

Suffolk County Council's response to SZC Co.'s Consultation on Proposed Changes

17 December 2020

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GLOSSARY OF ACRONYMS

<i>AIL</i>	<i>Abnormal Indivisible Loads</i>
<i>AOD</i>	<i>Above Ordnance Datum</i>
<i>AONB</i>	<i>Suffolk Coast and Heaths Area of Outstanding Natural Beauty</i>
<i>BLF</i>	<i>Beach Landing Facility</i>
<i>CWS</i>	<i>County Wildlife Site</i>
<i>DCO</i>	<i>Development Consent Order (referring to the application documents submitted by SZC Co. to the Planning Inspectorate)</i>
<i>HCDF</i>	<i>Hard Coastal Defence Feature</i>
<i>HGV</i>	<i>Heavy Goods Vehicle</i>
<i>LEEIE</i>	<i>Land East of Eastlands Industrial Estate</i>
<i>LOAEL</i>	<i>Lowest observed adverse effect level (related to noise)</i>
<i>M&MP</i>	<i>Monitoring and Mitigation Plan (related to coastal change)</i>
<i>oLEMP</i>	<i>outline Landscape and Ecology Management Plan</i>
<i>SCDF</i>	<i>Soft Coastal Defence Feature</i>
<i>SOAEL</i>	<i>Significant observed adverse effect level (related to noise)</i>
<i>SSSI</i>	<i>Site of Special Scientific Interest</i>
<i>SZC Co.</i>	<i>The applicant</i>
<i>WMZ</i>	<i>Water Management Zone</i>

“The Council” refers to Suffolk County Council and “the Councils” refers to Suffolk County Council and East Suffolk Council, together.

“The Consultation Document” refers to the SZC Co.’s Consultation on Proposed Changes, November 2020.

EXECUTIVE SUMMARY

- I. Suffolk County Council (the Council) welcomes this consultation on proposed changes, as a number of the changes aim to address key concerns that the Council raised in its [Relevant Representation](#).
- II. Whilst these proposed positive changes are appreciated, the Council is disappointed that SZC Co. has not used this opportunity to consult on other changes to address further concerns raised by the Council in its [Relevant Representation](#), including removing pylons from the proposals, removing the outage car park from Goose Hill, and providing the Sizewell Link Road as a temporary road to be removed after Sizewell C construction.
- III. The Council strongly supports the principle of proposals to increase the use of rail and marine freight deliveries to reduce HGV movements. However, the consultation provides inadequate information on the deliverability of the proposals and their adverse consequences. In particular, assessments and suitable mitigation proposals for noise and vibration impacts of night time trains on the East Suffolk Line have not yet been provided, and the environmental impact assessments of the different Beach Landing Facility (BLF) options are not advanced enough to conclude whether the proposals may result in unacceptable impacts. Further detail is also required to show that the necessary infrastructure can be delivered in the timescales required, as any delays in the

rail and marine facilities would require more freight to be moved by road which would cause disruption to the existing highway for both construction traffic and local users. As such, the Council cannot at this stage make an informed overall judgment on the proposals. The Council would welcome further dialogue with SZC Co. to better understand the evidence base which has led to the current proposals. The Council is committed to continuing to work with SZC Co. with an aim to overcome challenges and find suitable mitigation measures to enable an increase of sea and rail deliveries, as these proposals would go some way towards addressing the Council's concerns about the transport strategy raised in its [Relevant Representation](#).

- IV. The Council considers the proposed change to the design of the Site of Special Scientific Interest (SSSI) crossing is preferable to that in the DCO proposals. This results in some improvement to ecological connectivity, although further ecological improvements of that design should be considered, as outlined in this response. However, the Council maintains its position that the ecological impact of the crossing can, and should, be further reduced by replacing the proposed design with a three-span bridge design.
- V. Whilst accepting that the crest height of the Hard Coastal Defence Feature (HCDF) must be set at a level that provides appropriate flood protection and resilience to the power station, the Council cannot accept the proposed indicative designs of the HCDF and its increased seaward movement, as the proposals significantly lack detail and assessment at this stage.
- VI. The Council notes a number of positive changes which are tentatively welcomed, although it reserves final judgement on the suitability of the proposals until more detail and substance is provided. The proposed changes, which are welcomed in principle, include:
 - a. Removal of the relocated Sizewell B outage car park from Pillbox Field;
 - b. Provision of an additional fen meadow compensation area at Pakenham;
 - c. Change of location of the water storage area away from the northern edge (Minsmere boundary) and its replacement with a flood mitigation area;
 - d. Provision of the new bridleway link between Aldhurst Farm and Kenton Hills; and
 - e. Extension of the north west bund of the southern Park and Ride site.
- VII. Further detailed comments are made on other proposed changes.

A. PREAMBLE

1. Suffolk County Council welcomes this consultation on proposed changes, as a number of the changes aim to address key concerns that the Council raised in its [Relevant Representation](#), most notably proposals that seek to increase rail and sea material deliveries and reduce the number of HGV movements, changes to the design of the SSSI crossing, and an additional fen meadow compensation site.
2. Whilst these proposed positive changes are acknowledged, the Council is disappointed that SZC Co. has not used this opportunity to consult on further changes to address the other concerns raised in the Council's [Relevant Representation](#). The Council continues to argue that these issues need to be addressed, either by further changes to the application, or, where this is appropriate, through Section 106 obligations or changes to the DCO requirements. These issues include:
 - a. Removing the proposed pylons for electricity export connection on the main development site, by utilising alternative means to connect to the grid;
 - b. Removing the outage car park for Sizewell C from its proposed location within the Suffolk Coast and Heaths Area of Natural Beauty (AONB);
 - c. Designing the Sizewell Link Road as a temporary road to be removed after Sizewell C construction;
 - d. Improving ecological connectivity to Aldhurst Farm;
 - e. Acceptable proposals for potable water supply;
 - f. Acceptable realignment of the coastal footpath, as well as a safe and suitable diversion route during its closure for the construction of the development and for the operation of the BLF (noting that it appears that, as a result of the proposed changes, the frequency of beach closures is likely to be reduced compared to the proposals from the DCO application);
 - g. An acceptable solution to mitigate the impact on the Leiston Household Waste Recycling Centre at Lovers Lane;
 - h. Additional highway improvements required to ensure continued sustainable and safe movement of people and materials and improving road capacity;
 - i. Provision for the cost of full removal of the hard sea defence as part of the decommissioning process unless and until a future study showed this to be unnecessary or undesirable; and
 - j. A comprehensive coastal change Monitoring and Mitigation Plan (M&MP), with an allocated mitigation/compensation budget, that allows determining if and to what extent an observed coastal change in the Sizewell C zone of influence is attributable to the development, and appropriate and required mitigation measures.
3. The feedback provided in this response should be read in parallel with comments provided in the Council's [Relevant Representation](#). The Council recognises that, in some instances, the new proposals may either alter or make redundant previous feedback, however in general previous feedback remains valid.
4. Several of the changes proposed may result in the need to allow additional parties to register as Interested Parties with the Planning Inspectorate.

