

**From:** [REDACTED]  
**To:** [SizewellC](#)  
**Subject:** SOCG  
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**Attachments:** [SOCG - TASC - V1 120321 \(1\)21440.pdf](#)

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Our reference: 20026424

Together Against Sizewell C

To the PINS Sizewell C Team:

Please see the Statement of Common Ground document attached. Please refer to the comment made by TASC at the beginning of the responses table which is revealed when expanding the page to the right to show 'comments'. For ease of reference, the statement is repeated here:

TASC is a small, local opposition group and we do not have the time or resources to engage with the Statement of Common Ground. Our position has always been and remains clear: we oppose the building of SZC altogether. In our view it is the wrong project, on the wrong site and at the wrong moment in time for twin EPR reactors to be built inside a legally protected AONB on Suffolk's crumbling Heritage Coast, especially given that modern, genuinely renewable options are safer, cheaper and faster to deploy.

This email has been copied to EdF for their reference.

With regards,

Pete Wilkinson

Chairman TASC

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## 1 INTRODUCTION

### 1.1 Status of the SOCG

1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of the application for development consent under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project. This version, version 01, dated 22 March 2021, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and the Together Against Sizewell C, referred to as 'the parties'.

### 1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project'). This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.2 The aim of this SoCG is, therefore, to inform the Examining Authority and provide a clear position on the state and extent of discussions and agreement between the parties on matters relating to the proposed Sizewell C Project.

1.2.3 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website.

### 1.3 Structure of this Statement of Common Ground

1.3.1 **Chapter 2** provides a schedule which detail the position on relevant matters between the parties, including any matters where discussions are ongoing. This is underpinned by Appendix A, which provides a summary of engagement undertaken to establish this SoCG.

## 2 POSITION OF THE PARTIES

2.1.1 **Table 2.1** provides an overview of the position of the parties and any further actions planned.

Table 2.1: Position of Parties

Ref.	Matter	TASC's position [taken from relevant representation]	SZC Co.'s Position	Position of the Parties
1.	Policy and the need for nuclear energy	The insufficient justification for the proposal as there is <i>“there is no NPS which establishes the “need” for a new nuclear power station post 2025, or the appropriateness of SZC for that purpose, when judged against the reasonable alternatives”</i> .	The need for a new power station at Sizewell C is firmly established within the Government's policy on national significant energy infrastructure. The National Policy Statement for Nuclear Power Generation (EN-6) (NPS EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and Wales by 2025. This is further supported by the Government's Energy White Paper: Powering our Net Zero Future (2020) that identifies an 'aim to bring at least one further large scale nuclear project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals'. The White Paper confirms that the NPS continues to provide a proper basis with which to examine the application and that the need assessment it provides remains relevant. The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – set out in the Planning Statement (Doc Ref. 8.4) <a href="#">[APP-590]</a> that accompanied the Application and remains valid.	Not agreed. Given the in-principle differences between the parties no further action identified at this stage.
2.	Landscape character and visual amenity	The impact on the landscape character and visual amenity of the area. In particular the <i>“adverse effects during the operational phase (60 years) on the character and appearance of the area, including on the AONB”</i> .	<p>The inclusion of Sizewell C in NPS EN-6 reflects the in-principle acceptability of its location and together with Chapter 3.10 (Nuclear Impact: Landscape and Visual Impacts) of NPS EN-6, it recognises the potential acceptability of significant environmental impacts in this regard in view of the national need for nuclear power generation and the scarcity of alternative sites.</p> <p>The Area of Natural Beauty (AONB) Partnership's natural beauty and special qualities document and has been used to inform the assessment of the effects of the Project on the AONB. An assessment on the AONB is provided in Volume 2 of the ES (Doc Ref 6.3) and the significance of effects are identified. SZC Co.'s assessment (Doc Ref 6.3) has concluded that local effects on the AONB will not result in any widespread effect on the AONB. NPS EN-6 recognises <i>‘the potential for long-term effects on visual amenity’</i> (para 3.10.3) and that <i>‘the scope for visual mitigation will be quite limited’</i> (para 3.10.8). SZC Co. has deployed extensive mitigation as part of the embedded design for operation and construction phases to reduce adverse effects. SZC Co. does not agree that during construction the effect on the designated area in its entirety, would be significant. SZC Co. note that nuclear infrastructure has been a feature of the AONB since its designation, with SZA being in place before the AONB itself was designated. As such energy infrastructure has, and will continue to be, a feature of this part of the AONB but the AONB would not be 'overwhelmed' by it. SZC Co. recognise that the Project will affect the performance of the immediate AONB during construction as recorded in the ES (Doc Ref 6.3), but that reasonable mitigation measures (including those to be secured through the Section 106 Agreement) are being put in place to minimise effects. In addition, SZC Co. note that the AONB is 'supported' by wider expanses of non-designated open countryside which forms a recognised setting to the AONB and is not impacted during construction.</p>	Not agreed. Given the in-principle differences between the parties no further action identified at this stage.
3.	Cultural heritage	Concerns that ES, Volume 2, Chapter 16, <i>“identifies harm to the significance of a number of heritage assets during the operational phase, particularly the Pillbox in Pillbox Field and Leiston Abbey”</i> as well as Leiston Abbey Scheduled Monument (first site) and a Grade II Listed Cottage 450m west of Upper Abbey Farmhouse.	SZC Co. has undertaken an assessment of the potential historic environment impacts of the Sizewell C Project, including on archaeology and designated heritage assets, namely: Chapter 16 of Volume 2 of the ES (Doc Ref. 6.3) <a href="#">[APP-272]</a> and Chapter 9 of Volumes 3 to 9 of the ES (Doc Ref. 6.4 to 6.10) <a href="#">[APP-368]</a> , <a href="#">APP-399</a> , <a href="#">APP-432</a> , <a href="#">APP-467</a> , <a href="#">APP-499</a> , <a href="#">APP-</a>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the

