



The Sizewell C Project

9.10.34 Initial Statement of Common Ground - Suffolk Coastal Friends of the Earth

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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 03, dated 01 June 2021, has been prepared following a meeting on 24 May 2021 between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Suffolk Coastal Friends of the Earth ('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. Appendix A summarises the 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	Suffolk Friends of the Earth on Sizewell's Position	SZC Co.'s Position	Position of the Parties
1. 1.	Mitigation for rare species	<p>We agree that steps have been taken to identify the potential significant effects on the environment, in terms of comprehensive surveys, although some of these are out of date so that conclusions drawn are unreliable.</p> <p>We understand that some new surveys are being put forward, which are welcome. We pointed out that fungi surveys were entirely missing, but have learnt that these will be put in hand in the autumn. It is disappointing that we will be unable to respond to these within the examination timetable.</p> <p>We would be pleased to see the new fungi surveys.</p> <p>We do not agree that the mitigation measures proposed would sufficiently avoid, reduce or satisfactorily compensate for the LSEs on habitats and wildlife within this protected landscape and wider countryside.</p> <p>As regards land take, we are especially concerned by how much this has increased over the nine years of consultation and do not agree that it is 'acceptable'.</p> <p>All the proposed mitigation plans rely on successful achievement of target conditions. We, the public, have to trust that the Applicant will carry out the plans as stated. We would be reassured if we could see more detail of monitoring and management – how, what, where, when etc – and what would be done if there were any failings.</p> <p>We look forward to seeing the proposed new designs for the SSSI crossing. However it remains our view that a three-span bridge would be considerably less damaging.</p> <p>We would welcome the suggested briefing on new proposals for monitoring and mitigation and how they would be secured.</p>	<p>We welcome FoE's comments on the surveys, and can assure its members that we are confident that they provide a robust basis for impact assessment. We thank FoE for its suggestion to carry out fungi surveys, which will be worthwhile, although they won't affect the EclA conclusions. We would be pleased to brief FoE fully on the additional 2021 surveys and explain how they will be used.</p> <p>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.</p> <p>It is considered that the proposals are appropriately located and that the temporary and permanent land-take is justified in planning terms. Impacts on Sizewell Marshes SSSI have been reduced by the proposed single span crossing that was proposed in the January 2021 change submission. In response to ongoing stakeholder concerns we are carrying out a design review to consider if the design of the structure could be optimised 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 to be provided at Deadline 4.</p> <p>SZC Co. will continue to engage with stakeholders such as East Suffolk Council, Suffolk County Council, the Environment Agency, Natural England, the Marine Management Organisation to develop mitigation and monitoring for the Sizewell C Project. An updated version of the Terrestrial Ecology Monitoring & Mitigation Plan (TEMMP) has been submitted into the examination at Deadline 1. We would be pleased to brief your members on the current package of monitoring and mitigation plans that we are proposing, and their securing mechanisms in the DCO, if that's helpful.</p>	<p>In progress.</p> <p>Further engagement on</p> <ul style="list-style-type: none"> - optimised SSSI crossing - new 2021 baseline surveys - monitoring and mitigation plans/securing mechanisms <p>Meeting to</p>
2.	Eco-hydrology of Sizewell Marshes SSSI	<p>The new bridge design is a modest improvement on the culvert and causeway, but we would still like to see a much more open structure that would interfere less with the natural drainage. Our hydrological advisers tell us that these natural flows would change due to the new structure, so we cannot agree that the hydrological function would continue to be 'normal'.</p>	<p>SZC Co. recognises the concerns raised by the public and the stakeholders on the design of the SSSI crossing. The current SSSI crossing design (accepted change) includes a widened opening over Leiston Drain (approximately 24m at ground level and up to 30m at soffit level). This will allow normal hydrological function of the watercourse under normal conditions, and natural drainage of the Sizewell Marshes SSSI.</p>	<p>In progress.</p> <p>Further engagement on</p> <ul style="list-style-type: none"> - New synthesis report on effects on groundwater.