5. We note that, in its introduction (paragraph 1.1.6), the Consultation Document refers to the opportunity “to establish an independent environmental Trust to manage the ongoing re-wilding and biodiversity of the growing Sizewell Estate (...), with a view to expand and connect parcels of land identified for re-wilding and habitat creation”. The Council is very interested in such a proposal and would like to find out more detail, as so far the information about this idea is still very vague. Careful consideration would have to be given to any relationship between such a Trust and required mitigation and compensation for the Sizewell C development secured under Section 106.
6. The response has separate headings on the most important changes, related to the freight strategy, the beach landing facilities, the SSSI crossing proposals and the changes to the HCDF. Any other changes from the consultation are covered under the subsequent Main Development Site and Associated Development Site headings.

B. FREIGHT STRATEGY

7. Paragraph 5 of the Council's [Relevant Representation](#) states:

“The Council does not support the applicant’s proposed freight transport strategy as it stands, due to the fact that (1) it is not a sustainable strategy, because an increased proportion of rail transport (and potentially sea-borne transport) could be reasonably achievable, and (2) it does not currently mitigate its transport impacts on the highway network to acceptable levels for the community. The Council asks the Examining Authority to consider the proposals against national policies promoting sustainable transport solutions. The Council is not content that the Sizewell C proposals have not replicated the much greater use of sea transport which occurred at Hinkley Point C and is proposed for Bradwell B. Given the minimal use of sea transport, the Council is particularly disappointed that opportunities have not been taken up by the applicant to pursue an upgrade of the East Suffolk Line which would allow for a greater percentage of materials to be delivered to site by rail. The Council considers that it is still reasonably achievable to increase the proportion of rail and potentially sea-borne deliveries at this point. “
8. Therefore, the Council welcomes the reconsideration of the freight strategy by SZC Co. and strongly supports the principle of proposals to increase the use of rail and marine freight deliveries to reduce HGV movements.
9. The Consultation Document leaves a number of key issues unresolved. In addition, it re-emphasises the need for mitigation of harm that was not dealt with in the draft DCO. Further assurance is required about the deliverability, impact and mitigations of any submitted changes to the transport strategy.
10. The Consultation Document suggests (in table 3.1) that the new proposals may result in “the optimum integrated freight management option”. The Council is in support of finding the most sustainable freight management solution but wishes to note that these proposals should have been considered and put forward in the pre-examination phase and at DCO submission. The reliance on and importance of rail that is being discussed now should have advised the proposals at an earlier stage where it might have been able to allow for the adoption of the “rail-led” strategy proposed at Stages 2-4 of consultations, which would have provided for day-time

rail freight deliveries. An earlier consideration of alternative marine transport solutions, following the conclusion that a jetty was not considered deliverable after the Stage 2 consultation, would have allowed for a comprehensive assessment of optimal solutions and their impacts to be available now. Notwithstanding this, the Council is very supportive for the changes proposed at this stage to be further pursued, assessed and, wherever possible, implemented.

11. If SZC Co. can deliver an additional Beach Landing Facility (BLF) and an enhanced capacity of the permanent BLF, the Council wishes to see the marine deliveries be maximised and prioritised over train and HGV deliveries. It would be strongly welcomed if, as a result of the BLFs, HGV and Abnormal Indivisible Loads (AIL) movements can be even further reduced, and (as secondary priority) night-time rail movements can be reduced.

Outstanding questions about the freight strategy.

12. The following queries arise from the Consultation Document in respect of the freight strategy. The Council wishes to see greater clarity on these matters:

- a. The Council needs to be assured that the most sustainable approach of sourcing and transporting materials to site will be used wherever possible and that disruption of haul routes is kept to a minimum. Detailed questions about apparent inconsistencies in the Consultation Document were set out in a letter from the Councils to SZC Co. on 30 November 2020 (included in the Appendix to this response). In particular, there appears to be a difference between the opportunities for additional capacity afforded by increased rail and/or marine options and the decrease of HGV movements. A clearer understanding is required of
 - the relationship between the figures for the overall amount and types of materials to be transported to the site;
 - the likely origins of materials;
 - the timings of the demand for different materials across the life of the project and the capacity of the different transport modes to meet these requirements; as well as
 - the delivery timetable for the associated works such as the green rail route, BLF and relief roads so that these are available when required by the freight strategy.
- b. Consideration by SZC Co. as to whether using the capacity of the BLFs in the early years may provide an opportunity for delivering improvements to the East Suffolk Line (as proposed in previous consultations under the "rail-led strategy") without jeopardising the main project's construction programme. If such improvements were still deliverable, this could permit freight trains to be brought to the site by day rather than by night, without much of the latter's attendant noise issues and possibly allowing an increase in the achievable number of rail movements per day.
- c. In addition to the possible increase in the number of trains, the Council requests that SZC Co. assesses the opportunities to improve the capacity of rail haulage by increasing the length and payload of trains, as well as running trains on six nights a week rather than five (though the consequent impacts

on blocking of level crossings with the former and extended night-time disturbance with the latter would need to be considered). If trains were run on six nights a week, the Council's preference would be for trains to run between Sunday evenings and Saturday mornings (i.e., not running trains on the nights from Saturday to Sunday).

- d. Paragraph 3.2.8 of the Consultation Document suggests that there might be continued use of the rail facilities at the Land East of Eastlands Industrial Estate (LEEIE) after the opening of the Green Rail Route in the event of a four- (or five-) train operation. Clarification is required whether the use would continue to be restricted as proposed during the early years (i.e., no movements through Leiston or unloading overnight), and if prolonging use of the LEEIE as a transport hub increases traffic on Lovers Lane in peak years.
- e. There is reference to the possible use of a fifth train per day during peak construction. The Council would have concerns if this significantly disrupted passenger services, particularly at peak travel times, and would welcome further discussions on this.
- f. The changes to the freight management strategy will affect the Environmental Statement and the controls within the relevant management strategies. This needs to be better understood, including whether the HGV reductions will be reflected in these documents.
- g. The Consultation Document refers (Table 3.5) to the impacts of additional rail movements on level crossings. Confirmation is sought on this, including whether this includes the East Suffolk Line as well as the Leiston Branch Line.
- h. Confirmation is required on the deliverability of running the proposed additional trains (as well as the trains as set out in the draft DCO) in the wider rail network.

