



The Sizewell C Project

9.10.29 Statement of Common Ground - Stop Sizewell C

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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, dated 1 October 2021 (i.e. Version 3), has been prepared through written exchanges between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Stop Sizewell C, 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 details the final position on relevant matters between the parties at the end of examination.

2 POSITION OF THE PARTIES

- 2.1.1 **Table 2.1** provides an overview of the position of the parties.

Table 2.1: Position of the Parties

Ref.	Matter	Stop Sizewell C's position [Starting from relevant representation (RR)]	SZC Co.'s Position	Position of the parties
1	Project Financing	<p>RR: Concerns raised in relation to financing and approach to funding.</p> <p>At 27th May: No change from position at RR.</p> <p>EDF have publicly stated that they cannot pursue this project on their own balance sheet.</p> <p>EDF see themselves as a minor investor in this development and intend to seek financing from a significant number of third-party investors perhaps in combination with a Regulated Asset Base (RAB) approach.</p> <p>For RAB to be applied to the Sizewell C project, it will require both government agreement and primary legislation to enable such a model in our commercial electricity market. Whilst we understand discussions are in process with government, we also note that multiple pension and insurance investment institutions have stated that they will not consider investing in Sizewell C or nuclear power as “the ESG status of nuclear power is unclear”.</p> <p>It is also unclear what position China General Nuclear will take, if any, in any financing of this project. CGN are a 20% stakeholder in the project up to the DCO submission and have a 33% stake in Hinkley Point C.</p> <p>Overall, therefore, it is completely unclear how this project can or will be financed and the project therefore does not meet one of the primary requirements for a National Strategic Infrastructure Project that requires clarity of financing as part of the Development Consent Order application.</p>	<p>Information on the project cost and funding sources is provided within the Funding Statement [APP-066]. Additional information has also been submitted within the Funding Statement Addendum [AS-011] and the Second Funding Statement Addendum [AS-150]. These provide details on how the acquisition of additional land necessary to build the Sizewell C Project would be funded and on how the Sizewell C Project generally is to be funded.</p> <p>For new nuclear power stations to be built, the Government has been clear that costs must come down. New nuclear costs are driven by construction and financing and both can be cheaper by replicating the design of Hinkley Point C. Evidence shows repetition brings costs down in nuclear development, just like other technology. Many of the design and qualification costs for Sizewell C have been paid for already at Hinkley Point – as well as the costs of setting up the supply chain and training workers. With the right timing, we can directly transfer the skills from Hinkley Point C to Sizewell C. In 2019 the government carried out a consultation on the use of a Regulated Asset Base model of financing (which was used for the Thames Tideway Tunnel) for new nuclear projects. This consultation invited responses on all of the impacts of using such a model and the government is now considering the responses that were received in forming its conclusion.</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.</p>
2a.	Site Selection	<p>RR: Concerns regarding the status of national policy and the reliance on this.</p> <p>At 27th May: No change from position at RR.</p> <p>Whilst EN-1 and EN-6 will continue to be “important and relevant” to the application for SZC under section 105 of the 2008 planning act, the 2008 white paper on nuclear power and our reliance on nuclear powers as a significant part of the energy mix must be seems as long out of date. Indeed, even the 2017 Ministerial Statement referred to is out of date given recent reports referred to below.</p> <p>The expectation for up to 5 new stations to be built from the designated sites in EN-6 and the very low expectations for wind and solar energy being a significant part of the mix are now seen as having been poor predictions for what has actually happened in the electricity generation market and we are still a long way from seeing the first new nuclear power station being completed and have seen three other sites from two developers withdrawing their applications.</p>	<p>The 2017 Ministerial Statement indicated that the Government considers that neither NPS EN-1 nor NPS EN-6 “has effect” for the Sizewell C DCO application and that if the decision on the application were made today it would be made pursuant to section 105 of the Act. However, EN-1 and EN-6 incorporate information, assessments and statements, including concerning the need for nuclear power, which continue to be important and relevant to the Sizewell C Project. Section 3 of the Planning Statement [APP-590], as updated by REP2-043 and Doc Ref. 8.4Ad2, explains there has been no relevant change of circumstances which would suggest that anything less than significant weight should be given to the policy in EN-1 and EN-6. Indeed, the need for new nuclear power is now even greater than when NPS EN-1 and NPS EN-6 were designated.</p> <p>The need for a new power station at Sizewell C is firmly established within the Government’s policy on national significant energy infrastructure. The National Policy Statement for Nuclear Power Generation (EN-6) (NPS EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and Wales by 2025. This is further supported by the Government’s Energy White Paper: Powering our Net Zero Future (2020) that identifies an ‘aim to bring at least one further largescale nuclear project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals’. The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – was set out in the Planning Statement [APP-590] that accompanied the Application and remains valid.</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.</p>

