The Sizewell C Project

9.10.27 Initial Statement of Common Ground - Minsmere Levels Stakeholder Group

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Planning Act 2008
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APPENDICES

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 16 April 2021, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Minsmere Levels Stakeholder Group, 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	MLSG's position [Starting from relevant representation (RR)]	SZC Co.'s Position	Position of the parties
1.	Completeness of the submitted application	RR: Concerns that the Application remains significantly incomplete and fails to provide answers to questions raise consistently during four rounds of consultation. At 7th May, no change from that at RR. Given the fact that further details are to be submitted by Deadline 2, MLSG's position is consistent with actions expected from applicant	Throughout the development of Sizewell C, SZC Co. has always listened carefully to feedback from consultation and has conducted on-going engagement. Multiple stages of formal pre-application consultation took place between 2012 and 2020 helped to inform significant changes to the proposals, particularly in respect of transport, accommodation and the visual impact of the power station. It was noted at all stages of formal consultation that all issues raised would be considered and answered in the Consultation Report [APP-068]. It is worth noting that the numbers of consultation responses received and the number of relevant representations submitted have been quite consistent throughout the period from Stage 1 to submission and beyond. The proposed changes are in response to feedback, particularly from local councils, on issues such as transport and the environment. Feedback from this consultation has helped inform the proposals in the proposed change submission. The Consultation Report Addendum [AS-153] was submitted in January 2021 in response to the non-statutory consultation on the proposed changes.	SZC Co's Position Not agreed. Given the in-principle differences between the parties no further action identified at this stage. MLSG's Position Not agreed Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.
2.	Coastal assessments	RR: Concerns relating to the assessment of coastal geomorphological impacts over time, the role of the Sizewell-Dunwich Bank and coastal breach. At 7th May, we consider SZC Co's assessment to still be inadequate on a number of points and defer to Mr Nick Scarr's submission AS-028 We believe the reliance on the existing CPMMP is inappropriate given no plans of the permanent BLF, HCDF and SCDF in relation to the existing coastal frontage has been made available. The parameter plans are too vague to be of use in any assessments. Further expert assessments are still in preparation and will be referenced in our Written Representation.	The Environmental Statement provides a thorough, roibust assessment of all elements of the Sizwell C project and concluded no significant effects on coastal geomorphology for the lifetime of the project of the project. Nonetheless, SZC Co will be obliged to monitor coastal processes and mitigate any impacts by means of a Coastal Processes Monitoring and Mitigation Plan (CPMMP). The CPMMP will be a Requirement on the DCO and a Condition on the Marine Licence and will need to be approved by East Suffolk Council and the Marine Mannagement Organisation. The Sizewell-Dunwich bank attenuates potential impacts of wave actions etc along the Sizewell coastal frontage, but its form and fubtion are not relied upon by the Sizewell C Project.	SZC Co's Position Not agreed. However, a meeting can be arranged by the Applicant and further material made available to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.
3.	Platform size	RR: The platform is well below the expected 30 hectares per nuclear reactor envisaged in EN-6 and has required unacceptable compromises on long term site safety. At 7th May, EN-6 gives no indication of whether the site is suitable for any particular design or number of nuclear reactors. It states that 30 hectares is considered as a guide per reactor but also states that multiple reactors may require less than 30 hectares each. It made no blanket approval of any particular installation or design at any site nominated in EN-6. EN-6 nomination is not approval of a specfic design/proposal at this site, just a declaration that the site is potentially suitable. Suitability of the site size will ultimately be considered by the Office for Nuclear Regulation, although the issue surrounding	The Government confirmed in the NPS EN-6 that the Sizewell C site (to the north of Sizewell B) 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.	SZC Co's Position Not agreed. Given the in-principle differences between the parties no further action identified at this stage. MLSG's Position Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.