			<p><a href="#">528</a> and <a href="#">APP-560</a> submitted with the Application, and updated within the ES Addendum submitted with the Change Application [<a href="#">AS-181</a> to <a href="#">AS-188</a>, as relevant].</p> <p>Where archaeology is present, this will be mitigated through an agreed scheme of archaeological investigation (preservation by record) comprising excavation and post-excavation assessment and analysis, followed by public dissemination of the results. The scope would be agreed with SCCAS and they would also monitor this work. Nothing that requires preservation in situ has been identified to date.</p> <p>In terms of matters relating to setting, impacts are proposed to be avoided or reduced by design or by embedded mitigation measures such as screening by vegetation and earthworks, as well measures included in the CoCP (Doc Ref. 8.11(A)) [<a href="#">AS-273</a>] to limit noise disturbance during construction. Where required, additional mitigation will take the form of a fund through the Section 106 Agreement.</p>	area of disagreement between us on this topic.
4.	Public rights of way network	TASC are concerned about the impact on public rights of way, particularly the coast path, Bridleway 19 and the connectivity to other well used footways along the coastal stretch.	<p>Impacts on PROW are assessed in detail in Volume 2, Chapter 15 [<a href="#">APP-267</a>] and Volumes 3-9, Chapter 8 of the ES (Doc Ref. 6.3 to 6.10).</p> <p>SZC Co. has sought to minimise the impacts of the Sizewell C Project on public rights of way (PROW) and the range of mitigation proposals are set out in the ES. Measures include an inland diversion provided for periods of temporary closure to ensure that people can continue to walk the Suffolk Coast Path, Sandlings Walk and the England Coast Path at all times, albeit along a longer inland route. The period of these closures and diversions would be minimised as far as possible. The Right of Way Access Strategy which describes the above proposals and temporary diversions during construction is set out within Volume 2, Appendix 15I of the ES (Doc Ref 6.3) [<a href="#">APP-270</a>], with detailed Rights of Way Plans included within Book 2 (Doc Ref. 2.4(B) [<a href="#">AS-113</a> and <a href="#">AS-114</a>]). The 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, Natural England, the Suffolk Local Access Forum, the Ramblers Association and the Suffolk Coasts and Heaths AONB Partnership.</p> <p>Furthermore, the Applicant is currently discussing additional mitigation to be secured through the Section 106 Agreement with Suffolk County Council and East Suffolk Council.</p>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.
5.	Climate change	<i>"TASC considers there to be inadequate evidence on the carbon impacts of the construction, decommissioning and storage phases of the proposal."</i>	<p>The Environmental Statement assesses the Project from a climate change (including matters relating to carbon) perspective at Volume 2, Chapter 26 [<a href="#">APP-342</a>]. In the context of the wider electricity generation sector, there are significant benefits in the long term, as nuclear power stations produce no greenhouse gas emissions while generating electricity. The lifecycle greenhouse gas emissions from Sizewell C are estimated to equate to 4.5 grams of carbon dioxide equivalent per kilowatt hour (gCO<sub>2</sub>e/kWh). Government modelling supporting the Energy White Paper confirms the importance of new nuclear generation as part of the energy mix necessary to achieve net zero by 2050.</p>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.
6.	Transport strategy	[TASC to provide views in light of additional information submitted into the examination]	<p>SZC Co.'s freight management strategy is based on sustainable principles. SZC Co.'s has continued engagement and project development to optimise the movement of materials by rail and sea. In January 2021, SZC Co. submitted proposed changes to the Application to increase rail movements</p>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the

			to 4 trains per day and to provide an additional temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport.	area of disagreement between us on this topic.
7.	Sizewell Marshes SSSI, SPA and SAC	[TASC to provide views in light of additional information submitted into the examination]	<p>An assessment of effects on the Sizewell Marshes SSSI is presented within Volume 2, Chapter 14 of the ES (Doc Ref. 6.3) <a href="#">[AS-033]</a>, with updated SSSI land take calculations provided within SZC Co. letter to the Examining Authority submitted on 16 November 2020 <a href="#">[AS-006]</a>. SZC Co. recognises that the Project will result in landtake from the SSSI (2.94ha of temporary and 6.6ha of permanent landtake). Landtake within the SSSI was also recognised within the Government's National Policy Statement EN-6 when nominating Sizewell as a potentially suitable location for a new nuclear power station.</p> <p>In advance of the works, SZC Co. established a 67ha habitat creation area at Aldhurst Farm which provides replacement habitats for reedbeds and ditches.</p> <p>The Fen Meadow Strategy was included as Appendix 2.9.D of Volume 3 of the Environmental Statement Addendum (Doc Ref. 6.14 ) <a href="#">[AS-209]</a> to define SZC Co's commitment to provide appropriate compensation measures to mitigate the loss of fen meadow habitat through the creation of compensatory fen meadow habitats, and the provision of a contingency fund. SZC Co. is proposing to deliver substantially larger areas of compensatory habitat at a series of off-site locations and has undertaken an extensive series of studies to define these. In the event that all of the three offsite areas for fen meadow habitats proposed by SZC Co. are successfully established, the Sizewell C Project would provide at least 4.5ha of new fen meadow habitat compared to 0.46ha of fen meadow habitat lost. Replacement wet woodland habitat would be provided within the main development site to the west of the Grove, which would establish over the long-term and a Wet Woodland Strategy has been developed to establish additional areas alongside the fen meadow habitats.</p> <p>Furthermore, SZC Co. is proposing changes to the design of the SSSI crossing, to replace the previously proposed culvert with embankments with a single-span bridge with embankments. The bridge structure would provide greater connectivity for species, reduce the potential for habitat fragmentation (specifically for invertebrates, water vole and otter) and also reduce land take within the SSSI by 0.08ha.</p>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.
8.	Crossing of the SSSI	Concerns over irreparable damage to the SSSI: water management, quality and levels key to the overall ecology of the Sizewell Belts SSSI and in adequate mitigation. [TASC to provide views in light of additional information submitted into the examination]	Detailed groundwater modelling has been undertaken to understand the potential effects of the Sizewell C Project on groundwater levels within the Sizewell Marshes SSSI. The assessment is reported within Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) <a href="#">[APP-297]</a> . The assessment demonstrates that significant effects on groundwater levels and quality would be avoided through measures embedded within the project proposals, such as the construction of a cut off wall, which will prevent major changes in water levels off-site. The modelling indicates that the construction phase may cause a typical drawdown of water levels of less than 10cm adjacent to the site boundaries and the drawdown would rapidly diminish with distance from the site. This would not result in a significant effect on the habitats within the Sizewell Marshes SSSI. A Water Monitoring and Response Strategy has been prepared (an updated version was issued in January 2021 and included within Volume 3, Appendix	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.



