



The Sizewell C Project

6.3 Volume 2 Main Development Site

Chapter 6 Alternatives and Design Evolution

Appendix 6A Alternative Sizewell B Relocated Facilities

Implementation Scenario

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1 ALTERNATIVE SIZEWELL B RELOCATED FACILITIES IMPLEMENTATION SCENARIO

1.1 Introduction

1.1.1 A hybrid planning application for the relocation, demolition and replacement of a number of existing Sizewell B facilities (known as the Sizewell B relocated facilities works) was submitted to East Suffolk Council (ESC) in April 2019 (application ref. DC/19/1637/FUL) and planning permission for these works was granted on 13 November 2019. The Environmental Statement (ES) submitted with that application is provided in full in **Volume 1, Appendix 2A** of this ES.

1.1.2 The Sizewell B relocated facilities works are critical elements to facilitate the construction of Sizewell C, and have therefore also been included in the development for which consent is sought in the Development Consent Order (DCO), and treated as part of the Sizewell C Project in this ES. The purpose of obtaining planning permission for those works in advance of the application for development consent is to enable them to be carried out significantly earlier than would otherwise be the case, and thereby to expedite the construction programme. That is how the works are intended to be carried out, and as explained below the core assessment of likely significant effects in the ES reflects that.

1.1.3 However, in the event that any of the Sizewell B relocated facilities works have not been completed by the date that the DCO is granted, those works will be capable of being carried out (or continued) pursuant to the DCO.

1.1.4 The draft DCO submitted with the application includes provisions which will allow SZC Co. to serve notice on the local planning authority, notifying them of the point at which implementation of the Sizewell B relocated facilities works will continue under the DCO rather than the planning permission. In practice, the works carried out will be the same, but the requirements that would apply when carrying out those works under the DCO may be different from the conditions that apply under the planning permission, reflecting any difference in the types of controls and mitigations which are considered appropriate in the context of the grant of consent for the wider Sizewell C Project.

1.1.5 The core assessment scenario within this ES assumes that:

- The first part of the Sizewell B relocated facilities works (referred to as 'Phase 0') would be completed pursuant to the ESC planning permission in advance of the commencement of works under the DCO.
- The second part of the Sizewell B relocated facilities works would be carried out during Phases 1 and 2 of the Sizewell C Project under the DCO in

parallel with the other DCO works due to be carried out during those phases.

1.1.6 **Volume 2, Chapter 3** of the ES provides further details of the works to be undertaken within each phase of the core assessment scenario and an assessment of this construction programme is presented within the technical topic chapters of **Volume 2** of the ES.

1.1.7 All of the Sizewell B relocated facilities works and relevant mitigation would be authorised by the DCO, which will allow the entirety of the Sizewell B relocated facilities works to be carried out under the DCO. For a reasonable ‘worst-case’ environmental assessment, a scenario has been defined whereby all of the Sizewell B relocated facilities works would be undertaken concurrently with the other Sizewell C Project works included in the DCO. This appendix considers the potential for materially new or different significant environmental effects to arise in that alternative implementation scenario.

1.2 Implementation of Sizewell B relocated facilities entirely under the DCO

1.2.1 In the alternative scenario considered in this appendix, the planning permission granted by ESC (application ref. DC/19/1637/FUL) is assumed not to have been implemented, and all of the Sizewell B relocated facilities works are, therefore, assumed to be undertaken pursuant to the DCO. The Sizewell B relocated facilities works included within the DCO are the same as consented by the ESC under the Town and Country Planning Act 1990. Therefore, the key change in this alternative implementation scenario is to the indicative construction phasing described in **Volume 2, Chapter 3** of the ES.

1.2.2 The implementation of the Sizewell B relocated facilities works under the DCO in their entirety could result in a variety of changes to the construction programme. However for the purposes of the environmental assessment, the worst case effects would occur, if the number of construction activities carried out at any one time were increased, as this could change the magnitude of impacts experienced by sensitive receptors. Therefore, under the alternative implementation scenario, instead of the Sizewell B relocated facilities works starting two years prior to the DCO works, all works would be undertaken concurrently and within the overall duration of the Sizewell C construction programme (i.e. 9-12 years).

