



The Sizewell C Project

9.10.6 Initial Statement of Common Ground - Historic England

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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 a development consent order ('DCO') to the Planning Inspectorate ('PINS') under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project.

1.1.2 This SoCG version 01 has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Historic England and agreed on 2 June 2021.

1.1.3 This SoCG has evolved through a programme of engagement and series of versions as detailed in Section 2.

1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties on the historic environment (terrestrial and marine) issues 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').

1.2.2 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').

1.2.3 Paragraph 58 of the DCLG Guidance states:

"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence"

1.2.4 The aim of this SoCG is therefore to inform the Examining Authority and provide a clear position of the state and extent of discussions and agreement

between SZC Co. and Historic England on matters relating to the Sizewell C Project.

- 1.2.5 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 <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>).

1.3 Parties to this Statement of Common Ground

- 1.3.1 SZC Co. has submitted an application for development consent to build and operate a new nuclear power station, Sizewell C, along with the associated development required to enable construction and operation.

- 1.3.2 The Historic Buildings and Monuments Commission for England (HBMCE), better known (and referred to throughout this SoCG and the application for Development Consent) as Historic England, is the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape. In addition to its remit for the conservation of the historic environment the National Heritage Act (2002) gave HBMCE responsibility for maritime archaeology in the English area of the UK Territorial Sea. Historic England has a duty to promote conservation, public understanding and enjoyment of the historic environment. It is an executive Non-Departmental public body and answers to Parliament through the Secretary of State for Digital Culture, Media and Sport.

- 1.3.3 Collectively SZC Co. and Historic England are referred to as 'the parties'.

- 1.3.4 Matters of interest to Historic England and which are detailed in Section 2 of this SoCG are as follows:

- The terrestrial historic environment assessment for the main development site, specifically:
 - The peat strategy.
 - The settings assessment for Scheduled Monuments, Grade I, Grade II* listed buildings.
- The marine historic environment assessment for the main development site.

- The terrestrial historic environment assessments for the associated development sites, specifically the settings assessments for Scheduled Monuments Grade I, Grade II* listed buildings. These comprise:
 - the northern park and ride at Darsham;
 - the southern park and ride at Wickham Market;
 - the two village bypass;
 - the Sizewell link road;
 - the freight management facility;
 - Yoxford roundabout and other highway improvements;
 - the green rail route and other rail improvements.
- In addition, other DCO application documents of interest to Historic England include:
 - Draft DCO (including the Requirements);
 - the draft Section 106 heads of terms [now the Draft Deed of Obligation];
 - Code of Construction Practice;
 - Mitigation Route map.

1.4 Structure of this Statement of Common Ground

1.4.1 Chapter 2 provides schedules which detail the matters of agreement and disagreement between the parties, and also identifies where discussions are continuing if applicable.

1.4.2 **Appendix A** provides a summary of engagement undertaken to establish this SoCG.

1.5 Status of this version of the Statement of Common Ground

1.5.1 This version 01 of the SoCG has the status *"Draft agreed SoCG with matters outstanding – The draft SoCG has been agreed by both parties, but there remain matters outstanding that SZC Co. and the other party(ies) agree to continue engage on through the examination. The matters outstanding have defined actions to resolve in the main."*

1.5.2 This version 01 has not been through Historic England legal review.

2 POSITION OF THE PARTIES

2.1.1 **Table 2.1 to 2.13** provide details on the areas of agreement and disagreement between the parties.

2.1.2 This SOCG focuses on the areas within Historic England’s remit, specifically:

- the settings assessments for Scheduled Monuments, Grade I and Grade II* listed buildings for the main development site and associated development sites;
- the peat strategy for the main development site;
- the marine historic environment assessment for the main development site.

2.1.3 Suffolk County Council Archaeological Service and the East Suffolk Council Conservation Officer have responsibility for other aspects of the historic environment assessment, including buried archaeology and settings assessment for other heritage assets. Historic England will not comment on these.