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		coastal defence assessments have both nuclear security and coastal impact implications that will have to be assessed in conjunction with the overall platform size issue.		
4	Coastal defence design	RR: The platform requires the Hard Coastal Defence Feature (HCDF) to be very close to the beach and subject to early exposure by wave action. There is no proposed design for the HCDF, yet EDF have unevidenced confidence about its likely exposure. At 7th May. Without a clear HCDF/SCDF detailed design extending to the permament BLF, as the most northerly point of the entire coastal defence system, any CPMMP is speculation against an unknown structure with unsupportable claims of maintenance and mitigation to, and potentially beyond, the end of the century. Raisng the height of the HCDF pushes the toe of the defence significantly towards the coast and SZC's concentration on overtopping risks ignoring the potential for the defence to be undermined due to wave and episodic storm erosive action on the SCDF and ultimately the toe of the HCDF which at 0mODN remains too shallow to be considered as adequate. We await the promised submission of the HCDF/SCDF/BLF plans at Deadline 2 but remain sceptical that the current proposals, even if elaborated more extensively, can be considered as adequate unless the toe of the defence is taken significantly deeper.	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 detailed design of the hard coastal defence feature would be developed following the DCO being granted and the details would be submitted to and approved by East Suffolk Council, following consultaton with the MMO, the EA and NE. This is secured by Requirement 12B (Coastal Defences) of the Draft Order. Further details in respect of the monitoring and mitigation proposals for the coastal processes are then secured by Requirement 7 (Main development site: Coastal Processes Monitoring and Mitigation Plan (CPMMP)) of the Draft Order. This prevents relevant works from commencing until the CPMMP has been submitted to and approved by East Suffolk Council, following consultation with the MMO, the EA and NE. An updated draft of the CPMMP was issued to the Examining Authority in January 2021 (refer to Volume 3, Appendix 2.15.A (Doc Ref. 6.14) [AS-237]) which demonstrates that the hard coastal defences are not predicted to have significant impact on coastal processes. The parameters and criteria of the HCDF are also being considered 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 necessary. 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.	SZC's Position Not agreed. However, a meeting can be arranged and further material made available by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.
5.	Groundwater and surface water	RR: EDF do not evidence an understanding of the relationship between ground and surface water despite being a Scoping Report Opinion requirement At 7th May: MLSG support the submissions of Suffolk Coastal Friends of the Earth (SCFOE) and their experts on this matter. We remain concerned that little information is provided about water quality effects within Sizewell Marsh given the sensitivity of area to changes in water quality as well as water levels both at the surface and within the ground. It is disappointing that SZC	SZC Co. has undertaken an extensive programme of ground and surface water monitoring of the Site. This monitoring information is presented as part of Volume 2, Chapter 19 of the ES within Appendices 19A [APP-298, APP-299, APP-300, APP-301, APP-302, APP-303], and 19B / 19B1 [APP-304, APP-305, APP-306, APP-307, APP-308] and provides the evidence base for the assessment of the project's impacts on ground and surface water. This includes an understanding of the existing relationship between ground and surface water levels and quality.	SZC's Position Not agreed. However, a meeting can be arranged by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position.