1.2.3 Whilst this scenario is practically feasible, it is not preferred, due to increased complexity to the phasing of construction works, increased risk to Sizewell B operation and increased cost. In practice, if implementation of the Sizewell B relocated facilities works had to take place entirely pursuant to the DCO, this would likely result in a two year extension to the period between commencement of works on site pursuant to the DCO and the start of generation from Unit 1. In

those circumstances, however, the likely significant effects would be no worse than when compared to the assessment presented within Volume 2 of the ES. This is because there are no construction impacts that would, by delaying the start of works for two years so that all works are undertaken pursuant to the DCO, be likely to trigger a new or materially different significant effect with the proposed mitigation in place.

1.2.4 All mitigation for the Sizewell B relocated facilities works identified through the planning permission granted by ESC has been captured as part of the Sizewell C Project proposals. Therefore, although the requirements for mitigation under the DCO may differ, as they would reflect the context of the wider Sizewell C Project, these have been specified to incorporate and, where appropriate, exceed the mitigation that would be required for the Sizewell B relocated facilities works, if completed on their own.

1.2.5 In addition, whilst under the DCO the proposed construction working hours would be extended, construction activity would be regulated and limited by a series of requirements set out in **Schedule 2 of the Draft Order** (Doc Ref. 3.1) and obligations set out in the **Draft Section 106 Heads of Terms** (Doc Ref. 8.4). These include the requirement obliging the construction activity to be undertaken in accordance with the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11) and for Heavy Goods Vehicles (HGV) movements to be capped, as described within the **Construction Traffic Management Plan (CTMP)** (Doc Ref. 8.7).

1.2.6 The alternative implementation scenario described above would not change the operational assessment presented in **Volume 2** of this ES. Therefore, the operation of the Sizewell B relocated facilities has not been considered further within this appendix.

1.3 Environmental assessment of the alternative implementation scenario

1.3.1 The increased construction activity during the early years of the main development site construction has the potential to change the following technical assessments presented in **Volume 2** of the ES:

- Chapter 8 Conventional waste and material resources;
- Chapter 10 Transport;
- Chapter 11 Noise and vibration; and
- Chapter 12 Air quality.

1.3.2 In addition, any assessments that are informed by the impacts identified in the above chapters (such as Chapter 14 Terrestrial Ecology and Ornithology,

Chapter 15 Amenity and Recreation, Chapter 16 Terrestrial Historic Environment, and Chapter 28 Health and Wellbeing) may also change.

- 1.3.3 The conclusions of all remaining technical assessments presented within **Volume 2** (i.e. Chapter 9 Socio-economics, Chapter 13 Landscape and Visual, Chapter 17 Soils and Agriculture, Chapter 18 Geology and Land Quality, Chapter 19 Groundwater and Surface Water, Chapter 25 Radiological Considerations, Chapter 26 Climate Change and Chapter 27 Major Accidents and Disasters) are not dependent on the assumed phasing of construction works. Therefore, there would be no change to the conclusions of the assessments presented within these chapters. In addition, the Sizewell B relocated facilities works do not affect the assessment of likely significant effects on the marine environment, as presented within Chapters 20-24 of **Volume 2**.

- 1.3.4 **Table 1.1** below considers how the delivery of all of the Sizewell B relocated facilities works under the DCO may affect the environmental assessments presented within **Volume 2** and whether, as a result, additional mitigation is likely to be required to prevent new or different significant environmental effects.