Environmental consequences of the freight strategy

13. The Council has always pressed the developer to look for transport solutions that reduce HGV road traffic. Any reduction in HGV movements will have environmental benefits in reductions of the impact on amenity, noise, vibration, air quality and fear and intimidation created by the number of HGVs along the A12 and B1122. Less HGVs is also likely to lead to a reduction in climate change emissions. A reduction of HGV movements is expected to reduce the perception of traffic volumes which may lead to fewer vehicles diverting to local roads. As such, the Council strongly supports the principle of the proposed changes and is committed to working with SZC Co. to overcome any challenges and find suitable mitigation measures to make these changes happen.
14. While any reduction of HGVs will reduce noise and vibration impacts along road corridors, to achieve a perceptible noise and vibration impact by comparison with the DCO application proposals, a significant diversion of loads to both marine and rail is needed.
15. Whilst welcoming the benefits arising from fewer HGVs, the environmental costs created by the increased use of alternative modes need to be carefully considered and mitigated.

16. On greater utilisation of BLFs, it is not possible to make a judgement as to the environmental impacts when so many factors remain to be determined (see details in the section below).
17. For rail, the principal impact would be the noise and vibration disturbance of two additional night-time train movements along the East Suffolk Line (one additional train to site and back), which would be in addition to the five night-time and one day-time train movements already proposed in the draft DCO (plus a possible fifth day-time return train journey). These additional trains would exacerbate existing issues by extending the hours when such disturbance would take place. Accordingly, it is important to effectively deal with the impacts of those services already identified in the DCO application as well as any additional train services. Further assessment of the environmental impacts of night-time train movements (both for the draft DCO proposals and the additional train movements proposed in the Consultation Document) is required, particularly on noise and vibration, but also on the wider environmental and ecological impact.
18. Appendix 1 of the Consultation Document refers to the DCO Environmental Statement, identifying properties which are subject to significant observed adverse effect level (SOAEL) in respect of noise and vibration from rail use. It then goes on to propose a Noise Mitigation Scheme that deals with properties expected to be subject to noise levels over SOAEL. This is an inadequate response to the issue and is not policy compliant. Both National Policy Statement EN-1 and the Noise Policy Statement for England state that there should be steps taken to mitigate and minimise adverse effects of health and quality of life where the impact lies between SOAEL and the lowest observed adverse effect level (LOAEL) and there is no indication that the SZC Noise Mitigation Scheme is proposing to do this. The Council expects mitigation to be provided on both any breach of SOAEL and any breach of LOAEL to ensure that internal noise levels do not cause adverse effects to residents. Mitigation needs to be based on modelling and prediction and actual monitoring.

C. BEACH LANDING FACILITIES (BLF)

19. As outlined above, the Council welcomes that SZC Co. proposes in its Consultation Document options to increase marine freight deliveries to site, which is something the Council has asked to be investigated for many years. Whilst it would have been preferable if these proposals had already been explored and put forward in the pre-examination phase, the Council is committed to working with SZC Co. to aim to overcome any challenges arising.
20. The proposals in the Consultation Document are not sufficiently developed, and the impacts, particularly on coastal processes, have not been fully evaluated. The Council needs to be convinced that any proposal is deliverable and will not have unacceptable coastal impacts. The Council is working closely with the technical experts from Coastal Partnership East and East Suffolk Council to assess the proposals.
21. The Consultation Document proposes both to enhance the design of the permanent BLF proposed in the DCO to receive more regular deliveries, and to provide an additional temporary BLF. As both proposals would reduce transport by road, each is welcome in principle. The Council understands that the proposals for enhancing the permanent BLF will increase the number of AILs to be delivered by

sea from 50 per annum to 100 per annum in the construction phase, which will reduce ALLs delivered by road. This would be welcome considering that ALLs can cause significant disruption to traffic flows.

Outstanding questions about the BLFs (in addition to the coastal processes comments below)

22. It is not clear how the capacity of the different temporary BLFs relates to the indicated reduction of HGVs. It is stated that options 1 and 2 for the BLF would equate to a reduction of 25 HGVs (50 movements) and Options 3 and 4 would result in reductions of 50 HGVs (100 Movements). However, these figures do not directly compare with the tonnes of material set out at Table 3.6 (and what has previously been stated about one HGV equating to 18.5 tonnes), which indicate Options 1 and 2 could deliver as much as 40 HGVs (80 movements) daily and Options 3 and 4 would be considerably more than this given they have seven times the capacity.
23. The Consultation Document refers to delivery “campaign” periods for both BLFs to be between approximately 1 April and 31 October. Whilst it is understood that the proposed changes to provide for additional stockpiling would allow for material deliveries to be front loaded in each season, the Council is seeking additional clarification of how far these campaign periods may result in seasonal variations in HGV deliveries and whether the same restrictions to daily and quarterly HGV movements would apply all year around given these limitations.
24. Confirmation is required as to whether any additional facilities will be required and what impact these would have if marine deliveries are increased e.g. regarding bunkering, provisioning, or customs/ port health inspection cargo superintendents.

Impacts of the new BLF proposals on coastal processes

25. Our assessment of the proposals is limited because further information is required to adequately understand the proposed works and their potential impacts, and how this differs from the information presented in the DCO. The comments in this section, and in the section on the changes to the sea defence structures, must therefore be regarded as a preliminary view conditional upon the supply, and the Councils’ review, of additional material by SZC Co.
26. The feedback provided in this response should be read in parallel with feedback given in the Council’s [Relevant Representation](#). We recognise that the new works information may either alter or make redundant previous feedback; however, any previous feedback should not be overlooked or automatically regarded as superseded.
27. The Council is disappointed that it has not received responses to questions and points of clarification from the [Relevant Representation](#) and raised at subsequent meetings with SZC Co., and that the new change proposals have not clarified or answered those concerns. The Councils now have additional questions. This makes it more challenging for the Councils to reach common ground with SZC Co. on these matters in the desired timescales.
28. It should be noted that a robust Monitoring and Mitigation Plan (M&MP), that is fully funded by the developer/site operator, is a critical requirement in the delivery of satisfactory outcomes on coastal processes. We recommend that this document be placed in the public domain as soon as possible.