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		<p>We have no doubt that the company would endeavour to follow best practice according to the Design Manual for Roads and Bridges. However, all roads cause pollution. Our research tells us that no SuDs drainage systems are 100% effective. It is a real worry that pollutants would inevitably drain into the neighbouring designated sites.</p> <p>We understand about the flooding risks, and hope that by working with the Environment Agency, you will be able to resolve these issues satisfactorily. However, it should be noted that the agency remains deeply concerned about the ecological damage that would be caused by this road crossing, as do we.</p> <p>We cannot agree that the ecohydrological effects would be sufficiently limited, bearing in mind the vast size and depth of the construction works. However, we would like to see the new synthesis report.</p>	<p>The original design of the SSSI Crossing culvert had been oversized to minimize effects on natural hydrologic function. The proposed widened bridge design further limits the impact on hydrology, and also on flood flows. Ecohydrological impacts associated with dewatering of the deep excavations for the power station will be mitigated using a cut-off wall that would be installed around them and sunk through the alluvium and crag aquifers into the underlying london clay to minimise effects on groundwater. A similar approach was used in construction of Sizewell B to protect Sizewell belts. We have carried out extensive groundwater and surface water monitoring and built a bespoke groundwater model to reliably assess impacts. We engaged closely with the Environment Agency and Natural England in the design of the baseline monitoring programme and model calibration. We are preparing a synthesis report for the ExA and stakeholders to summarise the considerable evidence we have on likely ecohydrological effects which are assessed as limited given the mitigation that has been designed-in. We will be pleased to share this document.</p> <p>All highways drainage, including that from the SSSI Crossing itself, will be managed in accordance with appropriate guidance (e.g. Design Manual for Roads and Bridges), allowing for climate change allowance in respect of future capacity. This also includes for the potential pollutant loads and requirement to mitigate this in the context of the sensitive neighbouring habitat. 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].</p>	
3.	Rare invertebrates	<p>Having studied the documents regarding invertebrates, we do not agree that it is possible to mitigate for the loss of the rarest species. Many of these have specialist requirements that are not replicated at the new Aldhurst Farm site nor elsewhere. We refer you to our Written Representation on this subject.</p> <p>We welcome the proposals for more Sandlings on the Goose Hill site post construction, but regret the extensive loss of woodland and the sheltered rides, of high value for reptiles and invertebrates such as the rare White Admiral butterfly. The proposed planting is insufficient in both extent and quality.</p>	<p>Species-specific mitigation plans and method statements have been developed for all protected species found to be present within the site. Habitat replacement carried out at Aldhurst farm and Studio field (Sizewell gap) used a number of techniques to facilitate colonisation of the new habitats by rare invertebrates including 'seeding' the wetland with ditch slubbings from neighbouring SSSIs and spreading heather brashings over the arable conversion areas to encourage establishment of sandlings mosaic and introduce natural Sandlings seedbank and invertebrates. The maturing dry grassland/sandlings habitat is developing a notable invertebrate fauna. The habitats proposed on existing arable land within the temporary construction area, as set out in the outline Landscape and Ecology Management Plan (oLEMP) (Doc Ref. 8.2) [APP-588], can only be established once construction works have finished and the temporary construction area has been removed. This proposed habitat 'mosaic' would have a higher biodiversity value than the existing habitats.</p>	<p>Not agreed.</p> <p>However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement on this topic.</p>
4.	Biodiversity Net Gain	<p>Despite several requests from Bioscan, who are acting on our behalf, the metric spreadsheets have not been forthcoming. This</p>	<p>Updated Biodiversity Net Gain Reports are due to be issued into the Examination at Deadline 1.</p>	<p>Not agreed.</p>

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		indicates to us a lack of transparency. It is our view that the 19% net gain being claimed is grossly exaggerated. This will be demonstrated in our WR.		However, a meeting has been offered by the Applicant to discuss opportunities for narrowing the area of disagreement on this topic.
5.	Effects of new roads	<p>Friends of the Earth are entirely opposed to the building of new roads, due to the chronic damage to the environment as well as to the climate. While we appreciate that both the Link Road and Two Villages Bypass have been requested by both local residents and Suffolk County Council, we have not supported these proposals.</p> <p>Hundreds of thousands of wild animals and millions of birds are killed on our roads each year. More would be killed on these new roads, especially at 60mph. Bypasses are particularly damaging to wildlife, as the remaining arc is generally not sufficiently large to support viable colonies. These become separated by the road from other colonies and individuals cannot disperse to find mates. They thereby become weakened and eventually die out.</p> <p>We agree that the speed limit on the Sizewell Gap road should be reduced to 40mph and are pleased at this suggestion. We would like to see it extended to include Lover's Lane.</p> <p>We do not agree that the bridge structure would provide connectivity for species. Underpasses are only successful if they are placed at the animals' established foraging routes. Even then, research shows that populations of species are lowered. While some otters and water voles may be able to use it, the lack of light and length of the tunnel (even the reduced version) would deter invertebrates and small fish. The surrounding land is far too marshy for other mammals, both large and small, to be able to access it. We request that a proper underpass or green bridge be created between this point and the B1122.</p> <p>We do not see how land take can be reduced by 0.08ha, bearing in mind that the original width at base was 63m, while it is now 70m.</p> <p>We disagree that your mitigation proposals would reduce impacts on birds. Peer-reviewed research indicates that populations are reduced by up to 30% within 1km either side of any road (see our WR on this subject).</p> <p>While we understand that sea and rail will play a role in transport, the fact is that the Access Road will remain as a permanent risk to wildlife and ongoing barrier to their movement.</p>	<p>SZC Co. established at an early stage that the Sizewell C nuclear power station would need to be accessed from the north, from a new access road linking the site to the B1122, both during construction and operation of the power station. The new access road would be needed to meet the regulatory requirement that all new nuclear power station sites must have two separate accesses. The new access road would provide the primary access to the Sizewell C main platform area, with the current route to the existing Sizewell power station complex via Sizewell Gap road providing a secondary access. The access road would be used as primary construction haul road during the construction period, as part of a multi-modal freight strategy in which rail and sea transport will play significant roles. The access road would be downgraded to a two-lane carriageway with a segregated route for cyclists and pedestrians during operation.</p> <p>The January 2021 change submission proposed a new design for the SSSI crossing, comprising embankments and a single span bridge across Leiston drain/the retained SSSI, rather than the previously proposed embankment over culvert that would have run across the full width of the SSSI. The proposed new bridge structure would provide greater connectivity for species, reduce the potential for habitat fragmentation (specifically for water vole and otter) and also reduce land take within the SSSI. A design review is underway to further reduce impacts on the SSSI.</p>	<p>Not agreed.</p> <p>Further engagement on optimised SSSI crossing.</p>
6.	Coastal erosion and flooding	Our members are extremely nervous about the building of another nuclear power station on our rapidly eroding and changing coastline, especially with climate change and rising seas. Forecasts concerning coastal management have been	SZC Co. recognises that the coastline adjacent to the proposed development is part of a changing coastline and our assessments have investigated the potential impact of the proposed power station. SZC Co. has also had to assess the impacts of a potentially	<p>In progress</p> <p>Further details on the proposed 'hard' and 'soft' coastal defence features to</p>

