissioning will be covered by the EIA for decommissioning. SZC Co. has applied the principles of waste minimisation, so far as is reasonably practicable, in the design of the Sizewell C power station.</p> <p>Wherever reasonably practicable, measures would be taken to prevent materials either becoming radioactively contaminated or activated, or as being classified as radioactively contaminated due to the inadvertent placement of inert material adjacent to radioactive material. Waste processing systems have also been specified to treat radioactive liquid and gaseous effluents and discharges and solid wastes, in order to reduce the environmental impact to as low as reasonably achievable prior to disposal. The activity and volume of radioactive wastes discharged and disposed of shall be minimised through the application of Best Available Techniques (BAT), and the use of the waste hierarchy. Furthermore, the disposal of radioactive wastes would be permitted and monitored by the Environment Agency under the Radioactive Substances Regulations permit.</p> <p>Chapter 7 (Spent fuel and radioactive waste management) of Volume 2 presents an overview of the proposed arrangements for the management of radioactive wastes and spent fuel arising during operation of the Sizewell C power station. The operation and decommissioning of the Sizewell C power station would result in the unavoidable generation of quantities of radioactive waste and spent fuel. This is a known and justifiable consequence of nuclear power generation and the UK regulatory permissions regime for nuclear power stations defines precise regulatory requirements and expectations for the management of this waste.</p> |
| 544 | Main Development Site | Marine Navigation | Suffolk County Council | <p>The ES should assess the potential for ecological effects to arise from rerouting of shipping traffic (7.16.22).</p> | <p>As identified in Volume 2, Chapter 22, for fish receptors, additional vessel traffic associated with the BLF, may result in a slight (few dB) increase in the ambient noise levels along the delivery route. However, the median noise levels are unlikely to be affected, as provided in Volume 2, Appendix 22L. Therefore, no further consideration is given to noise from vessel transits. However, Volume 2, Chapter 22 does consider the effects of additional vessel traffic on marine mammals.</p> |
| 545 | Main Development Site | Radiological Assessment | Suffolk County Council | <p>The ES should assess the need for monitoring (during appropriate conditions) of airborne radiological pollution through either aerosol (very fine spray) or sea spray dispersal - reference should be made to the research undertaken at North Uist.</p> | <p>To establish baseline conditions for the assessment of radiological effects (Volume 2, Chapter 25), SZC Co. has undertaken surveys and monitoring programmes in order to obtain a more detailed understanding of the background radioactivity levels around the Sizewell C main development site and of the potential implications of any planned radiological discharges.</p> <p>The assessment of radiological effects (Volume 2, Chapter 25) concludes that no further mitigation or monitoring measures for radiological effects are required.</p> |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|----------------|-------------------------------|------------------------|---|---|
| 546 | Project-wide | Amenity and Recreation | Suffolk County Council | The ES should assess impacts on open access land - this is omitted from further baseline research (7.4.18) and as a possible impact of the development (7.4.35). Paragraph 7.4.13 should also refer to restricted byways in its description of a right of way, and carriage driving should be included within list of extra rights. Figure 7.4.1 also has a number of errors that need to be addressed - Roads Used As Public Paths should be shown as Restricted Byways, for example. | Volume 1, Appendix 6K confirms that open access land is considered as a receptor within the ES . Where relevant open access land is identified and considered within the Amenity and Recreation assessments presented in Volumes 2 to 9 of the ES . |
| 547 | Project-wide | Groundwater and Surface Water | Suffolk County Council | The ES should assess all temporary (for example for the campus) and permanent foul water drainage arrangements, with any sea water disposal discharge designed to; <ul style="list-style-type: none"> Minimise any harmful effect on sea life diversity, Control temperature and turbidity which may encourage algae blooms. | The Outline Drainage Strategy (Volume 2, Appendix 2A) states that the overarching surface water drainage philosophy follows conventional Sustainable Drainage (SuDS) steps / hierarchy presented below, moving from each stage to the next only when the current stage is deemed not practicable within the Sizewell C Project: <ul style="list-style-type: none"> store rainwater for later use (e.g. rainwater harvesting); use infiltration techniques (e.g. porous surfaces, swales, trenches); attenuate rainwater in basins or open water features for gradual release; attenuate rainwater by storing in tanks for gradual release through an outlet; and discharge rainwater direct into watercourse or sea. The outline drainage strategy (Volume 2, Appendix 2A) identifies that the MCA and TCA would be served by temporary Sewage Treatment Plants. The treated effluent would be pumped to the Combined Drainage Outfall (CDO) from where it would discharge to sea. The permanent sewage treatment plant would receive and treat all domestic foul water generated within the operational site. The treated effluent would be discharged to sea through the cooling water tunnel. An assessment of the potential effects associated with these arrangements is presented in Volume 2, Chapter 21 . |
| 548 | Project-wide | Socio-economics | Suffolk County Council | The ES should also explain all the assumptions used in the Gravity Model - for example around the rates of pay, length of contracts and terms and conditions that will prevail and thus contribute to the attractiveness to prospective employees. Such factors will have a significant bearing on the potential for displacement of the labour force. | Volume 2, Appendix 9C describes how the workforce is anticipated to distribute geographically at the peak of construction activity, drawing on information from other technical notes in this list, and the Gravity Model. This appendix provide all the assumptions associated with the Gravity Model in relation to both construction workforce and transport. |
| 549 | ES Preparation | Scope of assessment | Suffolk County Council | The ES should acknowledge the scale and the geographic extent of the development is such that it will have very wide ranging environmental effects over a large area, particularly when one considers: <ul style="list-style-type: none"> The environmental effects of the offsite associated development sites The environmental effects of transport movements, terrestrially and at sea the environmental effects associated with the deflection or displacement of recreational users to wider/alternative areas. Consequently, we would not wish the environmental impacts to be presented in such a way that the full scale of effects is not readily appreciable. In addition to interactions with other projects or programmes Volume 9 (cumulative assessment) therefore needs to consider the cumulative effect of all the individual elements of the project, particularly where they impact on the same receptor (for example the rail line extension, site entrance works and the campus will all separately impact on Leiston Abbey) It would also, in this vein, be useful for the ES to explain the interrelationships with the Habitats Regulation Assessment. | The ES has been structured such that the assessments of the main development site and associated development sites are generally provided within separate volumes (Volume 2 - Main development site; Volume 3 - Northern park and ride; Volume 4 - Southern park and ride; Volume 5 - Two village bypass; Volume 6 - Sizewell link road; Volume 7 - Yoxford roundabout and other highway improvements; Volume 8 - Freight management facility; Volume 9 - Rail). In addition, there are a number of project-wide technical environmental assessments, within which the impacts of the Sizewell C Project as a whole are considered. These include socio-economics; transport; radiological, conventional waste management; climate change; health and wellbeing; and major accidents and disasters, and are presented in Volume 2 of the ES . Volume 10 - Cumulative and transboundary effects, presents the assessment of cumulative effects, and includes consideration of: <ul style="list-style-type: none"> Inter-relationship effects: Effects that occur when different environmental impacts interact with one another with the potential to result in significant effects on a resource and/or receptor (for example, noise, dust and visual effects on a particular receptor, or changes to hydrology on ecological receptors). Project-wide effects (intra-project): Effects that occur when environmental impacts from different components of the proposed development combine (for example, the combination of road traffic noise of one component of the proposed development and road traffic noise of another component of the proposed development on a residential receptor). Effects with other plans, projects and programmes: Effects that occur when environmental impacts from the proposed development combine with impacts from other planned/potential third party projects, plans and programmes (normally in the vicinity of the site) In addition to the assessment of inter-relationship effects, project-wide effects and effects with other plans, projects and programmes, the scope of the Environmental Impact Assessment (EIA) includes an assessment of and transboundary effects. Transboundary effects occur when the impacts of the proposed development extend beyond the United Kingdom (UK) to another European Economic Area State. |
| 550 | Project-wide | Socio-economics | Suffolk County Council | The ES needs to consider the impacts of temporary as well as permanent staff on accommodation provision in the local area during the operational phase of development (6.2.38). Paragraph 3.5.1 indicates approximately 1,000 additional staff would be employed during outage work, which, for each reactor, occurs for up to three months every 18 months. | A short-term, temporary workforce of approximately 1,000 would be required in addition to the 900 operational staff per outage. It is estimated that the majority of the annual temporary outage workforce would be recruited from outside the local area (around 85%), and that there would be some continuity of employment between the current (Sizewell B) and future (Sizewell C) outage teams – thereby minimising any additional new employment, but increasing the frequency for current contractors. It is therefore anticipated that around 850 outage workers would be non-local and require accommodation in the area. There is likely to be an impact on local accommodation, including tourist accommodation. A small proportion would take up spare rooms in houses (latent accommodation) based on previous experience, and – at Sizewell B - this is usually facilitated by people advertising in local shops, at the power station itself, and in newspapers. |
| 551 | Project-wide | Transport | Suffolk County Council | The driver stress section of the DMRB 11.3.9 should be consulted as the use of the DMRB Driver Stress methodology would allow a more detailed assessment with respect to driver delay and road safety. DMRB 11.3.9.4 should inform the process of professional judgement. | It should be noted that DMRB Volume 11, Section 3, Part 9 is superseded by LA112 - DMRB 11, Section 3, part 6. Within the transport ES chapter (Volume 2, Chapter 10) effects associated with driver delay and road safety utilise judgement based on analysis detailed in the Transport Assessment (Doc Ref 8.5). |
| 552 | Project-wide | Socio-economics | Suffolk County Council | The discussion on study areas in (6.2.5) should recognise the existence of the Suffolk Coast Destination Management Organisation (DMO) area as a relevant unit for the purposes of assessment. The Suffolk Coast Tourism Strategy 3 describes this area. | Within Volume 2, Chapter 9 , reference is made to the Economic Impact Report has been produced for the Destination Management Organisation (DMO) by Destination Research (2018) for the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) in defining baseline conditions. The Economic Impact Report presents information on visitor numbers, expenditure, and an estimate of the number of jobs supported by this and indirect/induced expenditure in different sectors. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|---------------------------------|-------------------------------------|------------------------|--|---|
| 553 | Project-wide | Socio-economics | Suffolk County Council | The development of the Economic Strategy is welcomed, though consideration should be given to the opportunity to engage with other relevant stakeholders. | An Economic Statement (Doc Ref. 8.9) has been prepared to highlight the key policy objectives locally and nationally. It goes on to identify the economic impacts of the Sizewell C Project, with a particular focus on the local and regional economy. It concludes by setting out how SZC Co. would work with partners to maximise the economic benefits that Sizewell C would bring. The Economic Strategy is accompanied by an Employment, Skills and Education Strategy and a Supply Chain Strategy. |
| 554 | Project-wide | Transport | Suffolk County Council | The detail of mitigation provided in the report is considered an early estimate and is not considered exhaustive. An assessment using the criteria set out in Section 6.3, with the additional assessment requirements detailed in this response is likely to identify the need for additional mitigation measures, which will require environmental assessment. In particular reference should be made to the active transport options for the workforce, for example cycle routes to/from park and ride sites. We have also at Stage 1 indicated broad parameters for a Travel Plan, which will need to be provided within the ES. | Further details of mitigation measures related to the movement of construction workers are provided in the draft Construction Worker Travel Plan (Doc Ref. 8.8). |