Ref.	Matter	MLSG's position [Starting from relevant representation (RR)]	SZC Co.'s Position	Position of the parties
		Co's report APP-292 marked as confidential has now been withdrawn. In various documents referenced by SZC Co here, three AMEC reports are referenced for water quality issues but are not made available for review, these are; AMEC, 2012a. Additional Groundwater Monitoring for Sizewell C. Report No 15930/TR/00074. AMEC, 2012b. UK EPR Sizewell C. Sizewell C Hydrogeological Monitoring, Synthesis Report. Report No 29816/C/017/A. AMEC, 2012c. Summary of Groundwater Quality (Campaigns 1-6). Report No 15930/TR/00077 It would be helpful if these were made available for review. Further details of our concerens will be referenced in our Written Representation.	SZC Co. has developed a Conceptual Site Model and updated this in a further iteration based on observable monitoring results. The Conceptual Site Model and Conceptual Site Model Addendum are, respectively, Appendices 19B and 19B1 to Volume 2, Chapter 19 of the ES (Doc Ref. 6.3) [APP-297]. These provide a detailed evaluation of the relationship between ground and surface water [APP-304, APP-305, APP-306, APP-307, APP-308]. The Conceptual Site Model has enabled SZC Co. to propose a water monitoring and response strategy that provides further assurance in achieving no significant impacts on water levels and water quality of the Sizewell Marshes SSSI.	Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.
6	Water impacts of the platform	RR: The platform requires redirection of existing drainage in Sizewell Marsh, permanent loss of SSSI marsh, wet woodland, and fen meadow with un-evidenced expectations for simplistic water level controls as mitigation. Dewatering of the platform and changes to surface water runoff conditions will alter the natural hydrological relationship of the complex Sizewell Marsh and Minsmere Levels systems and is likely to impact water quality and have a negative impact on Minsmere Sluice. At 7th May: MLSG support the submissions of Suffolk Coastal Friends of the Earth (SCFOE) and their experts on this matter. We also refer to the comments in section 5 of this docuemnt on water quality and lack of information to support the case of no significant effect. Simple controls on surface water will not be able to manage the complex relationship within the groundwater regime. Further details will be referenced in our Written Representation.	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) [APP-297]. The assessment of potential changes to the water environment shows that the predicted changes are limited in extent, magnitude and duration such that no significant environmental impacts should occur. 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 peak 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 degree of change in water level is not expected to result in a significant effect on the habitats within the Sizewell Marshes SSSI. Detailed modelling shows that hydraulic effect in realigning the Sizewell Drain and loss of SSSI is very small, although the control structure has been proposed to provide fine tuning in setting water levels as mitigation. However, it is recognised that this is a sensitive environment and in recognition of this an ongoing programme of monitoring is proposed to demonstrate that the predictions in the Environmental Statement can be adequately relied on, and not exceeded, as the Sizewell C Project progresses. This programme of monitoring is then supported by mitigation strategy should that monitoring identify impacts that were materially diferent to those presented in the Environmental Statement. The principal mitigation measure that would be employed would relate to the fine tuning of the water control structure so as to provide adequate control of water levels beyond the site.	SZC's Position Not agreed. However, a meeting can be arranged by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position. Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.

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			This monitoring and response plan is secured by Requirement 7 of the Draft Order. The principles for the monitoring and response plan are set out within the Water Monitoring and Response Strategy, an updated version was issued in January 2021 and included within Volume 3, Appendix 2.14.A of the ES Addendum (Doc Ref. 6.14) [AS-236]. 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 different environmental effects on groundwater levels or quality. This degree of change in water level is not expected to have significant adverse effect on the habitats within the Sizewell Marshes SSSI. SZC Co. has proposed a requirement to secure the design of the surface and foul water drainage system (including management and maintenance arrangements, means of pollution control, sewage treatment works and a programme of construction and implementation). These details would be prepared in accordance with the Outline Drainage Strategy, which has established an approach to surface water management that follows the drainage hierarchy and mimics natural processes (Volume 2, Chapter 2, Appendix 2A [APP-181]). The approach adopts a series of steps as part of the SuDS treatment train, using local source control to promote infiltration, prior to collection in infiltration basins and prior to discharge at greenfield rates. Consequently the impact is assessed as not significant. Correpondingly the impact in Minsmere and at the Minsmere Sluice is also assessed as not signifcant.	
7	Impact of the SSSI Crossing	RR: Hydrological impacts of the proposed Causeway and Culvert crossing are not properly assessed. The overall ecology of both Sizewell Marsh and Minsmere Levels are reliant on the annual cycle of ground and surface water changes, any disturbance will have direct impacts on bird, insect, reptile and mammal species. At 7th May: MLSG support the position of SCFOE, Suffolk Wildlife Trust (SWT) and RSPB as stated in the position of the parties. We support Environment Agency's (EA) position that the wider culvert proposal, now accepted in the changes to the DCO, still do not meet the need for an open construction, as proposed in earlier consultation options for a 3 span bridge structure and are concerned that long dark culvert will not satisfy the Water Framework Directive. Any significantly piled structure placed across the narrow gap between Sizewell Marsh and Minsmere Levels will have an impact on both ground and surface water quality and flows and we concur with EA and SCFOE that the structure as proposed is unacceptable. The proposals to replace coastal fenland with fen meadow only is misplaced because the habitats being destroyed are a matrix of other habitat types that together also enable the exceptional SSSI special interest feature (invertebrates) to exist. This appears to have been overlooked. All proposed sites for fen	The original design of the SSSI Crossing culvert had been oversized to minimize effects on natural hydrologic function. However, flood risk modelling showed that during extreme events the culvert could impede the flow of flood waters, albeit with very small effects on flood levels. The proposed widened bridge design further limits the impact on hydrology, and also on flood flows. Consequently, the impact of flood levels is further reduced and the effect from the revised SSSI Crossing is substantially mitigated, both for the development and off-site receptors. Further details are set out in the ES Addendum (Doc Ref 6.14), Main Development Site Flood Risk Assessment Addendum (Doc Ref. 5.2(A)Ad) and Outline Drainage Strategy (Doc Ref. 6.3) [APP-181]. As noted above, the degree of change in water level is not expected to have significant adverse effect on the habitats within the Sizewell Marshes SSSI. Sizewell Drain would be diverted north, parallel to the base of the platform slope, provided in Appendix 19C of the ES. At its northern extent, it would discharge to the Leiston Drain upstream of the SSSI crossing. In addition, revised water level management may be required for the drainage units and watercourses adjacent to the construction site. This would require the inclusion of a water level control structure along the realigned Sizewell Drain. This structure would allow for fine tuning of water levels. The control structure will act to prevent any detrimental impacts on groundwater from the Sizewell Drain. The specific position, nature and operational parameters of the control structure will be determined in conjunction with	SZC's Position Not agreed. However, a meeting can be arranged by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position. Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.