			2.14.A of the ES Addendum (Doc Ref. 6.14) <a href="#">[AS-236]</a> . This strategy sets out the principles of the monitoring and mitigation approach should monitoring identify that construction works within the main development site are leading to materially worse environmental effects on groundwater levels or quality. The update provides clarity over the respective remits of the DCO and associated mitigation, and the subsequent permits and consents regime, which includes for a framework of 'trigger' and 'action' levels within water level and quality management measures, where required.	
9.	Level of detail within the application	<p>Points raised relate to:</p> <ul style="list-style-type: none"> <li>• Rochdale envelope</li> <li>• UK Marine Policy Statement 2011</li> <li>• Use of IROPI</li> <li>• Common Law Nuisance and Statutory Nuisance matters</li> <li>• Integration with other energy infrastructure projects affecting the region</li> <li>• Relationship with local and regional planning policy</li> </ul>	<p>Sizewell C is a large scale infrastructure project and PINS has recognised that projects of this scale require an element of flexibility within clearly defined parameters (see PINS Advice Note 9 on ""Using the Rochdale Envelope""). SZC Co has complied with this Advice Note in the preparing its application. The Environmental Statement set out the defined parameters clearly and the environmental impact assessment considered the full extent of those parameters. The parameters themselves are secured through the draft DCO. This ensures that the flexibility SZC Co. has is limited to the parameters and impacts which have been assessed. SZC Co. considers that these are sufficient to ensure there is control over the development. However, there are certain cases where it has been agreed with the local planning authority and other stakeholders that further detail is needed for approval. Requirements have therefore been added to the draft DCO for SZC Co. to obtain approval of further detail before development of certain aspects can begin.</p> <p>The Planning Statement (Doc Ref. 8.4) <a href="#">[APP-590]</a> explains the relevant policy for Sizewell C and explains how it has been complied with.</p> <p>The enforcement bodies under the draft DCO <a href="#">[AS-143]</a> have been given authority through statute. The draft DCO clearly identifies the appropriate enforcement authority for various obligations as well as any further approvals that are necessary under the draft DCO <a href="#">[AS-143]</a>. The section 106 agreement will set out the governance arrangements which secure the sharing of information with enforcement authorities to ensure that they are provided with the appropriate information to fulfil their role.</p>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.