| 555 | Project-wide | Transport | Suffolk County Council | The decommissioning phase should also be assessed, as far as is possible, as it will result in an impact over an extended period of time. It may also overlap with the elements of the decommissioning programme of Sizewell 8 - more information is required. | A description of the anticipated activities for the decommissioning phase, including a summary of the types of environmental effects likely to occur is provided in Volume 2, Chapter 5 The decommissioning phase is qualitatively assessed from a transport perspective within Volume 2, Chapter 5 . |
| 556 | Project-wide | Transport | Suffolk County Council | The current mitigation measures reflect the outcome of assumptions relating to the gravity model, transport model and construction programme and delivery assumptions. There are likely to be cumulative inaccuracies within this process and sensitivity testing should be undertaken to ensure that variability in these assumptions is fully considered. | The socio-economic ES chapter (Volume 2, Chapter 9) recognises that there is a degree of uncertainty, and several externalities, which could affect the distribution of the workforce modelled by the Gravity Model, and their effects spatially and on different parts of the accommodation market, public services and community facilities. The Gravity Model represents a 'point-in-time' position estimating distribution based on the best available data and transport assumptions, using survey information and published national statistics. Rather than test myriad, potentially unlimited scenarios, it is more prudent to secure a monitoring and reporting mechanism and responsive mitigation strategy that is able to flexibly respond to potential issues before they arise – these have been set out in the Accommodation Strategy, via an Accommodation Management System and Housing Fund, and through a Public Services Contingency Fund. |
| 557 | Project-wide | Transport | Suffolk County Council | The baseline information makes no reference to the collection of data for non- motorised users (NMU's), i.e. pedestrians, cyclists and equestrians using the highway network, this should include the Public Rights of Way network. | This has been corrected where appropriate within the ES |
| 558 | Project-wide | Transport | Suffolk County Council | The assessment should consider the effect the increase in traffic will have on cyclists and equestrian road users and consider the anxiety and intimidation the increase in traffic will impose. It should be noted that equestrians are sensitive to smaller increases in traffic and this group may cease to use parts of the network affected by significant increases in traffic and make established horse-riding routes untenable. | The Fear and Intimidation assessment presented in the Transport Assessment (Document Reference 8.05) includes the consideration of pedestrian, cyclists and Equestrian. |
| 559 | Project-wide | Noise & Vibration | Suffolk County Council | The assessment of vibration from road traffic is welcomed. In accordance with guidance, cumulative effects are to be addressed, which is also welcomed. | The traffic noise assessment is based on the Transport Assessment (Doc Ref. 8.5) data which includes consideration of cumulative schemes in the reference year. Further details is provided in the noise and vibration ES chapters (Volumes 2 to 9) and the Transport Assessment (Doc Ref. 8.5) |
| 560 | Project-wide | Transport | Suffolk County Council | The assessment of impact of construction related traffic should also consider contingency measures, for example the implication of extended bad weather preventing the use of the MOLF. | No contingency measures have been modelled. There is no MOLF proposed. The beach landing facility is used only for occasional AILs. |
| 561 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | The Annex II status of Barbestelle (<i>Barbastella barbastelus</i>) should be noted in Table 7.2.4. Also missing is reference to BAP habitats and species - except for breeding birds. | This point is noted - where relevant this has been considered in the preparation of the terrestrial ecology and ornithology assessments presented in Volumes 2 to 9 of the ES . |
| 562 | Other Rail Improvements | Amenity and Recreation | Suffolk County Council | The amenity and recreation study assess the use of open access sites in the area that may be affected. | As set out within Volume 1, Appendix 6K , consideration is given to open access sites in the amenity and recreation effects assessment. However, Volume 9, Chapter 8 does not identify any open access sites that may be affected by the rail proposals. |
| 563 | Off-site Associated Development | Amenity and Recreation | Suffolk County Council | The amenity and recreation studies should gather information on the extent to which local roads are used by all non-motorised users, particularly pedestrians. Generally, it should be noted that mitigation could also be achieved by enhancing local non-motorised access. | The transport assessment presented in Chapter 10 of Volume 2 , considers the impacts of non-motorised users on the local highway network. |
| 564 | Project-wide | Air Quality | Suffolk County Council | The air quality monitoring regime is acceptable. The Scoping Report advises that Suffolk Coastal District Council is in the process of consulting with the Department of Environment, Food and Rural affairs (DEFRA) on the need to declare an Air Quality Management Area (AQMA) in Stratford St Andrew (7.8.12). DEFRA has now confirmed the need for an AQMA to be declared at this location and, following a Public Consultation currently underway, the AQMA Order will be made in June 2014. | An Air Quality Management Area (AQMA) in Stratford St Andrew has been declared, further details are provided in Volume 5, Chapter 5 . |
| 565 | Southern Park and Ride | The Proposed Development | Suffolk County Council | The access details will need to be agreed with the Highways Authority. There are concerns about the safe egress of traffic from the existing slip road onto the A 12 which will need to be assessed and appropriate mitigation proposed | Details of site access arrangements at the southern park and ride site are provided within Volume 4, Chapter 2 . This includes a deceleration lane. The chapter also provides further details of proposed changes to the A12 and surrounding network, including changes to the A12 northbound carriageway which would be reduced from two lanes to one lane before the northbound slip road from the B1078 joins the A12 to avoid three lanes of traffic reducing to one at this location. |
| 566 | Northern Park and Ride | The Proposed Development | Suffolk County Council | The access details will need to be agreed with the Highways Authority. A solution is required to provide a layby area for long vehicles to pull in once they have crossed the East Suffolk railway line. There have been discussions with Network Rail but no proposals have been presented to date. | Details of site access arrangements at the northern park and ride site are provided within Volume 3, Chapter 2 . The proposed access arrangement include the provision of a temporary roundabout on the A12. The proposals do not require changes to be made to the northbound and southbound laybys to the north of the petrol station (Darsham Service Station) on the A12. |
| 567 | Project-wide | Noise & Vibration | Suffolk County Council | The 33 measurement locations and measurement protocol described in the Scoping Report has been agreed with the Environmental Protection Team at Suffolk Coastal District Council. The ES should present the noise monitoring data together with an assessment of magnitude of impact and sensitivity of receptor. | The ES provides details of the survey work undertaken to inform the noise and vibration assessment within Volumes 2 to 9 , and monitoring locations are presented on figures, as well as a full summary provided within Volume 2, Appendix 11A . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
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| 568 | Project-wide | Historic Environment | Suffolk County Council | Table 7.5.1 relies heavily on criteria drawn from the DMRB and its appropriateness beyond road schemes is questionable - reference should be made to English Heritage's Conservation Principles and the new British Standard. In respect of paragraph 7.5.29, reference to 'Standards for Field Archaeology in the East of England' (Gurney 2003, East Anglian Archaeology Occasional Paper 14)7 and the Suffolk County Council Archaeology Service Conservation Team documents 'Requirements for Trenched Archaeological Evaluation 2012 Ver 1.3' and 'Requirements for Archaeological Excavation 2012 Ver 1.1' should also be made | This comment refers to the 2014 scoping report which was appended for information. The assessment methodology for the Terrestrial Historic Environment assessment presented in the 2019 scoping report was updated accordingly (see section 6.9.5). |
| 569 | Project-wide | Transport | Suffolk County Council | <u>Specifically sensitive areas</u> This should include areas where there is an increase of 10% or more in HGV flows, not just total flows. | Determination for the sensitivity of areas is defined within Volume 2, Appendix 10B . This has been completed by applying Rules 1, 2, and 3 of the screening process set out below and further explained within Volume 1, Appendix 6F : <ul style="list-style-type: none"> • Rule 1: include highway links where traffic flows would increase by more than 30% (or the number of HGVs would increase by more than 30%). • Rule 2: include any other specifically sensitive areas (where sensitivity is defined as high) where traffic flows have increased by 10% or more. • Rule 3: include highways links which Suffolk County Council (SCC) have determined to be of particular sensitivity. |
| 570 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | Southern Minsmere Levels CWS is incorrectly labelled on Figure 7.2.4 (Number "1" is positioned on Goose Hill which is part of Sizewell Levels and Associated Areas - listed as CWS Reference "2" in key). | This point is noted - where relevant this has been considered in the preparation of the terrestrial ecology and ornithology assessments presented in Volumes 2 to 9 of the ES . |
| 571 | Other highway improvements | Scope of assessment | Suffolk County Council | Similar assessments would likely be needed for any other highway improvements. | An assessment of the likely effects arising from the construction and operation of the proposed highway improvements is presented in Volume 7 of the ES . |
| 572 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | Shingle habitat is missing from identified habitats in Figure 7.2.1. | This point is noted - where relevant this has been considered in the preparation of the terrestrial ecology and ornithology assessments presented in Volumes 2 to 9 of the ES . |
| 573 | Project-wide | Transport | Suffolk County Council | Sensitivity testing should also be undertaken to reflect an uncertainty of delivery of materials by rail and sea. This should include alternative plans for the delivery of Abnormal Indivisible Loads (Alls). | Alls cannot be modelled in the strategic modelling. |
| 574 | Project-wide | Landscape & Visual | Suffolk County Council | Regional seascape units were used for the assessment of the Galloper wind farm, and suggest that these may also inform discussion of the seascape character of the study area. | The following documents were reviewed in developing the seascape baseline to determine seascape character types considered within the landscape and visual assessment for the main development site (Volume 2, Chapter 13): <ul style="list-style-type: none"> • Seascape Character Assessment Suffolk, South Norfolk and North Essex; • Seascape Characterisation around the English Coast (Marine Plan Areas 3 and 4 and Part of Area 6 Pilot Study); • Seascape Character Area Assessment East Inshore and East Offshore Marine Plan Areas; • Historic Seascape Characterisation (HSC) Newport to Clacton; and • Sizewell C Landscape and Visual Impact Assessment: Seascape Character Assessment of the Landscape and Visual Impact Assessment Study Area |
| 575 | Southern Park and Ride | Terrestrial Ecology and Ornithology | Suffolk County Council | Reference is made to potential ecological impacts on the River Deben - this will need to be picked up through the HRA process. | Volume 4, Chapter 7 identifies that there are no statutory designated sites of nature conservation importance were identified within the 5km ZOI of the southern park and ride site. Therefore a detailed assessment on statutory designated sites has not been undertaken for the southern park and ride as no direct or indirect impacts are anticipated. |
| 576 | Project-wide | Amenity and Recreation | Suffolk County Council | Re-establishment of rights of way should be to a level commensurate with expected increased use - for example by staff accessing the site during operation. | A Right of Way and Access Strategy (Volume 2, Appendix 15I) has been prepared and is expected to inform the relevant Footpath Implementation Plan which would be prepared by SZC Co. and submitted to the highway authority for agreement pursuant to the Draft DCO. The Rights of Way and Access Strategy includes descriptions of the main temporary and permanent rights of way closures and diversions. There would also be further local short-term temporary closures and diversions during, for example, construction of roads or other works that cross PRoWs which have, where they are currently known, been shown indicatively on the detailed Rights of Way plans in Book 2 (Doc Ref. 2.4). There might also be further local short-term temporary closures and diversions which are not known at this stage, which would be developed in consultation with the relevant authorities should development consent be granted. Any such closures or diversions would be for the minimum time possible and would be communicated to the public in advance, as required. The Rights of Way and Access Strategy has been informed by observation and questionnaire surveys of existing users of recreational resources within the vicinity of the main development site, and by consultation with stakeholders including Suffolk County Council, East Suffolk Council (ESC) (formerly Suffolk Coastal District Council (SCDC)), Natural England, the Suffolk Local Access |