Table 1.1: Environmental assessment of all Sizewell B relocated facilities works being completed under the DCO

| Topic | Assessment | New or materially different significant environmental effects | Requirement for additional mitigation |
|---|--|---|---------------------------------------|
| Conventional waste and material resources | In the alternative implementation scenario, construction waste associated with the first part of the Sizewell B relocated facilities works would be produced concurrently with other DCO works. For a worst-case assessment, these quantities were already considered in the calculations for overall waste volumes occurring during the early years of the Sizewell C Project construction presented in Volume 2, Chapter 8 of the ES. Furthermore, material quantities associated with the Sizewell B relocated facilities works are minimal in comparison to the overall material requirements for the main development site. Therefore, the alternative implementation scenario would result in no change to the effects presented in Volume 2, Chapter 8 of the ES. | None | None required. |
| Transport | In the alternative implementation scenario, the peak construction traffic movements associated with the Sizewell B relocated facilities works would occur concurrently with other DCO early works. The early years assessment for year 2023 presented in Volume 2 of the ES already accounts for the estimated peak number of construction traffic from the Sizewell B relocated facilities works. In addition, HGV movements to the main development site would be capped at limits set out within the CTMP (Doc Ref. 8.7). Therefore, the alternative implementation scenario would result in no change to the effects associated with early years construction traffic | None | None required. |

| Topic | Assessment | New or materially different significant environmental effects | Requirement for additional mitigation |
|---------------------|--|---|---------------------------------------|
| | presented in Volume 2, Chapter 10 of the ES. | | |
| Noise and vibration | <p>The alternative implementation scenario would result in a change to construction phasing and overlap of construction activities. However, given the spatial separation of the construction works, those receptors impacted by the Sizewell B relocated facilities works and those impacted by the Sizewell C works (excluding Sizewell B elements) are not likely to experience new significant adverse effects as a result of the temporal overlap in works.</p> <p>Construction noise and vibration thresholds set out within the CoCP (Doc Ref. 8.11) would be applied and contractors would be required to implement best practice control measures to keep construction noise and vibration within the set thresholds. Where required, acoustic screening would be used. In addition, where noise exposure is predicted to exceed the criteria defined in the Noise Mitigation Scheme (Volume 2, Appendix 11H of the ES), SZC Co. would offer noise insulation or temporary re-housing.</p> <p>In addition, as described above, the alternative implementation scenario would result in no change to the effects associated with early years construction traffic.</p> <p>As a result, no new or materially different construction noise and vibration effects have been identified.</p> | None | None required. |

| Topic | Assessment | New or materially different significant environmental effects | Requirement for additional mitigation |
|-------------------------------------|--|---|---------------------------------------|
| Air quality | <p>The alternative implementation scenario would result in a change to construction phasing and overlap of construction activities. Construction dust management measures set out within the CoCP (Doc Ref. 8.11) would be applied and regular inspections to monitor compliance with the specified management measures would be undertaken.</p> <p>In addition, as described above, the alternative implementation scenario would result in no change to the effects associated with early years construction traffic and would introduce no new emissions sources.</p> <p>As a result, no new or materially different construction dust effects have been identified.</p> | None | None required. |
| Amenity and recreation | <p>As no new or materially different effects have been identified for transport, noise and air quality assessments, there would also be no new or materially different effects to amenity and recreation, historic environment, ecology and human health receptors.</p> | None | None required. |
| Terrestrial historic environment | | | |
| Terrestrial ecology and ornithology | | | |
| Health and wellbeing | | | |

1.4 Conclusion

- 1.4.1 An environmental assessment of the alternative implementation scenario, in which all Sizewell B relocated facilities works would be undertaken pursuant to the DCO, has been completed and is presented in this appendix. The environmental assessment demonstrates that no new or materially different environmental effects are likely to occur as a result of the alternative implementation scenario.
- 1.4.2 The principal effects of construction activities would be regulated and limited by a series of requirements set out in **Schedule 2 of the Draft Order** (Doc Ref. 3.1) and obligations set out in the **Draft S106 Heads of Terms** (Doc Ref. 8.4). These include the requirement obliging the construction activities to be undertaken in accordance with the **CoCP** (Doc Ref. 8.11) and for HGV movements to be capped, as described within the **CTMP** (Doc Ref. 8.7). With these measures in place, the construction activities would not result in new or materially different environmental effects.