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		<p>Furthermore, the National Infrastructure Council, Committee on Climate Change and the CCC Sixth Carbon Budget along with the latest assessments for electricity generation have shown that there are ways to net zero 2050 without the significant redevelopment of nuclear power perhaps apart from the completion of Hinkley Point C and life extension of Sizewell B.</p> <p>Despite the statement that government would like to see one further large nuclear power station brought to FID before the end of this parliament, it is also caveated with both planning approval being gained and with there being “clear value for money for consumers and taxpayers” which given Hinkley Point's guaranteed price per kWh which is double the CfD investment seems to be focused on the flexible potential of Small Modular Reactors, Advanced Modular Reactors and fusion along with the continuing success and proposed increase in off-shore wind generation and multiple storage options, many of which can be developed and contributing to the grid and its stability in advance of any reactor at Sizewell C, which in its “always on” operating style is disruptive to the more flexible renewable generation technologies.</p>	<p>The UK Government has made it clear in its recent statements that it considers new nuclear to have an important role in the UK's pathway to achieving its Net Zero carbon emissions. The Energy White Paper stated that nuclear continues to be ‘an important source of reliable clean energy’ and nuclear power forms one part of the Prime Minister's Ten Point Plan to continued decarbonisation. The Energy White Paper announced a specific aim to bring at least one large-scale nuclear project to the point of Final Investment Decision by the end of this Parliament (by 2024) as additional nuclear power (beyond Hinkley Point C) will ‘be needed in a low-cost 2050 electricity system of very low emissions’.</p> <p>Under the BEIS Net Zero scenarios, the UK electricity demand will increase between around 250TWh and 350TWh between 2030 and 2050. This is equivalent to another nine to twelve low-carbon power stations of Sizewell C's output which would be required to come online after Sizewell C. Demand for electricity will increase substantially throughout the period to 2050 as other sectors such as heating, transport and industry increasingly electrify in order to decarbonise. Moreover, new low carbon generation of all technologies is expected be required on a continual basis up to, and beyond, 2050 in order to meet increasing electricity demand and to replace existing low-carbon generation as it reaches the end of its technical life. In other words, rather than Sizewell C being too late to contribute to decarbonisation, it will come online in a timely fashion to help meet the rising demand for low carbon electricity in the 2030s and 2040s and there will still be a requirement for very large amount of additional low new low carbon generation after Sizewell C for the 2050 Net Zero target and beyond. Nuclear has a critical and complementary role alongside renewables in a decarbonised power system. Volume 2, Chapter 26 of the ES [APP-342], as updated by AS-181, REP2-110, and Doc Ref. 9.116(A), demonstrates that construction emissions from the Sizewell C Project would be less than 1% of the relevant UK Government's carbon budget for that period and would, therefore, not have a significant effect on the ability of the Government to meet the UK's obligations under the Paris Agreement. Similarly, the gross emissions associated with the operational phase were also found to be less than 1% of relevant periods in which they arise. In consideration of the displacement of other more carbon-intense power suppliers to the grid, the net emissions associated with the operational phase will be of significant benefit to the UK in meeting its carbon budget targets.</p>	
2b.		<p>RR: Concerns on siting from the perspective of flood risk, impact on adjacent internationally designated sites of ecological importance, coastal processes, sites of amenity, cultural heritage and landscape value and cumulative impacts.</p> <p>At 27th May: No change from position at RR.</p> <p>Whilst the changes to the DCO accepted by PINS in late April makes a number of changes to the site coastal defences to further protect the site from flooding due to overtopping, consequential changes to the profile of the hard and soft coastal defences and permanent beach landing facility have not been adequately documented or explored. Impacts from these changes will be considered once accurate plans and locations for these features are provided at Deadline 2. It is unfortunate that these have not been made available earlier and regrettable that an attempt to make delivery of these plans as conditions</p>	<p>The ES [APP-159 to APP-582], as updated by the subsequent ES Addenda [AS-179 to AS-292, REP5-062 to REP5-069, REP6-017, REP7-029 to REP7-033, REP8-072 to REP8-073 and information listed within the ES Signposting Document (Doc Ref. PDB-2(C)), 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 the ES Addenda are all identified in the Mitigation Route Map (Doc Ref. 8.12(F)) and will be secured as commitments and controls imposed through the Development Consent Order if granted.</p> <p>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. SZC Co. considers that all of the accepted changes to the Application and Additional Information submitted into examination go some way in positively addressing concerns of stakeholders.</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.</p>

