



# The Sizewell C Project

## 9.10.6 Statement of Common Ground - Historic England

---

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

---

October 2021

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



## CONTENTS

1	INTRODUCTION .....	1
1.1	Status of the SOCG .....	1
1.2	Purpose of this document .....	1
1.3	Parties to this Statement of Common Ground .....	2
1.4	Structure of this Statement of Common Ground .....	3
1.5	Status of this version of the Statement of Common Ground .....	3
2	POSITION OF THE PARTIES .....	4
	SIGNATURES .....	13

## TABLES

Table 2.1	Position of the Parties - SZC Co. and Historic England .....	5
Table 2.2	SOCG meetings held between SZC Co. and Historic England .....	12

## APPENDICES

APPENDIX A:	ENGAGEMENT ON THE SOCG .....	12
-------------	------------------------------	----

## 1 INTRODUCTION

### 1.1 Status of the SOCG

1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of the application for a development consent order ('DCO') to the Planning Inspectorate ('PINS') under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project.

1.1.2 This SoCG version 02 has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Historic England for submission at Deadline 10 on 12 October 2021.

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

### 1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties on the historic environment (terrestrial and marine) issues arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project').

1.2.2 This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.3 Paragraph 58 of the DCLG Guidance states:

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

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

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

1.2.5 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>).

### 1.3 Parties to this Statement of Common Ground

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

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

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

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

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



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

## 1.4 Structure of this Statement of Common Ground

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

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

## 1.5 Status of this version of the Statement of Common Ground

1.5.1 This version 02 of the SoCG is final.

## 2 POSITION OF THE PARTIES

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

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

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

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

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

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

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

Ref.	Matter	Book ref.	Historic England Position at Deadline 2 [REP2-070]	SZC Co. Position at Deadline 2 [REP2-070]	Update for Deadline 10	Agreed / Not Agreed / In Progress
<b>Project Wide</b>						
PW_HE1	The methodology for the assessment of impacts on the terrestrial historic environment as detailed in <b>Volume 1 Appendix 6L</b> of the ES.	6.2	Agreed.	Agreed.	-	Agreed.
PW_HE2	The list of assets to be scoped in or out of the settings assessment in the EIA, as detailed in <b>Volume 1 Appendix 6L Annex 6L.1 "Historic Environment Settings Scoping Update"</b> which also includes the 2015 "Settings Assessment Scoping Recommendations".	6.2	Agreed.	Agreed.	-	Agreed.
PW_HE3	The methodology for the assessment of impacts on the marine historic environment as detailed in <b>Volume 1 Appendix 6S</b> of the ES.	6.2	Agreed.	Agreed.	-	Agreed.
PW_HE4	The Overarching WSI provided in <b>Book 6, Volume 2, Chapter 16, Appendix 16H</b>	6.3	Some revisions required - comments provided on 3/12/20. Agreed subject to those comments having been incorporated.	Comments addressed, along with comments from Suffolk County Council Archaeological Service.	The revised <b>Overarching WSI</b> was re-submitted at Deadline 3 [REP3-022] and this incorporated HE's comments of 3/12/20 and 28/6/20 [REP2-518]. It was resubmitted again at Deadline 8 [REP8-065] in response to the Examining Authority's comments on control documents and to secure mitigation agreed for the freight management site - see FMF_HE2 below. A final version will be submitted at Deadline 10 (no changes from Deadline 8 version) (Doc Ref. 10.24).	Agreed.
PW_HE5	The approach to inter-relationship effects on the terrestrial and marine historic environment set out in <b>Book 6, Volume 10, Chapter 2</b>	6.11	Under assessment.	-	-	Agreed.
PW_HE6	<b>Section 3.7 of Book 6, Volume 10, Chapter 3</b> setting out project-wide effects on the terrestrial historic environment and the scoping out of marine historic environment as set out in <b>Section 3.1 x</b> .	6.11	Under assessment.	-	-	Agreed.
PW_HE7	<b>Sections 4.10 and 4.16 of Book 6, Volume 10, Chapter 4</b>	6.11	Under assessment.	-	-	Agreed.