| 577 | Main Development Site | Marine Navigation | Suffolk County Council | Recognition should be made of the opportunities on the Aide-Ore estuary (7.16.9). | The baseline description presented in Volume 2, Chapter 24 does not make specific reference to the Aide-Ore estuary. However, the chapter provides a description of navigational features, incident data and marine traffic within the study area (defined as a 12 nautical mile (nm) radius around the main platform). |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
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| 578 | Project-wide | Noise & Vibration | Suffolk County Council | Projected noise levels for the proposed 'Stand-by Diesel Generators' shall be calculated and represented as a LAeq(5 minute) value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitations on testing times should be specified to achieve 'Best Environmental Practice'. | Routine testing of emergency generators has been considered in detail in the operational noise assessment presented in Volume 2, Chapter 11 . The time period used is taken from BS4142, so is not 5 minutes as requested in this comment. However in this case, since the noise is constant, the 5 minute value would be the same as a the one hour value presented in the assessment. |
| 579 | Project-wide | Noise & Vibration | Suffolk County Council | Projected noise levels for grid reconstructions following reactor trips and outages shall be calculated and represented as a LAeq <5 minute) value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitations on reconnection should be specified to achieve 'Best Environmental Practice'. | Noise from test runs of generators following outages has been considered within the ES . The time period used in the noise assessment presented in Volume 2, Chapter 11 is taken from BS4142, so is not 5 minutes as requested in this comment. However in this case, since the noise is constant, the 5 minute value would be the same as a the one hour value presented in the assessment. |
| 580 | Project-wide | Noise & Vibration | Suffolk County Council | Projected levels for general site noise from the newly constructed Sizewell C power station should be calculated and represented as a LAeq (1hour) value during daytime hours and LAeq (5 minute) value during night time hours at all nearby noise sensitive properties. If noise from the site is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation should be specified to achieve 'Best Environmental Practice'. | 'Best Environmental Practice' is not directly relevant to the noise and vibration assessment. The assessment methodology for the noise and vibration assessment is provided in Volume 1, Appendix 6G and identifies that construction noise levels are calculated and represented as a LAeq (1hour) value during daytime hours and LAeq (5 minute) value during night time. |
| 581 | Project-wide | Air Quality | Suffolk County Council | Predictions should also include the combined emissions arising from Sizewell B and C power stations at the nearest relevant receptor locations. It is important to also include emissions from standby equipment. The methodology for evaluating the magnitude and significance of air quality effects from site operation as laid out in the Scoping Report is also agreed. | No cumulative or in combination effects have been identified for operation of Sizewell B and C power stations, as testing of standby equipment including diesel generators would be scheduled such that these would not coincide. The likelihood of a Loss of Off-site Power event is considered to be remote for a single power station and therefore this scenario occurring for both stations is not considered further. In addition, routine emissions from each site are located far enough apart to not have a combined effect of any significance at any identified receptor. |
| 582 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | Paragraph 7.2.11 and Fig 7.2.5 should refer to the north east corner of Sizewell Marshes. | This point is noted - where relevant this has been considered in the preparation of the terrestrial ecology and ornithology assessments presented in Volumes 2 to 9 of the ES . |
| 583 | Project-Wide | Incombination & Cumulative Effects | Suffolk County Council | Paragraph 5.5.1 suggests that only cumulative effects with projects in the vicinity of the development site will be considered. The geographic scope will need to be considered on a case by case basis. In the case of socio-economics the approach in paragraph 6.2.42 is acknowledged, though this could overlook localised cumulative effects, for example decommissioning of Sizewell A. | Volume 10, Chapter 1 , provides the methodology for the cumulative effects assessment with other plans, projects and programmes. To inform the assessment of cumulative effects with non-Sizewell C plans, projects and programmes, the reasonable maximum geographical area around the Sizewell C Project sites, where there is potential for impacts to occur, has been established through the identification of a zone of influence (ZOI). Further details on each of the ZOIs is provided within each of the technical sections of Chapter 4 of Volume 10 . This includes additional information on how the ZOI has been identified and how it differs between each of the Sizewell C Project sites. In addition to the plans, projects and programmes within the ZOI, there have been other developments that have been identified through engagement that required consideration on a topic-specific basis, for example, SCC has requested that projects affecting the A12 and A14, such as Felixstowe Port located approximately 40km away from the proposed development, are considered in the Transport Assessment (Doc Ref. 8.5). |
| 584 | Project-Wide | Incombination & Cumulative Effects | Suffolk County Council | Paragraph 2.1.9 confirms that while Sizewell is connected to the National Grid's high voltage network, local modification and wider network reinforcement is required - the local authorities understand this is to be reductoring of the Sizewell to Bramford Line, and additionally a new line between Bamford and Twinstead - registered with PINS as the 'Bramford to Twinstead Overhead Line project'. The most up to date Need case for that project, confirms that, based on the currently contracted connection dates, Sizewell C, alongside the East Anglia Array, is a significant contributor to that need - however it is the Sizewell C project that currently triggers the need for the Bramford to Twinstead Project. | No further response provided. |
| 585 | Project-wide | Air Quality | Suffolk County Council | No reference has been made to the National Planning Practice Guidance relating to Air Quality. Consideration should be given as to whether this is relevant. | The assessment of likely effects in air quality has considered the National Planning Practice Guidance as relevant, further details are provided in Volume 1, Appendix 6H . |
| 586 | Project-wide | Health Impact Assessment | Suffolk County Council | Monitoring and evaluation of possible health impacts should be conducted to inform ongoing assessment of the health impact. | Monitoring would be undertaken to inform the effectiveness of any mitigation. Further detail is provided in Volume 2, Chapter 28 . |
| 587 | Project-wide | Historic Environment | Suffolk County Council | It should be noted that English Heritage has now listed at Grade II several WWI, WWII and Cold War military structures at Orford Ness (7.5.22). | Effects on the group of designated heritage assets at Orford Ness have been assessed within the Main Development Site Terrestrial Historic Environment Chapter (Volume 2, Chapter 16) |
| 588 | Project-wide | Transport | Suffolk County Council | It should also be noted that the National Cycle Network regional routes 31, 41 and 42 intersect the 81119 to the west and the 81122 to the north of Leiston - in addition to intersecting the A 12 at a number of locations within the study area. Impacts on users of these routes need to be assessed. More generally, rights of way crossing points should be identified a sensitive receptor and the effects of severance thereon assessed. | This route is covered in Pedestrian & cyclist chapter of the Transport Assessment (Document Reference 8.05). The effects are assessed having consideration of severance magnitude and sensitivity. |
| 589 | Main Development Site | Marine Ecology | Suffolk County Council | It is reported that Sizewell B 'impinged' Sprat, herring band whiting 'in large numbers'; it is not clear how this would score against the degrees of magnitude in 7.15.16. The ES should report on the cumulative impacts on commercial fisheries through direct fish mortality and through loss of fishing grounds associated with Sizewell B, C (including jetty/outfall construction) and laying of offshore wind farm cables (and/or placement of turbines) for both Galloper and other windfarms within recognised commercial fishing areas. | An assessment of the cumulative effects on the marine environment is presented in Volume 10, Chapter 4 and supported by Volume 10, Appendix 4C . Volume 10, Appendix 4C considers pressures on commercial and recreational where pressures from all stages of identified projects where there is the potential to overlap with the Sizewell C Project. Cables from the Galloper OWF have already been installed within the vicinity of the Sizewell C Project and hence form part of the baseline in terms displacement of fishing activities. The construction of four projects have the potential to spatially overlap with the proposed development and have impacts in terms of temporary displacement of fishing activities during the construction period. These projects are: <ul style="list-style-type: none"> • Nautilus National Grid Interconnector, connecting the UK to Belgium; • EuroLink National Grid Interconnector, connecting the UK to the Netherlands; • East Anglia One North (cable routes), and; • East Anglia Two (cable routes). |
| 590 | Project-wide | Transport | Suffolk County Council | It is proposed that this will be assessed using professional judgment on links where there is an increase of more than 100% in either total or HGV flows. The use of a threshold of 100% does not appear consistent with the other thresholds. Using this criterion for assessing impact and risks will result in almost all of the impacts being dismissed as "Negligible". | As set out in Volume 1, Appendix 6F , IEMA guidance has been followed during the assessment of transport effects presented in Volume 2, Chapter 10 . In addition the approach taken (100%-150%, 150%- 200% and >200%) is consistent with that used in other DCO submissions. All Transport Assessments and ES chapters rely on a level of professional judgement to interpret the modelling and assessment output. It is not a wholly mechanical process. Quantifiable analysis is included in the assessment based on the traffic modelling and assessment criteria. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
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| 591 | Project-wide | Transport | Suffolk County Council | It is proposed that the percentage criteria adopted for "Severance" should be used to inform the assessment of pedestrian amenity. This would mean adopting a threshold of 30% above which impacts would be assessed as Minor/Slight, Moderate or Substantial. The 10% threshold should also be used for specifically sensitive areas. | As set out in Volume 1, Appendix 6F , factors relevant to the prediction of severance include road width, traffic flow, speed, the presence of crossing facilities and the number of movements across the affected route. IEMA guidelines refer to the DfT's 'Manual of Environmental Appraisal', which suggests that changes in traffic flow of 30%, 60% and 90% would be likely to low, medium and high magnitude of impact on severance, respectively. However it is acknowledged that these broad indicators should be used with care and regard paid to specific local conditions |
| 592 | Project-wide | Air Quality | Suffolk County Council | It is noted that traffic datasets derived from the Transport Assessment will be used. | The noise and vibration and air quality assessments presented in the ES are based on the data from the Transport Assessment (Doc Ref. 8.5) |
| 593 | Project-wide | Noise & Vibration | Suffolk County Council | It is noted that the NPPF and specifically the associated Guidance relating to Noise is not referred to and the validity of Table 7.7.3 is queried. Also, whether separate assessment of magnitude criteria should be applied to road traffic noise increases on the construction traffic routes, in accordance with the guidance for short term impacts contained in DMRB. The content of Table 7.7.5 is agreed. The NPPF Guidance ' refers to the Noise Policy Statement for England (NPSE), which includes the types of noise which are within its scope, which include: • "environmental noise" which includes noise from transportation sources; • "neighbourhood noise" which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street." | The content of table 7.7.3 has been reviewed and updated to take account of the different types of noise effects that could arise as a result of the Sizewell C Project. The updated impact magnitude tables are set out within Volume 1, Appendix 6G . |
| 594 | Project-wide | Noise & Vibration | Suffolk County Council | It is noted that the currently proposed length of the construction period is estimated to be seven to nine years (plus time for site preparation). The definition of "long term" and criteria for the assessment of magnitude should follow recommendations in the most up to date versions of BS5228 with respect to noise and also vibration, and any other relevant documents. As mentioned earlier, the ES should generally maintain consistency in the definition of terms (temporary, long, medium short et cetera) unless there is a clear reason to depart from this. | Definitions of short term and long term are based on Guidance in the Design Manual for Roads and Bridges (DMRB) (LA111). Further detail is provided in Volume 1, Appendix 6G . |
