



# The Sizewell C Project

## 9.10.31 Statement of Common Ground - English Heritage Trust

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

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October 2021

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



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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 02, dated 08-10-21, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and English Heritage Trust ('EHT'), referred to as 'the parties'.

### 1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project'). This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.2 The aim of this SoCG is, therefore, to inform the Examining Authority and provide a clear position on the state and extent of discussions and agreement between the parties on matters relating to the proposed Sizewell C Project.

1.2.3 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website.

### 1.3 Structure of this Statement of Common Ground

1.3.1 Chapter 2 provides a schedule which detail the position on relevant matters between the parties, including any matters where discussions are ongoing. This is underpinned by Appendix A, which provides a summary of engagement undertaken to establish this SoCG.

## 2 POSITION OF THE PARTIES

2.1.1 Parties to this SoCG are SZC Co and EHT.

2.1.2 The Leiston Abbey (second site) is in the care of EHT; it is a scheduled monument and one of Suffolk's most impressive monastic ruins. The site also includes four listed buildings. Three of the listed buildings – the Guesten Hall,

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the Barn and the Retreat House (aka Abbey House / the farmhouse) – are outside of the English Heritage Guardianship area. These buildings are Pro Corda’s responsibility.

2.1.3 EHT generally has overall responsibility for the main part of the site that is accessible to the public, including the responsibility for promoting public access, and for conservation care and repair of the monument and its buildings. Some day-to-day management and care is undertaken by EHT's local partners, Pro Corda, who also run their music school business on part of the site. Pro Corda is not party to this SoCG as matters related to their business are discussed and dealt with separately.

2.1.4 **Table 2.1** provides an overview of the position of the parties and any further actions planned.

Table 2.1 Position of the Parties

Ref.	Matter	SZC Co.'s Position	EHT's Position	Final position	Agreed / Not Agreed / In Progress
<b>Relevant Representation</b>					
EH1	<p>English Heritage Trust (EHT) was formed in 2015 as a registered charitable company, independent of government – effectively English Heritage at that time was split into Historic England and EHT. We care for over 400 buildings monuments and sites nationally including Stonehenge, Dover Castle and Leiston Abbey. Caring for these places is the cornerstone of everything we do, and our business plan is also driven by the need to be financially independent by 2023. Key parts of Leiston Abbey affected by the proposals are within our guardianship. EHT generally have responsibility for major repairs and upkeep here, with day to day management and care undertaken by our local partners Pro Corda who also run their own business on part of the site.</p>	<p>In recognition of the fact that EHT and Pro Corda perform different functions in relation to the Leiston Abbey second site, two separate contributions have been agreed under the Deed of Obligation (Doc Ref. 8.17(G)).</p> <p>These comprise a heritage contribution for EHT (payable via Historic Buildings and Monuments Commission for England) and a resilience fund for Pro Corda.</p> <p>A contribution to a landscape and access masterplan has also been agreed to address site-wide landscaping and access issues for all visitors to the site. This would be payable to EHT (via Historic Buildings and Monuments Commission for England as above) with a requirement for consultation with Pro Corda.</p>	<p>The Leiston Abbey second site is mainly under the control of EHT (on behalf of Historic England), and the site is protected for the nation by guardianship under the Heritage Acts. Sustainable Management; care and upkeep of the site is an expensive commitment for EHT and recent site surveys have demonstrated the need for urgent and widespread repairs.</p> <p>Pro Corda occupy part of the Abbey site (and own the underlying freehold) and carry out some local day to day management by agreement with us.</p> <p>EHT's main focus for the Abbey site is to make it accessible to the general public, promote education and understanding of the site, and preserve and care for the buildings. The general visitor experience is very important here.</p> <p>The Abbey site also provides an important visitor and education experience to the local community.</p> <p>The Abbey site has developed over the centuries as a fairly remote and tranquil location (which is why of course the Pro Corda music school also use part of the site), and any changes to this setting and feel will disproportionately affect the heritage significance, visitor experience, and understanding of the site.</p> <p>Management and mitigation from the Sizewell C project, to protect the Scheduled Monument and listed buildings, is required. EHT is pleased to note the proposed separate Deed of Obligation contributions for its work (for heritage management and conservation), and for Pro Corda.</p> <p>Appropriate financial contributions, through the Deed of Obligation, for EHT can help to offset the harm to the site by improving the visitor experience in many ways. This will, in turn, help visitors to better understand the site, and better reveal the site's significance.</p>	<p>Deed of Obligation contribution is agreed. This comprises:</p> <p>Survey costs of £63,000</p> <p>Repair costs of £1,027,224</p> <p>Landscape and access masterplan costs (in consultation with Pro Corda) of £150,000</p> <p><b>Total £1,240,224</b></p> <p>The detail of the works is set out in the Sustainable Conservation and Management Strategy (SCMS) which forms an annex to the Deed of Obligation.</p>	Agreed