29. For any BLF solution, the Council's preference is to minimise the use of additional permanent embedded piles, to maximise the use of fully removable equipment and avoid the need for dredging of the outer sand bar, as far as feasible.
30. The proposals for both permanent and temporary BLFs could result in new impacts/increased risks arising from dredging of the outer sand bar, for navigation access, and sediment movement blocking by the berthing platform. These require further investigation and modelling to confirm and quantify. The possibility of the use of a backhoe dredger is of concern as it has potential to lead to a loss of material from the nearshore system; the use of a plough dredger appears preferable.
31. The changes have potential to cause additional negative impacts that may be temporary and potentially manageable via the M&MP process, but this needs to be demonstrated by SZC Co. in respect of detailed further studies and modelling.
32. Further detailed investigation and impact assessment of this design, alongside an agreed M&MP that deals with identified risks, is required for the Council to be able to come to a more fully informed view on the proposals.
33. Based on the considerations above, our initial preferences are:
- a. **For the permanent BLF:** The Council prefers a berthing platform that does not include piles. We note that discussions during this consultation period have suggested the berthing platform (or grillage) design may exclude piles, which would be welcome.
 - b. **For the temporary BLF:** Based on the incomplete information provided in the Consultation Document, the Council's preference is Option 4, as the option with the highest freight delivery capacity.
- Option 4, as presented in the Consultation Document, also appears to be favourable in its potential use of Self Elevating Platforms and a berthing platform design that does not include piles. However, we would need to see full details of the proposed works and the associated environmental impact assessment.

Consideration of other impacts of the BLF proposals

34. Coast path: The Council welcomes the indication (in paragraph 3.3.14 of the Consultation Document) that in enhancing the permanent BLF, the coast path would only need to be closed in 'rare circumstances', which is a reduction from the proposals in the draft DCO application. Closures for the temporary BLF are also indicated to occur only during 'rare circumstances' (paragraph 3.3.40). Further information is sought on the envisaged frequency of closures and the communication to the local community of these closures, and on the impact of the temporary BLF on the amenity and experience of users of coastal access.
35. Landscape: Whilst an additional BLF will have an adverse effect on the coastal character of the beach area and near shore coastal waters in the immediate locality of Sizewell Beach, the Council's initial views is that this is unlikely to be of significance in relation to the overall impact of the construction phase, beyond the visual envelope of the beach area. However, to finalise the Council's views on this matter, it requires an updated LVIA and an assessment of the impacts on the character and special qualities of the AONB, as well as further detail in respect of

lighting requirements for operation in the dark, navigating lighting requirements, and the scale of the vessels involved.

36. Ecology: The Council agrees that a proposed temporary BLF would have little additional terrestrial ecological impact, as the Suffolk Shingle Beaches County Wildlife Site in front of the platform will already have been removed as part of the construction of the Hard Coastal Defence Feature (HCDF). The Consultation Document recognises that, for marine ecology and designated sites impacts, the further assessment is required for both the temporary and permanent BLF. In the absence of this information, it is not possible to determine which of the proposed options is the least ecologically damaging. For any piling activities, it is likely that a seasonal restriction will be required to protect nesting little terns.
37. Environmental protection: Environmental impacts in terms of noise, vibration, light, and dust will need to be considered and the mitigation of those impacts addressed for whichever option is chosen. For the temporary BLF, a conveyor belt is proposed between the beach and stockpile locations. The Council requests that the conveyor belts should be covered to reduce dust and particulate impacts.

D. CONCLUSION ON PROPOSED CHANGES TO THE FREIGHT STRATEGY

38. The Consultation Document suggests that there is an opportunity to substitute some of the proposed HGV movements with additional use of rail and marine. This reduction in HGVs is to be welcomed for many important environmental reasons. It is apparent that these improvements will need to be balanced against any adverse consequences created by the increases in night-time rail use and provision of additional BLFs, and mitigation needs to be provided for these impacts. Inadequate information has been provided within the Consultation Document as to the deliverability and impacts of the proposals, and the Council would welcome further dialogue with SZC Co. to better understand the evidence base which has led to the current proposals.
39. Whilst strongly in favour of the principle of the proposed changes, the Council wishes to continue to work with SZC Co. to seek to understand these consequences and resulting mitigation requirements further, which will need to be made clear in any formal submission to the Planning Inspectorate.
40. In terms of rail use, the Council considers that the most effective approach remains the implementation of the original proposals of the "rail-led strategy" included in earlier consultations with appropriate improvements being made to the East Suffolk Line as well as the Sizewell branch line.
41. The Council strongly supports the principle of increased delivery of materials and ALLs by sea, and therefore welcomes the proposals for the BLFs. It is important to note that the impact assessments of the different BLF options are not advanced enough to conclude whether the proposals may result in unacceptable impacts. From the information available, the proposals to enhance the capacity of the permanent BLF appear acceptable. For the temporary BLF, the Council's initial preference is for Option 4, with its highest freight delivery capacity and its apparent preferable design in terms of coastal process impacts. These conclusions are strongly caveated as further assessments particularly on coastal processes and, also, on ecological and environmental impacts, are required to take an informed judgment.

42. To ensure that SZC Co. and its contractors retain a more sustainable split between the different modes of freight transport, robust measures should be in place through the DCO and its supporting documents that cap the number of HGVs coming to the site.
43. The Council is committed to working with SZC Co. to increase deliveries by rail and sea, as these proposals would go some way towards addressing the Council's concerns about the transport strategy raised in its [Relevant Representation](#). In the Council's view, it will be imperative for SZC Co. to implement solutions that significantly reduce HGV numbers from those stated in the DCO application.

E. **SIZEWELL MARSHES SSSI CROSSING**

44. Paragraph 70 of the Council's [Relevant Representation](#) notes the Council's serious concern about SZC Co.'s proposals for a causeway to cross the Sizewell Marshes SSSI and the resulting ecological impacts:

“A causeway design would have a much higher ecological impact than the alternative of a three-span bridge across the Sizewell Marshes SSSI (as was proposed as one option during the pre-submission consultations), as the causeway would involve a greater amount of direct land-take from the SSSI than a bridge option and would sever connectivity for species moving between Sizewell Marshes SSSI and Minsmere (particularly species such as water vole, birds and invertebrates, and including European Protected Species).”

45. The Council considers that the proposed change to the SSSI crossing put forward in the Consultation Document to a 30m bridge with embankments is an improvement to the proposals set out in the draft DCO. The Council agrees that there would be some ecological improvement as a result of the change, particularly in terms of somewhat improved connectivity for bats, water vole and otter, and the slight reduction in SSSI land take (although there will still be temporary land take/damage to the parts of the SSSI which will not be permanently lost). SZC Co. still needs to provide evidence that species such as riparian mammals would use such a feature to pass from habitat to habitat. However, the Council understands that, as currently proposed, the crossing design would still impede the passage of a number of invertebrate species, therefore conflicting with the requirements of the Water Framework Directive, as the status of the relevant waterbodies would be adversely affected.
46. The Council considers that the newly proposed option remains sub-optimal from an ecological perspective and is worse than a 'full three-span bridge' option, particularly in relation to permanent SSSI area loss and habitat connectivity for invertebrates. The Council maintains its position that the ecological impact of the crossing can and should be further reduced by replacing this design by a full three-span bridge design.
47. As the change proposed is an ecological improvement to the proposals assessed in the DCO Environmental Statement, the terrestrial ecology and ornithology assessment rationale set out in Table 4.4 is accepted.
48. The Consultation Document refers to the overall height of the crossing currently being proposed at 7.3m AOD with a potential need to increase the height to 10.2m AOD at some point in the future if the risk of flooding requires this modification. Consideration should be given as to whether there is scope to directly design and

construct the crossing at the increased height of 10.2m AOD. This could allow an increase of the height of the bridge under the causeway, facilitating the passage along the watercourse underneath the crossing for a greater range of invertebrate species. Increasing the height now would also avoid the need for future disturbance to vegetation and landscaping on the embankment and the damage this could cause to biodiversity utilising the area. For such a change, a full landscape and visual impact assessment and ecological appraisal would be required.