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		<p>within the DCO document rather than submitting them for proper scrutiny at the examination.</p> <p>Significant concerns still exist over the understanding of the surface to groundwater hydrological regime as required by the Secretary of State in the 2014 Scoping Report Opinion (APP-169) p691 section 3.96. Further detail on this lack of understanding and impacts to adjacent designated habitats will be provided within our Written Representation at Deadline 2.</p> <p>We are supportive of the AONB's concerns on Landscape and Visual Impact of the site especially from the south, west and east from the beach and sea. We agree with Minsmere Levels Stakeholders Group that the new designs for the permanent Beach Landing Facility, in particular, are significantly intrusive to the beach landscape and are concerned that these features will be evident on the beach into the next century.</p>		
3.	Local communities	<p>RR: Concerns over impacts on local communities, in particular Leiston, Eastbridge and Theberton; and settlements along the B1122 and A12, including from a noise perspective.</p> <p>At 27th May: No change from position at RR.</p> <p>No noise or vibration assessment has been made of the B1122 from its junction with B1125 through Theberton village to the site entrance during the early years when the Sizewell Link Road has not been built. Indeed Theberton residences to the west of the B1122 will be subject to noise from both the B1122 and the construction of the Sizewell Link Road. There are a number of properties along the B1122 that are listed and have little if any foundations and some are within 2 metres of the kerb. The 2023 assessment in Appendix G (APP-209) refers to site 10, but maps in APP-211 refer to RT6 and RT15 which are used in APP-203 but there is a disconnect between this report and the assessment against the Theberton with site 10 in (APP-209) being in Leiston. Considering the levels of HGV traffic is at a maximum around 2023, the assessment of low noise is remarkable and simply not credible when you consider that the assessment at the junction of the B1122 and B1125 is moderate adverse, how can the assessment in Theberton be low?</p> <p>More recent assessments for the centre of Theberton village are for 2028 (AS-249) when the Sizewell Link Road is assumed to have been completed and the noise impact at that time is rated as major beneficial significant, even though the noise that will be coming from the higher speed Sizewell Link Road will be added to the admittedly lower noise impact from the B1122. The fact that both Church Farm and Doughy Wylie crescent are rated as Major Adverse Significant, the latter being very close to the centre of the village, has to be treated with a good dose of scepticism.</p>	<p>The effects of noise and vibration from HGVs, and other traffic, serving the project were set out in the Application. The noise and vibration effects of construction traffic on existing roads were set out within Volume 2, Chapter 11 of the ES (APP-202) and subsequently updated within ES Addenda (AS-181, AS-204 and REP7-030). The noise and vibration effects of traffic, including construction traffic, on new or altered roads can be found in the following locations:</p> <ul style="list-style-type: none"> For the Two Village Bypass: Volume 5, Chapter 4 of the ES (APP-415), as updated by the subsequent ES Addenda (REP6-017 and REP7-030). For the Sizewell Link Road: Volume 6, Chapter 4 of the ES (APP-451), as updated by the subsequent ES Addenda (REP6-017 and REP7-030). For the Yoxford roundabout and other highways improvements: Volume 7, Chapter 4 of the ES (APP-484), as updated by the subsequent ES Addenda (REP6-017 and REP7-030). <p>The assessments follow the appropriate guidance in LA111 'Noise and vibration', which is the relevant part of the UK assessment method for considering the effects of highways noise and vibration. It forms part of the 'Design Manual for Roads and Bridges'.</p> <p>Measures are proposed to address identified impacts in a proportionate way in the 'Noise Mitigation Scheme' (Annex W of the Deed of Obligation (Doc Ref. 10.4)), which provides a mechanism through which affected properties can obtain improvements to their glazing to better keep out sound, subject to certain qualifying noise criteria.</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.</p>