10.	Coastal processes, flood risk and hydrology	<p>Points raised relate to:</p> <ul style="list-style-type: none"> <li>• Hard sea defences to protect SZC site, staff and local communities</li> <li>• Sea defences on SZC's neighbours</li> <li>• Impact of permanent beach landing facility on coastal processes and environment</li> <li>• Flood risk</li> <li>• Sea level rises</li> <li>• Impact on water-level dependent flora and fauna, affecting nationally and internationally designated areas</li> </ul>	<p>Whilst the detailed design of the sea defences is still being refined, the parameters and criteria that it needs to meet are defined as part of the Safety Case assessment to support the Nuclear Site Licence, and thus in close consultation with both the EA and ONR. Specifically, the basis of design is to limit overtopping rates up to 2140 to acceptable levels for the 10,000 year event with allowance for reasonably foreseeable climate change. The design approach allows for future raising to meet credible maximum climate change, in the event that climate change is greater than expected. The assessment is made on those parameters and criteria and the detailed design is not considered necessary.</p> <p>The purpose of the soft coastal defence feature is specifically to provide an erodible beach that will be recharged when required to ensure that the hard coastal defence feature is not exposed. The reference to exposure dates refers to an unmitigated scenario but the Coastal Processes Monitoring and Mitigation Plan (CPMMP) issued to the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.15.A (Doc Ref. 6.14) <a href="#">[AS-237]</a>) will ensure that the soft and hard defences have no significant impact on coastal processes.</p> <p>An assessment of the likely effects of the beach landing facility on marine ecology is provided within Volume 2, Chapter 22 of the ES (Doc Ref. 6.3) <a href="#">[APP-317]</a>. The effects on marine ecology would be not significant due to the localised nature of the effects and mitigation, such as soft start piling techniques, described within the Code of Construction Practice (Doc Ref. 8.11(A)) <a href="#">[AS-273]</a>.</p> <p>Volume 2, Chapter 15 of the ES (Doc Ref. 6.3) <a href="#">[APP-267]</a> considers the likely effects of the beach landing facility on on-shore and off-shore recreational activities. There would be no significant effects on off-shore recreational activities. Significant effects are predicted on the users of the Suffolk Coast Path during construction, however, these would be significant as a result of the overall views of construction activities, noise and temporary diversion required due to the works on the main development site.</p> <p>The potential for extreme conditions to result in flooding of the main platform from breach of defences elsewhere along the coastline, with inundation from the rear of the main platform, is understood. The proposed elevation of the main platform at 7.3m AOD has been set in the context of the Safety Case assessment and in support of the Nuclear Site Licence, in close consultation with the ONR.</p> <p>Although the detailed design of the sea defences is still being refined, the parameters and criteria that it needs to meet are defined as part of the Safety Case assessment to support the Nuclear Site Licence, and thus in close consultation with both the EA and ONR. Specifically, the basis of design is to limit overtopping rates up to 2140 to acceptable levels for the 10,000 year event with allowance for reasonably foreseeable climate change. The design approach allows for future raising to meet credible maximum climate change, in the event that climate change is greater than expected.</p>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.
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11.	Site safety	<p>Points raised relate to:</p> <ul style="list-style-type: none"> <li>Impacts on SZB, including in terms of emergency planning</li> <li>Size of the site to accommodate the operational buildings</li> <li>The waste storage facility</li> </ul>	<p>The Government confirmed in the NPS EN-6 that the Sizewell C site is a potentially suitable location for new nuclear power and it is reasonable to conclude that there is enough land within the nominated boundary to safely and securely operate a nuclear power station.</p> <p>UK Government Policy requires that for New Nuclear Builds Intermediate Level Waste and Spent Fuel is stored on-site until the availability of the Geological Disposal Facility.</p> <p>The design of interim stores at Sizewell C is based on a 100 year design life. Given the relatively simple design of these facilities they would be capable of extension beyond this period if necessary, subject to any required refurbishment and or replacement of equipment.</p> <p>The SZB and SZC operator emergency plan and offsite emergency plan would be integrated to enable coordination of activities during response.</p>	<p>Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.</p>
12.	Landscape and visual and heritage	<p>Points raised relate to:</p> <ul style="list-style-type: none"> <li>Impact on AONB</li> <li>Night-time light pollution and effects on 'dark skies'</li> <li>Visual and ecological impacts associated construction works and pylons</li> </ul>	<p>Volume 2, Chapter 13 (Landscape and Visual) of the ES (Doc Ref. 6.3) <a href="#">[APP-216]</a>, supported by a night-time appraisal presented within Appendix 13B (Doc Ref. 6.3) <a href="#">[APP-218]</a> and <a href="#">[APP-219]</a> presents an assessment of the likely landscape and visual effects, including the impact on the AONB and of light pollution arising from the construction and operation of Sizewell C. These assessment include sufficient information to inform the judgements made by the expert in terms of the level of impact.</p> <p>SZC Co. recognises that some significant effects from light pollution will arise. However, these will be minimised as far as possible through the Lighting Management Plan (LMP), appended to Chapter 2 (Description of Permanent Development) of Volume 2 of the ES (Doc Ref. 6.3) <a href="#">[APP-182]</a>, which has been prepared for the main development site, for both the construction and operational phases. The LMP sets out measures, which when implemented, would minimise light spill from the development during construction and operation. These include (but are not limited to) adopting the lowest safe lighting levels possible for the area to be lit, limiting the hours of lighting, using the lowest possible mounting for the luminaires and using directional lighting and louvres, where required. Specific measures have specified to minimise light spill in proximity to bat roosts and commuting routes/ flightpaths.</p> <p>Overhead pylons, as opposed to underground power transmission, are proposed following consideration of a range of alternatives. The Site Selection Report, Appendix 8.4a to the Planning Statement (Doc Ref. 8.4) <a href="#">[APP-590]</a> presents a description of the site selection process which SZC Co. undertook in relation to development on the main development site, including the approach taken for overhead power lines. SZC Co. considered the potential for gas insulated cables (GIL), which are underground, but this was discounted on the basis that:</p> <ul style="list-style-type: none"> <li>The insulating gas (SF6) has 22,000 times the global warming potential of CO2. Although sealed, industry experience is that it gets 'lost' at a rate of c. 1% per annum on average. This could present a 10% increase to the lifetime carbon footprint of Sizewell C and is contrary to the UK Government's aim of achieving net zero by 2050.</li> <li>Construction of GIL would require the operational platform to be extended c. 20m into the Sizewell Marshes SSSI, with consequential further loss of 0.6ha of SSSI habitat.</li> </ul>	<p>Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.</p>

