



The Sizewell C Project

9.10.32 Statement of Common Ground - B1122 Action Group

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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, version 04, dated 01 September 2021, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and the B1122 Action Group on Sizewell, 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 **Table 2.1** provides an overview of the position of the parties and any further actions planned.

Table 2.1: Position of Parties

Ref.	Matter	B1122 Action Group on Sizewell's Position	SZC Co.'s Position	Position of the Parties
1. 1.	Transport strategy	<ul style="list-style-type: none"> The projected traffic levels cannot be relied upon while the ability of rail and sea transport to deliver to target remains unclear and aspirational. The latest addition of 40 tanker trucks per day in the Early Years also undermines confidence in the projections. The strategy will overwhelm eastern Suffolk's already challenged road network, especially at the Orwell Bridge, notwithstanding the limited bypasses proposed. There has been insufficient consideration of the combined traffic impacts of up to eight other energy projects planned for the area which would use the same road network. The volume of road-based transport would have severe adverse impacts on local communities and result in significant damage to the East Suffolk visitor economy. The proposed delayed completion of the SLR until year 3 of the development will mean that the A12 through Yoxford and the B1122 will carry substantially increased traffic during the first three years of site development, including additional 200 HGV movements per day associated with the SLR's construction over and above the 600 HGVs associated with the early years construction at the Sizewell facility. Construction of the SLR at the same time will create, in aggregate, a 'surround sound' of unacceptable noise and disturbance from all sides, affecting residents' enjoyment of living in their communities, their health, safety and mental wellbeing. The magnitude of these cumulative impacts has not been adequately measured: the ES fails to consider the most sensitive times of day. 	<ul style="list-style-type: none"> SZC Co.'s has continued engagement and project development to optimise the movement of materials by rail and sea. In January 2021, SZC Co. submitted proposed changes to the Application to increase rail movements to 4 trains per day and to provide an additional temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport. To reduce the effects of construction traffic on the local road network, the principal mitigation proposed is in the form of associated developments submitted with the Application. SZC Co. have undertaken a robust site selection process for each of the associated developments proposed, including the park and rides, two-village bypass, Sizewell link road, green rail route, East Suffolk line improvements and freight management facility. Need and proposals for highway improvements have been informed by transport modelling. This process is explained in Site Selection Report appended to the Planning Statement (Doc Ref. 8.4) [APP-591]. SZC is committed to minimising HGVs by utilising both rail and marine capacity for the delivery of materials. The HGV controls and caps proposed within the CTMP are based on high utilisation Any HGVs required for the delivery of water would be included within the HGV caps currently proposed. The commencement of construction of the SLR is scheduled early in the Implementation Plan to ensure that the road is completed as soon as possible in the construction period. 	<p>SZC Co's Position Not agreed. B1122 Action Group's Position Not agreed.</p>
2.	Sizewell Link Road	<ul style="list-style-type: none"> Support the principle of a link road however the proposed route of the SLR itself is unacceptable. Alternative routes exist, in particular potential routes starting from south of Saxmundham. Alternatives have been dismissed as options by the applicant with poor reasoning, insufficient evidence and contrary to the views of Suffolk County Council as Highways Authority. Connecting the B1125 to the SLR will encourage additional traffic to use the B1125 from the north increasing impacts in Middleton and Westleton. We concur with Theberton, Middleton and Westleton Parish Councils that this junction should be removed. The road design creates effective severance or diversion of several public rights of way and lanes which are 	<ul style="list-style-type: none"> SZC Co. has undertaken a robust site selection process, including consideration of routes further south than the proposed Sizewell link road. This process is explained in Site Selection Report appended to the Planning Statement (Book 8) [APP-591] and in the Alternatives Chapter of Volume 6 of the ES (Book 6, Volume 6, Chapter 3) [APP-450]. The most southerly routes considered were named Route W (north and south) during consultation. Route W (South) which is close to the D2 alignment considered in the past during the construction of Sizewell B, is no longer feasible because it follows the same alignment as the green rail route, from where the route crosses the Saxmundham to Leiston branch line. The green rail route is required as part of the integrated freight management strategy to transport larger quantities of freight by rail. Route W is not considered suitable for a number of reasons. For example, Route W would require a crossing of both the East Suffolk line and the Saxmundham to Leiston branch line (two rail crossings on bridge structures) as well as at least two substantial watercourse crossings of the River Fromus and Hundred River and their floodplains (and would include sections within Flood Zone 3) as well as 	<p>SZC Co's Position Not agreed. B1122 Action Group's Position Not agreed.</p>