| 595 | Project-wide | Transport | Suffolk County Council | It is noted that the categories adopted relate to changes in traffic flows along existing roads and are not related to any absolute measure of existing levels of severance. DMRB 11.3.8.6 defines three categories of severance; Slight, Moderate and Severe. Although technically these relate to new severance, i.e. new highway schemes, they provide one possible way of quantifying severance in absolute rather than relative terms. To quantify existing levels of severance, it is suggested that reference is made to these categories. | IEMA guidance has been followed within the transport ES chapter (Volume 2, Chapter10) in determining severance. The IEMA guidelines refer to the DfT's 'Manual of Environmental Appraisal' which suggests that changes in traffic flow of 30%, 60% and 90% would be likely to low, medium and high magnitude of impact on severance, respectively. |
| 596 | Project-wide | Decommissioning | Suffolk County Council | It is noted that a separate Flood Risk Assessment (FRA) will be produced for the decommissioning phase (2.3.4); any mitigation actions arising from this FRA may have implications for the design of the Sizewell C site - so thought needs to be given at this stage to the decommissioning FRA. | Before the decommissioning of a new nuclear power station can take place, there is a requirement for the operator to undertake an Environmental Impact Assessment (EIA) and prepare an Environmental Statement under the relevant EIA Regulations, such as Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations. Chapter 5, Volume 2 of the ES outlines the overall approach that SZC Co. is adopting to decommission the proposed UK European Pressurised Reactor (EPR) units, and the associated buildings and infrastructure at Sizewell C. The main development site flood risk assessment (Doc Ref. 5.2) considers the decommissioning phase. |
| 597 | Project-wide | Noise & Vibration | Suffolk County Council | It is noted and agreed that BS:8233 will be used as design criteria for the new campus accommodation. | No further response provided. |
| 598 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | It is important that the study area reflects the actual extent of the impacts - and that includes those impacts associated with the displacement of recreational activity which may intensify activity on other SSSIs and County Wildlife Sites (Table 7.2.1). For the same reasons the Deben Estuary SPA should be included in Table 7.2.2. | Volume 1, Appendix 6J identifies that the study area includes the land within the site boundary and the zone of influence (the area over which ecological features may be affected by potential biophysical changes caused by a proposed project and associated activities) of the Sizewell C Project. The specific study areas, survey areas and ZOI for the main development site and the associated development sites are described within the methodology sub-sections of the terrestrial ecology and ornithology chapters of Volumes 2 to 9 of the ES . The ZOI for designated site is 20km for the main development site and 5km for associated development and as the Deben Estuary is located over 20km from the main development site and only within 5km of the freight management facility, it is only considered within Volume 8, Chapter 7 of the ES . However the Deben Estuary SPA is not considered within the detailed assessment as there would be no direct or indirect impacts are anticipated on statutory designated sites. |
| 599 | Main Development Site | Coastal Geomorphology | Suffolk County Council | It is important that the study area is clearly defined - which is not the case in Figure 7.13.1. The study area must include the potential impact of interrupted 'natural' sediment flow on the coastline from the Blyth Estuary to at least Orford Ness. However, if the observed net sediment transfer is southwards (7.13.3), the southern boundary of the Telemac study needs to be moved further south to include Shingle Street to correct the current northern bias. | The study area/ zone of influence for the coastal geomorphology and hydrodynamics assessment is defined within Volume 1, Appendix 6P . The Zone of Influence for the coastal geomorphology assessment has been defined in agreement with the Marine Technical Forum as the Greater Sizewell Bay (GSB) (see Figure 20.1 in Volume 2, Chapter 20 of the ES and Figure 20A.57 in Appendix 20A of Volume 2 of the ES). The study area for coastal geomorphology extends from Walberswick in the north to the Coralline Crag formation at the apex of the Thorpeness headland in the south within the GSB. The seaward boundary extends to beyond the eastern flank of the Sizewell-Dunwich Bank and includes the proposed cooling water infrastructure on the east side on the bank |
| 600 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | It is important that the proposed mitigation strategies across the environmental disciplines are closely aligned to ensure the mitigation proposals are complementary, for example for landscape, ecology and recreation. There will be a particular need for them to make provision for ongoing monitoring with associated trigger points for a review of the mitigation as necessary. | The proposed mitigation strategies across the environmental disciplines are closely aligned to ensure the mitigation proposals are complementary. |
| 601 | Project-wide | Noise & Vibration | Suffolk County Council | It is important that the Noise & vibration and Air Quality Assessments are based on the information contained within the Transport Assessment (TA). Data in the TA should therefore be presented in the format that it will be used in the noise and air quality assessments for example 18 hour, 8 hour, hourly, 24 hourly flows, together with proportions of heavy goods vehicles and average speeds to allow transparency and cross checking. | The noise and vibration and air quality assessments presented in the ES are based on the data from the Transport Assessment (Doc Ref. 8.5) |
| 602 | Project-wide | Landscape & Visual | Suffolk County Council | It is however important to clarify that at this stage, viewpoints have been agreed for the operational platform only (7.3.3) and not for the whole of the "main development site" as defined on Figure 3.2.1. Further viewpoints will need to be agreed for example for the rail routes taking account of the proposal to store materials adjacent to the line (3.3.3). | The location of representative viewpoints, illustrative viewpoints and the location of viewpoints to be used to generate photowire visualisations, has been agreed with the Natural England, Suffolk County Council, Suffolk Coastal and Waveney District Councils (now East Suffolk Council) and Suffolk Coast and Heaths AONB. The landscape and visual assessment identifies the likely effects of the proposed development on visual receptors. Reference is made to agreed representative and illustrative viewpoint photographs as appropriate. Visualisations have been prepared for agreed viewpoint locations. Further details are provided within the landscape and visual assessments in Volumes 2 to 9 of the ES . |
| 603 | Off-site Associated Development | Noise & Vibration | Suffolk County Council | It is agreed that noise and vibration impacts should be assessed using the same methodologies as discussed above. Care however needs to be taken with the description of potential mitigation measures - there is reference in Tables 8.3 and 8.6 to "screening or planting" for noise and vibration mitigation. Planting would not necessarily provide adequate noise mitigation unless very dense and further explanation of this would be helpful. | Details of primary mitigation measures that are relevant to the noise and vibration assessment are outlined within the environmental design and management section of the noise and vibration assessments presented in Volumes 2 to 9 of the ES . The content of this comment is noted and agreed. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

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|-----|-----------------------|-------------------------------------|------------------------|---|--|
| 604 | Project-wide | Noise & Vibration | Suffolk County Council | It is acknowledged that road traffic noise monitoring is useful for any noise model calibration and verification work, but that noise level changes during the construction period and once the site becomes operational would be established by calculation and direct comparison of the relevant scenarios. | Details of the noise models for construction and operation are provided in Volume 2, Appendices 11B and 11C respectively. |
| 605 | Main Development Site | Coastal Geomorphology | Suffolk County Council | It is absolutely critical that the ES sets out how the impacts of the development will be monitored for the lifetime of the development and how that monitoring will inform any remedial action required. | Volume 2, Chapter 20 identifies that detailed monitoring and mitigation plans would be developed in accordance with any conditions attached to an approved Marine Licence deemed within the DCO approval (Deemed Marine Licence; DML). The monitoring and mitigation plans follow the approval of DCO and DML because the predicted effects and their significance need to first be determined and agreed. If approved, the DML would contain a condition that forms the basis of the monitoring and mitigation plans – activities affecting the coast would not be able to commence until these plans are approved by the MMO. |
| 606 | Project-wide | Noise & Vibration | Suffolk County Council | Inclusion of a preliminary programme of construction activities and plant use, to identify impacts and variability throughout the construction period, would clarify impacts. Also, whether night-time traffic movements would be necessary, either for workers or construction vehicles, and any shift working and changeover times, if significant. | The construction noise and vibration assessment is based on the information provided in Chapter 3 of Volume 2, and Chapter 2 of Volumes 3 to 9 . Further detail is provided in the noise and vibration ES chapters and associated appendices in Volumes 2 to 9 . |
| 607 | Main Development Site | Coastal Geomorphology | Suffolk County Council | In the Marine Ecology section outfall structures are identified as potentially affecting sediment transport (7.15.32). This is not recognised in the corresponding section of the Coastal Geomorphology chapter. | The coastal geomorphology and hydrodynamics assessment presented in Volume 2, Chapter 20 identifies that the four intake and two outfall heads would represent a long-term obstruction to tidal streams at the bed, prompting scour pits to form where the bed is sandy, which would, in combination with the head, also act as additional roughness elements locally affecting wave and current propagation and so contribute to local changes to sediment transport and deposition. |
| 608 | Project-wide | Amenity and Recreation | Suffolk County Council | In terms of mitigation (7.4.40), it is especially important that long distance routes are kept open during the construction phase. We would also suggest that, in line with the EN-1, the ES should set out opportunities to enhance green infrastructure in the locality by, for example, creating new public access, be it a right of way or open access land, having regard to other constraints, such as ecology. | The Rights of Way and Access Strategy (Volume 2, Appendix 15I) has been prepared to inform the relevant Footpath Implementation Plan which would be prepared by SZC Co. and submitted to the highway authority for agreement pursuant to the Draft DCO (Doc Ref. 3.1). In relation to the construction phase the strategy states: <ul style="list-style-type: none"> • to minimise as far as possible any physical disruption or any other reductions in amenity on existing PRoW, permissive footpaths, access land, promoted cycle routes and all other pre-existing linear and area access, on the coast and inland; • to minimise as far as possible any reductions in connectivity in and around the development, especially north-south; • to, in particular, minimise any reductions in accessibility and amenity to the Suffolk Coast Path, Sandlings Walk and the future England Coast Path; • to comply with the legal requirements of the Equality Act 2010 and the Countryside and Rights of Way Act 2000 in terms of temporary access infrastructure and management, by ensuring that there are no physical barriers to access without lawful authority and that reasonable adjustments are made to facilitate participation by all; • to ensure that all new linear surfaces are easy to use; • to minimise the need for temporary path closures and diversions, and where these are unavoidable, to provide and maintain alternative routes so as to reduce to a minimum any disruption or loss of amenity; • to minimise road crossing points and, where unavoidable, to carry out relevant road safety audits and implement recommendations to ensure user safety; • to apply and maintain best practice in terms of on-site signage and other information provision, and to enhance visitor enjoyment and safety; and • to justify, manage and agree temporary closures in advance and to publicise closures to members of the public, as required. |
| 609 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | In terms of impacts during construction and operation, those listed (7.2.38/39) do not explicitly identify ecological impacts associated with transport movements. The ecological consequences of the displacement of maritime activity, for example recreational sailing, should also be considered. | The assessments presented within the ES, consider ecological impacts associated with transport movements. Terrestrial ecology and ornithology is considered in Chapter 14 of Volume 2, and Chapter 7 of Volumes 3 to 9 . Marine ecology is considered in Chapter 22 of Volume 2 . |
| 610 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | In Table 7.2.3 Southern Minsmere Levels CWS text is incorrect as this is mainly grazing marsh - this could be due to mislabelling of this site on Figure 7.2.4 | This point is noted - where relevant this has been considered in the preparation of the terrestrial ecology and ornithology assessments presented in Volumes 2 to 9 of the ES . |
| 611 | Project-wide | Transport | Suffolk County Council | In response to the Stage 1 consultation, concerns were raised about the impact of construction and commuter traffic on the B1122. This needs to be assessed. | These impacts have been assessed within the Transport Assessment (Document Reference 8.05) and therefore considered within the preparation of the Transport ES chapter (Volume 2, Chapter 10) |