			<ul style="list-style-type: none"> <li>Deeper excavations for the additional galleries (if underground cables were used) may require more materials to be taken off-site, thereby necessitating additional transport movements.</li> <li>The GIL life expectancy is not sufficient to cover the life of the power station – full replacement required after c. 40 years. Any faults within the GIL during operation would take on average two weeks to repair (compared the matter of a day for the restringing of the wires on overhead lines).</li> <li>Experience from Hinkley Point C has indicated that the gallery installation would introduce risk to schedule and cost.</li> </ul> <p>The use of pylons continues to be the most appropriate solution. The impact of the pylons is assessed in the ES (Doc Ref. Book 6) and the ES Addendum (Doc Ref. 6.14), most notably the Landscape and Visual assessment and remains valid.</p> <p>In terms of the pylons themselves, SZC Co. has worked hard to further reduce the visual impact of the pylons, albeit recognising they fall within the backdrop of the power station. The proposed changes submitted to the Examining Authority in January 2021 include the proposal to reduce the height and visual impact of the southern pylon, so that the Application would then propose three shorter pylons and one taller pylon.</p>	
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13.	Terrestrial habitats & wildlife	<p>Points raised relate to:</p> <ul style="list-style-type: none"> <li>• Impact to protected habitats: SSSI, Ramsar, SPA, SAC,</li> <li>• Impact of vibration, noise, dust, light, air pollution on wildlife/residents</li> <li>• Adequacy of compensatory wildlife areas eg. for Marsh Harriers</li> <li>• Biodiversity net gain</li> <li>• Impact of construction activities on the water systems and wider environment</li> <li>• Cumulative impacts</li> </ul>	<p>The ES (Doc Ref. Book 6) [APP-159 to APP-582] identified all the likely significant effects associated with each component of the Project, the Project as a whole and then in-combination with other projects and plans. Where potentially significant effects are identified, SZC Co. has identified measures to mitigate the impacts, this includes a range of mitigation measures for the construction phase. The ES was updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] which SZC Co. submitted in January 2021 alongside a request of changes to the DCO Application. SZC Co. considers the EIA undertaken for the Project and presented within the ES is robust. With specific reference to the example provided as an inconsistency within the comment, the air quality assessment, based on Environment Agency guidance, defines a 'sensitive ecological receptor' as ecological receptors designated under international legislation (including Ramsar sites and Natura 2000 sites) up to 10 kilometres (km) from the source; and ecological receptors designated under national legislation (e.g. sites of special scientific interest (SSSI) and national nature reserves (NNR)) and locally designated sites (e.g. county wildlife sites) up to 2km from the source. The roadside nature reserve, whilst identified as of national importance under the</p> <p>SZC Co. continues to engage with stakeholders such as East Suffolk Council, Suffolk County Council, Environment Agency, Natural England, the Marine Management Organisation to discuss results of the EIA and develop Statements of Common Ground to develop the mitigation required for the Sizewell C Project, which will be secured as commitments and controls imposed through the Development Consent Order, if granted.</p> <p>A biodiversity net gain assessment has been undertaken and was submitted with the Application [APP-266]. This assessment is being updated in light of the latest metrics issued by Natural England and will be submitted into the examination at Deadline 1.</p> <p>SZC Co. recognises the potential for the main development and associated development sites to impact on the hydrological and hydrogeological regimes, through the introduction of buildings, hardstanding, drainage infrastructure, materials handling and infill, often within floodplains, in proximity to watercourses and adjacent to sensitive ecological receptor sites. Impacts could include the effects on water quantity, flow, location and quality, and over time. SZC Co. proposes the use of sustainable drainage systems (SuDS) and other techniques to mimic natural processes where possible, promoting infiltration and managing stormwater volumes, whilst recognising the need to protect habitats and groundwater by managing potential pollutant loading such as sediment and hydrocarbons. These approaches are described in the Outline Drainage Strategy provided in Volume 2, Appendix 2A of the ES [APP-181], the Sizewell C Main Development Site Flood Risk Assessment (FRA) (Doc Ref. 5.2(A)) [AS-018] and the CoCP Practice (Doc Ref. 8.11(A)) [AS-273].</p> <p>In terms of cumulative effects, these are considered within Volume 10, Chapter 4 of the ES (Doc Ref. 6.11) [APP-578].</p>	<p>Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.</p>
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14.	Marine Environment & Marine Conservation Zone	<p>Points raised relate to:</p> <ul style="list-style-type: none"> <li>Impacts on recreational/commercial fishing and the marine environment</li> <li>Impacts of the sea water outlet pipe</li> <li>Impacts of the pipework &amp; beach landing facility</li> </ul>	<p>An assessment of the likely effects of dead and moribund being discharged from the the cooling water system is provided within Volume 2, Chapter 21 of the ES (Doc Ref. 6.3) <a href="#">[AS-034]</a>. The discharge would not affect local water quality significantly nor cause a nuisance. Pelagic fish, such as herring and sprat, tend not to survive impingement on the power station drum screen filters due to damage to their delicate scales. However many, more robust fish species do survive. Return of the dead fish to the local marine environment is preferable to their removal to waste as it provides food for other marine species (i.e. returns the biomass).</p> <p>An assessment of the likely effects of removing fish and crustaceans in the cooling water system is provided within Volume 2, Chapter 22 of the ES (Doc Ref. 6.3) <a href="#">[AS-035]</a> and demonstrates that there would not be a significant impact on fish stocks or, therefore, local fishermen's livelihoods.