



# The Sizewell C Project

## 9.10 Statement of Commonality of Statements of Common Ground

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Revision: 2.0  
Applicable Regulation: Regulation 5(2)(q)  
PINS Reference Number: EN010012

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June 2021

Planning Act 2008  
Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009



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## FIGURES

**None provided.**

## APPENDICES

**None provided.**



## 1 INTRODUCTION

### 1.1 Purpose

1.1.1 This document is provided on the request of the Examining Authority (ExA) to assist in understanding areas of commonality across the Statements of Common Ground (SoCGs) for the Sizewell C Project.

1.1.2 It comprises SZC Co.'s understanding of the stakeholders' positions, as set out in the SoCG submitted by SZC Co. at Deadlines 2 and 3. This document also provides an update on the status of each of the SoCG.

1.1.3 For a more detailed understanding of the respective stakeholders' positions in relation to the topics covered, reference should be made to the SoCG submitted at Deadlines 2 and 3.

1.1.4 This document is being updated during the examination to reflect any changes to the SoCGs through further discussions with Interested Parties.

### 1.2 Structure

1.2.1 This document is structured as follows:

- **Section 2** provides an introduction to the drafting of the SoCG along with a summary of their structure;
- **Section 3** provides an up to date list of the SoCG and their status; and
- **Section 4** details the commonality between the SoCG.

## 2 STATEMENTS OF COMMON GROUND

2.1.1 SZC Co. has sought SoCG with Interested Parties in line with the ExA's Rule 6 letter [\[PD-011\]](#)<sup>1</sup>. The purpose of the SoCG is to set out the position of the parties on all relevant matters relating to the Application, including the construction and operation of the Sizewell C nuclear power station and its associated development. The SoCG cover matters raised within the relevant representations of the Interested Parties, topics listed within the ExA's Rule 6 letter [\[PD-011\]](#), the ExA's first round of written questions [PD-016 to PD-022] and any other issues raised over the course of the

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<sup>1</sup> As requested by the ExA in the Rule 6 letter [\[PD-011\]](#), SZC Co. invited the Suffolk Preservation Society (SPS) to enter into a SoCG. SPS later confirmed that it '*will not be making further representations or taking any further involvement in the examination process*'. Responses to comments raised by SPS are therefore provided within the **Relevant Representations Report** [\[REP1-013\]](#).

examination process. A full list of the SoCG and their status is provided within **Section 3**.

2.1.2 To ensure consistency in the approach taken to documenting matters agreed, matters subject to ongoing discussions or matters not agreed, the SoCG generally adopt a standard format in order to provide clarity. Each SoCG is broadly structured as follows:

- a brief introduction, setting out the status of the SoCG, purpose of the document, an explanation of the statutory role of the Interested Party and the structure of the SoCG;
- a table(s) setting out the current position of the Interested Party and SZC Co. – for most SoCG this is set out by topic with areas of agreement, disagreement and discussions ongoing stated under each topic or matter; and
- a summary of engagement undertaken on the SoCG.

2.1.3 The following SoCG do not follow this standard format, either because they relate to limited topics, or because the SoCG party wished to follow a different format:

- Natural England;
- Network Rail; and
- Department for Transport.

## 3 LIST AND STATUS

3.1.1 This section provides a list and a summary of the current status of each SoCG.

3.1.2 **Table 3.1** provides a high-level position of the SoCG and where necessary includes further detail to aid understanding by the ExA. In summary, the high-level positions used in **Table 3.1** are as follows:

- **Agreed SoCG** – The final version of the SoCG has been signed by both parties, if required, and there are no matters outstanding.
- **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.

- **SoCG in draft (reflecting individual positions)** – The SoCG was drafted by SZC Co., it has been shared with the other party and comments have been provided, but it has not been possible to fully close out comments and / or reach full agreement with the other party that the document is a mutually agreed draft. These drafts are considered to be an accurate representation of the individual positions of the SoCG parties.
- **SoCG in draft (SZC Co. drafted, awaiting comments)** – The SoCG was drafted by SZC Co. and issued to the other party, however, comments are awaited. The SoCG represents SZC Co.'s position.

3.1.3 **Table 3.1** will be updated at subsequent deadlines to provide an update on the progress made with finalising the SoCG.