| 612 | ES Preparation | Alternatives | Suffolk County Council | In presenting how EDF has come to its preferred alternative it should be clear how it has weighted the various determining factors - for example environmental impact, transport impact, cost. | SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals. A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4 , together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects. Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 provide a description of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co. |
| 613 | Project-wide | Amenity and Recreation | Suffolk County Council | In particular, it needs to examine where people may be deflected to and the sensitivity of those sites to increased recreational pressure - for example increased dog walking on SSSIs. It will also need to look at how workers, both in the construction and operational phases may access the site using the rights of way network and how this access may be affected and enhanced to offset this. For example, Bridleway 19 is currently used by commuting workers as well as for recreation. Its temporary closure could deflect cyclists on to busier roads (or indeed participation in cycling/walking may decrease) so this will need to be assessed and mitigated for to ensure a similar standard of recreational opportunities remain available during and post-construction. The findings of this work should also inform the HIA. | The assessment of amenity and recreation considers the impacts to users of existing amenity and recreation resources, and where appropriate, the use of these resources by construction workers. In addition, a Rights of Way and Access Strategy (Volume 2, Appendix 15I) has been prepared which sets out the strategy for PRoW, permissive paths, long distance walking routes, cycle routes, open access land and the beach during the construction and operational phases, for the main development site. This strategy is expected to inform the relevant Footpath Implementation Plan which would be prepared by SZC Co. and submitted to the highway authority for agreement pursuant to the Draft DCO (Doc Ref. 3.1). The strategy has been designed to minimise the displacement of people away from the proposed development area and to nearby European sites to minimise disturbance to ground-nesting bird species and trampling of vegetation. The findings of this work has informed the Health and wellbeing assessment, presented in Volume 2, Chapter 28 . |
| 614 | Project-wide | Transport | Suffolk County Council | In addition to the IEMA Guidelines, a more detailed scale of impacts is set out in DMRB 11.3.8.7 Table 1, distinguishing between Built-Up and Rural areas and providing more detail as to their application. It is recommended that reference is made to this table. Furthermore, areas where a 10% increase in flows is considered significant should be identified and agreed. | Reference is made to Volume 11 of the DMRB. Rural area calculation has been used for all as these are considered to represent a worse case assessment. The assessment of transport effects is provided within Chapter 10 of Volume 2 of the ES . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|-------------------------|------------------------------------|------------------------|---|---|
| 615 | Project-wide | Historic Environment | Suffolk County Council | In addition to the assessment of inter-relationships and cumulative effects, which is welcome, it may be that individual heritage assessments are required to be undertaken of those designated heritage assets of the greatest importance (and, therefore, sensitivity) within the Historic Environment Study Area - such as Scheduled Monuments and Grade I and Grade II* listed buildings, in order that impacts arising from the proposal can be most fully understood. | Individual heritage assets are discussed within the Terrestrial Historic Environment ES chapters within Volumes 2 to 9 of the ES, with sections detailing heritage significance and contribution of setting for individual assets, before setting out the impact, and significance of effect. |
| 616 | Project-wide | Transport | Suffolk County Council | In addition to the above, the TA should include an assessment of the impact of different transport options on the incidence of transport related injury and death. This should inform the Health Impact Assessment. | The health and wellbeing assessment presented in Volume 2, Chapter 28 , consider the potential health and wellbeing effects from additional transport movements, this includes consideration of road traffic accidents and injury for the main development site and associated developments. |
| 617 | Project-wide | Air Quality | Suffolk County Council | Impacts at locations such as Yoxford, and along the B1122, such as Theberton and Middleton Moor where there are a relatively high number of properties in a rural location, should be specifically quantified. Numbers of properties affected should be included, as well as timescales and durations, which would be relevant to the National Objective Limit levels for the significant pollutants (including nitrogen dioxide and particulate matter (PM10), as set out in the Local Air Quality Management Regime'). The road traffic assessment pollutants of nitrogen dioxide and particulate matter are agreed. | An assessment of traffic emissions has been considered within the air quality assessment, and has considered pollutants (including nitrogen dioxide and particulate matter (PM10)); see the Air Quality ES Chapter in Volume 2 to 9 . |
| 618 | Project-wide | Air Quality | Suffolk County Council | If any of the above Air Quality Standards or Objectives is predicted to be exceeded by the above mentioned activities, further assessment will be required. This may include monitoring at relevant receptor locations, detailed computer modelling and investigations of solutions to reduce pollutant concentrations. | Volume 1, Appendix 6H identifies that the magnitude of non-mobile plant emissions have been evaluated based on the Environment Agency's risk assessment method. Volume 2, Appendix 12C assess the potential environmental impacts of anticipated emissions to air from combustion activities and details assessment methodology and criteria used within the assessment. The assessment included detailed dispersion modelling and a description of the model used and the emissions modelled is provided within Volume 2, Appendix 12C . |
| 619 | Project-wide | Groundwater and Surface Water | Suffolk County Council | Groundwater monitoring (including for radiochemicals) should be included within the mitigation plan and this should cover flows outside the cut-off wall in the SSSI. There should not be a complete reliance on modelling - this will need to be ground-truthed (7.11.40). | A programme of gas, groundwater and surface water monitoring would be designed as part of the ground investigation and would be required prior to construction works commencing. The results of this short-term monitoring would determine whether further long-term gas, and groundwater monitoring is required during the construction and operational phases. |
| 620 | ES Preparation | Alternatives | Suffolk County Council | Given the evident uncertainty and lack of discussions/agreement with the local authorities on this matter, we do suggest it is premature to scope out the potential need for such a facility. Consequently, we suggest the ES should report should report on alternative measures to manage freight and their comparative effects. Other alternatives should include rationalising the use of land across all three nuclear sites, sharing facilities, for example parking wherever possible. | SZC Co. have undertaken extensive formal and informal consultation from 2008 to 2019 to inform the design of development proposals. A summary of the main alternative considerations for the Sizewell C Project are provided in Volume 1, Chapter 4 , together with an indication of the main reasons for selecting the chosen options and comparison of the environmental effects. Volume 2, Chapter 6 and Chapter 3 of Volumes 3 to 9 provide a description of the main development site-specific alternatives and associated development site-specific alternatives considered by SZC Co. |
| 621 | Project-wide | Noise & Vibration | Suffolk County Council | Generally, the proposed methodologies are acceptable, however, since drafting of the Scoping Report, BS5228 has been updated to BS5228-1:2009+A1:2014 and as mentioned previously, the most up to date guidance available at time of assessment should be used. Furthermore, we note that where professional judgement is relied upon (7.7.9), this should be in the form of evidence-based judgements, rather than reasoning alone. | The assessment methodology for the noise and vibration assessment is provided in Volume 1, Appendix 6G and summarised in the Noise and vibration ES Chapter in Volumes 2 to 9 . |
| 622 | Project-Wide | Incombination & Cumulative Effects | Suffolk County Council | Furthermore, paragraph 6.3.58 states EDF will provide "support to Network Rail to deliver a new passing loop on the East Suffolk Line near Wickham Market Station. This is not discussed further in the Scoping Report (for example as offsite associated development). The impacts of this should be presented in the ES. The location of this development is adjacent to a new housing development and consideration should therefore be given to minimising train waiting times during passing manoeuvres, or exploring other engineering options (such as lengthening the loop) to minimise impacts on those residents. | SZC Co. are not pursuing the rail-led transport strategy, and therefore no changes to the passing loop on the East Suffolk line are proposed. |
| 623 | Project-wide | Transport | Suffolk County Council | Furthermore, information is required on how HGV deliveries and departures to/from the main site will be managed, together with the volumes and timing of movements associated with the accommodation campus and on-site car park. These issues should be considered within the TA. | All such information has been considered and reported in the Transport Assessment (Document Ref 8.05). |
| 624 | Other Rail Improvements | The Proposed Development | Suffolk County Council | Further information will be needed with respect to the impact of the proposed rail routes on the existing highway network, especially with respect to any proposals for new rail crossings | A description of the proposed work associated with the rail proposals is included in Volume 9, Chapter 2 , this includes temporary realignments of Buckleswood Road and B1122 (Abbey Road) during the construction of the proposed level crossings. The effects of the proposed rail crossings are considered within Chapter 3 to 12 of Volume 9 of the ES . |
| 625 | ES Preparation | EIA Methodology | Suffolk County Council | Further Discussion are required with EDF in describing the magnitude of impacts, in particular the spatial extent and duration of effects that are used to derived the magnitude. As currently described, the ES is likely to underreport localised impacts of significant duration. A better acknowledgement of the longevity of the temporary, but long-term construction period is required | SZC Co. have undertaken formal and informal consultation with Suffolk County Council on the development proposals and scope of the assessment undertaken in the EIA. A summary of the consultation undertaken is provided in the Consultation Summary Report (Doc Ref. 5.1), Volume 1, Appendices 6D to 6Y and, where relevant for a specific site, within the individual topic chapters in Volumes 2 to 9 . |
| 626 | Project-wide | Air Quality | Suffolk County Council | Full details shall be submitted regarding the type, location, chimney height requirements and emissions from the Standby Diesel Generators. If any of the above Air Quality Standards or Objectives are predicted to be exceeded by the site related Combustion Processes, including stand-by equipment, further assessment will be required. This may include monitoring at relevant receptor locations, detailed computer modelling and investigations of solutions to reduce pollutant concentrations. | Volume 1, Appendix 6H identifies that the magnitude of non-mobile plant emissions have been evaluated based on the Environment Agency's risk assessment method. Volume 2, Appendix 12C assess the potential environmental impacts of anticipated emissions to air from combustion activities and details assessment methodology and criteria used within the assessment. The assessment included detailed dispersion modelling and a description of the model used and the emissions modelled is provided within Volume 2, Appendix 12C . The relevant stack and emission parameters for the installation are provided in the appendix and the conceptual locations shown in Volume 2, Figure 12C.1 . |
| 627 | ES Preparation | The Proposed Development | Suffolk County Council | ES will need to detail the hours of working both onsite and at any offsite facilities and the timing of all anticipated transportation movements to and from the site or to any offsite facilities. It is noted that 24 hour working shift patterns are likely to be used and consideration will need to be given to mitigating noise from night time and weekend works. | Descriptions of the working hours for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES . |
| 628 | Project-wide | Scope of assessment | Suffolk County Council | Environmental impacts on nearby residential properties (e.g. construction works, noise, dust, lighting, foul drainage etc) should be assessed and mitigation measures provided where necessary. | The noise and vibration, air quality and landscape and visual assessments presented in Volumes 2 to 9 of the ES consider the potential effects of the Sizewell C Project on nearby residential properties. Volume 10, Chapter 2 presents an assessment of the inter-relationship between these effects and considers the potential for new, or different significant environmental effects to arise at nearby residential properties |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