</p> <p>An assessment of the likely effects of the cooling water discharge on marine fish and crustecans is provided within Volume 2, Chapter 21 of the ES (Doc Ref. 6.3) <a href="#">[AS-034]</a> and demonstrates that local water quality is not significantly affected. The heat and chemical loadings in the discharge are diluted very rapidly as the discharge moves away from the outfall. As the discharge is thermally buoyant it rises to the surface rapidly and thus away from crustaceans such as crabs and lobsters that live on the seabed. The discharge will need to comply with the stringent assessment process performed by the Environment Agency in order for it to be approved for the Water Discharge Activity permit.</p> <p>An assessment of the likely effects of the cooling water discharge on the marine environment is provided within Volume 2, Chapter 21 of the ES (Doc Ref. 6.3) <a href="#">[AS-034]</a> and Volume 2, Chapter 22 of the ES (Doc Ref. 6.3) <a href="#">[AS-035]</a> and demonstrates that local water quality is not significantly affected. The heat and chemical loadings in the discharge are diluted very rapidly as the discharge moves away from the outfall. As the discharge is thermally buoyant it rises to the surface rapidly and thus away from crustaceans such as crabs and lobsters that live on the seabed. The discharge will need to comply with the stringent assessment process performed by the Environment Agency in order for it to be approved for the Water Discharge Activity permit.</p> <p>Volume 2, Chapter 15 of the ES (Doc Ref. 6.3) <a href="#">[APP-267]</a> considers the likely effects of the beach landing facility on on-shore and off-shore recreational activities. There would be no significant effects on off-shore recreational activities. Significant effects are predicted on the users of the Suffolk Coast Path during construction, however, these would be significant as a result of the overall views of construction activities, noise and temporary diversion required due to the works on the main development site.</p>	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.
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15.	Community Impacts	<p>Points raised relate to:</p> <ul style="list-style-type: none"> <li>• Economy - 'Boom &amp; bust' effects and local employment gains and effects of existing local businesses</li> <li>• Tourism</li> <li>• Environmental impacts on communities</li> <li>• Potable water supply</li> <li>• Impacts on local public services (e.g. health, fire)</li> <li>• Impact on local housing availability</li> </ul>	<p><b>Economy</b></p> <p>The Sizewell C Project will generate a significant demand for labour, in a range of employment sectors and skill levels in both construction and non-construction-related activities, and long-term operational jobs once the power station is built. SZC Co. is working with partners including Suffolk County Council, New Anglia LEP and education, training and skills providers to develop a suite of Employment, Skills and Training measures that support local people into work, into higher skilled work, and to develop sustainable careers in construction, energy and other sectors that support the Sizewell C Project and the wider ambitions for growth in the region. By focusing on promoting 'legacy' skills that the Project and the region both need, local people will be supported into sustainable careers that will reduce the risk of 'boom and bust' – such measures were not fully considered and the scope of wider opportunity and regional strategic planning were not so developed for the construction phase of SZB.</p> <p>Jobs will be created for local people in a range of skill types and through a number of skill and training opportunities such as apprenticeships. These will not be limited to 'low skill, low pay' jobs – Sizewell C aims to invest in education and training initiatives to dovetail with the region's wider aspirations for legacy skills in engineering and construction, including project management. The operational phase of the Project will also generate substantial local employment, as well as supply chain effects, for 60 years. Combined, these measures ensure a commitment to sustainable employment initiatives that will support the local economy and labour market beyond the construction phase.</p> <p>The construction phase of Sizewell C will be up to 10-12 years long – during that time the UK's economy is likely to pass through at least one economic cycle, resulting in differing levels of unemployment and economic activity. Even at 'high' points in the economic cycle, Sizewell C's labour market will have a substantial amount of labour market slack, offering opportunities for people to enter the labour market from worklessness as well as from training/education.</p> <p>SZC Co. will seek to maximise the Home Based recruitment beyond this assessment case. Note there are no 'targets' for local employment – the DCO sets out a reasonable expected level which takes into account the measures funded by the ESE enhancement measures. There is clearly benefit in promoting local employment for economic and social benefit, but also to reduce scale of NHB workforce meaning fewer accommodation, community safety, public services effects.</p> <p>Intelligent Replication will be used - this does not necessarily mean local firms being overlooked. Tier 1 contractors will be required to seek local procurement options through their contracts, using the SCoC supply chain portal. Weighting in assessment criteria will be in favour of Suffolk firms, but contracts could go outside Suffolk if e.g. the contract is critical replication, there is a lack of competency or the price is not-competitive. Note that SCoC have an agreed set of activities to pro-actively raise competencies to help Suffolk firms win contracts.</p> <p>Through engagement with local and regional stakeholders in the skills, training and employment sector, SZC Co has been made aware of concerns that local businesses may experience vacancies being harder to fill. To tackle this, SZC Co are working with local stakeholders to develop a range of precautionary measures that will reduce those risks while enhancing the benefits and focussing them on local people and businesses. A SZC Jobs Service will be open to all local employers, who</p>	<p>Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.</p>
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will be able to access the skilled pool of labour generated by the project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics can be used to monitor a sub-section of movement between the Project and wider employment market. Local firms will be supported through local supply chain engagement activities to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the project. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain.