	setting out cumulative effects on the terrestrial historic environment and marine historic environment, respectively.					
PW_HE8	The proposed mitigation for Leiston Abbey as set out in the <b>draft Section 106 Heads of Terms, Section 6.6, paragraph 6.6.1</b> noting also the Pro Corda resilience fund as set out in <b>paragraph 16.4.1</b> .	8.4	<p>It is agreed that a S106 agreement would be acceptable in principle to secure enhancements to visitor experience that would serve as a mitigation of the effects of the proposed development on the significance of Leiston Abbey and associated listed buildings.</p> <p>For the second Leiston Abbey site, it is agreed that the scope and detail of any S106 should be a matter for agreement between SZC Co. English Heritage and Pro Corda.</p>	For the first Leiston Abbey site, SZC Co, to arrange a meeting with the RSPB archaeologist to discuss potential mitigation measures.	<p>Mitigation has been agreed with English Heritage Trust for the Second Leiston Abbey Site (SM 1014520, LB1215753, LB 1215754, LB 1216380, LB 1268290) and this is set out and secured in Schedule 8 of the <b>Deed of Obligation</b> (Doc Ref. 10.4). This comprises a contribution towards:</p> <ul style="list-style-type: none"> <li>measures for survey and consolidation of the Scheduled Monument SM 1014520 and improved interpretation; and</li> <li>the development (in consultation with the Pro Corda Trust) and implementation of a landscape and access masterplan.</li> </ul> <p>Queries on access and road safety have been dealt with in the <b>English Heritage Trust Statement of Common Ground</b> (Doc Ref. 9.10.31(A)).</p> <p>Mitigation has also been agreed with the Pro Corda Trust. This comprises a Resilience Fund, secured in Schedule 13, to be applied towards:</p> <ul style="list-style-type: none"> <li>staffing costs to allow for increased supervision and marketing;</li> <li>provision of indoor and outdoor sensory spaces suitable for children with autism and other special educational needs and disabilities;</li> <li>physical security features; and</li> <li>other measures determined by Pro Corda to increase business resilience.</li> </ul> <p>In addition, in Schedule 12 of the <b>Deed of Obligation</b> (Doc Ref. 10.4), Pro Corda's residential accommodation located in the Grade II listed Retreat House LB 1215754 and in the Guesten Lodge has been expressly scoped into the Noise Mitigation Scheme. This will not only address noise issues but address concerns about security due to the poor state of the existing windows, particularly in the Retreat House.</p>	Agreed.
PW_HE9	The mitigation, management and monitoring measures for the historic environment detailed in <b>Chapter 8 of Part B and Chapter 8 of Part C of the Code of Construction Practice</b> .	8.11	Under assessment	-	-	Agreed.