Ref.	Matter	SZC Co.'s Position	EHT's Position	Final position	Agreed / Not Agreed / In Progress
			Most critically Deed of Obligation contributions would help EHT to promote and achieve a sustainable state of conservation and maintenance at the ruined site. This underpins the public's continued long-term enjoyment of the site. Day to day upkeep, security, and improved interpretation are all also important.		
EH2	It is clear that the proposed development will have a significant adverse effect on the monument and its attractiveness to our visitors including the effects of increased traffic, construction noise and the proximity of the workers village.	<p>Effects on Leiston Abbey (second site) are identified in the main development site (<b>Book 6, Volume 2, Chapter 16</b>) and rail chapters (<b>Book 6, Volume 9, Chapter 9</b>) of the <b>ES</b>.</p> <p><u>MDS construction</u> A number of primary and tertiary mitigation measures have been embedded in the project to address the potential loss of heritage significance through change to setting of the heritage assets. For the construction phase of the main development site, these are as follows:</p> <ul style="list-style-type: none"> <li>• Change in design to offset roundabout on B1122 and allow for enhanced screening.</li> <li>• Design of lighting to minimise light spill.</li> <li>• Amended campus design west of Eastbridge Road to increase separation from asset.</li> <li>• Retained landscape buffers between accommodation campus and asset.</li> <li>• Strengthened planting in hedgerow to Abbey Lane.</li> <li>• Enhanced connectivity with Leiston Abbey (first site) via Suffolk Coast Path diversion.</li> <li>• Best-practice noise mitigation during construction.</li> </ul> <p>Following these, the construction phase impacts are assessed as:</p> <ul style="list-style-type: none"> <li>• Leiston Abbey (second site) and moated site (SM 1014520)/St Mary's Abbey, Grade I (LB 1215753) - moderate adverse (significant). A S106 contribution to provide for enhancements to the visitor experience is therefore proposed as additional mitigation to reduce the impact to minor adverse (not significant).</li> <li>• The Guesten Hall at Abbey Farm, Grade II (LB 1268290), Barn at Abbey Farm, Grade II (LB 1216380), Retreat House, Grade II (LB 1215754) - all minor adverse (not significant) so no additional mitigation proposed.</li> </ul> <p><u>MDS Operation</u></p>	<p>EHT is pleased to note that SZC Co. recognises the effects of the proposals on the Leiston Abbey Second Site. The scale of these effects has been discussed through the DCO Examination process and a Deed of Obligation contribution has been agreed.</p> <p>EHT is concerned about the effect on the Abbey site during the construction phase. The setting of the Abbey site, and the understanding and appreciation of it by visitors, will be harmed significantly in the short term, with some minor long term effects including site vistas being changed due to the visibility of Sizewell C.</p> <p>EHT is concerned about the effects on Leiston Abbey second site arising from the construction phases of the project, the proposed road and rail movements, and the proposed workers "campus." The direct effects of these on the setting of the Abbey, and the indirect effects from increased road movements, and potentially visitor pressure will need to be carefully managed. EHT is also concerned about legacy or long lasting effects on Leiston Abbey second site as outlined above but is content that these effects will be managed, and mitigated.</p> <p>To help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT has developed a comprehensive "Sustainable Conservation and Management Plan" (SCMP) to provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site.</p> <p>Turning to the suggested: "S106 contribution to provide for enhancements to the visitor experience is therefore proposed as additional mitigation to reduce the impact to minor adverse"</p> <p>EHT has shared its SCMS for Leiston Abbey second site with SCZ Co. and this has been used as the basis for agreeing the</p>	As set out in EH1 above.	Agreed