#### Tourism

SZC Co. recognises the importance of the tourist economy within and around the Suffolk Coast, and has undertaken an assessment of the effects of the Sizewell C Project on tourism, in-line with the requirements of National Policy Statement EN-1, as part of Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [\[APP-195\]](#).

As part of this, SZC Co has commissioned an ex-ante stated preference survey to identify potential sensitivities to change for existing and potential visitors, in order to identify measures that could effectively be implemented by a Tourism Fund to reduce the risk of stated intentions to change visiting behaviour from manifesting, and then contributing to changes in economic activity. That fund would promote the area and support the longevity of the very important and diverse tourist economy of the Suffolk Coast and will be secured in the Section 106 Agreement.

#### Impacts on communities

The level of HGVs forecast to be generated to/from the main development site in the early years is summarised in the Transport Assessment [\[AS-017\]](#). It is forecast that up to 600 two-way HGVs would be generated during the early years prior to the two-village bypass and Sizewell link road being operational. HGVs to/from the main development site will be required to adhere to the proposed HGV routes via the A12 and B1122 and then the Sizewell Link Road once operational and compliance with the HGV routes will be monitored through the Construction Traffic Management Plan [\[APP-608\]](#). Two new roads (Two Village bypass and Sizewell Link Road) are proposed, which will enable HGVs and other Sizewell C traffic to bypass local communities. As set out in the Construction Traffic Management Plan [\[APP-608\]](#), it is only once the two village bypass and Sizewell link road are operational that that level of HGVs to/from the main development site could increase to up to 1,000 two-way HGVs on the busiest day. Since the Application was submitted, a VISSIM micro-simulation model has been built of the A12 corridor between Seven Hills and A1152 at Melton as set out in Chapter 9 of the Transport Assessment Addendum (Doc Ref. 8.5Ad) [\[AS-266\]](#). The VISSIM modelling study forecasts that the impact of Sizewell C traffic on A12 average journey times would be no more than 18 seconds in the Early Years during the AM and PM network peak periods. Journey times on the A12 corridor between Seven Hills and Melton are forecast to increase by up to 37 seconds on a typical day during peak construction, and up to 62 seconds on the busiest day during peak construction.

SZC Co. has taken all reasonable steps to limit the adverse environmental effects of the Sizewell C Project, embedding mitigation and good practice measures in order to avoid, reduce or compensate for adverse impacts wherever possible. In accordance with paragraph 4.1.3 of NPS EN-1, in



			<p>making a determination of the Application, the decision maker will take the following matters into account when determining whether a Development Consent Order should be granted:</p> <ul style="list-style-type: none"> <li>the potential benefits, including in addition to its contribution to meeting the need for energy, its contribution to job creation and any long term or wider benefits; and</li> <li>the potential adverse impacts, including any long term and cumulative adverse impacts as well as any measures to avoid, reduce or compensate for any adverse impacts.</li> </ul> <p>Since the submission of the Application, SZC Co. has continued to engage with the local authorities, environmental organisations, local stakeholder groups and the public with regard to the Application. This process has identified potential opportunities for changing the Application to further minimise impacts on the local area and environment in many cases, whilst reflecting the additional design detail that has come forward in preparation for implementation of the Sizewell C Project. For the reasons set out in Part 1 (Doc Ref. 8.19) <a href="#">[AS-281]</a> of the proposed changes submission, SZC Co. considers all of the proposed changes and Additional Information go some way in positively addressing concerns of stakeholders.</p> <p><b>Potable water</b></p> <p>SZC's construction demand is estimated to be around 1.5 MI/day in the early years, increasing to around 3.5 MI/day during the main construction peak. The demand would be around 2 MI/day during the operational phase. ESW has confirmed that they would be able to meet this demand in full from its Barsham Water Treatment Works (WTW) near Beccles located in the Northern/Eastern Water Resource Zone. The scheme would utilise licensed capacity with their existing River Waveney abstraction that supplies the works. Environmental studies carried out by ESW are at an advanced stage and are expected to demonstrate that this supply would be ecologically sustainable.</p> <p><b>Radiological impacts</b></p> <p>Appendix 25B Radioactive Substances Regulations Permit Application: Support Document D1 - Human radiological impact assessment for Sizewell C (Doc Ref. 6.3) <a href="#">[APP-340]</a> details the radiological impact assessment of the proposed radioological discharges from the operation of Sizewell C that was included in the permit application. This includes an assessment of the impacts both at the predicted discharges (best estimates) and proposed discharge limits, which allows for operational fluctuations. In summary, the level of exposure is broadly equivalent to that which a member of the public would receive from a dental x-ray and less than that of a transatlantic flight.</p>	
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#### Impacts on local services and housing

The Sizewell C Project will require a temporary non-home-based workforce who may seek to access public services. Volume 2, Chapter 9 (Socio-economics) and Chapter 28 (Health and Wellbeing) of the ES (Doc Ref. 6.3) [APP-195 and APP-346] set out an assessment of the potential net additional demand from the workforce for these services, and identify that there is unlikely to be a substantial demand that would not otherwise be accounted for by general taxation. However, in recognition of the potential demand for some services as a result of workers bringing dependents, the lag time between taxation and central government funding, or related to the specific demographic profile of the workforce, SZC Co. will provide a public services resilience fund and a residual healthcare demand fund that can be applied where potential additional demand may arise.

SZC Co. Also recognises that there will be multiple residual, intangible effects on communities which may result in perceptions of a reduction in quality of life. As such, SZC Co. have proposed:

- a) A Community Fund to help compensate for intangible, residual or in-combination effects through schemes, measures and projects which promote the economic, social or environmental well-being of communities and enhance their quality of life.
- b) A Housing Fund that will enable empty properties to return to the market, and provide recyclable grants and loans for renovation of homes.
- c) An Employment, Skills and Education Strategy to support New Anglia LEP and Suffolk County Councils long-term plans for key growth sectors in the region.
- d) A Tourism Fund to promote the area and support the longevity of the very important and diverse tourist economy of the Suffolk Coast.

SZC Co. provided an assessment of the impact of journey delays for emergency services within Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14) [AS-181]. The assessment concluded that journey times during peak construction on the A12 northbound would be predicted to increase by up to 62 seconds between 08:00-09:00 and for all other hours the increase would be less than 36 seconds. In the southbound direction, the model predicts a journey time increase of 0-28 seconds. Over the 14 km route, this is considered to be imperceptible to drivers and even combined impacts from multiple trips throughout the day would not affect the scheduling or delivery of community health services or materially impact on ambulance conveyance and emergency response.

SZC Co. is aware of the potential effects from workers accessing rented accommodation in the local area that is an important resource for local residents. An assessment of the likely effects is set out in Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) [APP-195]. SZC Co. has developed an Accommodation Strategy (Doc Ref. 8.10) [APP-613] and will provide a Housing Fund to avoid potential adverse effects on the housing market.