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		<p>Overall the cumulative impact of both roads on the south of the village will be higher than current levels and decidedly not beneficial.</p> <p>These assessments are simply not fit for purpose.</p> <p>No attempt has been made to assess the potential impacts of rat-running through Eastbridge from Westleton via RSPB Minsmere access roads.</p>		
4.	Worker Campus	<p>RR: Impact of the campus on local communities from a noise, light, pollution, traffic and social pressures perspective; and insufficient justification of its siting.</p> <p>At 27th May: No change from position at RR.</p> <p>The original campus plan was set when the expected maximum number of on-site workers was 5,400. We, along with Suffolk County Council (SCC) suggested that having the campus on a green-field site immediately adjacent to the AONB was an inappropriate and significantly impactful option. The Boyer and Cannon report commissioned by SCC suggested a number of other local sites, one of which was suggested by EDF in its earliest consultations that were in a more urban environment but rejected because of a rather inappropriate access route through AONB land which was avoided in the B&C report. Such a site could also have left a potential legacy site for affordable or mixed housing helping to fulfil the District Councils needs for housing in the area and mirror the two-campus development associated with Hinkley Point C where the Bridgwater campus will leave the services infrastructure for future housing development.</p> <p>We are now faced with a maximum on-site worker population of 7,900 and yet with no additional campus facility expansion, and the expectation that local accommodation will pick up the additional 2,500 bed spaces. Considering Leiston population is only ~4,500, the available housing can only come at the expense of additional houses of multiple occupancy in Leiston, Saxmundham, Aldeburgh and surrounding villages and hamlets, which will require approval by East Suffolk District Council bringing problems of car parking on narrow street and country lanes as well as a significant incursion into existing tourist accommodation, further damaging that thriving sector of the East Suffolk economy.</p> <p>At 1st September:</p> <p>Additionally, we support the AONB's concern At ExQ2 LI 2.24 that the current building arrangements will potentially increase light spill and would echo and support Theberton and Eastbridge Parish Councils ExQ2 LI 2.24 suggestions on accommodation campus design for quadrangle arrangements or buildings with all inwards facing windows to dramatically reduce</p>	<p>SZC Co. has developed its proposals for a single, on-site accommodation campus for Sizewell C and considered alternatives, including alternative locations, throughout four stages of consultation. A range of factors have led to the finalization of a strategy for the on-site accommodation campus. Specifically it would allow to:</p> <ul style="list-style-type: none"> • reduce the number of journeys on local roads; • balance the economic benefits of workers integrating within housing markets and communities, without overwhelming local communities with new residents; and • allow flexible working patterns and out of hours working that would be necessary to maintain construction productivity and progress. <p>Further details of the site selection process are set out in the Site Selection Report provided in Appendix A of the Planning Statement [APP-591] and the Accommodation Strategy [APP-613]. Appendix A of the Design and Access Statement (Doc Ref. 10.18) sets out the design principles for the accommodation campus to minimise environmental effects on the nearby AONB, including (but not limited to) limiting the height of the buildings, locating taller four-storey buildings further away from sensitive receptors and the sympathetic use of the colour palette for facades.</p> <p>As part of the accommodation strategy, SZC Co. will also provide upgraded sports facilities at the Alde Valley School in Leiston, which will provide shared facilities for the school and for use by the Sizewell C construction workforce. Following the construction period, these facilities would remain as a legacy benefit in Leiston.</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.</p>