Ref.	Matter	SZC Co.'s Position	EHT's Position	Final position	Agreed / Not Agreed / In Progress
		<p>For the operational phase of the main development site, embedded mitigation comprises restoration of agricultural land and heathland east of B1122 and retention of established vegetation. Effects on Leiston Abbey (second site) and moated site (SM 1014520)/St Mary's Abbey, Grade I (LB 1215753) are assessed as minor adverse (not significant). No effects are predicted elsewhere on the site. No additional mitigation is required for the operational phase.</p> <p><u>Rail Construction</u></p> <p>For the green rail route, embedded mitigation will comprise retention of established vegetation, introduction of appropriate landscape proposals and best practice noise mitigation during construction. For the construction phase of the rail extension:</p> <ul style="list-style-type: none"> <li>• Effects on Leiston Abbey (second site) and moated site (SM 1014520)/St Mary's Abbey, Grade I (LB 1215753) are assessed as moderate adverse (significant). A S106 contribution to provide for enhancements to the visitor experience is therefore proposed as additional mitigation to reduce the impact to minor adverse (not significant).</li> <li>• No effects are predicted elsewhere on the site.</li> </ul> <p><u>Rail Operation / Removal and Reinstatement</u></p> <p>For the operational phase of the rail (which, once constructed, corresponds with the construction phase of the main development site), embedded mitigation measures will comprise retention of established vegetation and introduction of appropriate landscape proposals. Following the implementation of these:</p> <ul style="list-style-type: none"> <li>• Effects on Leiston Abbey (second site) and moated site (SM 1014520)/St Mary's Abbey, Grade I (LB 1215753) are assessed as moderate adverse (significant). A S106 contribution to provide for enhancements to the visitor experience is therefore proposed as additional mitigation to reduce the impact to minor adverse (not significant).</li> <li>• Minor adverse (not significant) impacts are assessed elsewhere on site with no additional heritage mitigation required.</li> </ul> <p>No effects are predicted during removal and reinstatement.</p>	<p>necessary financial contribution that would be capable of reducing the scale of effects upon the scheduled monument and the associated listed buildings. The SCMS has been provided to the Examination at Deadline 8 and is attached as an Annex to the Heritage Schedule of the Deed of Obligation.</p>		

Ref.	Matter	SZC Co.'s Position	EHT's Position	Final position	Agreed / Not Agreed / In Progress
		<p><u>Project Wide</u></p> <ul style="list-style-type: none"> <li>During the construction phase, changes in the setting of Leiston Abbey (second site) and moated site (SM 1014520)/St Mary's Abbey, Grade I (LB 1215753) arising from the combination of the main site construction activity and the construction, operation and removal and reinstatement of the green rail route are assessed as giving rise to a major adverse (significant) effect. A S106 contribution to provide for enhancements to the visitor experience is therefore proposed as additional mitigation to reduce the impact to moderate adverse (significant).</li> <li>Minor adverse (not significant) impacts are assessed elsewhere on site with no additional heritage mitigation required.</li> <li>No project-wide effects are predicted following removal and reinstatement of the Green Rail Route.</li> </ul>			
EH3	I note that the importance of protecting local heritage assets is recognised in your public consultation documents. It was good to see that proposals for mitigation works to the site are proposed including security and fencing/landscaping improvements and possible support for site improvements and enhanced historic interpretation. In addition, proposals to improve access to the site and help maintain the monument would be welcomed. It should be noted that maintaining heritage assets is highlighted as an important part of Sustainable Development in the NPPF, with associated local community benefits.	SZC Co. welcomes the preparation of the SCMS for Leiston Abbey and the updated survey work which EHT has undertaken to prepare this. SZC Co. agrees this is the most appropriate document to use as the basis for mitigating the effects of the Sizewell C Project.	EHT has shared a SCMS for Leiston Abbey second site with SZC Co., which EHT suggests is the most appropriate document to use as the basis for mitigating the effects of the Sizewell C Project.	As set out in EH1 above.	Agreed.
<b>Matters raised by the Examining Authority</b>					
EH4	The SoCG should address all the issues raised by English Heritage in their relevant representation [RR-0371].	Addressed above.	Addressed above.	Addressed above.	All agreed.
EH5	Effects on heritage assets and their setting including designated and undesignated archaeological assets.	For the project as a whole, SZC Co. is addressing effects with stakeholders as follows:	Agreed, for the purposes of this application, EHT only has interest in the Leiston Abbey second site.	None.	Agreed.