PW_HE10	The measures and mechanisms to mitigate impacts on the historic environment as detailed in the <b>Mitigation Route Map</b> including: <ul style="list-style-type: none"> <li>- MDS-HE1-HE12</li> <li>- MDS-MHE1-MHE4</li> <li>- NPR-HE1-HE4</li> <li>- SPR-HE1-HE7</li> <li>- 2VBP-HE1-HE6</li> <li>- SLR-HE1-HE8</li> <li>- YOX-HE1-HE4</li> <li>- FM-HE1-HE7</li> </ul>	8.12	NB may want to split out some of these if there are areas of particular agreement / disagreement or cross ref to more detail in chapters below.  Currently under assessment	-	-	Agreed.
PW_HE11	The historic environment specific DCO requirement / deemed marine licence condition to control impacts on the historic environment as set out in the <b>Draft Development Consent Order</b> : <ul style="list-style-type: none"> <li>- DCO, Requirement 3 (project wide - archaeology)</li> <li>- Deemed marine licence, pre-construction condition 18</li> </ul>	3.1	Reviewed in meeting 19/1/20 - changes to both marine conditions and terrestrial requirements proposed - wording to be agreed between SCC / HE / SZC Co.	Reviewed in meeting 19/1/20 - changes to both marine conditions and terrestrial requirements proposed - wording to be agreed between SCC / HE / SZC Co.	Amendments have been made to the wording of Requirement 3 in the <b>draft Development Consent Order (dDCO)</b> (Doc Ref. 3.1(J)) to specify that Historic England is consulted on the site-specific and peat WSIs and to secure an evaluation stage, ahead of mitigation, on sites where archaeological trenching has not yet been completed.  Amendments made to Deemed Marine Licence Condition 16 (in the <b>dDCO</b> Doc Ref. 3.1(J)) to ensure that no licensed activity, or phase of licensed activity may commence until a Marine Archaeological WSI for that activity or phase of activity has, after consultation with Historic England, been submitted to and approved by the MMO.	Agreed.
<b>Main Development Site – Terrestrial Historic Environment – Book 6, Volume 2, Chapter 16</b>						
MDS_HE1	The baseline environment as detailed in <b>section 16.4</b> and <b>Appendices 16A-F</b> .	6.3	Currently under assessment	-	-	Agreed.
MDS_HE2	The assessment of impacts on the terrestrial historic environment for the construction and operation of Sizewell C as detailed in <b>section 16.6</b> for the main development site and <b>Appendix 18F</b> for the off-site developments.	6.3	Currently under assessment	-	-	Agreed.
MDS_HE3	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as set out in <b>sections 16.5</b> and <b>16.7</b> for the main development site and in	6.3	Currently under assessment	-	-	Agreed.

	Appendix 16F for the off-site developments.					
MDS_HE4	The proposed Peat Strategy set out in Appendix 16G.	6.3	Agreed.	Agreed.	-	Agreed.
MDS_HE5	The residual effects conclusions as detailed in section 16.7.	6.3	Currently under assessment	-	-	Agreed.
<b>Main Development Site – Marine Historic Environment – Book 6, Volume 2, Chapter 23</b>						
MDS_MHE1	The baseline environment as detailed in section 23.4 and Appendices 23A and 23B.	6.3	Currently under assessment	-	-	Agreed.
MDS_MHE2	The assessment of impacts on the marine historic environment for the construction and operation of Sizewell C as detailed in section 23.6 for the main development site.	6.3	Currently under assessment	-	-	Agreed.
MDS_MHE3	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as set out in sections 23.5 and 23.7 for the main development site.	6.3	Currently under assessment	-	See PW_HE8 regarding mitigation for the Second Leiston Abbey Site. Mitigation has been agreed with the RSPB for the First Leiston Abbey Site (SM 1015687) and this is set out and secured in Schedule 8 of the Deed of Obligation (Doc Ref. 10.4). This comprises a contribution towards: <ul style="list-style-type: none"> <li>• undertaking an assessment of the existing heritage interpretation;</li> <li>• preparing and implementing a new visitor strategy;</li> <li>• undertaking a structural survey;</li> <li>• consolidating and repairing existing buildings;</li> <li>• engagement and liaison between RSPB and Historic England and such other stakeholders as RSPB considers necessary; and;</li> <li>• refreshing and improving interpretation prior to the tenth anniversary of the Commencement Date.</li> </ul>	Agreed.
MDS_MHE4	The recommendations and conclusions set out in Appendix 23C: Geoarchaeological and palaeoenvironmental assessment of vibrocores recovered east of Sizewell.	6.3	Agreed.	Agreed.	None.	Agreed.
MDS_MHE5	The residual effects conclusions as detailed in section 23.7.	6.3	Currently under assessment	-	-	Agreed.