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		light spill both to the bat corridor to the east and generally to Eastbridge Road and the redirected bridleway to the west.		
5.	Transport and related associated development	<p>RR: Whilst a number of issues have changed as a result of the accepted changes to the DCO our original Relevant Representation still listed a number of issues that are unaffected by these changes. These are 1) timings of upgrades to both A12 and B1122, 2) rejection of the Sizewell Link Road (SLR) due to damages to farm viability, village severance and lack of legacy value, and 3) rejection of alternative routes with insufficient justification.</p> <p>At 27th May: No change from position at RR.</p> <p>It is unacceptable that any relief road should not be available for the so called “early years” when HGV and worker traffic (prior to completion of the Park and Ride sites) will almost be at the maximum level anticipated for the SLR during the peak development period, always assuming both the proposed rail and sea delivery aspects of the changed application are met. There are too many, “ifs”, “buts” and “if possible” caveats to the strategy now adopted by EDF. What is clear is that if any of these options is not delivered, proves not possible to deliver, then the fallback will be additional HGV numbers on the A12, B1122 and SLR. It is notable that when there were delays in delivering the jetty at Hinkley Point additional HGV movements had to be added to maintain progress on-site.</p> <p>The SLR or one of the alternative routes that were dismissed without sufficient consideration needs to be delivered in advance of significant site preparation. The SLR itself provides significantly less legacy to the area as the route essentially runs parallel to the existing B1122 and forces traffic from the south to travel further north than necessary before travelling south and east again to reach the site. A route leaving the A12 south of Saxmundham, not necessarily at the point suggested by the D2 or W routes previously suggested would provide both a shorter route to the site and a good legacy both for the Sizewell sites, Leiston and the various wind farm and interconnector projects that are proposed for this area.</p> <p>Whilst we note the point that the SLR will remove traffic through the village off Theberton, the AECOM report commissioned by EDF seems to dismiss the fact that all the other options do likewise and in fact both the alternate routes discussed above avoid many more residential, farm and listed buildings than the SLR.</p>	<p>The level of HGVs forecast to be generated to/from the main development site in the early years is summarised in the Consolidated Transport Assessment [REP4-005]. It is forecast that up to 600 two-way HGVs would be generated during the early years prior to the two-village bypass and Sizewell link road being operational. As set out in the Construction Traffic Management Plan (Annex K of the Deed of Obligation (Doc Ref. 10.4)), it is only once the two village bypass and Sizewell link road are operational that that level of HGVs to/from the main development site could increase to up to 700 two-way HGVs on the busiest day with the proposed freight management strategy.</p> <p>Within the 2023, 2028 and 2034 ‘Reference Case’ models (i.e. future year traffic models without Sizewell C), background traffic growth that takes account of committed development has been included. The committed development schemes and background traffic growth for the traffic modelling has been discussed and agreed with Suffolk County Council and East Suffolk Council. All future year reference case scenarios have also been modelled including traffic flows generated by an outage at Sizewell B. This is highly robust, given that a planned outage only occurs for 8% of the time. The Sizewell B relocated facilities has been assessed in the early years (2023) scenario. In addition, a cumulative assessment of Sizewell C with East Anglia 1 North’ (EA1N) and ‘East Anglia 2’ (EA2) has been undertaken (refer to the Fourth ES Addendum for the updated assessment [REP7-030 and REP7-032]). A Freight Management Strategy [AS-280] was included in this submission and sets out the likely sources of construction materials.</p> <p>As a response to the Stage 4 consultation, a decision was made to propose the Sizewell link road as a permanent facility, rather than temporary. Retaining the Sizewell link road offers permanent benefits, particularly in relation to the Theberton element of the bypass, including improvements in noise and air quality in the village. The Councils summarise these benefits in its response to the Stage 4 consultation. Paragraph 246 of the Councils response states: “<i>The Councils consider the Theberton Bypass as a legacy benefit of the development, by removing through traffic from the village, with likely associated benefits on noise and air quality and greater network resilience, and strongly believe it should be retained following construction</i>”.</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.</p>
6.	Landscape & Heritage	<p>RR: Impact on landscape character, the AONB and other nationally and internationally designated nature conservation areas.</p> <p>At 27th May: No change from position at RR.</p>	<p>THE AONB natural beauty and special qualities document has been produced in agreement with Suffolk Coast & Heaths AONB Partnership, SCC and ESC and has been used to inform the assessment of the effects of the project on the AONB. An assessment on AONB is provided in Volume 2, Chapter 13 of the ES [APP-216], as updated by the subsequent ES Addenda [AS-181, REP7-030], and the significance of effects are identified. SZC Co.'s assessment has</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This,</p>