Ref.	Matter	SZC Co.'s Position	EHT's Position	Final position	Agreed / Not Agreed / In Progress
		<ul style="list-style-type: none"> <li>Scheduled Monuments, Grade I and II* listed assets, marine (below mean high water mark) archaeology, peat strategy - Historic England.</li> <li>Grade II listed assets, Conservation Areas - Conservation Officer, East Suffolk Council.</li> <li>Buried archaeology, peat strategy - Suffolk County Council Archaeology Service.</li> <li>This is in line with these stakeholders' remits.</li> </ul> <p>English Heritage Trust's interest is in their assets at Leiston Abbey (second site) only for the purposes of this application.</p>			
EH6	A summary of matters agreed; and A summary statement of matters not agreed or outstanding.	All matters are now agreed. The Deed of Obligation, Schedule 8 (Doc Ref. 8.17(G)) sets out the agreed contribution.	All matters are now agreed. The Deed of Obligation, Schedule 8 (Doc Ref. 8.17(G)) sets out the agreed contribution.	As set out in EH1 above.	Agreed.

## APPENDIX A: ENGAGEMENT ON THE SOCG

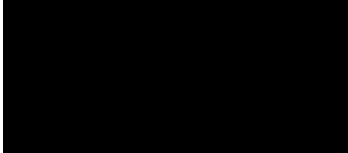
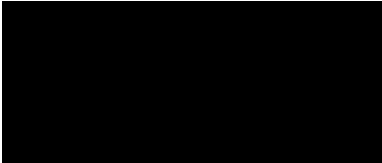
- A.1.1. The preparation of this SoCG has been informed by a programme of discussions between the parties, as summarised in Table 2.2.

**Table 2.2 SOCG meetings held between the parties**

Date	Details of the Meeting
6/8/20	Meeting to discuss assessment / approach to mitigation to inform SoCG.
1/10/20	Meeting to discuss assessment / approach to mitigation to inform SoCG.
2/2/21	Meeting to discuss assessment / approach to mitigation to inform SoCG.
3/4/21	Meeting to discuss assessment / approach to mitigation to inform SoCG.
18/5/21	Meeting to run through EHT's comments on SoCG and first draft of SCMS
10/6/21	Discussion on detail of the proposed DOO measures.
15/7/21	Discussion on detail of the proposed DOO measures.
11/8/21	Discuss specific measures to be included / excluded from DOO contribution.
24/8/21	Discuss DOO drafting and financial sums for Deadline 7, noting updated survey information awaiting. Also discussed legal rights of access / road safety issues.
13/9/21	Meeting for EHT to present updated survey information for Second Leiston Abbey Site and for parties to agree final details of the financial contribution for the DOO.
8/10/21	Final proposed draft of SoCG agreed by email.

## SIGNATURES

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

2.1.5	Signed:	
2.1.6	Print Name:	Christopher Denny
2.1.7	Job Title:	Portfolio Surveyor
2.1.8	Date:	08/10/21
2.1.9	Duly authorised for and on behalf of EHT	
2.1.10	Signed:	
2.1.11	Print Name:	Carly Vince
2.1.12	Job Title:	Chief Planning Officer
2.1.13	Date:	30/09/21
2.1.14	Duly authorised for and on behalf of SZC Co.	