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		<p>shown to be wrong, e.g. Thorpeness was considered to be stable, until a storm severely eroded the cliffs so that revetments had to be quickly put in place.</p> <p>BEEMS technical report TR311 admits that there is no model that can take account of the many and complex variables. This is extremely worrying. We do not agree that Sizewell will continue to be a safe site for more nuclear power generation, especially bearing in mind the very long timeframe to post-decommissioning.</p>	<p>changing shoreline on the safety of the power station. EDF has a long history of coastal studies in this area as part of the ongoing shoreline management group of the adjacent power station (Sizewell B) and have a detailed understanding of the local system. Using our own studies and the opinions of independent coastal geomorphological experts, our assessments show that the construction and operation of the proposed power station will not have a significant impact on coastal process either to the north or south of the site. The proposed hard coastal defence feature has been designed to withstand a design basis 1:10 000 year coastal flooding event over the lifetime of the plant, and decommissioning, with an allowance for climate change. An adaptive design is also proposed that would allow for the defences to be raised should climate change and sea level rise be even greater than assumed. The coastal defences have been designed to allow for erosion, with sediment lost from the soft coastal defence being recharged. Further details on the proposed 'hard' and 'soft' coastal defence features for Sizewell C will be submitted into the examination at Deadline 2.</p>	<p>be submitted into the examination at Deadline 2</p>
7.	Suffolk Shingle Beaches County Wildlife Site	<p>We pointed out at our meeting that there were no details concerning the storage of substrate for later use on the rock armour, on the assumption that the rare plants would re-grow. We would like to know where it would be stored, under what conditions and for how long. It was agreed that this information would be forthcoming. We also wish to see further scientific work carried out as to whether collection and freeze-drying of seeds, following the Sizewell B example, or other particular storage methods, would be more successful than the piling up of substrate.</p>	<p>The approach to mitigation for the Shingle Beaches CWS is explained in the ES (refer to Volume 2, Chapter 14 of the ES (Doc Ref. 6.3) [AS-033]), the oLEMP (refer to (Doc Ref. 8.2) [APP-588]). The relevant monitoring of the re-establishment is covered in the Terrestrial Ecology Monitoring and Mitigation Plan, which will be submitted into the examination once it has been agreed with stakeholders. We acknowledge that further information has been requested on the handling and storage of shingle containing the seedbank for the existing vegetation that is to be used in restoration.</p>	<p>In Progress.</p> <p>Further detail to be provided on the handling and storage of shingle containing the seedbank for the existing vegetation that is to be used in restoration</p>
8.	Impacts of the cooling system on marine wildlife	<p>We have been supporting the group TASC by providing them with our research into impacts on fish, and will not ourselves be submitting a WR on this topic. However, we remain deeply concerned about loss of so much marine wildlife and consider it to be unacceptable, especially bearing in mind the ongoing effects on birds within this Outer Thames Special Protection Area.</p> <p>We trust that the MMO will examine the proposals concerning protected harbour porpoise within the Southern North Sea SAC. Underwater noise has been increasingly harming marine mammals, and the pile-driving, dredging, movement of barges and persistent noise from the cooling system etc would all add to this.</p>	<p>An assessment of the likely effects of the cooling water system is provided within Volume 2, Chapter 21 of the ES (Doc Ref. 6.3) [APP-314]. 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) [APP-317] 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) [APP-314] and demonstrates that local water quality is not significantly affected. The heat and chemical</p>	<p>Not agreed.</p>



NOT PROTECTIVELY MARKED

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			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.	

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.2: SOCG meetings held between the parties

Date	Details of the Meeting
24 May 2021	Meeting to discuss potential areas of common ground / key areas of concern and plan to develop SoCG
26 May 2021	Updated position received by email from FoE
28 May 2021	Second draft version of SoCG issued to FoE
01 June 2021	Agreement reached on Rev 3 version for D2 submission