2.1.4 Therefore, where the tables below refer to a specific document or part of a document, agreement or disagreement relates only to the parts of that document which consider the matters set out in **paragraph 2.1.2** above.

2.1.5 The SOCG considers the historic environment chapters only. Where the historic environment assessments draw on other topic areas, including noise, transport, landscape and visual impact and coastal geomorphology and hydrodynamics, the summaries / cross references in the historic environment chapters are relied upon.

Table 2.1 Position of the Parties - SZC Co. and Historic England

Ref.	Matter	Book ref.	Historic England Position	SZC Co. Position	Further Action / Additional references.	Agreed / Not Agreed / In Progress
Project Wide						
PW_HE1	The methodology for the assessment of impacts on the terrestrial historic environment as detailed in Volume 1 Appendix 6L of the ES.	6.2	Agreed.	Agreed.	None.	Agreed.
PW_HE2	The list of assets to be scoped in or out of the settings assessment in the EIA, as detailed in Volume 1 Appendix 6L Annex 6L.1 “ <i>Historic Environment Settings Scoping Update</i> ” which also includes the 2015 “ <i>Settings Assessment Scoping Recommendations</i> ”.	6.2	Agreed.	Agreed.	None.	Agreed.
PW_HE3	The methodology for the assessment of impacts on the marine historic environment as detailed in Volume 1 Appendix 6S of the ES.	6.2	Agreed.	Agreed.	None,	Agreed.
PW_HE4	The Overarching WSI provided in Book 6, Volume 2, Chapter 16, Appendix 16H	6.3	Some revisions required - comments provided on 3/12/20. Agreed subject to those comments having been incorporated.	Comments addressed, along with comments from Suffolk County Council Archaeological Service.	The revised Overarching WSI will be submitted at Deadline 3.	Agreed subject to HE being satisfied that changes have been incorporated.
PW_HE5	The approach to inter-relationship effects on the terrestrial and marine historic environment set out in Book 6, Volume 10, Chapter 2	6.11	Under assessment.	-	-	In progress.
PW_HE6	Section 3.7 of Book 6, Volume 10, Chapter 3 setting out project-wide effects on the terrestrial historic environment and the scoping out of marine historic environment as set out in Section 3.1 x .	6.11	Under assesment.	-	-	In progress.
PW_HE7	Sections 4.10 and 4.16 of Book 6, Volume 10, Chapter 4 setting out cumulative effects on the terrestrial historic	6.11	Under assessment.	-	-	In progress.

	environment and marine historic environment, respectively.					
PW_HE8	The proposed mitigation for Leiston Abbey as set out in the draft Section 106 Heads of Terms, Section 6.6, paragraph 6.6.1 noting also the Pro Corda resilience fund as set out in paragraph 16.4.1 .	8.4	<p>It is agreed that a S106 agreement would be acceptable in principle to secure enhancements to visitor experience that would serve as a mitigation of the effects of the proposed development on the significance of Leiston Abbey and associated listed buildings.</p> <p>For the second Leiston Abbey site, it is agreed that the scope and detail of any S106 should be a matter for agreement between SZC Co. English Heritage and Pro Corda.</p>	For the first Leiston Abbey site, SZC Co, to arrange a meeting with the RSPB archaeologist to discuss potential mitigation measures.	-	In progress - subject to HE being happy with the final S106 proposals.
PW_HE9	The mitigation, management and monitoring measures for the historic environment detailed in Chapter 8 of Part B and Chapter 8 of Part C of the Code of Construction Practice .	8.11	Under assessment	-	-	In progress.
PW_HE10	<p>The measures and mechanisms to mitigate impacts on the historic environment as detailed in the Mitigation Route Map including:</p> <ul style="list-style-type: none"> - MDS-HE1-HE12 - MDS-MHE1-MHE4 - NPR-HE1-HE4 - SPR-HE1-HE7 - 2VBP-HE1-HE6 - SLR-HE1-HE8 - YOX-HE1-HE4 - FM-HE1-HE7 	8.12	<p>NB may want to split out some of these if there are areas of particular agreement / disagreement or cross ref to more detail in chapters below.</p> <p>Currently under assessment</p>	-	-	In progress.
PW_HE11	The historic environment specific DCO requirement / deemed marine licence condition to control impacts on the historic environment as set out in the Draft Development Consent Order :	3.1	Reviewed in meeting 19/1/20 - changes to both marine conditions and terrestrial requirements proposed - wording to be agreed between SCC / HE / SZC Co.	Reviewed in meeting 19/1/20 - changes to both marine conditions and terrestrial requirements proposed - wording to be agreed between SCC / HE / SZC Co.	-	In progress.