49. The Council requests greater clarity about the rationale for the retention of the formation for the second carriageway and supporting structures of the crossing beyond the construction period. The removal of the second carriageway formation after the construction phase could facilitate more effective ecological connectivity in the long term, and improve the passage of, for example, invertebrates (see paragraph 45 above), and should therefore be fully explored, although the Council recognises that this would result in additional disturbance to vegetation and landscaping on the embankment. If such alternatives are proven not to be deliverable, the Council requests that further modifications to the design are developed, to better maintain the ecological function of the habitats on either side of the SSSI crossing.
50. Beyond the ecological comments above, there are no specific concerns about the proposed change. From a landscape perspective, the change proposed is acceptable. As stated before, in terms of archaeology, assessment and mitigation will need to be factored in as this area has a potential for buried surface archaeological deposits, including wet-zone activity, waterlogged remains, as well as palaeo-environmental remains. The area has yet to be subject to archaeological investigation. For surface archaeology, trial trenched evaluation and palaeo-environmental assessment will be required (post consent), subject to an agreed Written Scheme for Investigation and followed by mitigation as appropriate. For deeper deposits, assessment required in line with the peat strategy. Further mitigation to be decided pending results of evaluation. Historic Environment is not included in table 4.4 but should be considered as per comments above.

Conclusions on the SSSI crossing

51. The proposed change of the design of the SSSI crossing results in improved ecological connectivity and a slight reduction of SSSI land-take and is therefore preferable to the draft DCO proposals, although even with this design, further improvements should be explored. However, the ecological impact of the SSSI crossing can and should be further reduced by replacing this short bridge with a full three-span bridge design.

F. CHANGES TO THE HARD COASTAL DEFENCE FEATURE (HCDF)

52. It is accepted that the crest height of the HCDF must be set at a level that provides appropriate flood protection and resilience to the power station. The amount of change proposed (from 10.2m AOD to 14m AOD), which we note is due to new climate change information, is surprising.
53. It appears that the increase in crest height and the relocation of Marine Shafts to outside the cut-off walls has led / contributed to a significant seaward movement of the HCDF profile of around 8m (to be confirmed by SZC Co.) compared to the draft DCO proposals. We require confirmation if and by how much the relocation

of Marine Shafts has moved the HCDF seaward, and if so, justification of the temporary construction-related benefits of this action against the long-term negative impacts of a more seaward HCDF.

54. The Council requires more detailed information on the nature and extent of changes in the HCDF profile, including how the more seaward position will affect planned mitigation actions, notably the Soft Coastal Defence Feature (SCDF) design and management and the post-SCDF phase of beach management.
55. The adaptive profile appears to move the rock slope much further seaward. It is disappointing that no information is included as to under what environmental conditions the adaptive profile would be built. We expect to see more detail of the profile design at this stage of development to enable us to assess the proposals.
56. At the southern extent of the Sizewell C frontage, the temporary defence line makes a 90 degree return landward. Confirmation is sought as to whether this a proposed change to the DCO application design which featured a tapered transition between Sizewell C's HCDF and the existing Sizewell B defence. If so, a justification for the change and an assessment of the new impacts should be provided.
57. Due to this absence of data, a meaningful assessment of linked environmental impacts has not been provided, and could not be undertaken, by SZC Co. This is reflected in the lack of information on coastal change impacts in the Consultation Document. It is therefore not possible for the Council to make an informed assessment and fully comment about the proposals.
58. The Council's view is that the apparent significant seaward movement of the defence will lead to an earlier, and, over the lifetime of the site, a much greater negative impact on natural shoreline change.
59. Concerns were raised in the Council's [Relevant Representation](#) about the potential impact of the defence position relative to the shoreline. This new information significantly increases these concerns - not least as SZC Co. has not yet indicated the extent and timing of the interception by the HCDF on the active shoreline, including both the SCDF and the natural beach.
60. The Council requires assessment of the proposal as an integrated package; as such we cannot accept the proposed 'indicative' designs of the HCDF because of the apparent significant seaward movement of the HCDF and the uncertain impacts on coastal processes caused by it. Further work is required by SZC Co. to produce clearer and more developed HCDF design information, allowing for the possibility of an increase of the crest height without an associated significant seaward movement.
61. It is noted that the changes proposed to the HCDF may mean that the soft materials covering it are lost/need recharging earlier in the life of the station. As a result, the long term impacts (and potentially eventual loss) on this part of the Suffolk Shingle Beaches County Wildlife Site (CWS) could be accelerated, possibly resulting in a worse long term impact than that assessed in the Environmental Statement.
62. From a landscape perspective, there are no specific concerns provided the HCDF will not be exposed, and subject to a well-considered surface restoration programme in line with what has been discussed throughout.

Conclusions on the proposed changes of the Hard Coastal Defence Features

63. SZC Co. should prepare a developed HCDF proposal that addresses the concerns described above together with further detailed investigation and impact assessments. More information is also required on its plan location and profile relative to the proposed permanent HCDF (with comparison of that presented in the draft DCO), the permanent and temporary BLFs and other features, including mean high water springs (MHWS), to give context. As part of this process, options should be prepared and presented for review by consultees that:
- a. Avoid a significant seaward movement as part of the transition to an Adaptive profile;
 - b. Ensure that the initial toe detail / level is appropriate in the context of the site life and potential shoreline retreat / beach level drop; and
 - c. Include the use of engineered structures, for example wave return walls, in both initial and adaptive profiles whilst managing the proposed landscaping measures by which the infilling of the rock armour with a soil for planting could impair the hydraulic properties of the structure.
64. SZC Co. must demonstrate that the M&MP includes appropriate coverage of any changes to forecast impacts and mitigation measures.

G. OTHER CHANGES PROPOSED FOR THE MAIN DEVELOPMENT SITE

Definition of the main development site

65. Detailed confirmation is sought on what powers will be used for the delivery of level crossing works associated with the Green Rail Route and which bodies will be responsible for signing-off the proposals. The Council assumes that the main development site definition by SZC Co. includes the Green Rail Route as well as the proposed highway works on Lover's Lane and Abbey Hill – these items are within the red line but are not included in the list in paragraph 2.3.3 of the Consultation Document.