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| 629 | Off-site Associated Development | Terrestrial Ecology and Ornithology | Suffolk County Council | Ecological studies should have regard to Biodiversity habitats and species. The study area for bats in particular will need to be agreed. | The Bat Conservation Trust has developed an evidence-based methodology for the assessment of core sustenance zones (CSZs). Volume 2, Chapter 14 and Volumes 3 to 9, Chapter 7 provide the justification for the bat study areas. The study/assessment area has generally been extended to the unless otherwise stated. A list of the published CSZ radii is provided within Volume 2, Appendix 14A8 . The CSZ for Barbastelle (<i>Barbastellus barbastella</i>) has been increased from 2km to 10km based on the distances travelled by bats radio-racked during survey work. |
| 630 | Project-wide | Geology & Land Quality | Suffolk County Council | Details of any material (e.g. soil, peat, contaminated material et cetera) removed from site for disposal purposes or safely encapsulated on site shall be notified to both the Environmental Protection Team at Suffolk Coastal District Council and the Environment Agency. Validation shall be required following this remediation action to indicate the site is suitable for its new specified use. | The materials management strategy (Volume 2, Appendix 3B) which is submitted as part of the application for development consent, sets out how SZC CO. would manage excavated materials generated by the proposed development that is not considered to be waste. Materials considered waste are addressed in the waste management strategy. This document provides the framework for managing waste which would be produced during the construction, operational and, where relevant, the removal and reinstatement phases for the various elements of the Sizewell C Project. The relevant authorities would be notified. |
| 631 | Main Development Site | Radiological Assessment | Suffolk County Council | Detailed information should be provided as to the integrity of all radioactive material storage and any radioactive waste packaging facility on site. This should include comments on the suitability of storage over the proposed 'lifetime' of the site. | Details of radioactive material storage are provided with Volume 2, Chapter 7 . This includes an overview of the proposed arrangements for the management of radioactive wastes and spent fuel arising during operation of the Sizewell C power station. |
| 632 | Project-wide | Geology & Land Quality | Suffolk County Council | Detailed evidence in the form of certification to 'CLEA standard' will need to be supplied to indicate the source and suitability of all imported material used on site. | Due to the strict requirements for nuclear standard concrete, the approach taken for sourcing concrete supply is likely to replicate that used for Hinkley Point C, which sourced most material from within the UK. Other imported material would need to meet EDF Energy standards before they can be used on site. |
| 633 | ES Preparation | EIA Methodology | Suffolk County Council | Conversely, we would not wish the localised transport and socio-economic impacts to be underplayed. For example, the campus will have localised impacts by virtue of its proximity to other communities which may be presented in such a way that other socio-economic impacts on the labour market or accommodation availability take dominance | Socio-economics - The Gravity Model helps to estimate the residential location of construction workers and, therefore, the level of impact on receptors such as accommodation markets, demography and services. The study area is based on areas of administrative geography including national, regional, county and local. These form the basis of the assessment of impacts on the local labour market. Effects on local communities are also determined. Further information is provided in Volume 2, Chapter 9 . Transport – The Transport Assessment considers potential effects on the local road network, in terms of changes in traffic levels. Traffic-related environmental effects, including severance, pedestrian delay and amenity, noise and air quality are reported in the ES (Volume 2, Chapter 10 Transport and Volume 2, Chapter 11 Noise and Vibration, and Volume 2, Chapter 12 Air Quality) . |
| 634 | Project-Wide | Incombination & Cumulative Effects | Suffolk County Council | Consistency in terminology is particularly important to facilitate that measurement of in-combination effects. We are concerned that the ES could underreport these effects if it does not acknowledge the potential for accumulation of effects of minor significance. The ES should explain how the significance of an in-combination effect will be determined - for example, for a given receptor, is the significance of a moderate noise impact plus a moderate air quality impact moderate or major? | The majority of potential inter-relationship effects associated with the proposed development are either inherently considered or clearly identified and assessed within the technical assessments in Volumes 2 to 9 of the ES (Doc Ref. 6.3 to 6.10). For example, where there is the potential for a receptor to be impacted by an effect reported in another technical chapter, this is identified and assessed as appropriate in the receptor chapter, such as the Terrestrial Ecology and Ornithology assessment presented in Chapter 14 of Volume 2 of the ES (Doc Ref. 6.3) considers how impacts associated with construction works on groundwater and surface water described in Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) affect ecological resources and receptors. Where potential inter-relationship effects were not considered within the technical chapter, such as on residential receptors, commercial facilities and schools further assessment has been undertaken in Volume 10 . There is no established methodology for assessing the effects on sensitive receptors or resources resulting from the interaction or inter-relationship of different effects, and therefore the methodology applied to identify such inter-relationship effects is set out in Chapter 1 of Volume 10 , with the assessment provided in Chapter 2 of the same volume. |
| 635 | Project-wide | Socio-economics | Suffolk County Council | Consideration should be given to the likely cumulative impacts where there are coincident outages on reactors, either both the Sizewell C reactors or Sizewell B, or indeed all three. While it is understood that this would not be planned - unplanned outages do occur and are indeed part of EDF's justification for being unable to rationalise some infrastructure (for example parking) across the A, B and C sites. | The socio-economics ES chapter (Volume 2, Chapter 9) provides an assessment of the potential effects where outages would be required for both stations. |
| 636 | Project-wide | Noise & Vibration | Suffolk County Council | Consideration should be given to the appropriateness of referring to this Guidance (given its status in the NSIP regime) and the description of "Effect Levels" within the assessment. As mentioned above, it is noted that there is some mapping of terms in the Ecology section (Table 7.2.8) to maintain consistency with industry- standard terminology and this could equally be applied here. | The NPSE, the NPSs and the PPG require the assessment of noise and vibration against the lowest observed adverse effect levels (LOAEL) and the significant observed adverse effect level (SOAEL). These differ depending on variables such as the level and character of the noise or vibration source, receptor sensitivity, timings of when it would occur, its duration, existing sounds present and the frequency of the occurrence of the source. Each source type requires its own specific value for LOAEL and SOAEL, which depends on these factors. The LOAEL and SOAEL values adopted for the assessment of noise and vibration effects for the Sizewell C Project are set out within Volume 1, Appendix 6G . |
| 637 | Project-wide | Transport | Suffolk County Council | Consideration should be given to assessing the traffic related to the outage works as a permanent increase on the road network during the operation phased due to their frequency and duration of its occurrence. | A 'planned' outage is a period of scheduled refuelling and maintenance during which time the station is not operational, but generates traffic associated with the outage. This is highly robust, given that a planned outage only occurs for 8% of the time. |
| 638 | Main Development Site | Marine Ecology | Suffolk County Council | Consideration should be given to aligning this study area with that related to the HRA process - as mentioned above the interrelationship between the EIA and HRA process should be clear. | As set out within Volume 2, Chapter 22 , The Sizewell C Project has the potential to affect ecological sites designated as being of European or International Importance for nature conservation. Consequently, a Shadow Habitats Regulations Assessment (HRA) (Doc Ref. 5.10) is submitted to the PINS with the Sizewell C DCO application. The Shadow HRA (Doc Ref. 5.10) details the likely significant effects on the designated features of European Sites including SPAs, SACs and Ramsar sites within the zone of influence of the Sizewell C Project (Doc Ref. 5.10). In conjunction with the Shadow HRA (Doc Ref. 5.10) the marine ecology chapter (Volume 2, Chapter 22) considers the specific marine components (below MHWS) of designated European Sites and identifies where the effects are considered within the ES . During scoping, details of which can be found in Volume 2, Appendix 22M , potential marine impacts of the proposed development on Sites of Special Scientific Interest (SSSIs) and Country Wildlife Sites were also considered. The results of the scoping exercise are available in the Edition 2 of the Marine Ecology and Fisheries Final Scoping Report provided in Volume 2, Appendix 22M . |
| 639 | Project-wide | Socio-economics | Suffolk County Council | Consideration should be given to a public attitudes survey aimed at understanding in particular the less tangible social effects such as local anxiety associated with a major development prior, during and following construction. EN-1 (5.12.3) identifies the potential for impacts on social cohesion. Such concerns warrant analysis and mitigation as necessary. | These paragraphs of the NPS EN-1 set out the requirements for the applicant's assessment which have been adhered to within Volume 2, Chapter 9 of the ES , Socio-economics. This includes: - Assessments at regional and local levels - Assessments related to: the creation of jobs and training opportunities; the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; effects on tourism; the impact of a changing influx of workers during the different construction and operation phases on the energy infrastructure; effects on social cohesion depending on how populations and service provision change as a result of the development; and cumulative effects. - A review of existing baseline socio-economic characteristics, and regard to local policies where relevant. |
| 640 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | Consequently, while we welcome the commitment to making full use of the mitigation hierarchy (5.4), in order to do this a comprehensive and robust assessment of the impacts, including on BAP species will be required. With reference to the proposed loss of the SSSI, we suggest that the Defra biodiversity offsetting pilot metrics are applied. | The mitigation hierarchy has been applied with a strong emphasis to include and embedded appropriate measures into the design (primary mitigation). Primary and tertiary mitigation measures have been specified within the relevant ES volumes, specifying those which are of benefit to ecology, and the assessment has considered the inclusion of these. A Biodiversity Net Gain assessment has been completed using the Biodiversity Metric 2.0 for the permanent development and appended to the Terrestrial Ecology and Ornithology ES Chapter (Volumes 2, 5, 6 and 7). |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
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| 641 | Project-wide | Transport | Suffolk County Council | Clear distinctions needs to be made on the longevity and reversibility of impacts. | Where effects are considered temporary, this is explained within the Transport ES chapter (Volume 2, Chapter 10). Volume 1, Appendix 6F identifies that the operational phase has been assessed to provide an assessment of the permanent effects of the Sizewell C Project |
| 642 | Project-wide | Groundwater and Surface Water | Suffolk County Council | As with groundwater, the ES should include provision for monitoring, during and post construction, which links to appropriate mitigation as necessary (7.12.38). | A programme of gas, groundwater and surface water monitoring would be designed as part of the ground investigation and would be required prior to construction works commencing. The results of this short-term monitoring would determine whether further long-term gas, and groundwater monitoring is required during the construction and operational phases. |
| 643 | Project-wide | Transport | Suffolk County Council | As mentioned, the impact of Sizewell outages and other local events, for example the Latitude festival, need to be assessed/accommodated within the assessment of impacts. | An assessment of the seasonality of traffic in the study area was undertaken at Stage 2 and it was considered reasonable that modelling of seasonal variability should not be required, since the modelling already includes 'worst case' traffic inputs in many forms. Further details are provided in the Transport Assessment (Doc Ref 8.5). |
| 644 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | As indicated earlier, we have some concerns that the ES could underplay impacts on features/resources classified as being of local value (7.2.25). As National Policy Statement EN-1 states, the ES must set out clearly any effects on locally designated sites of ecological importance, and on habitats and species identified as being of importance to the conservation of biodiversity. We would expect therefore to see a thorough assessment of the impacts of the development on local Biodiversity Action Plan (BAP) priority habitats and species. Table 7.2.5 omits reference to the latter. | The Terrestrial Ecology and Ornithology assessments within the ES have included a detailed review and consideration of the Suffolk BAP as well as priority habitats and species. This has also included consideration of CWS. The mitigation hierarchy has been applied with a strong emphasis to include and embedded appropriate measures into the design (primary mitigation). Primary and tertiary mitigation measures have been specified within the relevant ES volumes, specifying those which are of benefit to ecology, and the assessment has considered the inclusion of these. A Biodiversity Net Gain assessment has been completed using the Biodiversity Metric 2.0 for the permanent development and appended to the Terrestrial Ecology and Ornithology ES Chapter (Volumes 2, 5, 6 and 7). |