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		<p>popular and well used by local people and form part of the area's innate appeal to tourist visitors.</p> <ul style="list-style-type: none"> The SLR will impact many homes with noise, pollution, light and vibration. In some cases, it is as close as 100 metres to homes on the B1122. It will scar the landscape considerably: 80% of its length are either embankments up to 10 feet high or cuttings as deep into the landscape. Those embankments and cuttings will create a barrier, slicing through the parishes of Theberton, Middleton, Kelsale and Yoxford, with outlying homes and farms split from their village cores. It will also prevent natural wildlife movement, especially of deer. The route will create a ribbon of unusably small fields between itself and the B1122, and complicate local private traffic and farm traffic, forcing circuitous routes and adding to emissions. The selection process for the route of the SLR, and the subsequent peer review, was flawed and insufficiently evidence-based. We support the many negative conclusions drawn by SCC and ESC in their joint response of July 2019, which stated that further work was needed to provide an evidence-based approach if the chosen route be considered sufficiently robust. The superior D2 route (which closely aligns with W) is on the line of the existing B1119 for much of its length shortly after leaving Saxmundham until it meets the Leiston branch line. This is where the Green Rail Spur leaves the Leiston line and head towards the SZC site. It was also the route of the eastern end of D2. There is no reason why the rail line and the road cannot be built side-by-side, and from a disturbance point-of-view would indeed be desirable. We recommend that the Middleton Moor Spur be better connected to the SLR with a roundabout instead of a T junction. Conversely the north end of the Spur would be more suited to a sensor-triggered traffic light control on a T junction. We recommend that Fordley Road not be connected to the SLR, but instead pass under it. We are not convinced that the proposed B1122/ A12 roundabout will be safe from flooding given the area's flood plain location. 	<p>other tributaries. The crossings of the two rivers will likely require large span bridge structures and earthworks to ensure clearance beneath the bridge and facilitate maintenance access and these would be prominent structures which would be visible in the surrounding landscape, which is lower lying in topography when compared to the landscape in which SZC Co.'s preferred alignment passes. SZC Co.'s proposed Sizewell link road alignment does not require these structures.</p> <ul style="list-style-type: none"> In addition, Route W is also the longest route of the options considered (8.2km) and would require the greatest amount of agricultural land and result in a larger area of habitat loss. Furthermore, the objective of the Sizewell link road is to mitigate potential impacts caused from the construction associated with Sizewell C. Traffic modelling undertaken predicts that construction traffic associated with Sizewell C would cause impacts that would require mitigation at Yoxford, Theberton and Middleton Moor. Therefore, the purpose of the Sizewell link road is to alleviate those impacts. Route W would not provide as much traffic relief to Yoxford, Middleton Moor or Theberton compared with the proposed Sizewell link road. The Sizewell link road would reduce the amount of traffic on the B1122 through Middleton Moor and Theberton by approximately 92% during the peak construction phase of the Sizewell C Project according to Chapter 8 of the Transport Assessment (Doc Ref. 8.5) [REP4-005]. The flow remaining on the B1122 would be about a tenth of the current traffic volume. The proposed junction of the B1125 to the SLR will ensure that traffic flows are removed from Theberton and directed onto the SLR. The junction designs for the Middleton Moor link have been undertaken in accordance with the Design Manual for Roads and Bridges (DMRB) and in order to maintain the existing AIL route from Lowestoft. 	
3.	Cumulative Impacts	<ul style="list-style-type: none"> The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast is highly significant as it would adversely impact the lives of Suffolk residents, visitors, the tourism and hospitality industry and the built and natural heritage for many years to come. Cumulative impacts include Sizewell C, the operation of Sizewell B, the decommissioning of Sizewell A, the Scottish Power Renewables proposals for onshore wind farm 	<ul style="list-style-type: none"> The strategic traffic modelling that SZC Co. has undertaken has been completed working alongside Suffolk County Council throughout the process. The model has met stringent Department for Transport WebTAG criteria before being used to forecast future traffic flows. It allows for background traffic growth, committed developments that already have planning permission but have not yet been built and other significant developments such as that proposed by ScottishPower Renewables. It then adds all Sizewell C construction traffic, i.e. heavy and light goods vehicles, buses and cars, into the model to give a robust prediction of future traffic volumes. 	<p>SZC Co's Position Not agreed. B1122 Action Group's Position Not agreed.</p>