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		meadow creation/restoration are too nutrient rich or distant from the site and the coast and it appears that there is no explanation as to why the interest cannot be maintained on site via habitat management. This would require surveys to identify the particular value of the areas lost to the total SSSI interest, which does not appear to have been done. In any case any mitigation or compensation should be within as close a proximity as possible and be coastal fenland not at inland sites including a nutrified west Suffolk site in a different administrative authority. Moving biodiversity and potentially different biodiversity into another local authority area is recognised as bad practice in any case. Further details will be referenced in our Written Representation. At 29th May: Changes made by SZC Co post our comments of 7th May prior to Deadline 2 submission, we note the update from SZC Co regarding potential decrease in width of the SSSI crossing. However, whilst this may reduce the width of the dark culvert after the construction phase it, a considerable amount of damage will have been done during the 10-12 year build phase. The exact nature of the ground improvement below the northern and southern sides of the SSSI crossing are still not fully clear and whether those would be removed at the same time as reducing the width needs to be addressed. We will await the submission of changes at deadline 4 but are still unconvinced that this style of crossing is appropriate and refer back to the original option of a 3 span open bridge structure as being the most appropriate design, in line with comments from Natural England, Environment Agency and others.	stakeholders, forming part of the design required to support the associated permit or licence. The normal IDB consenting regime will manage the realignment of the Sizewell Drain. A Water Monitoring and Response Plan is secured by Requirement 7 of the Draft Order. The principles for the monitoring and response plan are set out within the Water Monitoring and Response Strategy, an updated version was issued in January 2021 and included within Volume 3, Appendix 2.14.A of the ES Addendum (Doc Ref. 6.14) [AS-236]. 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 different environmental effects on groundwater levels or quality. The normal EA permitting regime will manage the operation of construction related activities such as dewatering. In respect of impacts on bird, insect, reptile and mammal species, an assessment of effects on the Sizewell Marshes SSSI is presented within Volume 2, Chapter 14 of the ES (Doc Ref. 6.3) [AS-033], with updated SSSI land take calculations provided within SZC Co. letter to the Examining Authority submitted on 16 November 2020 [AS-006]. SZC Co. recognises that the Project will result in land take from the SSSI. Land take 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. In advance of the works, SZC Co. has successfully established a 67ha habitat creation area at Aldhurst Farm which provides replacement habitats for reedbeds and ditches. The Fen Meadow Strategy was included as Appendix 2.9.D of Volume 3 of the Environmental Statement Addendum (Doc Ref. 6.14) [AS-209] 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. Furthermore, SZC Co.'s accepted change to the design of the SSSI crossing would 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. Following recent stakeholder feedback SZC Co commissioned a design review of the	