	<ul style="list-style-type: none"> - DCO, Requirement 3 (project wide - archaeology) - Deemed marine licence, pre-construction condition 18 					
Main Development Site – Terrestrial Historic Environment – Book 6, Volume 2, Chapter 16						
MDS_HE1	The baseline environment as detailed in section 16.4 and Appendices 16A-F .	6.3	Currently under assessment	-	-	In progress.
MDS_HE2	The assessment of impacts on the terrestrial historic environment for the construction and operation of Sizewell C as detailed in section 16.6 for the main development site and Appendix 18F for the off-site developments.	6.3	Currently under assessment	-	-	In progress.
MDS_HE3	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as set out in sections 16.5 and 16.7 for the main development site and in Appendix 16F for the off-site developments.	6.3	Currently under assessment	-	-	In progress.
MDS_HE4	The proposed Peat Strategy set out in Appendix 16G .	6.3	Agreed.	Agreed.	None.	Agreed,
MDS_HE5	The residual effects conclusions as detailed in section 16.7 .	6.3	Currently under assessment	-	-	In progress.
Main Development Site – Marine Historic Environment – Book 6, Volume 2, Chapter 23						
MDS_MHE1	The baseline environment as detailed in section 23.4 and Appendices 23A and 23B .	6.3	Currently under assessment	-	-	In progress.
MDS_MHE2	The assessment of impacts on the marine historic environment for the construction and operation of Sizewell C as detailed in section 23.6 for the main development site.	6.3	Currently under assessment	-	-	In progress.
MDS_MHE3	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as set out in sections 23.5 and 23.7 for the main development site.	6.3	Currently under assessment	-	-	In progress.

MDS_MHE4	The recommendations and conclusions set out in Appendix 23C: Geoarchaeological and palaeoenvironmental assessment of vibrocores recovered east of Sizewell.	6.3	Agreed.	Agreed.	None.	Agreed.
MDS_MHE5	The residual effects conclusions as detailed in section 23.7.	6.3	Currently under assessment	-	-	In progress.
Northern Park and Ride – Terrestrial Historic Environment - Book 6, Volume 3, Chapter 9						
NPR_HE1	The baseline environment as detailed in section 9.4 and Appendices 9A-9D.	6.4	Currently under assessment	-	-	In progress.
NPR_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in sections 9.5 and 9.7.	6.4	Currently under assessment	-	-	In progress.
NPR_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the park and ride as detailed in sections 9.6 and 9.8.	6.4	Currently under assessment	-	-	In progress.
Southern Park and Ride – Terrestrial Historic Environment - Book 6, Volume 4, Chapter 9						
SPR_HE1	The baseline environment as detailed in section 9.4 and Appendices 9A-9D.	6.5	Currently under assessment	-	-	In progress.
SPR_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in sections 9.5 and 9.7.	6.5	Currently under assessment	-	-	In progress.
SPR_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the park and ride as detailed in sections 9.6 and 9.8.	6.5	Currently under assessment	-	-	In progress.
Two Village Bypass – Terrestrial Historic Environment - Book 6, Volume 5, Chapter 9						
2VBP_HE1	The baseline environment as detailed in section 9.4 and Appendices 9A-9D.	6.6	Currently under assessment	-	-	In progress.
2VBP_HE2	The proposed primary, secondary and tertiary	6.6	Currently under assessment	-	-	In progress.