Relocated Sizewell B facilities / Pillbox Field

66. The Council welcomes the proposal to remove the outage car park from Pillbox Field and move it to the existing Sizewell B west car park as part of the relocated facilities proposals (Option 1 in the Consultation Document), with its resulting reduction in landscape and ecological impacts and reduced additional development within the AONB. Whilst both Option 1 and Option 2 propose a reduction in building heights which is supported, Option 2 of the Consultation Document does not provide other significant improvements.
67. Further detail on Option 1 needs to be provided:
- a. Confirmation that there will be no intensification in the use of the site entrance to Sizewell B compared to the current usage during Sizewell B outages;
 - b. The provision of a safe crossing point for users of Bridleway 19 on Sizewell Gap to mitigate the increase in use during construction of Sizewell C and the Sizewell B relocation; and

- c. An archaeological management plan is required, outlining how remains are to be preserved in situ both prior to, during and after construction and including during proposed landscaping works on this field. Should plans revert to locating the car park over the area of known archaeology, excavation will be required.

68. Both Options 1 and 2 could, and should, be improved if some of the oak trees on the existing boundary of Coronation Wood could be retained. It must be emphasised that any trees that do not need to be removed must be retained with appropriate protection from vehicle movements and other activity. Replacement planting at a 10 to 1 ratio is welcomed and details have recently been agreed with East Suffolk Council in respect of the 2019 Town and Country Planning Act (TCPA) consent for the Sizewell B Relocated Facilities application.

69. It is noted that Coronation Wood has now had an archaeological earthwork survey but still requires trenched evaluation, followed by mitigation as appropriate.

Temporary Water Storage Area

70. The proposed change of moving the water storage area away from the northern edge of the main development site (Minsmere boundary) and its replacement with a flood mitigation area is tentatively welcomed as a likely improvement in terms of landscape impacts and ecological mitigation measures compared to the DCO proposals, subject to:

- a. Final profiling details. As a very sensitive area in landscape terms, over engineered land profiling will need to be avoided, and the final details given careful consideration;
- b. Confirmation that the creation of the wetland area is not going to have any adverse impact on either the adjacent Minsmere South Levels (part of the Minsmere-Walberswick Heaths and Marshes SSSI) or the adjacent woodland (The Grove). In particular, any potential hydrological impacts on the Minsmere South Levels need to be assessed (this is not picked up in Table 4.3);
- c. Arrangements being in place for monitoring water quality; and
- d. More details on the design and construction methodology for the proposed wetland area.
- e. Archaeological mitigation areas being confirmed prior to site preparation works and any landscaping or planting, noting that archaeological evaluation has defined extensive and sensitive archaeological remains.

71. In terms of water management, clarification is required as to whether Water Management Zone (WMZ) 5 is being reduced in size to account for the new location of the temporary water storage area, alongside justification for the sizing of any WMZs. The Council notes that both the water resource storage area and WMZ 5 have shrunk in capacity as a result of the proposed changes; this may facilitate a reduction in flood risk to offsite land and property, but there needs to be an assessment and balancing of all impacts.

72. It is not clear whether the water storage area is proposed as a temporary facility or, as what would be favoured in principle f by the Council, left in place as a legacy benefit to local farming activity, although this option would require further discussions with local stakeholders.

Landscape Retention and Removal

73. As the changes involve only minor additional tree removal, the Council has no significant concerns on this matter. It should be noted that the isolation of habitats needs to be addressed in post-construction mitigation and management

Surface Water Discharge Across Sizewell Beach

74. The Council does not have significant concern about the proposed construction of a storm surface water discharge as a temporary measure until the permanent Combined Drainage Outfall (CDO) is constructed.

75. The Council as the Lead Local Flood Authority (LLFA) does not have concerns over the principle of this outfall, but it will be necessary to control the area that it serves and the rainfall events for which it operates, detail of which is yet to come forward. This will have an impact on the extent of all WMZs across the main development site.

76. The LLFA notes its concerns around the deliverability of the proposed WMZs (in particular WMZ 1) prior to construction of the CDO. We have concerns that this may result in the temporary outfall being used in every storm event rather than during extreme events only; the Council would not want to see it being used regularly. SZC Co. needs to identify under what design event it would expect this outfall to be utilised. Anything less than or equal to a 1 in 30 years return period (3.33% annual probability) would not be acceptable. Given the sensitivity of water level management in this area, this is an important issue - the problem is not that the water is discharged to sea but that it may not be going into the watercourses linked with sensitive habitats. Further information on the impact of this outfall on the management of water levels needs to be provided, to provide assurance that this will not lead to unacceptable ecological impacts.

77. The fact that the need for this new outfall has been identified indicates that modelling of the management of surface water on the Main Development Site has been conducted. This information should be provided to the Council.

78. Users of the coast path are likely to be disrupted during construction, maintenance (e.g. if blocked by shingle) and removal of the proposed temporary outfall pipe. It is indicated that the pipe would not obstruct the coastal path and this needs to be ensured to be the case. Consideration should be given to adding signs warning beach users of potential sudden and large flows. The structure should be designed to be safe to avoid people and animals from getting inside.

79. Whilst the outfall pipe will cross the Suffolk Shingle Beaches CWS, the CWS will already have been removed to build the HCDF so there will be no additional direct ecological impact.

80. The Council notes that the outfall would add to the 'industrialisation' of the beach area, but it is not considered to be additionally significantly adverse in the light of other associated beach activity.

Construction parameters

81. The new stockpile is noted. It is unlikely to result in significant additional landscape or other impacts, and even then, impacts will be temporary.

Pakenham Fen Meadow

82. The principle of an additional SSSI compensation area at Pakenham is welcomed as it gives a greater chance of successful habitat creation being achieved, provided that works have no impacts on the existing adjacent SSSI and CWS.
83. In the light of discussions with Pakenham Parish Council, the Council has questions about the proposal which are not answered by the Consultation Document:
- a. Will there be wider public access to the land either through improvements to existing public rights of way or through new permissive paths and, if so, can this be reconciled with the ecological objectives?
 - b. What is the impact of revisions to management of the water environment on the existing SSSI and preserved Pakenham Watermill?
 - c. How will the fen meadow be managed in the long term and will there be adequate funds to do so?
84. Archaeological evaluation in the form of trial trenched evaluation, subject to an agreed WSI is necessary, followed by mitigation as appropriate – as advised previously for the other proposed sites at Benhall and Halesworth. This work should be undertaken at the earliest opportunity given the high archaeological potential of this area, but not necessarily pre-consent. palaeo-environmental assessment will also be required in flood zone areas.