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			single span bridge design to identify opportunities to further reduce impacts on the SSSI. This work is ongoing but we are confident that at the end of construction the width of the single span bridge can be reduced from 40m to approximately 15m. It will also be possible to increase the soffit level although the design review has not yet concluded in this respect. Details of the optimised design are to be provided at Deadline 4.	
8.	Quality of assessment	RR: Some habitat assessments are out of date and, as a result, impacts are likely to be missed or wrongly interpreted. At 7th May: MLSG notes the submission of additional updates to the ecological assessments from 2020 that were submitted after our Relevant Representation. We also note that Natural England have concerns that references to Red Book and red list species are out of date and request that these concerns are reviewed and updated.	An Environmental Impact Assessment (EIA) of the Sizewell C Project has been carried out in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and the Marine Works (Environmental Impact Assessment) 2007 Regulations and is reported within the Environmental Statement submitted with the Application. An EIA is an environmental assessment process to ensure that planning decisions are made with knowledge of the likely significant environmental effects of a future development. It is a systematic process that examines the potential effects on the environment resulting from the construction and operation of a development, and allows for the identification of measures to prevent, reduce or offset any adverse effects and to enhance any beneficial effects. A full ecological assessment of the Sizewell C proposals is provided in the relevant chapters of the ES (Doc Ref. Book 6) on a site by site basis updated as relevant within the ecological assessments within the ES Addendum (Doc Ref. 6.14) which also references and appends the additional surveys which were undertaken in 2020. The potential for impacts on European sites is assessed in detail in the Shadow HRA (sHRA) report (Doc Ref. 5.10) [APP-145 - APP-152] and updated in the sHRA Addendum (Doc Ref. 5.10Ad).	SZC's Position Not agreed. However, a meeting can be arranged by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.
9.	Water supply	RR: No clear plan exists to satisfy the water requirements of the development and impact assessments of water resource options are missing. At 7th May: The position given by SZC in APP-601 is stated as having uncertainty around potential impacts of future licence reductions. Whilst this new confidence is welcome, it needs to be secured and properly evidenced in the DCO application not left to an as yet to be formalised commitment. The proposal involves significant new and upgraded pipelines as well as a new pumping stations, which in consideration of the time left to achieve such a network enhancement, has to be viewed as having considerable risk of failure of timely delivery. On a separate but still important point, the proposed reservoir to be constructed at Black Walks, north of the borrow pits and next to the Water Management Zone close to Lower Abbey Farm has no stated source other than rainfall. Several speculative methods of sourcing from the New Cut at Minsmere Sluice, Benacre Sluice, tanker delivery or purchase of abstraction licenses from local farmers are documented in APP-601.	SZC's peak construction demand is estimated to be around 4 Ml/day. The demand would be around 2 Ml/day during the operational phase when both units are generating and 2.9 Ml/day when one unit is in outage. ESW has proposed a water transfer scheme from their Northern/Central Water Resource Zone. Environmental (WINEP) studies are at an advanced stage and will demonstrate what the sustainable abstraction would be.	SZC's Position Not agreed. However, a meeting can be arranged by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.