	mitigation measures to mitigate impacts as detailed in sections 9.5 and 9.7 .					
2VBP_HE3	The assessment of impacts on terrestrial historic environment for the construction and operation of the two village bypass as detailed in sections 9.6 and 9.8 .	6.6	Currently under assessment	-	-	In progress.
Sizewell Link Road (SLR) - Terrestrial Historic Environment - Book 6, Volume 6, Chapter 9						
SLR_HE1	The baseline environment as detailed in section 9.4 and Appendices 9A-9D .	6.7	Currently under assessment	-	-	In progress.
SLR_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in sections 9.5 and 9.7 .	6.7	Currently under assessment	-	-	In progress.
SLR_HE3	The assessment of impacts on terrestrial historic environment for the construction and operation of the SLR as detailed in sections 9.6 and 9.8 .	6.7	Currently under assessment	-	-	In progress.
Yoxford Roundabout and Other Highway Improvements (OHI) - Terrestrial Historic Environment - Book 6, Volume 7, Chapter 9						
YOX_HE1	The baseline environment for Yoxford roundabout as detailed in section 9.4a) and Appendices 9A-9D .	6.8	Currently under assessment	-	-	In progress.
YOX_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in sections 9.4b) and 9.4d) for Yoxford roundabout.	6.8	Currently under assessment	-	-	In progress.
YOX_HE3	The assessment of impacts on terrestrial historic environment for the construction and operation of Yoxford roundabout as detailed in sections 9.4c) and 9.6 .	6.8	Currently under assessment	-	-	In progress.
YOX_HE4	The baseline environment, proposed mitigation measures and assessment for the OHI as set out in sections 9.5 and 9.6 .	6.8	Currently under assessment	-	-	In progress.
Freight Management Facility (FMF) - Terrestrial Historic Environment - Book 6, Volume 8, Chapter 9						

FMF_HE1	The baseline environment as detailed in section 9.4 and Appendices 9A-9C .	6.9	Currently under assessment	-	-	In progress.
FMF_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in sections 9.5 and 9.7 .	6.9	Currently under assessment	-	-	In progress.
FMF_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the FMF as detailed in sections 9.6 and 9.8 .	6.9	Currently under assessment	-	-	In progress.
Rail - Terrestrial Historic Environment - Book 6, Volume 8, Chapter 9						
RAIL_HE1	The baseline environment as detailed in section 9.4 and Appendices 9A-9D .	6.10	Currently under assessment	-	-	In progress.
RAIL_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in sections 9.5 and 9.7 .	6.10	Currently under assessment	-	-	In progress.
RAIL_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the rail proposals as detailed in sections 9.6 and 9.8 .	6.10	Currently under assessment	-	-	In progress.

APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of discussions between SZC Co. and Historic England following submission of the DCO application. The relevant meetings are summarised in **Table 2.2**.

Table 2.2 SOCG meetings held between SZC Co. and Historic England

Date	Details of the Meeting
8 June 2020	Overview of the application, timings and proposed approach to SoCG.
4 August 2020	Q+A session on historic environment assessment with Historic England and SCCAS.
29 September 2020	Discuss relevant rep issues and first draft of SoCG.
22 October 2020	Joint meeting with ESC, SCCAS and HE.
3 November 2020	Discuss SoCG.
1 December 2020	Discuss mitigation documents including peat strategy and overarching WSI to inform SoCG.
19 January 2021	Amends made to second draft of version 1 SoCG following on from comments sent by WF on 6/11/20.
2 March 2021	Meeting to discuss draft.
28 May 2021	Confirmation from HE that this draft should be submitted as 2) Draft agreed SoCG with matters outstanding.