Northern Park and Ride – Terrestrial Historic Environment - Book 6, Volume 3, Chapter 9						
NPR_HE1	The baseline environment as detailed in <b>section 9.4</b> and <b>Appendices 9A-9D</b> .	6.4	Currently under assessment	-	-	Agreed.
NPR_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in <b>sections 9.5</b> and <b>9.7</b> .	6.4	Currently under assessment	-	-	Agreed.
NPR_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the park and ride as detailed in <b>sections 9.6</b> and <b>9.8</b> .	6.4	Currently under assessment	-	-	Agreed.
Southern Park and Ride – Terrestrial Historic Environment - Book 6, Volume 4, Chapter 9						
SPR_HE1	The baseline environment as detailed in <b>section 9.4</b> and <b>Appendices 9A-9D</b> .	6.5	Currently under assessment	-	-	Agreed.
SPR_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in <b>sections 9.5</b> and <b>9.7</b> .	6.5	Currently under assessment	-	-	Agreed.
SPR_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the park and ride as detailed in <b>sections 9.6</b> and <b>9.8</b> .	6.5	Currently under assessment	-	-	Agreed.
Two Village Bypass – Terrestrial Historic Environment - Book 6, Volume 5, Chapter 9						
2VBP_HE1	The baseline environment as detailed in <b>section 9.4</b> and <b>Appendices 9A-9D</b> .	6.6	Currently under assessment	-	-	Agreed.
2VBP_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in <b>sections 9.5</b> and <b>9.7</b> .	6.6	Currently under assessment	-	As set out in PW_HE11, amendments have been made to the wording of Requirement 3 in the <b>dDCO</b> Doc Ref. 3.1(J)) to secure an evaluation stage, ahead of mitigation, on sites where archaeological trenching has not yet been completed.	Agreed.
2VBP_HE3	The assessment of impacts on terrestrial historic environment for the construction and operation of the two village bypass as detailed in <b>sections 9.6</b> and <b>9.8</b> .	6.6	Currently under assessment	-	-	Agreed.



Sizewell Link Road (SLR) - Terrestrial Historic Environment - Book 6, Volume 6, Chapter 9						
SLR_HE1	The baseline environment as detailed in <b>section 9.4</b> and <b>Appendices 9A-9D</b> .	6.7	Currently under assessment	-	-	Agreed,
SLR_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in <b>sections 9.5</b> and <b>9.7</b> .	6.7	Currently under assessment	-	As set out in PW_HE11. amendments have been made to the wording of Requirement 3 in the <b>dDCO</b> Doc Ref. 3.1(J)) to secure an evaluation stage, ahead of mitigation, on sites where archaeological trenching has not yet been completed.	Agreed.
SLR_HE3	The assessment of impacts on terrestrial historic environment for the construction and operation of the SLR as detailed in <b>sections 9.6</b> and <b>9.8</b> .	6.7	Currently under assessment	-	-	Agreed,
Yoxford Roundabout and Other Highway Improvements (OHI) - Terrestrial Historic Environment - Book 6, Volume 7, Chapter 9						
YOX_HE1	The baseline environment for Yoxford roundabout as detailed in <b>section 9.4a)</b> and <b>Appendices 9A-9D</b> .	6.8	Currently under assessment	-	-	Agreed,
YOX_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in <b>sections 9.4b)</b> and <b>9.4d)</b> for Yoxford roundabout.	6.8	Currently under assessment	-	-	Agreed,
YOX_HE3	The assessment of impacts on terrestrial historic environment for the construction and operation of Yoxford roundabout as detailed in <b>sections 9.4c)</b> and <b>9.6</b> .	6.8	Currently under assessment	-	-	Agreed,
YOX_HE4	The baseline environment, proposed mitigation measures and assessment for the OHI as set out in <b>sections 9.5</b> and <b>9.6</b> .	6.8	Currently under assessment	-	-	Agreed,
Freight Management Facility (FMF) - Terrestrial Historic Environment - Book 6, Volume 8, Chapter 9						
FMF_HE1	The baseline environment as detailed in <b>section 9.4</b> and <b>Appendices 9A-9C</b> .	6.9	Currently under assessment	-	-	Agreed,
FMF_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in <b>sections 9.5</b> and <b>9.7</b> .	6.9	Currently under assessment	-	Additional mitigation has been agreed during the course of the Examination. This was added to the Overarching Written Scheme of Investigation at Deadline 8 [REP8-065], in section 8.1.3 as follows: <i>"The freight management facility site-specific WSI will set out specific proposals for further engagement focused on the Seven Hills barrow cemetery (which includes SM 1011339, SM</i>	Agreed.