New Bridleway Link between Aldhurst Farm and Kenton Hills

85. The Council welcomes the proposed provision of the new bridleway link between Aldhurst Farm and Kenton Hills and seeks further information on the expected delivery timescales of this link and the proposed form of the bridleway crossing of Lover's Lane.
86. Consideration should be given to whether in the operational phase, following removal of the lagoon to the south of Lover's Lane and the secondary access ghost island, the crossing point can be located closer to the south end of BW19 to match the desire line of users. It is currently envisaged that the changes to the alignment of Lover's Lane in this area should be able to provide the necessary visibility for a safe crossing point.

H. PROPOSED CHANGES TO ASSOCIATED DEVELOPMENT SITES

Southern Park and Ride

87. The Council welcomes the proposed change in extending the north west bund of the site, to provide additional screening to local views, which the Council is aware was of particular concern locally.
88. The Council has no concerns about changes to order limits at the Southern Park and Ride. We note that archaeological evaluation has been completed and mitigation areas are defined. Mitigation is required prior to site preparation works, and construction of bunds and landscaping/planting.

Sizewell Link Road

89. The Council acknowledges that extensions to order limits may be justified in order to provide a sustainable drainage strategy, and the Council has no objections to the proposed highway changes (set out at paragraph 5.3.9) or the changes to the highway drainage proposals (paragraph 5.3.11) subject to agreement of the detailed design, and the following comments being addressed:
- a. The number of highway drainage lagoons being as few as necessary;
 - b. The impact on the routing and amenity of Public Rights of Way to be fully assessed and relevant schedules amended, as necessary;
 - c. If it is likely to contain standing water, the need for protective fencing to be assessed during detailed design;
 - d. Access to lagoons to be provided to allow for future maintenance requirements;
 - e. Pumping to only be used as the last resort;
 - f. Any new drainage basins to be designed to maximise their long term ecological potential – but this should not be seen as a replacement for essential mitigation;
 - g. Notwithstanding the Council's aspiration that the SLR becomes a temporary road rather than permanent, proposals by SZC Co. for a permanent SLR need to be designed to comply with the highway authority's requirements for adoptable roads, and early discussions need to be held with the authority;
 - h. Any extension to order limits to be scoped in for archaeological assessment. Some archaeological evaluation has been completed along the Link Road, however, further evaluation is still required, to be followed by mitigation as appropriate; and
 - i. Assessment of whether the additional woodland loss now proposed will have an additional adverse impact on roosting, foraging or commuting bats (this is not picked up in Table 5.2).

Two Villages Bypass

90. The principle of the highway changes to allow for visibility at junctions (set out at paragraph 5.4.20) is considered acceptable.
91. The Council is disappointed that the proposed changes introduce further habitat loss, with removal of part of Nuttery Belt (which is a UK Priority habitat). The rationale for this loss is not clear in the Consultation Document, although it is noted that it may be avoided following more detailed design work. Table 5.3 identifies that further survey work is required (particularly for roosting bats). If part of the woodland is to be lost, this survey work is essential, although the Council strongly prefers that the final design avoids this loss.
92. Paragraph 5.4.28 concludes that the loss of part of Nuttery Belt is not significant enough to alter the conclusions presented in the ES; however, in the absence of the identified, required, survey work, it is not possible to support this conclusion at this time.
93. It is noted that mitigation for the loss of flood plain grazing marsh (a UK Priority habitat) in the form of habitat quality improvements is proposed, although no details are provided, as SZC Co. propose this to be part of the outline Landscape and

Ecology Management Plan (oLEMP) for the scheme. In the absence of details on what improvements are proposed, the Council cannot be confident that the improvements will be adequate to mitigate the habitat loss that is identified in the ES and therefore it is not possible to make comment further now.

94. Any extension to order limits should be scoped in for archaeological assessments. Some archaeological evaluation has been completed along the Two Village Bypass, however, further evaluation is still required, to be followed by mitigation as appropriate.

Other Associated Development Sites

95. In general, the Council has no concern about the proposed changes to order limits in section 5.5. For the Yoxford Roundabout order limits (Figure 5.14), the Council requests that SZC Co. confirms whether the revised order limits will be taken forward to detailed design, as the revised carriageway alignment is close to the eastern boundary of the order limits.
96. It should be noted that archaeological mitigation areas are still to be agreed for Yoxford Roundabout, and for both Yoxford Roundabout and Northern Park and Ride, mitigation is required prior to site preparation works, construction of bunds and landscaping/planting.

I. CONCLUSION

97. As referred to throughout this response, many of the proposals within the Consultation Document are welcomed in principle but lack detail and assessment at this stage. The Council would welcome further dialogue with SZC Co. to better understand further details of the current proposals, and the evidence base which has led to them.
98. Notwithstanding this need for additional information, the change proposals set out in this Consultation Document are welcomed by the Council as they go some way to address concerns raised in the Council's [Relevant Representation](#).
99. It is of high importance to the Council for SZC Co. to pursue the development of these proposals, and to further improve these and other aspects of their scheme as set out in this response and in the Council's [Relevant Representation](#). Further evolved and implemented solutions to these concerns will be imperative not only for this Council but for Suffolk's communities.
100. The Council is looking forward to continuing to work with SZC Co. to aim to resolve the issues raised, overcome challenges, and find suitable mitigation measures to enable these changes which the Council considers as required.

APPENDIX: QUESTIONS ABOUT THE CHANGE CONSULTATION

Submitted to SZC Co. by Suffolk County Council and East Suffolk Council on 30 November 2020

It is clear from the Proposed Changes documentation that there are a number of areas of evidence that you are working on that will be available only at the time of the submission of your proposals to PINS. However, there is a series of issues where it would be helpful to have greater clarity on your assumptions and any already available background information that has not been included within the material now published. Much of this information will be of key importance in enabling East Suffolk and Suffolk County Councils to come to an informed response on these matters by 18 December.

Freight Management Strategy

Through all stages of consultation, it has always been the Councils' position to achieve an as sustainable as possible transport solution for the construction of Sizewell C. To that end, both Councils have continued to promote the potential use of marine and rail to transport freight to/from the site – understanding that this brings challenges of its own that need to be addressed. Whilst the Councils cautiously welcome the efforts being made to attempt a move towards a more sustainable solution, additional information is required on the potential impacts of these changes. These questions have attempted to treat the proposals holistically given the interaction between the rail and marine elements of the proposals. There are also questions with regards to the strategy in the Environmental Protection section below.