Ref.	Matter	Stop Sizewell C's position [Starting from relevant representation (RR)]	SZC Co.'s Position	Position of the parties
		<p>We fully support the AONB partnership's objections and concerns about both the intrusive nature of the site along with the addition of new tall pylons to the elevated site.</p> <p>The lack of regard to the statutory purpose of the AONB in combination with underrepresented impacts will have a significant impact to the designation as well as tourism and designated sites within its borders, particularly those closest at Sizewell, Minsmere and Dunwich Heath.</p> <p>The recent addition of coastal impacts such as the increasing height of the Hard Coastal Defence, the more intrusive permanent BLF structures and the temporary light jetty and conveyor system along with inevitable closures of the Suffolk Coastal Path and Sandlings Way cannot be mitigated.</p> <p>The suggestion that some adjustments to the outward design of these tightly packed buildings, with the plain concrete reactor building, can “<i>demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation</i>” as required at 4.5.3 EN-1 whilst hiding behind a 14 metre plus high defence to the north and east but plainly visible from the west, is simply a denial of the significant impact that this project will have both during the construction and over the entire lifetime of the installation through operation and decommissioning. Even after decommissioning the main platform will still exist as its removal is simply not practical and this will be a permanent eyesore on the coast for generations and centuries to come.</p> <p>Mitigation is simply not possible and this development is inappropriate in this AONB setting.</p>	<p>concluded that local effects on the AONB will not result in any widespread effect on the AONB. It is noted that NPS EN-6 recognises “the potential for long-term effects on visual amenity” (para 3.10.3) and that “the scope for visual mitigation will be quite limited” (para 3.10.8). SZC Co. have deployed extensive mitigation as part of the embedded design for operation and construction phases to reduce adverse effects.</p> <p>Where possible, impacts are proposed to be avoided or reduced by design or by embedded mitigation measures such as screening by vegetation and earthworks, as well measures included in the CoCP (Doc Ref. 10.2) to limit noise disturbance during construction. As required, additional mitigation has taken the form of agreed commitments within the Deed of Obligation (Doc Ref. 10.4).</p>	therefore, remains a matter that is not agreed between the parties.
7.	Environment Impacts	<p>RR: Impacts on Minsmere Sluice and wider environmental concerns, including on designated sites, including internationally designated European sites and European marine sites and nationally designated sites (SSSIs, the AONB) and Minsmere.</p> <p>At 27th May: No change from position at RR.</p> <p>Whilst we recognise that Minsmere Sluice is outside of the redline boundary of the SZC development site, this does not imply that impacts will not occur beyond that boundary. Impacts of changing the drainage characteristics of Sizewell Marsh, the introduction of the SSSI crossing culvert, supported on piling structures will inevitably change the nature of drainage to the Leiston Drain that ultimately empties via Minsmere South Levels and Minsmere Sluice.</p> <p>Any changes to the characteristics of the groundwater at Sizewell Marsh and/or the flow characteristics of the Leiston Drain exiting through the SSSI crossing culvert will have both groundwater and surface water impacts to Minsmere South Levels and at Minsmere Sluice.</p> <p>A report by experts engaged by Suffolk Coastal Friends of the Earth raises significant questions about the assessments of</p>	<p>SZC Co. recognises concerns of stakeholders regarding the long-term viability of Minsmere Sluice. Minsmere Sluice is an Environment Agency owned and maintained structure that controls drainage from the Minsmere New River, Leiston Drain and Scott's Hall Drain. It provides controls and limits the ingress of salt water and is tide locked when water levels in the North Sea are high. At low tide drainage of the upstream fluvial system via Minsmere Sluice is via gravity. We note that the Shoreline Management Plan (SMP) policy for the wider coast (MIN12.3 and MIN12.4) in the vicinity of Minsmere Sluice is managed realignment, whereas the position for Minsmere Sluice is for it to be maintained. However, SZC Co. as neither owns the structure nor includes it within the redline boundary for the proposed power station, there is no mechanism within the DCO for us to address this issue.</p> <p>The AONB natural beauty and special qualities document has been produced in agreement with Suffolk Coast & Heaths AONB Partnership, SCC and ESC and has been used to inform the assessment of the effects of the project on the AONB. An assessment on AONB is provided in Volume 2, Chapter 13 of the ES [APP-216], as updated by the subsequent ES Addenda [AS-181, REP7-030], and the significance of effects are identified. SZC Co.'s assessment has concluded that local effects on the AONB will not result in any widespread effect on the AONB. It is noted that NPS EN-6 recognises “the potential for long-term effects on visual amenity” (para 3.10.3) and that “the scope for visual mitigation will be quite limited” (para 3.10.8). SZC Co. have deployed extensive mitigation as part of the embedded design for operation and construction phases to reduce adverse effects. The Natural Environment Fund, and separate</p>	The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.