**Table 3.1 Status of SoCG at Deadline 3**

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
9.10.1	Anglian Water Services Limited	Draft agreed SoCG with matters outstanding (targetting Deadline 3 for next iteration)	Position as at Deadline 2, waiting for inputs from Anglian Water Services Limited. Targetting Deadline 5 for next iteration.					
9.10.2	Northumbrian Water Limited (Essex and Suffolk Water)	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.3	East Suffolk Internal Drainage Board	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.4	Environment Agency	Draft agreed SoCG with matters outstanding (targetting	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
		Deadline 4 for next iteration).						
9.10.5	Highways England	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.6	Historic England	Draft agreed SoCG with matters outstanding. Targetting Deadline 4 for updated version.	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.7	Natural England	SoCG in draft (reflecting individual positions) (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.8	National Grid Electricity Transmissions Plc (NGET)	Draft agreed SoCG with matters outstanding	Position as at Deadline 2, waiting for inputs from NGET.					

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
		Targetting Deadline 3 for next iteration.	Targetting Deadline 5 for next iteration.					
9.10.9	Cadent Gas Ltd	Draft agreed SoCG with matters outstanding. Targetting Deadline 3 for next iteration.	Position as at Deadline 2, waiting for inputs from Cadent Gas Ltd. Targetting Deadline 5 for next iteration.					
9.10.10	Network Rail	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.11	Royal Mail	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.12	East Suffolk Council and Suffolk County Council	Draft agreed SoCG with matters outstanding -	Position as at Deadline 2. Appendices submitted at					



Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
		Targetting Deadline 4 for next iteration	Deadline 3. Targetting Deadline 5 for next iteration.					
9.10.13	Suffolk Fire and Rescue	SoCG in draft (SZC Co. drafted, awaiting for comments). Targetting Deadline 4 for updated version.	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.14	Office for Nuclear Regulation (ONR)	<b>Agreed SoCG</b>						
9.10.15	Ipswich and East Suffolk Clinical Commissioning Group	Draft agreed SoCG with matters outstanding. Targetting Deadline 4 for updated version.	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.16	East of England Ambulance Trust	SoCG in draft (SZC Co. drafted, awaiting for comments) Targetting Deadline 3 for updated version.	Position as at Deadline 2, waiting for inputs from East of England Ambulance Trust. Targetting Deadline 5 for next iteration.					

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
9.10.17	Suffolk Constabulary	Draft agreed SoCG with matters outstanding. Targetting Deadline 4 for updated version.	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.18	Marine Management Organisation	Draft agreed SoCG with matters outstanding (targetting Deadline 3 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.19	Magnox Limited and Nuclear Decommissioning Authority (NDA)	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.20	Suffolk Coast and Heaths AONB Partnership	SoCG in draft (SZC Co. drafted, awaiting for comments)	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
9.10.21	Pro Corda Trust	SoCG in draft (SZC Co. drafted, awaiting for comments). Targetting Deadline 3 for updated version).	Draft agreed SoCG with matters outstanding. Targetting Deadline 6 for next iteration.					
9.10.22	Public Health England	<b>Agreed SoCG</b> - as set out in covering letter, PHE do not sign SoCGs.						
9.10.23	Together Against Sizewell (TASC)	SoCG in draft	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.24	Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.25	National Trust	SoCG in draft (reflecting individual positions). Targetting Deadline 4 for next iteration.	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
9.10.26	National Farmers' Union	SoCG in draft (reflecting individual positions). Targetting Deadline 4 for next iteration	Position as at Deadline 2 (refer to SoCG submitted by National Farmers Union at Deadline 2 for latest revision <a href="#">[REP2-385]</a> ). Targetting Deadline 5 for next iteration.					
9.10.27	Minsmere Levels Stakeholder Group	SoCG in draft (reflecting individual positions) – Targetting Deadline 4 for updated version	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.28	East Anglia One North and Two	SoCG in draft (reflecting individual positions) – Targetting Deadline 4 for updated version	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.29	Stop Sizewell C (Theberton and Eastbridge Action Group)	SoCG in draft (reflecting individual positions). Targetting	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
		Deadline 4 for next iteration.						
9.10.30	EDF Nuclear Generation Limited	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.31	English Heritage Trust	Draft agreed SoCG with matters outstanding. Targetting Deadline 4 for updated version.	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.32	B1122 Action Group	Draft agreed SoCG with matters outstanding SoCG in draft (reflecting individual positions) – Targetting Deadline 4 for updated version	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					