SZC Co has developed a Housing Fund including measures to boost supply of housing stock in order to reduce or avoid effects on the housing market, particularly for those at most risk of housing need or vulnerability within the private rented sector. Additionally, SZC Co proposes a 'resilience' element to the Housing Fund to allow ESC's statutory housing services to respond to increased applications for support should this arise, and prevent these issues from occurring.

			<p>SZC Co. and ESC agree that the Housing Fund should be robust and flexible to meet the needs of a potentially changing housing market, and spent within the first seven years of construction in order to address peak effects.</p> <p>SZC Co. proposed a structure, governance/monitoring framework and implementation plan within the Accommodation Strategy and subsequent Summary Papers / Response Papers on the Housing Fund, including a response to ESC's proposed scale and mix of measures (set out in the Accommodation Strategy).</p> <p>Further work is required to agree an appropriate scale for the Housing Fund based on an agreed indicative mix of measures, and to finalise the approach to administration / implementation of the Fund.</p> <p>The Socio-economic Assessment (Volume 2, Chapter 9 of the ES) and the Accommodation Strategy submitted with the DCO identify that there is unlikely to be a widespread, significant adverse effect on the ability of the Tourist Accommodation Sector to respond to demand, based on affordability, availability, location, occupancy rates and seasonality of accommodation.</p> <p>However – SZC Co consider (and ESC agree) that it is prudent to address the risk of any uncertainties and therefore have developed the principle for an element of the Housing Fund to be ring-fenced for supporting the tourist accommodation sector. Further work is progressing to develop a broad set of initiatives that this fund could support, including provision of support for planning, licencing, and development/reconfiguration of existing tourist accommodation sites.</p> <p>SZC Co will also run an Accommodation Management System which will interact with prospective landlords and provide information about the Project, its workers and broker information about safety, compliance and tenancy services.</p> <p>In order to provide additional assistance, SZC Co. developed a Property Price Support Scheme to provide assistance to homeowners, within agreed criteria, who sell their properties and can demonstrate a loss arising directly from the Sizewell C Project. This was launched in December 2019 and applications can be made once the application for the Sizewell C DCO has been accepted for examination. SZC Co. have committed to periodically reviewing the Property Price Support Scheme to ensure that it continues to be appropriate.</p> <p>SZC Co. considers the mental and physical health and wellbeing of local communities and the workforce to be paramount. A full assessment of the likely effects of the Sizewell C Project on residual healthcare service demand and the effects of environmental change to the area on health indicators and perceptions of wellbeing is included in Volume 2, Chapter 28 (Health and Wellbeing) of the ES (Doc Ref. 6.3) <a href="#">[APP-346]</a>.</p>	
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16.	National Policy	Points raised relate to: <ul style="list-style-type: none"> <li>Siting Criteria</li> <li>Energy White Paper</li> <li>Position of government</li> </ul>	The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – was set out in the Planning Statement (Doc Ref. 8.4) <a href="#">[APP-590]</a> that accompanied the Application. Nevertheless, the Examining Authority and ultimately the Secretary of State will have regard to the relevant policy context, and other relevant factors, in their decision making.	Not agreed. Given the in-principle differences between the parties no further action identified at this stage.
17.	Defra's 25-year environment plan	TASC stated that “SZC fails on most/all of 10 key aims”	The need for a new power station at Sizewell C is firmly established within the Government's policy on national significant energy infrastructure. SZC Co. has considered the relevant policies and guidance in developing and assessing its Application, which are detailed as relevant in the suite of Application documents.	Not agreed. However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic.
18.	Finance	Points raised relate to: <ul style="list-style-type: none"> <li>EDF's financial position</li> <li>EDF's approach to funding the of SZC</li> <li>Ability to meet the compulsory acquisition tests from a financial perspective</li> <li>Cost of nuclear</li> </ul>	Relevant information on the project cost and funding sources is provided within the Funding Statement (Doc Ref. 4.2) <a href="#">[APP-066]</a> . Additional information has also been submitted within the Funding Statement Addendum (Doc Ref. 4.2Ad) <a href="#">[AS-011]</a> and the Second Funding Statement Addendum (Doc Ref. 4.2Ad) <a href="#">[AS-150]</a> . These provide details on how the acquisition of additional land necessary to build the Sizewell C Project would be funded and on how the Sizewell C Project generally is to be funded.	Not agreed. Given the in-principle differences between the parties no further action identified at this stage.
19.	DCO Application process	Points raised relate to: <ul style="list-style-type: none"> <li>Timing the of application and process in light of Covid-19 restrictions and accordingly stakeholders' ability to engage in the process</li> <li>The documentation</li> </ul>	<p>SZC Co. has understood concerns regarding the timing of the application in recognition of the ongoing Covid-19 and in this context:</p> <ul style="list-style-type: none"> <li>Whilst the Sizewell C application was ready for submission in February 2020, we took the decision to defer its submission until May 2020 in recognition that the pandemic would impact upon the resources available to all stakeholders.</li> <li>Nevertheless, we shared the Application material in draft in October 2019 with the Defra family and in its full form on its submission in May, prior to its acceptance.</li> <li>The period provided for relevant representations then ran until 30 September – again in recognition of the scale of the Application but also the continuing implications of the pandemic.</li> </ul> <p>The process is now under the direction of the Examining Authority and the Applicant will adhere to the approach being taken.</p>	Not agreed. Given the in-principle differences between the parties no further action identified at this stage.

## APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of discussions between the parties, as are summarised in **Table A.1**.

**Table A.1: SOCG meetings held between the parties**

Date	Details of the Meeting
XX	XX
XX	XX