						1011340, SM 1011341, 1011342, SM 1011343, SM 1011344). This will include proposals for academic and popular publication of the results of the freight management facility excavations in the context of the wider group of barrows in addition to other forms of engagement as noted above. The site-specific WSI must, after consultation with Historic England, be submitted to and approved by SCC pursuant to Requirement 3."	
FMF_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the FMF as detailed in sections 9.6 and 9.8.	6.9	Currently under assessment	-	-	-	Agreed.
<b>Rail - Terrestrial Historic Environment - Book 6, Volume 8, Chapter 9</b>							
RAIL_HE1	The baseline environment as detailed in section 9.4 and Appendices 9A-9D.	6.10	Currently under assessment	-	-	-	Agreed.
RAIL_HE2	The proposed primary, secondary and tertiary mitigation measures to mitigate impacts as detailed in sections 9.5 and 9.7.	6.10	Currently under assessment	-	-	-	Agreed.
RAIL_HE3	The assessment of impacts on terrestrial historic environment for the construction, operation and removal and reinstatement of the rail proposals as detailed in sections 9.6 and 9.8.	6.10	Currently under assessment	-	-	-	Agreed.

## APPENDIX A: ENGAGEMENT ON THE SOCG

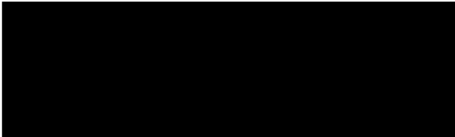
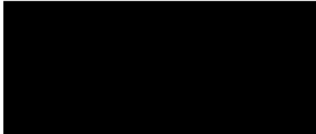
A.1.1. The preparation of this SoCG has been informed by a programme of discussions between SZC Co. and Historic England following submission of the DCO application. The relevant meetings are summarised in **Table 2.2**.

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

Date	Details of the Meeting
8 June 2020	Overview of the application, timings and proposed approach to SoCG.
4 August 2020	Q+A session on historic environment assessment with Historic England and SCCAS.
29 September 2020	Discuss relevant rep issues and first draft of SoCG.
22 October 2020	Joint meeting with ESC, SCCAS and HE.
3 November 2020	Discuss SoCG.
1 December 2020	Discuss mitigation documents including peat strategy and overarching WSI to inform SoCG.
19 January 2021	Amends made to second draft of version 1 SoCG following on from comments sent by WF on 6/11/20.
2 March 2021	Meeting to discuss draft.
28 May 2021	Confirmation from HE that this draft should be submitted as "Draft agreed SoCG with matters outstanding".
23 August 2021	Discussion on EXQ2.
13 September 2021	Catch up ahead of ISH13.
8 October 2021	Final version of SoCG agreed by email.

## SIGNATURES

The above Statement of Common Ground is agreed between SZC Co. and Historic England on the day specified below.

Signed:	
Print Name:	Dr Will Fletcher
Job Title:	Team Leader (Development Advice)
Date:	11-10-2021
Duly authorised for and on behalf of Historic England	
Signed:	
Print Name:	Carly Vince
Job Title:	Chief Planning Officer
Date:	9-10-21
Duly authorised for and on behalf of SZC Co.	