SIZEWELL C PROJECT – STATEMENT OF COMMONALITY

NOT PROTECTIVELY MARKED

Doc Ref.	Interested Party	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6	Position at Deadline 7	Position at Deadline 8
9.10.33	Suffolk Coast Destination Management Organisation	Draft agreed SoCG with matters outstanding. Targetting Deadline 4 for updated version.	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.34	Suffolk Coastal Friends of the Earth	Draft agreed SoCG with matters outstanding (targetting Deadline 4 for next iteration).	Position as at Deadline 2. Targetting Deadline 5 for next iteration.					
9.10.35	Department for Transport	<b>Agreed SoCG</b>						

NOT PROTECTIVELY MARKED

## 4 COMMONALITY

### 4.1 Summary

4.1.1 This section provides a summary of the principal issues covered in the SoCG and demonstrates where there is commonality in the topics or matters being discussed with the various parties.

4.1.2 **Table 4.1** has been presented in such a way to show topics covered within the various SoCG and how these are relevant to each Interested Party, using the colour coding detailed in **Plate 4.1**.

#### Plate 4.1: Key to colour coding used in the commonality table

Matter agreed	
Matter subject to ongoing discussion	
Matter not agreed	
Matter not relevant to a particular SoCG party	

4.1.3 Where a matter is marked as agreed (coloured in green), this may be conditional on mitigation being secured either through requirements within the **DCO** or through planning obligations within the **Draft Deed of Obligation** (Doc Ref. 8.17(D)). Where this is the case, this is set out in the SoCG. Details on the matters agreed, not agreed and subject to ongoing discussion are provided within the individual SoCG.

4.1.4 There has been no change to **Table 4.1** at Deadline 3 since the previous issue at Deadline 2.

Table 4.1 Table of Commonality at Deadline 3

SoCG Doc. Ref.	Interested Party	Miscellaneous (refer to footnote)	Agriculture and Soils	Air Quality	Alternatives	Amenity and Recreation	Biodiversity and Ecology (terrestrial and marine)	Habitats Regulations Assessment	Climate Change	Coastal Geomorphology	Compulsory Acquisition	Cumulative Impacts	Development Consent Order (inc. Protective Provisions)	Flood Risk and Water, Drainage, WFD	Health and Wellbeing	Historic Environment	Landscape and Visual	Land Quality	Major Accidents and Disasters	Marine Navigation	Marine Water Quality	Noise and Vibration	Radiological Considerations	Socio-economics	Transport	Waste and Materials	Water Supply
9.10.1	Anglian Water Services Limited	X <sup>2</sup>									X		X	X													
9.10.2	Northumbrian Water Limited (Essex and Suffolk Water)	X <sup>3</sup>											X														X
9.10.3	East Suffolk Internal Drainage Board												X	X													
9.10.4	Environment Agency						X		X	X		X	X	X				X			X				X	X	
9.10.5	Highways England																							X			
9.10.6	Historic England															X											
9.10.7	Natural England					X	X	X									X										
9.10.8	National Grid Electricity Transmissions Plc (NGET)	X <sup>4</sup>											X														
9.10.9	Cadent Gas Ltd	X <sup>5</sup>											X														
9.10.10	Network Rail	X <sup>6</sup>											X									X					
9.10.11	Royal Mail																							X			
9.10.12	East Suffolk Council and Suffolk County Council	X <sup>7</sup>	X	X		X	X	X	X	X		X	X	X	X	X	X	X	X		X	X		X	X	X	X
9.10.13	Suffolk Fire and Rescue																		X					X	X		
9.10.14	Office for Nuclear Regulation (ONR)	X <sup>8</sup>							X				X	X					X			X					
9.10.15	Ipswich and East Suffolk Clinical Commissioning Group											X			X									X	X		
9.10.16	East of England Ambulance Trust														X				X					X	x		
9.10.17	Suffolk Constabulary																		X					X	X		

<sup>2</sup> Effect on Anglian Water Services apparatus and delivery by Anglian Water of the works associated with the Application.

<sup>3</sup> Effect on NWL apparatus and delivery by NWL of the works associated with the Application.