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		However, a reference in the Wood Environment 2020 report, submitted by EDF (APP-296), states clearly that two abstraction licenses are held by EDF Estate, a borehole at Lower Abbey Farm and a surface water abstraction license for the New Cut at Twopenny Arch. These are not analysed as a potential source for the reservoir despite the fact that should the project be given permission to proceed, the use of the remaining arable land, not already convereted to Marsh harrier mitigation habitat, would not require irrigation from these two sources. At 29th May: Changes made by SZC Co post our comments of 7th May prior to Deadline 2 submission, have removed reference to a new pumping station at Holton. Whilst we understand there will be updates to plans and positions as the proposal progresses, it seems inappropriate to remove such a reference at this point when there is still no commitment within the DCO for fulfilling the water needs of this project.		
10	Impact and use of the borrow pits and spoil heaps	RR: Borrow pits and spoil heaps have great potential for introducing fugitive dust problems and pollution to groundwater and surface water runoff Using the borrow pits as a destination for disposal of unusable materials from excavations, including acidic peat, pose a long-term threat for pollution of groundwater and localized settling over time At 7th May: In APP-601 page 5, the use of non-potable water for dust suppression is highlighted in four periods, months 19-24, 31-36, 78-85 and 90-97. The presence of multiple 35m spoil heaps, spoil storage in excavated borrow pits and the sandy nature of the ground within the construction zone, will require constant dust suppression particularly during the often dry and strong windy weather that is typical in this area. This plan, not yet tied to particular months of the year is simply not credible and risks fugitive dust travel both across the Minsmere-Walberswick SSSI during summer months when the prevailing winds are from the south-west and across Aldhurst Farm, Sizewell Marsh SSSI and Leiston during winter months when the prevailing winds are from north west through north east. The Wood Environment 2020 report submitted by EDF APP-296 Appendix L, on Lime Stabilisation, states "No specific literature on the risks of increased alkalinity to sensitive receptors could be found". Most literature concerns heavy metal contamination leachate rather than effects on sensitive receptors, such as the the Minsmere-Walberswick SSSI and Ramsar site. Lack of supporting literature does not suggest "that it is not generally a significant concern", rather that it is not something that has been studied. Lime is used to manage the clays excavated rather than the peat and other alluvium.	Zones for borrow pits and stockpiles on the temporary construction area within main development site have been identified on the Construction Parameter Plans (Doc Ref. 2.5) [AS-287] and are shown within the illustrative construction masterplans (Volume 2, Figures 3.2-3.8 of the ES (Doc Ref. 6.3) [APP-186]. A detailed assessment of the temporary construction area on landscape and visual receptors is presented within Volume 2, Chapter 13 of the ES (Doc Rec. 6.3) [APP-216]. Specific measures for the management of these areas and for pollution prevention are set out within the Code of Construction Practice (CoCP) (Doc Ref. 8.11(A)) [AS-273], including measures to minimise dust (refer to the Dust Management Plan), surface water runoff and groundwater pollution. Measures included within the CoCP have been informed by the Borrow Pit Risk Assessment (Volume 2, Appendix 18E of the ES (Doc Ref. 6.3) [APP-296]), which considers the potential for the effects on the quality of groundwater and surface water from these areas which are not considered significant with primary mitigation in place, including the retention of 2m unsaturated zone between the base of the borrow pits and the water table and limiting the height of temporary stockpiling on top of the borrow pits to 5m. In line with the Materials Management Strategy, provided at Volume 2, Appendix 3B of the ES (Doc Ref. 6.3) [APP-185] and the update provided within Volume 3, Appendix 2.2.C of the ES Addendum (Doc Ref. 6.14) [AS-202], Material Management Plans and Soil Management Plans would be prepared by the contractor, so that site-won materials could be re-used on site. A neutral cut and fill balance is targeted for the Sizewell C Project, with any surplus excavated material to be retained on-site for re-use in landscaping. This will significantly minimise the amount of material classified as waste during the earthworks phase of construction. For any material that cannot be retained on-site, an assessment of effects on local landfill capacity is presented within Volume 2, Chapter 8 (Conventional Waste and Material Resources) of the ES (Doc Ref. 6.3) [APP-193]. The assessment demonstrates that there is sufficient landfill capacity within the region to accommodate the potential waste arisings from the Sizewell C Project.	SZC's Position Not agreed. However, a meeting can be arranged by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.