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		impacts on Sizewell Marsh and Minsmere and will be referenced in our Written Representation. Further questions about the marine species impact and the justification for removing the acoustic fish deterrent from the high volume of water cooling required for the two reactors have been raised by Together Against Sizewell C through their expert adviser at Pisces and we support that assessment.	resilience fund agreed bilaterally with RSPB Minsmere, will complement the plans, programmes and projects supported by the proposed Tourism Fund (and other funds, where applicable). These commitments are set out within the Deed of Obligation (Doc Ref. 10.4).	
8.	Marine and Coastal processes	RR: Seeking greater clarity on the effect of Sizewell C on coastal processes and flood risk. At 27th May: No change from position at RR. The CPMMP currently submitted to the examining authority is premature given there is no published design or plans for the Hard Coastal Defence, its associated Soft Coastal Defence not the permanent Beach Landing Facility. We support Minsmere Levels Stakeholders Group and Mr Nick Scarr's reports and will provide further references and information within our Written Representation at Deadline 2. At 1 st September - Regarding Shingle Beaches CWS: As stated at ISH 10, we are greatly concerned at the significant losses in biodiversity assessment for the shingle dunes and shingle beaches of the CWS lost in connection with the creation of the SZC Hard Coastal Defence. The restored habitats reaching only ~6% of the prior to intervention levels of the existing habitat - see REP1-004 Table 8 p39 (existing), Table 10 p49 (loss) and Table 13 p64 (created). Given the slope of the new soft coastal defence and the potential for further disturbance during beach recharge events, we question whether even this level of restoration of vegetated shingle will be achievable in the medium or long term. Your comments in section 6.1.2 reflects on the "penalty" that biodiversity metric 2 imposes on these habitats that are very difficult or in some case take significant time to establish. Such penalties are appropriate for exactly that reason, and it raises very appropriate questions as to whether the act of destroying such valuable and/or scarce habitats in the first place should be reconsidered. At 1 st October We note that a SoCG will be entered into between Paul Collins and SZC Co regarding Biodiversity Net Gain assessments. We support that effort and support Mr Collins position and submissions that result.	Although the detailed design of the sea defences is still being refined, the parameters and criteria that it needs to meet are defined 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 has been made on those parameters and criteria. Subsequently, SZC Co. has submitted additional information on the design of the sea defences into examination (e.g. refer to Preliminary Design and Maintenance Requirements for the Sizewell C Soft Coastal Defence Feature (Doc Ref. 9.12(C)), Sizewell C Coastal Defences Design Report [REP8-096] , and Temporary and Permanent Coastal Defence Feature Plans [REP5-015]). SZC Co. has issued a Coastal Processes Monitoring and Mitigation Plan (CPMMP) (Doc Ref. 10.5) into the examination. Implementation of the CPMMP will be a requirement of the DCO and the Deemed Marine Licence. The approach to mitigation for the Shingle Beaches CWS is fully explained in the ES (refer to Volume 2, Chapter 14 of the ES [AS-033]), the Outline Landscape and Ecology Management Plan (Doc Ref. 10.22) and the relevant monitoring of the re-establishment is covered in the Terrestrial Ecology Monitoring and Mitigation Plan (Doc Ref. 10.28) which has been consulted on with Natural England and other ecology stakeholders.	The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.
9.	Economic and social impacts	RR: Concerns from a socio-economic perspective, including tourism, the community and economy. At 27th May: No change from position at RR. We remain concerned that the impacts on the local economy as well as the stated intentions to bring Hinkley Point trained staff to	SZC Co. has undertaken a robust assessment of the likely impacts to the local and wider economy in terms of employment, supply chain spending, additionality and wages and benefits to employment, skills and education. These assessments are set out in Volume 2, Chapter 9 of the ES [APP-195] , and within the Economic Statement [APP-610] which also includes appendices that set out measures to enhance benefits to the supply chain and labour market (via employment, skills and education interventions).	The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a

