



The Sizewell C Project

9.10.21 Initial Statement of Common Ground - Pro Corda Trust / Leiston Abbey

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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 1, dated 2 June 2021, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant.

1.1.2 Pro Corda Trust and the Applicant have been meeting regularly to discuss matters. However, due to the complexity of issues, Pro Corda Trust have not yet had an opportunity to respond in writing. Subsequent versions of this SoCG will therefore be submitted during the course of the Examination.

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 the Parties

Ref.	Matter	SZC Co.'s Position	Pro Corda's Position	Further Action Required	Agreed / Not Agreed / In Progress
Relevant Representation					
PC1	Pro Corda Trust's representation focuses its concern as the charitable trust and business responsible for the running of Leiston Abbey, the acknowledged closest publicly accessible site to the proposed Construction worker campus for the Sizewell C project.	In recognition of the fact that English Heritage and Pro Corda perform different functions in relation to the Leiston Abbey second site, two separate contributions have been proposed under the S106 agreement: a heritage contribution for English Heirtage and a resilience fund for Pro Corda.			
PC2	As set out to EDF throughout the 3 stages of submission thus far, our primary concerns within this representation are: Security, including child protection as a national music education charity serving over 2,000 children and young people at the Leiston Abbey site each year, over 50% of whom are vulnerable with disabilities and additional needs. Within security we also wish to make representation on controlling visitor flow through to the public heritage site we are responsible for which is on the doorstep of the worker campus.	Leiston Abbey second site is an English Heritage guardianship site and is already open to the public (no admission charge). Both the issue of safeguarding of pupils on a site that is already open to the public and visitor flow through the site are pre-existing issues, not new issues introduced by the Sizewell C Project. However, SZC Co. recognises that Pro Corda is concerned about workers using the site. It is understood that this concern does not relate to all workers - they, as other members of the public, are very welcome to visit the heritage asset or attend community events e.g. concerts. Rather Pro Corda is concerned about the possibility of criminal activity related to the workforce, including access to the site at night for criminal purposes. SZC Co. will be putting in place a number of measures to support community safety (see Community Safety Management Plan - Doc Ref. 8.16). The following may provide comfort: <ul style="list-style-type: none"> Sizewell C workers will be vetted - vetting comprises a Valid Baseline Personnel Security Standard (BPSS) and DBS (Disclosure & Barring Service) check. DBS / BPSS are nationally recognised approaches (used by UK Government). 			

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		<ul style="list-style-type: none"> • Workers will be drug and alcohol tested both before starting work on the project and on an ongoing basis (random and 'for cause'). • The main development site and accommodation campus will have a 24/7 security team which Pro Corda will be able to contact if there are any concerns about worker behaviour. • SZC Co. will be funding additional support from Suffolk Constabulary, based partly on site and partly in the community. • There will be a mandatory code of conduct and workers may be dismissed from the project for breaching this - this will include for incidents off site. • SZC Co. will provide a fly parking team who will visit site and check car registration numbers if it is suspected that a worker is using the Pro Corda car park due to proximity to the main development site. Repeat fly parking will lead to dismissal from the project. <p>There is no evidence that the Sizewell C workforce will create a safeguarding risk for pupils of Pro Corda, indeed with vetting and pre-employment checks in place, workers could be deemed a lower risk than members of the public. However, to provide reassurance and also to tackle possible perceptions of risk from the institutions booking courses at Pro Corda, the following measures are also proposed:</p> <ul style="list-style-type: none"> • SZC Co. and Pro Corda have been working with English Heritage to more clearly define the opening hours of the site from "any reasonable daylight hours" to set times in summer and winter. This will enable SZC Co. to enforce the worker code of conduct should workers fail to comply with the opening hours restrictions. The new hours should be indicated on new signage that English Heritage is putting in place in 2021. • A new gate is proposed on the site entrance - this is on the same side of the Leiston Abbey site as the accommodation campus site entrance. It should provide both a visual deterrent to workers accessing the site out of hours and will also stop vehicular access. This will be funded by the resilience fund. 			