Ref.	Matter	MLSG's position [Starting from relevant representation (RR)]	SZC Co.'s Position	Position of the parties
		Earlier in the same report, there are concerns that the evaluations done so far are only on core samples that may not be representative of the actual excavated material from the site within the cut-off wall and that further testing will be needed to verify that the lime stabilisation will work. There is also acknowledgement that the peat content will need to be carefully managed and distributed within the back-fill of the borrow pits as it will not be affected by the lime treatment to avoid. It is also admitted that in prior studies the alkalinity of the leachate had not been measured, just the Ca2+ ion. So, it is not entirely clear that the confidence in suggesting "that it is not generally a significant concern", is not really supported in their analysis of the actual conditions that will be present in the back-filled borrow pits and the potential impacts that might occur many years down the line. At 29th May: Changes made by SZC Co post our comments of 7th May prior to Deadline 2 submission have been made with reference to primary mitigation being in place. Document AS-273 has 3 minor references to borrow pit mitigation and mainly concerns the excavation phase. It is also disconcerting that the CoCP reference on page 2 of the document requires a login to the AECOM site, and thus is not available for examination.		
11.	Environmental impacts	RR: Significant environmental impact assessments dismissed with undefined monitoring and mitigation At 7th May: Many mitigation statements within the routemap documents are hedged with qualifiers such as "where possible" or "where reasonably practicable". There are also instances where mitigateions are reliant upon contractors, yet to be appointed, to suggest mitigation rather than the mitigation being embedded in the design and details. There is also a strange fascination with limiting noise on Saturday afternoons, although no mention of Sunday's at all or the rest of the week. In general light and noise pollution at the main site and the inevitable consequences for the immediate surroundings has simply no practicable mitigation for such an environmentally sensitive and ecologically diverse setting. The needs and facts of safe night working is diametrically opposed to the ecological health of the environment in this area and will inevitably damage the environment for the 10-12 years that the construction site will be active.	The ES (Doc Ref. 6.1 to 6.11), updated by the ES Addendum (Doc Ref. 6.14) [AS-179 to AS-260] identifies the likely significant effects of the Sizewell C Project, and identifies mitigation to avoid, reduce or compensate effects. The mitigation measures identified within the ES and ES Addendum are all identified in the Mitigation Routemap (Doc Ref. 8.12) [APP-616] and Mitigation Routemap Addendum (Doc Ref. 8.12Ad) [AS-276] and will be secured as commitments and controls imposed through the Development Consent Order if granted. SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station. It has worked hard to bring forward a Project that is acceptable in planning terms. 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. 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) [AS-281] 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.	SZC's Position Not agreed. However, a meeting can be arranged by the Applicant to discuss opportunities for narrowing the area of disagreement between us on this topic. MLSG's Position Not agreed. Whilst a meeting has been offered, at this time we decided to respond electronically and may request a meeting at a future date.

Ref.	Matter	MLSG's position [Starting from relevant representation (RR)]	SZC Co.'s Position	Position of the parties
12.	Availability of referenced reports	RR: Reports relied upon not available for assessment At 7th May: Reports relied upon and referenced above are still not available for assessment and examination. These are three only recently revealed. There are many reports referenced across this DCO application and I suspect many more are not made available for assessment. Claims of CO2 Lifecycle Assessment are unsubstantiated in any report and the LCA report. relied upon. for the Hinkley Point C DCO has never been published and was never received by the Examining Authority for that application. Repeated requests to EDF have not resulted in the report being released. Julia Pyke has recently claimed that a "best in class" LCA assessment is underway for Sizewell C at industry meetings. This LCA assessment needs to be produced to underpin claims of CO2 payback periods and ultimately the low carbon credentials of this proposed development.	SZC Co. made an additional submission in response to the Examining Authority's Procedural Decision dated 23 October 2020 [PD-006] which contained reports referenced and relied upon in the Environmental Statement [AS-020].	SDZC's Position No further action required MLSG's Position Not agreed.

APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of electronic correspondence between the parties, as are summarised in **Table 2.2**.

Table 2.2: SOCG correspondence between the parties

Date	Details of the Meeting
16/04/2021	Initial submission of SoCG to MLSG
25/5/2021	Initial response of MLSG to SZC
28/5/2021	SZC Co edit of initial response
29/5/2021	MLSG update of initial response