| 645 | Main Development Site | Coastal Geomorphology | Suffolk County Council | As detailed in other sections of this report, we have concerns with the guidelines to be used to determine descriptions of magnitude, particularly so given the predominantly soft nature of the Suffolk coastline. In these circumstances impacts of the development may well be quite localised within the study area, but nonetheless have very material consequences if those impacts affect property frontages. Table 7.13 is constructed in such a way that, for example an effect of a ten year duration, affecting half the study area would be described as low magnitude. | Volume 1, Appendix 6P provides updated descriptions of criteria used in defining impact magnitude. A low impact magnitude is now described as a noticeable but small-scale change to receptor over a partial area for up to a period of a year. |
| 646 | Project-wide | Socio-economics | Suffolk County Council | As acknowledged in 6.2.31, the socio-economic environment is of a dynamic nature, underlining the need for sensitivity testing of the gravity model to different economic circumstances. This should then provide a better understanding of the likely need for/nature of appropriate triggers for contingency measures as part of the mitigation proposals. | The socio-economic ES chapter (Volume 2, Chapter 9) recognises that there is a degree of uncertainty, and several externalities, which could affect the distribution of the workforce modelled by the Gravity Model, and their effects spatially and on different parts of the accommodation market, public services and community facilities. The Gravity Model represents a 'point-in-time' position estimating distribution based on the best available data and transport assumptions, using survey information and published national statistics. Rather than test myriad, potentially unlimited scenarios, it is more prudent to secure a monitoring and reporting mechanism and responsive mitigation strategy that is able to flexibly respond to potential issues before they arise – these have been set out in the Accommodation Strategy (Doc Ref. 8.10), via an Accommodation Management System and Housing Fund, and through a Public Services Contingency Fund. |
| 647 | Main Development Site | Radiological Assessment | Suffolk County Council | Any intended off-site storage of radioactive waste, whether interim or permanent, should be detailed in full, including location and capacity, together with the radiological significance and justification for storing this type of fuel off-site. The issues surrounding the utilisation Sizewell C for the storing of radioactive waste derived from other sources, together with any impact of increased radioactive discharges that may arise in such circumstances, should be considered within the ES. We would ask PINS to confirm through which process would the potential environmental effects of an incident involving radioactive material be assessed - for example impacts on ground water/surface water features should emergency cooling be required. The Scoping Report gives little attention to the potential environmental implications associated with the storage of spent fuel (section 3.8). | Chapter 7, Volume 2 of the ES describes the proposed approach to managing spent fuel and radioactive waste, including disposal and/or discharge and measures to protect the environment. The disposal of radioactive wastes would be permitted and monitored by the Environment Agency under the Radioactive Substances Regulations permit. As described in Chapter 25 (Radiological considerations) of Volume 2 , there would not be any disposal of radioactive effluents to groundwater during construction or operation, therefore no radiological impact assessment on groundwater has been undertaken. Chapter 25 of Volume 2 , does present an assessment of radiological considerations including: dredging for construction radiological impact assessment; a human radiological impact assessment, non-human radiological impact assessment; and transport radiological impact assessment. This includes consideration of the radiological impacts from direct radiation and gaseous and liquid discharges to the atmosphere and the marine environment respectively resulting from routine operations, and the transportation off-site of radioactive materials and wastes to members of the public. Furthermore, there would be no radioactive materials used during the construction process prior to fuel loading and as such there is no source of contamination. |
| 648 | Project-wide | Transport | Suffolk County Council | An effective method of managing the timing of HGV and OGV movements will be required to manage the impact on the network during peak times and any maximum flow quota for key routes. We are yet to be presented with evidence of the efficiency of managing HGV traffic using electronic/camera based systems. | The draft Construction Traffic Management Plan (Doc Ref 8.7) identifies that the management and monitoring of HGVs would be undertaken using DMS and GPS. |
| 649 | Project-wide | Historic Environment | Suffolk County Council | An assessment in association with Conservation Officers is welcome, though should include non-designated heritage assets in addition to designated ones (7.5.26). | Non-designated assets, such as the Coastguard Cottages on Dunwich Heath and Southwold Pier have been considered within the Terrestrial Historic Environment assessments of Volumes 2 to 9 of the ES as appropriate. |
| 650 | ES Preparation | The Proposed Development | Suffolk County Council | Along with the phasing, the ES will need also need to detail the location of all major engineering tasks to be carried out (for example excavation work, dredging, dewatering, piling, stockpiling of soil/peat, road building, demolition of existing buildings, use of explosives, construction of new buildings, borrow pit workings et cetera). It should be clear where engineering works are contingent on offsite constraints, such as the receiving capacity of Wallasea Island to accommodate any peat winnings (3.4.5). A worst case in terms of the need for stockpiling should be assumed. | A description of the construction works at the main development site is provided within Volume 2, Chapter 3 and is supported by a construction parameter plan and an illustrative construction masterplan. A description of the construction works at the associated development sites is provided within Chapter 2 of Volumes 2 to 9 of the ES . |
| 651 | Project-wide | Terrestrial Ecology and Ornithology | Suffolk County Council | Additionally, we have concerns that the proposed 5km study area for bats (Table 7.2.1) may be insufficient to fully understand the significance of development area for bats - this will need to be justified through further survey. | The Bat Conservation Trust has developed an evidence-based methodology for the assessment of core sustenance zones (CSZs). Volume 2, Chapter 14 and Volumes 3 to 9, Chapter 7 provide the justification for the bat study areas. The study/assessment area has generally been extended to the unless otherwise stated. A list of the published CSZ radii is provided within Volume 2, Appendix 14A8 . The CSZ for Barbastelle (<i>Barbastellus barbastella</i>) has been increased from 2km to 10km based on the distances travelled by bats radio-racked during survey work. |
| 652 | Project-wide | Geology & Land Quality | Suffolk County Council | A site survey including samples from 150 locations across the Sizewell C site has been undertaken for the presence of Contaminated Material. This survey has not indicated any significant forms of contamination and as such the site remains in a low to very low category of potential risk for contamination. Additional sampling will need to be undertaken during site excavation and any identified contamination will need to be safely removed or encapsulation on site. The assumption that there is no anthropogenic contamination beyond the normal application of fertilisers and pesticides should however be validated (7.10.24). | Contamination testing was carried out as part of previous ground investigations undertaken on the main development site and included testing for a wide range of determinants including metals, hydrocarbons, volatile organic compounds, pesticides and herbicides. Results for pesticides and herbicides were reported below the laboratory limit of detection and it is considered that the assumption in paragraph 7.10.24 of the Scoping Report has been validated. Further discussion in relation to ground contamination is provided for the main development site in Volume 2, Chapter 18 . |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

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| 653 | Project-wide | Noise & Vibration | Suffolk County Council | A proposed 'Complaints Procedure' detailing who will undertake investigations of noise complaints on behalf of the site operators and the scope of amelioration in the event that complaints are justified should be provided. | SZC Co. would have a system for the receipt and recording of any noise or vibration complaints from occupiers of noise sensitive receptors, and procedures for investigating and acting appropriately as necessary upon those complaints. Further details are provided in the CoCP (Doc Ref. 8.11) |
| 654 | Project-wide | Transport | Suffolk County Council | A classification of possible receptors and their likely sensitivity is set out in Table 6.3.1. It is unclear where these categories are derived from. This table does not refer to equestrians and cyclists, focussing on pedestrians as the only NMU's. Cyclists need to be considered either as local road users or recreational tourist based users. The latter group are likely to include family groups that would be considered more vulnerable road users with respect to increased traffic flows. It is not unreasonable to assume a higher level of recreational activity in the area considering its location to the coast and the AONB. | Pedestrians, cyclists and equestrians all included as NMU's within the Transport Assessment (Document Reference 8.05). |
| 655 | Project-wide | Soils & Agriculture | Suffolk County Council | Reference is made to returning land to agriculture (7.9.33); we would prefer, as part of the 'Estate Vision' to see the whole of the estate returned to semi-natural habitats with gradation of public access south to north. | The scoping report discusses all parts of the project - there would be some return to agriculture on the estate there would be a focus on habitats - this is set out in the Outline Landscape and Ecological Management Plan (Doc Ref 8.2) |
| 656 | Project-wide | The Proposed Development | Theberton and Eastbridge Parish Council | We are concerned that once again, alternative sites are not being considered for this development (para. 4.1.3) both in terms of alternative, less environmentally sensitive sites also on EN-6 site list (EN-6 Annexe C) are available and should be considered prior to Sizewell. | The Government has identified that, in order to meet its energy and climate change objectives, there is an urgent need for new electricity generating stations and that new nuclear power should contribute to that mix. This is identified in the Overarching National Policy Statement for Energy and the National Policy Statement for Nuclear Power Generation. The latter lists eight potentially suitable sites for the deployment of new nuclear power stations in England and Wales by the end of 2025, including the site for Sizewell C. The location of the Sizewell C power station, to the north of the existing Sizewell B power station, and the approximate location of the temporary construction area are indicated on plans appended to the National Policy Statement for Nuclear Power Generation. As the proposed siting of Sizewell C is set out in the Nuclear National Policy Statement, SZC Co. has not considered any alternative sites in relation to the main platform. |
| 657 | Project-wide | The Proposed Development | Theberton and Eastbridge Parish Council | There are many references to mitigation within the scoping report and yet little evidence has been presented as to whether existing mitigation and compensation (Aldhurst Farm), already in place, is performing or likely to perform the services being claimed. Showing "likely effectiveness" is a requirement in regulation 63 of the Conservation of Habitats and Species Regulations 2017. | Habitats at Aldhurst Farm, including reedbeds, ditches and lagoons, rough grassland and scrub, have successfully established and are subject to an ongoing monitoring and management plan. This plan is implemented under a planning condition imposed through the existing planning consent for Aldhurst Farm under the Town and Country Planning Act. |
| 658 | Project-wide | The Proposed Development | Theberton and Eastbridge Parish Council | No in-depth assessment has been undertaken on EDFs Link Road/Theberton Bypass route (Z) or EDF route W or the old Sizewell B route, D2, and the Joint Local Authorities Group (JLAG), comprising Suffolk County Council (SCC) and Suffolk Coastal District Council, now East Suffolk Council (ESC), have requested that a full assessment is done of these routes prior to any decision being made | Chapter 3 of Volume 6 describes the alternatives considered for the route of the proposed Sizewell link road. |
| 659 | Other Rail Improvements | The Proposed Development | Ufford Parish Council | With respect to the footpaths and rail crossings, these are not explicitly mentioned in the document, except very broadly under the heading "East Suffolk Line branch line upgrades and level crossing works" (see example section 6.8.26 table 6.11 which says these works will be assessed for impact on "amenity and recreation"). In addition, there is no detailed map of the closures, only the works in Plate 3.36 and 3.37. We would like to see the plans for all pedestrian crossings explicitly mentioned wherever reference is made to works on the East Suffolk Line. | The integrated transport strategy, consulted on in Stage 4, has been selected and assessed within the EIA as the transport strategy. No upgrade works to the East Suffolk line are required. |