<sup>4</sup> Effect on NGET apparatus and delivery by NGET of the grid works.

<sup>5</sup> Effect on Cadent Gas Limited apparatus and delivery by Cadent Gas Limited of the works associated with the Application.

<sup>6</sup> Effect on Network Rail infrastructure and the delivery of Network Rail works associated with the Application.

<sup>7</sup> Principle of the development and design, draft Deed of Obligation.

<sup>8</sup> Nuclear site licensing and design.

SoCG Doc. Ref.	Interested Party	Miscellaneous (refer to footnote)	Agriculture and Soils	Air Quality	Alternatives	Amenity and Recreation	Biodiversity and Ecology (terrestrial and marine)	Habitats Regulations Assessment	Climate Change	Coastal Geomorphology	Compulsory Acquisition	Cumulative Impacts	Development Consent Order (inc. Protective Provisions)	Flood Risk and Water, Drainage, WFD	Health and Wellbeing	Historic Environment	Landscape and Visual	Land Quality	Major Accidents and Disasters	Marine Navigation	Marine Water Quality	Noise and Vibration	Radiological Considerations	Socio-economics	Transport	Waste and Materials	Water Supply
9.10.18	Marine Management Organisation						X	X		X			X	X							X						
9.10.19	Magnox Limited and Nuclear Decommissioning Authority (NDA)	X <sup>9</sup>									X		X														
9.10.20	Suffolk Coast and Heaths AONB Partnership	X <sup>10</sup>			X	X						X					X							X			
9.10.21	Pro Corda Trust / Leiston Abbey															X						X		X			
9.10.22	Public Health England			X											X							X	X				
9.10.23	Together Against Sizewell (TASC)	X <sup>11</sup>				X	X		X	X				X		X	X		X					X	X		X
9.10.24	Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust	X <sup>12</sup>			X	X	X	X		X		X	X	X								X		X			
9.10.25	National Trust				X	X	X	X		X			X			X	X							X			
9.10.26	National Farmers Union	X <sup>13</sup>	X		X						X			X												X	
9.10.27	Minsmere Levels Stakeholders Group	X <sup>14</sup>					X			X				X												X	X
9.10.28	East Anglia One North and Two											X	X												X		
9.10.29	Stop Sizewell C (Theberton and Eastbridge Action Group)	X <sup>15</sup>			X	X	X			X		X		X		X	X					X		X	X		
9.10.30	EDF Nuclear Generation Limited	X <sup>16</sup>									X																
9.10.31	English Heritage Trust															X											
9.10.32	B1122 Action Group	X <sup>17</sup>			X							X					X								X		
9.10.33	Suffolk Coast Destination Management Organisation											X												X			
9.10.34	Suffolk Coastal Friends of the Earth				X		X	X		X				X													

<sup>9</sup> Nuclear site licensing, decommissioning and interaction with Sizewell A.

<sup>10</sup> Construction programme.

<sup>11</sup> Policy and the need for nuclear energy, the level of detail within the application, financing and examination process.

<sup>12</sup> Legislative and policy context, adequacy of EIA, design proposals.

<sup>13</sup> Consultation and engagement, funding, access to land.

<sup>14</sup> Completeness and quality of the application, design, general environmental impacts, availability of referenced reports.

<sup>15</sup> Project financing, general environmental impacts, planning policy and examination process.

<sup>16</sup> Compatibility of the construction and operation of Sizewell C with the operation and decommissioning of Sizewell B, and the relationship with the use of the wider EDF Energy Estate, draft Deed of Obligation.

<sup>17</sup> General impacts on communities.

SoCG Doc. Ref.	Interested Party	Miscellaneous (refer to footnote)	Agriculture and Soils	Air Quality	Alternatives	Amenity and Recreation	Biodiversity and Ecology (terrestrial and marine)	Habitats Regulations Assessment	Climate Change	Coastal Geomorphology	Compulsory Acquisition	Cumulative Impacts	Development Consent Order (inc. Protective Provisions)	Flood Risk and Water, Drainage, WFD	Health and Wellbeing	Historic Environment	Landscape and Visual	Land Quality	Major Accidents and Disasters	Marine Navigation	Marine Water Quality	Noise and Vibration	Radiological Considerations	Socio-economics	Transport	Waste and Materials	Water Supply
9.10.35	Department for Transport																			X							