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		<p>the area, the low level of unemployment and availability of skilled workers, the fact that local is defined as within 90 minutes commute from the site, unlike Hinkley Point where 60 minutes was used, the potential for displacement from existing local employed cohort and the damage that will inflict on the local economy.</p> <p>We would support all efforts to raise the skills of the local unemployed or school/college leavers, but we should not forget that once this project completes the needs for this level and type of employment is likely to disappear, repeating the boom and bust that was clearly a characteristic of the SZA and SZB developments. It is notable that Leiston and the area has not been “raised up” as a result of SZB over the decades since SZB became and operational power station.</p> <p>Further assessment and comments on this point will be provided at the time we submit our Written Representation at Deadline 2.</p>	<p>The Sizewell C Project's effects on the local economy will be overwhelmingly positive – supporting long-term, sustainable careers through employment, skills and training initiatives secured in partnership with Suffolk County Council and New Anglia Local Enterprise Partnership (LEP)'s strategic plans for the regional economy.</p> <p>SZC Co. is working with partners including Suffolk County Council, New Anglia LEP and education, training and skills providers to develop a suite of Employment, Skills and Training measures that support local people into work, into higher skilled work, and to develop sustainable careers in construction, energy and other sectors that support the Sizewell C Project and the wider ambitions for growth in the region.</p> <p>SZC Co. is working with SCC, ESC, NALEP, Suffolk CoC to finalise a suite of activities for employment, skills and education - including activities in the supply chain - to ensure that the beneficial effects of the project can be enhanced and any risks of adverse effects can be avoided through the development of measures set out initially in the Employment, Skills and Education Strategy appended to the Economic Statement.</p> <p>SZC Co. recognises that while the macro-level effects of the Sizewell C Project are beneficial – creating more jobs, higher skilled jobs and promoting competency in the supply chain, and it will be important to optimise the benefits locally.</p> <p>Upskilling will benefit the project and the wider market – focus will be on 'legacy' roles (as determined by the Council's research base) that the region and the project both need for the long term. SZC Co. is working with SCC to develop the scope, implementation plans and governance proposals for the measures set out in the Employment, Skills and Education Strategy appended to the Economic Statement that will be secured by the Deed of Obligation (Doc Ref. 10.4). Broad scope and implementation has been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Skills and Student Bursary, Contribution for Funding for Regional Skills Coordinator. The scale of financial contributions has still to be discussed. The scope for each measure has been based around existing measures in the region - for example providing revenue funding to deliver on existing capital investment in skills centres in the region.</p> <p>The Deed of Obligation (Doc Ref. 10.4) includes a raft of measures to provide resilience and long-term legacy to the areas likely to experience the most change as a result of the Project, such as Leiston. This includes a ring-fenced Community Fund, Housing Fund, Tourism Fund, physical investment in transport infrastructure and PRow and cycleways, as well as employment, skills and training investment set out above that will focus on areas where social value can be most gained.</p>	<p>matter that is not agreed between the parties.</p>
10.	Planning Statement	<p>RR: Comments in relation to:</p> <ul style="list-style-type: none"> Proposed use of 'Not for Approval' plans Consents and Powers in the Draft DCO Approach to environmental mitigation, management and development flexibility (Rochdale Envelope) Approach to Subsequent Approvals Planning conditions and legal agreements <p>At 27th May: No change from position at RR.</p> <p>We remain concerned about the overuse of consents and powers through the Draft DCO along with over-reliance on the Rochdale Envelope as a means to avoid producing plans and proposals for examination during the DCO examination.</p>	<p>Sizewell C is a large-scale infrastructure project and PINS has recognised that projects of this scale require an element of flexibility within clearly defined parameters (see PINS Advice Note 9 on "Using the Rochdale Envelope"). SZC Co has complied with this Advice Note in the preparing its application. The Environmental Statement set out the defined parameters clearly and the environmental impact assessment considered the full extent of those parameters. The parameters themselves are secured through the draft DCO (Doc Ref. 3.1(J)). This ensures that the flexibility SZC Co. has is limited to the parameters and impacts which have been assessed. SZC Co. considers that these are sufficient to ensure there is control over the development. However, there are certain cases where it has been agreed with the local planning authority and other stakeholders that further detail is needed for approval. Requirements have therefore been added to the draft DCO (Doc Ref. 3.1(J)) for SZC Co. to obtain approval of further detail before development of certain aspects can begin.</p> <p>The Planning Statement [APP-590], as updated by REP2-043 and Doc Ref. 8.4Ad2, explains the relevant policy to Sizewell C and explains how it has been complied with.</p>	<p>The respective positions of the parties remain unchanged (as recorded in columns 3 and 4) on this matter. This, therefore, remains a matter that is not agreed between the parties.</p>

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		We will continue to review the various documents during the examination and provide further input through our Written Representation or as appropriate during the examination.	The enforcement bodies under the draft DCO (Doc Ref. 3.1(J)) have been given authority through statute. The draft DCO (Doc Ref. 3.1(J)) clearly identifies the appropriate enforcement authority for various obligations as well as any further approvals that are necessary under the draft DCO . The Deed of Obligation (Doc Ref. 10.4) sets out the governance arrangements which secure the sharing of information with enforcement authorities to ensure that they are provided with the appropriate information to fulfil their role.	
11a.	Examination Process	Endorses points raised by other stakeholders, including the Royal Society for the Protection of Birds Suffolk Wildlife Trust Theberton and Eastbridge Parish Council Minsmere Levels Stakeholder Group.	Noted. No further action.	
11c.		Concerns over the approach to the examination	Noted. No further action.	