Ref.	Matter	SZC Co.'s Position	Pro Corda's Position	Further Action Required	Agreed / Not Agreed / In Progress
PC3	<p>Noise. (Both from construction work and also new rail route/road traffic supplying the proposed power station and campus.) We wish to make representations on the impact on our education sessions, on our public community concerts and on those young people we work with who have additional needs - especially autism - who require special consideration and mitigation should the development proceed.</p>	<p>Further engagement with the noise consultants, including a site visit, has taken place since the DCO submission and a "Pro Corda - Construction Timeline" note was provided in October 2020 setting out how noise may be experienced over different areas of the site throughout the main development site construction phase. This also included detail on rail noise.</p> <p>This concluded that disruption to Pro Corda's normal activities is likely during the noisiest parts of Phase 1a, which is likely to last approximately 2 months when the works are at their closest to Leiston Abbey, and again during the restoration works in Phase 5. For the majority of the construction works, construction noise levels are predicted to be lower, and consequently carry a much lower risk of disrupting Pro Corda's activities in typical circumstances.</p> <p>It is noted that some activities, particularly community concerts, which may take place outside. [SZC Co. to confirm timings of train paths / HGV movements / extent to which noise levels will be lower at weekends / evenings].</p> <p>In terms of night noise, sleep disturbance as a result of passing trains would be considered unlikely in most cases.</p> <p>However, it is acknowledged that Pro Corda caters for individuals whose sensitivity to sound may extend beyond the consideration of levels alone, and may be linked more to both the character of the acoustic environment, and their expectations based on previous experience. The following mitigation is therefore being discussed:</p> <ul style="list-style-type: none"> For visitors with additional needs, particularly autism, it is proposed that the resilience fund is used to create indoor and outdoor sensory spaces, including a garden where individuals can be provided support on a one-to-one basis. This would be based on the design of the garden presented at the Chelsea Flower Show in 2016: https://www.rhs.org.uk/shows-events/rhs-chelsea-flower-show/history/2016/gardens/Pro-Corda-Trust---A-Suffolk-Retreat. 			

Ref.	Matter	SZC Co.'s Position	Pro Corda's Position	Further Action Required	Agreed / Not Agreed / In Progress
PC4	Physical impact. The impact of construction phases on an ancient site - both the heritage asset (which we have responsibility for under local management agreement with English Heritage) and our listed buildings and monuments on site.	No physical impacts on the heritage asset are predicted - as set out in the ES, impacts relate to the setting of the designated assets only.			
PC5	Road layout. The impacts on access to and from a site where we have vulnerable children staying (many with additional health needs.)	[It is understood that access would be vehicular only - to be discussed with Pro Corda whether some minor works at the site entrance might be helpful in this regard. This would form part of the detailed design of the bridleway which is proposed to run adjacent to Lover's Lane and crosses the entrance].			
PC6	Visual impact. Impacts from the scale and massing of new build structures and infrastructure including lighting and floodlights at the worker campus, rail sidings etc.	<p>A number of primary and tertiary mitigation measures have been embedded in the project to reduce the visual impacts.</p> <p><u>MDS construction</u></p> <ul style="list-style-type: none"> • Change in design to offset roundabout on B1122 and allow for enhanced screening. • Design of lighting to minimise light spill. • Amended campus design west of Eastbridge Road to increase separation from asset - sports facilities moved off-site to Leiston. • Retained landscape buffers between accommodation campus and asset. • Strengthened planting in hedgerow to Abbey Lane. <p><u>Green rail route construction / operation:</u></p> <ul style="list-style-type: none"> • Retention of established vegetation. • Introduction of appropriate landscape proposals. <p><u>MDS operation</u></p>			

Ref.	Matter	SZC Co.'s Position	Pro Corda's Position	Further Action Required	Agreed / Not Agreed / In Progress
		<ul style="list-style-type: none"> Restoration of agricultural land and heathland east of B1122. Retention of established vegetation. <p>The Lighting Management Plan, provided in Volume 2, Chapter 2, Appendix 2B of the ES (Doc Ref. 6.3) sets out that its aim is ensure that the external lighting provided on the construction and operational sites of Sizewell C power station provides safe lighting for the staff on-site and is functional to allow the safe construction and operation, but is also both energy efficient and designed as far as reasonably practicable to minimise its impact on the surrounding environment.</p> <p>SZC Co. is also proposing a S106 contribution to English Heritage to address the settings impact on Leiston Abbey (second site) and moated site (SM 1014520) / St Mary's Abbey, Grade I (LB 1215753) during the construction phase of the Sizewell C Project only. This will enhance the visitor experience for all visitors, including Pro Corda's.</p>			
PC7	<p>Disruption to business. Our business across all the operational areas of the charity relies on the tranquil and "retreat" aspects (and selling points) of the Leiston Abbey site. The dramatic changes to the immediately surrounding landscapes together with its increased population puts this at great risk, and for which we are seeking mitigation."</p>	<p>See PC2 / PC3 / PC6 above on mitigation measures proposed.</p> <p>In addition, SZC Co. is talking to Pro Corda, through the Net Zero Leiston Project, about addressing their need for heating in the barn (LB 1216380) and across the site as a whole. It is understood that the barn cannot be used in Winter as it is so cold. Bringing it into year round use would enable Pro Corda to increase their offer, particularly to the community (noting that it is a large space which allows for socail distancing).</p>			
PC8	<p>It is clear that the proposed development will have a significant adverse effect on the monument and its attractiveness to our visitors including the</p>	<p>Settings effects on the monment are being addressed through a S106 heritage contribution to English Heritage. We are awaiting a set of proposals from English Heritage on what the contribution will go towards.</p>			