| 660 | Park and Ride | Landscape & Visual | Wickham Market Parish Council | With respect to visual impacts the proposed study area of 2km may need to be extended to ensure full assessment from Marlesford Conservation area, public viewpoints and properties at Campsea Ashe, Hacheston, Wickham Market and Marlesford, Marlesford and Glevering historic parklands (local designated) and public rights of way. Night time lighting/sky glow will need to be considered and assessed. | The study area for the assessment of landscape and visual effects of all elements of the proposed southern park and ride within Volume 4, Chapter 6 has been agreed with the Natural England, Suffolk County Council, Suffolk Coastal and Waveney District Councils (now East Suffolk Council) and Suffolk Coast and Heaths AONB. Effects on the Marlesford Conservation Area are assessed in Volumes 4, Chapters 9 (Terrestrial Historic Environment). |
| 661 | Project-wide | The Proposed Development | Wickham Market Parish Council | With respect to Page 37, Para 3.4.11 the construction programme should also include phases relating to critical mitigating elements: <input type="checkbox"/> Advance planting; <input type="checkbox"/> Ecological mitigation measures; <input type="checkbox"/> Ecological habitat enhancement measures; <input type="checkbox"/> Management of the above elements; <input type="checkbox"/> Long term retention and management of the above after 'removal and reinstatement' of the car park and arable field. | The overarching construction programme for the Sizewell C Project is presented within Volume 1, Chapter 2 , which includes information on the relationship between the phasing of the main development site and associated development, as well as Sizewell B Relocated Facilities works. More detailed descriptions of the construction phasing and programmes for each of the Sizewell C Project sites are included Chapter 3 of Volume 2 (main development site) and Chapter 2 of Volumes 3 to 9 (associated development sites) of the ES . An assessment of combined project-wide effects is presented in Chapter 3 of Volume 10 . |
| 662 | Park and Ride | Landscape & Visual / Terrestrial Ecology | Wickham Market Parish Council | We remain concerned at the loss of part of the woodland, Whin Belt, the green lane/footpath and its associated ancient tree, this is skyline vegetation currently offering natural landscape mitigation to the proposed site. Detailed assessment should reveal the need for significant design amendments to be made prior to the ES/DCO being finalised. | Woodland blocks on the perimeter of the southern park and ride, including Whin Belt, would be retained in their entirety, and so there would therefore be no direct loss of this habitat and its associated species. |
| 663 | Park and Ride | Transport | Wickham Market Parish Council | We have previously expressed concern regarding the methodology relating to traffic modelling and expect this to be taken into account within the EIA process. All cumulative impacts on our local roads from both existing and proposed traffic use will need to be assessed. | The approach for the assessment of cumulative traffic impacts has been agreed with Suffolk County Council and East Suffolk Council. |
| 664 | Park and Ride | Landscape & Visual | Wickham Market Parish Council | We have noted the references to a Landscape Strategy in both the scoping report and the 2014 documentation. We consider that such a strategy should outline long term enhancement and management measures and should be both included and secured (via appropriate legal agreements and bonds) for all the Off-site developments including the northern and southern park and ride sites. | Illustrative masterplans are provided for all associated development sites as a figure to Chapter 2 of the relevant volume. |
| 665 | Other highway improvements | Transport | Wickham Market Parish Council | These proposals will not address the desire by many to travel through the village centre, along the High Street and through the many smaller roads in the vicinity. Measures to improve the public transport system and the EDF bus transport links will need to be encapsulated within the ES in order to ensure highway impacts are minimised. | SZC Co. has included a number of measures within the design to minimise the impact of Sizewell C Construction traffic. In addition, SZC Co. would provide funding for pedestrian, cycle and public realm improvements in Wickham Market with the aim of directing traffic to use the A12 rather than reassign to less suitable routes, such as the B1078 through Wickham Market. |
| 666 | Park and Ride | Landscape & Visual | Wickham Market Parish Council | There may be cumulative impacts with the current intrusive lighting at the five ways roundabout, suitable design measures and mitigation of impacts will need to be employed | Volume 4, Chapter 2 provides a description of the lighting arrangements at the Southern Park and Ride site including how light spill would be minimised as far as reasonably practicable. |

SIZEWELL C PROJECT - ENVIRONMENTAL STATEMENT
NOT PROTECTIVELY MARKED

| Ref | Site | Topic/Chapter | Consultation body | Detail | Response |
|-----|----------------------------|--|-------------------------------|---|---|
| 667 | Project-wide | Transport | Wickham Market Parish Council | The traffic impacts on the B1078 roundabout will need to be fully assessed, we currently consider there will be significant impacts on the traffic movements at this junction. | <p>The traffic flows are considered within the Transport Assessment (Doc Ref. 8.05) and the Transport ES Chapter (Volume 2, Chapter 10) consider all elements of the Sizewell C Project.</p> <p>The geographic extent of the traffic model has been agreed with SCC and is described in Volume 1, Appendix 6F. Due to the size of the study area, the study area has been summarised by reference to sub areas (Sub Area A - North, Sub Area B – East, Sub Area C – South and Sub Area D – West, as shown on Figure 10.1 in Volume 2). Wickham Market and surrounding roads are situated within Sub Area C.</p> |
| 668 | Park and Ride | Landscape & Visual | Wickham Market Parish Council | The Southern Park and Ride is situated between two Special Landscape Areas (as currently designated) and close to the Marlesford Conservation Area in a prominent location. The ecological, landscape and visual impacts will need to be fully assessed with subsequent design measures including both on and off site landscape/ecological mitigation and enhancement measures provided. | <p>The landscape and visual assessment at Volume 4, Chapter 6 includes assessment of the effect of the proposed southern park and ride on the Special Landscape Areas. Effects on the Marlesford Conservation Area are assessed in Volume 4, Chapters 9 (Terrestrial Historic Environment).</p> <p>These assessments also include design measures where appropriate for mitigation.</p> |
| 669 | Park and Ride | Landscape & Visual | Wickham Market Parish Council | The impacts of all buildings and ancillary facilities, signage and lighting will need to be assessed. Viewpoints should be agreed with the LPA. We would expect all buildings to be low level and designed to suit this rural location. | <p>The location of representative viewpoints, illustrative viewpoints and the location of viewpoints to be used to generate photowire visualisations, has been agreed with the Natural England, Suffolk County Council, Suffolk Coastal and Waveney District Councils (now East Suffolk Council) and Suffolk Coast and Heaths AONB.</p> <p>The landscape and visual assessment identifies the likely effects of the proposed development on visual receptors. Reference is made to agreed representative and illustrative viewpoint photographs as appropriate. Visualisations have been prepared for agreed viewpoint locations.</p> <p>The assessment of landscape and visual effects for the proposed southern park and ride is presented within Volume 4, Chapter 6.</p> |
| 670 | Other highway improvements | Landscape and Visual & Terrestrial Ecology and Ornithology | Wickham Market Parish Council | The impacts arising from the current proposed diversion route will need to be fully assessed and designed with appropriate mitigation in terms of highway safety, ease/attractiveness of use (to avoid traffic issues in WM), ecological and landscape impacts. | This has not been taken forward and is therefore not considered within the ES . Instead, SZC Co. would provide funding for pedestrian, cycle and public realm improvements in Wickham Market with the aim of directing traffic to use the A12 rather than reassign to less suitable routes, such as the B1078 through Wickham Market. The provision of this funding would be secured through obligations in a Section 106 Agreement (see Section 106 Heads of Terms). |
| 671 | Other highway improvements | Landscape and Visual & Terrestrial Ecology and Ornithology | Wickham Market Parish Council | The highways works will involve removing the deeply banked and hedged cutting of Valley Road which will require detailed landscape and ecological assessment. Measures to reinstate the road after use should be included in the ES. | This has not been taken forward and is therefore not considered within the ES . |
| 672 | Project-wide | Transport | Wickham Market Parish Council | Both the diversion route and the wider traffic impacts will need to be fully assessed and with mitigating measures provided. These might include improvements to public bus transport on the road routes (B1116, B1078) and proposals for EDF bus transport to the park and ride site thus reducing car use. | <p>A Transport Assessment (Doc Ref. 8.5) has been undertaken and is submitted with the application for development consent. A number of measures, relevant to transport, has been embedded into the Sizewell C Project to reduce traffic impacts associated with the construction and operation phase (see Volume 2, Chapter 10):</p> <ul style="list-style-type: none"> • accommodation campus at the main development site for up to 2,400 workers to reduce construction workforce trips on the up to highway network; • 400 space caravan park at the LEEIE for 600 workers (based on 1.5 people per caravan), who would be bussed to site in order to reduce the construction workforce trips on the highway network; • the proposed new north-south (off-road) bridleway, cycleway and footway parallel to Lover's Lane, B1122 and Eastbridge Road; • park and ride facility at the LEEIE in the early years to bus workers to the main development site; • northern park and ride facility at Darsham and southern park and ride facility at Wickham Market to intercept construction workforce trips and bus construction workers between the park and ride facilities and the main development site; • direct bus services to bus workers to the main development site, to reduce construction workforce trips on the highway network; • beach landing facility to enable the delivery of Abnormal Indivisible Loads (AILs) by sea during construction and operation; • Saxmundham to Leiston branch line upgrades, rail extension into the LEEIE, and green rail route in order to enable the transportation of construction material by rail and thereby reduce the number of HGVs on the road; • freight management facility at Seven Hills to manage the flow and route of HGVs on the highway network to the main development site; and • package of highway improvement works, including the two village bypass, Sizewell link road, Yoxford roundabout and other highway improvement schemes, to mitigate the transport effects of the residual Sizewell C Project related traffic. <p>The highway works also include improvements to walk and cycle infrastructure and PRoW diversions where necessary in order to maintain PRoW connectivity.</p> |
| 673 | Project-wide | Alternatives | Yoxford Parish Council | We are particularly concerned that EDF's submission states (in paragraph 4.1.3) that alternative sites will not be considered. This is unacceptable because, of the other potential sites identified in NPS EN-6, Sizewell has already been identified as having the greatest environmental impact and yet the alternative sites, with the exception of Hinkley Point C, are not being developed. These alternative sites now need to be reconsidered rather than to proceed with the attempt to cram two reactors into a very limited site, which EDF themselves admit is too small, and which will have a devastating impact on the surrounding area as identified in the last round of consultation. | <p>The Government has identified that, in order to meet its energy and climate change objectives, there is an urgent need for new electricity generating stations and that new nuclear power should contribute to that mix. This is identified in the Overarching National Policy Statement for Energy and the National Policy Statement for Nuclear Power Generation. The latter lists eight potentially suitable sites for the deployment of new nuclear power stations in England and Wales by the end of 2025, including the site for Sizewell C.</p> <p>The location of the Sizewell C power station, to the north of the existing Sizewell B power station, and the approximate location of the temporary construction area are indicated on plans appended to the National Policy Statement for Nuclear Power Generation.</p> <p>As the proposed siting of Sizewell C is set out in the Nuclear National Policy Statement, SZC Co. has not considered any alternative sites in relation to the main platform.</p> |
| 674 | Project-wide | Landscape and Visual & Terrestrial Ecology and Ornithology | Yoxford Parish Council | Furthermore, we have been given no evidence that EDF have completed the necessary modelling, assessments and mitigation which are of particular importance because the proposed site is in an AONB and SSSI and especially vulnerable. | The EIA has been undertaken in accordance with the 2019 Scoping Opinion, and includes an assessment of the likely effects on landscape and visual amenity, as well as terrestrial ecology and ornithology. The assessments are presented in Volumes 2 to 10 of the ES . |