1. Table 3.1 presents a preferred modal split for material transport; this is supported by paragraph 3.1.12 which sets out that "in an ideal world, SZC Co.'s contractors believe that the modal split set out in Table 3.1 would be desirable, if sufficient capacity existed". The Councils would like to query, whilst these figures may be *desirable* to SZC Co., what is the upper limit of what is *achievable* with regards to the transportation of freight materials by sustainable transport modes to meet the expectations of the Councils? What total proportion of materials could be transported by marine and rail and why do 40% of materials have to be transported by road? To understand what the opportunities may be to maximise sustainable transport at different times, it would be helpful to see a version of Table 3.1 profiled by time as well as mode over the life of the project please.
2. If sea freight was increased further to a maximum level, would this reduce the number of/remove night time trains or /and further reduce HGVs? If either was possible, we would like to discuss the impacts and implications of each option, with a focus on the impacts on residents.
3. With reference to Table 3.1, with sufficient storage on site, could concrete powders also be rail hauled to site? If there is not storage for these materials on site, where are they likely to be?
3. Based on the information supplied in Chapter 3 of the consultation document, the enhanced delivery of materials by sea (particularly bulk materials) appears to potentially provide a window of opportunity to deliver the improvements necessary for day time haulage on the railway. Could this be an option, particularly if the GRIP can be streamlined to allow earlier delivery? We would strongly support any efforts from SZC Co. and Network Rail to do so, as this could significantly reduce the environmental impact of rail haulage (and provide an important legacy benefit).
4. Could SZC Co. confirm whether they are considering the following options and their impacts with Network Rail (as indicated in the consultation document):
 - a) Running train over 6 days/nights a week – can SZC Co. confirm if the proposal is for 6 nights Sun-Fri or 6 nights Mon – Sat?

- b) Increasing the length/payload of trains;
 - c) Exploring practicality of rail haulage of all materials? and
 - d) Locations of signals to avoid blocking of level crossings (such as in Woodbridge and Saxmundham).
5. Further information is sought on what appears to be a difference between capacity of rail and marine and the reality. This may relate to the source of materials, as above, but we request further clarification on the points below as it will be difficult for the Councils to balance the different impacts and be able to respond in an informed way:
- a) At paragraph 3.2.5 we are told that the capacity of each train is equivalent to that of 67.5 HGVs based on 1,250 tonnes divided by 18.5 (one HGV in this cases). For clarity this would be 135 HGV movements. However, at Table 3.4 the additional train equates to a reduction of 25 HGVs (50 movements). In this case, why is the potential impact of the reality of an additional rail movement significantly less than the calculated reduction?
 - b) Table 2.4 also indicates that Options 1 and 2 for the BLF would equate to a reduction of 25 HGVs (50 movements) and Options 3 and 4 would result in reductions of 50 HGVs (100 Movements). However these figures do not directly compare with the tonnes of material set out at Table 3.6 (and what has previously been stated about one HGV equating to 18.5 tonnes), which indicate Options 1 and 2 could deliver as much as 40 HGVs (80 movements) daily and Option 3 and 4 would be considerably more than this given it has seven times the capacity.
 - c) It is understood that the temporary BLF would not be open all year around; how would this affect an annual profile of HGV movements; would the same restrictions to daily and quarterly HGV movements apply all year around given these limitations? Would it result in a greater proportion of materials transported by rail during Winter months and greater by marine in Summer months? And, if there is no marine unloading in the winter, is any gap likely to be made up by more road or rail? Therefore, could night-time train operation be seasonal? In answering this, please reference how you envision the additional stockpile parameter requested fitting into this complex arrangement?
6. Para 3.2.8 implies that LEEIE could continue to be used for rail until at least 2028 if there is a four-train operation. Is this correct? If it is, would you still commit to no unloading of trains overnight at the LEEIE as has been reassured in the past by SZC Co? Would this have any impact on peak traffic movements in the area?
7. In para 3.2.9, there is reference to further studies being undertaken to look at the possible impact of a fifth train on the passenger timetable. We would wish to see this as soon as possible as, again, it may affect the comments that we make on this consultation. Recent correspondence from Network Rail indicates that there are no changes to the passenger rail network proposed in forecasted timetables, the Councils have reservations regarding the potential impact of changes to the passenger timetable.
8. What further assessments are likely to be undertaken on rail noise and the impact of the BLF and are these likely to be shared with the Councils in the period before 18 December?
9. The numbers in terms of reduction of HGVs appear potentially significant but what is the identified/assessed reduction in impacts associated with it? (It is considered vital to establish a justified balance of impact going forward to ensure that sustainability is achieved, and mitigation is correctly apportioned to the most impacted areas).

Environmental Protection

10. P.36 Noise and vibration: Could you confirm why you have not classified the greater number of occurrences of the maximum noise event as a material change? (because night-time disturbance will be greater).
11. Please clarify why one train is not classified as two movements in the same way that HGV movements are?
12. Rail movements will occur between 23:00 and 07:00, this period is regarded by many important guidance documents as night-time and is subject to a higher level of sensitivity in terms of noise impact. How will sleep disturbance be avoided, prevented, or mitigated?

Coastal (conversation taking place 27.11.2020 with EDFE)

13. HCDF – need further detail including a DCO / Change profile comparison. More information on detail, impact assessment and potential mitigation is required to allow a view to be taken.

Ecology

14. Will the changes proposed to the HCDF mean that the soft material covering it are lost / need recharging earlier in the life of the station? If so, we need to consider that the long-term impacts on this part of the Suffolk Shingle Beaches CWS would be accelerated, potentially resulting in a worse long-term impact than that assessed in the ES.
15. It is unclear if the additional woodland loss now proposed for the Sizewell Link Road will have an additional adverse impact on roosting, foraging, or commuting bats? If this is still to be assessed, then this must be included in Table 5.2.
16. SSSI Crossing: with regard to para 4.5.6 on the causeway, can we have more clarity on the reduction of the length of the Sizewell Ditch which is undercover and out of daylight as a consequence of moving from culvert to a bridge?
17. Pakenham Fen Meadow (SCC only): On the Pakenham proposal, has any thought been given to the impact of the creation of fen meadow on downstream flows? In particular this is because immediately downstream is the mill pond of Pakenham Mill, a working watermill owned by the Suffolk Building Preservation Trust.

Landscape

18. Please confirm if the proposed water storage area is to be temporary or permanent? There is potential legacy benefit to local farming activity if it is to be retained and we would be keen to discuss this opportunity further.

Surface Water Drainage

19. Water management zone 7, 8, and 9 were said to discharge to WMZ 1 or 2 prior to CDO construction, is this no longer the case?
20. Please provide clarity on the parameters for when the temporary outfall would be used, we understand from the documents it is for approximately a two year period and is designed to function for extreme storm events (greater than 1 in 30) only.
21. From our reading of the document, WMZ5 is being reduced in size in order to account for the location of the new water storage area, both of which have been shrunk in capacity. What is the consequence of reducing the size of the two basins? There needs to be an assessment and balancing of all impacts please.

If we can have a response to any of these questions before 8 December it would enable us to include it within our response to the consultation.

We look forward to hearing from you.

Michael Moll, SCC

Lisa Chandler, ESC

27.11.2020