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	effects of increased traffic, construction noise and the proximity of the workers village.	<p>NB The historic environment chapters for main development site and green rail route assess the effects on the setting of the designated assets at Leiston Abbey:</p> <ul style="list-style-type: none"> Significant effects are predicted for the Leiston Abbey (second site) and moated site (SM 1014520)/St Mary's Abbey, Grade I (LB 1215753) during the construction phase only of the Sizewell C Project only - this includes main development site construction and green rail route construction and operation. A S106 contribution to provide for enhancements to the visitor experience is therefore proposed as additional mitigation to reduce the impact to minor adverse (not significant). This will be paid to English Heritage under the heritage contribution but will also benefit Pro Corda's visitors. <p>No significant settings effects are predicted for the Guesten Hall at Abbey Farm, Grade II (LB 1268290), Barn at Abbey Farm, Grade II (LB 1216380), Retreat House, Grade II (LB 1215754) during construction or operation.</p>			
Matters raised by the Examining Authority					
PC9	The SoCG should address all the issues raised by Pro Corda Trust/Leiston Abbey in their relevant representation [RR-0993];	Addressed above.			
PC10	The effects on heritage assets and archaeological considerations.	<p>For the project as a whole, SZC Co. is addressing effects with stakeholders as follows:</p> <ul style="list-style-type: none"> Scheduled Monuments, Grade I and II* listed assets, marine (below mean high water mark) archaeology, peat strategy - Historic England. Grade II listed assets, Conservation Areas - Conservation Officer, East Suffolk Council. Buried archaeology, peat strategy - Suffolk County Council Archaeology Service. 			

Ref.	Matter	SZC Co.'s Position	Pro Corda's Position	Further Action Required	Agreed / Not Agreed / In Progress
		<ul style="list-style-type: none"> Designated assets at Leiston Abbey (second site) for the purposes of agreeing the S106 heritage contribution - English Heritage. <p>Pro Corda and SZC Co. will work closely with the relevant stakeholders to ensure that any mitigation proposed under the resilience fund avoids or mitigates effects on buried archaeology and the setting of the designated assets, including securing any consents as necessary.</p>			
PC11	<ul style="list-style-type: none"> The effects on commercial operations; Security issues; Noise effects; Educational effects 	All set out above.			
PC12	<p>A summary of matters agreed; and</p> <p>A summary statement of matters not agreed or outstanding.</p>	To be set out in this SoCG, with contribution to be set out in the Section 106 agreement.	To be set out in this SoCG, with contribution to be set out in the Section 106 agreement.	In progress.	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 the parties, are as summarised in **Table 2.2**.

Table 2.2 SOCG meetings held between the parties

Date	Details of the Meeting
14/5/20	Catch up on DCO application / next steps
29/6/20	Update meeting including discussion on noise issues
29/7/20	Noise consultant site visit to understand in greater detail how different areas of the site are utilised by Pro Corda
24/9/20	Progress discussions on resilience fund and noise
1/10/20	Joint meeting Pro Corda and English Heritage
8/10/20	Net Zero Leiston team - discussion on heating at Leiston Abbey / bringing barn into year round use
11/2/20	Progress discussions on resilience fund, noise plus catch up with Net Zero Leiston team
19/3/21	Discuss structure of first draft SoCG ahead of issue on 22/3/21.
1/4/21	Progress discussions on resilience fund, noise plus catch up with Net Zero Leiston team
29/4/21	Discussion on SOCG, with focus on safeguarding concerns
14/5/21	Catch up