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		infrastructure at Friston and other planned projects (Greater Gabbard, and Galloper wind farm expansions, Nautilus, Eurolink and two Sizewell to Kent interconnectors). The disbenefits to Suffolk life from Sizewell C and these other projects will be overwhelming and result in significant industrialisation of a rural area and landscape and biodiversity assets of national significance.		
4.	'Early years' use of the existing B1122	<ul style="list-style-type: none"> We are very disappointed to see that very little mitigation is proposed for the B1122 in the Early Years when there will be up to 600 HGV movements a day plus additional cars and buses. We recommend that Middleton Moor receive enhanced pedestrian amenity improvements in line with those proposed for Theberton. The B1122/ A12 Yoxford T junction is a real concern. We do not believe that the applicant's modelling has properly accounted for the proximity of the A12/ A1120 and A12/ B1122 junctions and their interaction, the peaks that occur during the tourist season, festivals and bank holidays, nor the hourly release of traffic from Darsham level crossing. At these times, tailbacks from the former can already prevent egress from the latter; this can only become worse with higher traffic volumes, bringing substantial congestion and particulate pollution which is already close to WHO guide limits. Any use of the B1122 should include new speed cameras. We have found no proposals for speed cameras or reduced speed limits. The applicant should consider an average speed camera system from the A12 to the site entrance. Given the unacceptable levels of safety risk, noise, vibration and pollution in using the unimproved B1122 for up to 600 HGV movements per day, we maintain that a Link Road and Yoxford roundabout must be finished before any substantial HGV traffic be permitted. Mitigation measures are currently inadequate. They should include noise insulation, double glazing and compensation for vibration damage for homes on the B1122 and the SLR route in the Early Years, due to the SLR construction and the traffic on the B1122. Vibration damage can only be assessed with baseline surveys, which need to take place on relevant buildings before any construction starts. The proposed Property Price Support Scheme has too small a footprint and needs to be extended. 	<ul style="list-style-type: none"> An indicative phasing schedule for the Sizewell C Project as a whole is provided in the Implementation Plan, Appendix 8.4I of the Planning Statement (Doc Ref. 8.4) [APP-599]. The construction of the associated developments to reduce the impact of construction traffic would be undertaken early in the programme (within approximately the first two years of the construction period) and be in place prior to the peak of construction on the main development site. SZC Co. is now proposing some Early Years mitigation along the B1122 to include the following: <ul style="list-style-type: none"> Village gateways for Middleton Moor and Theberton to include speed limit signs and reinforce driver awareness of entering a village and speed restriction Enhanced pedestrian amenity in Theberton to include improved pavements and a road crossing SZC has committed to include all properties which front the B1122 in the Noise Monitoring Scheme, whether they technically qualify by virtue of the noise criteria or not. The number of properties that this would apply to is estimated to be 84, whereas the strict application of the noise criteria would apply to about a quarter of that. This commitment is going to be made in the Deed of Obligation, which is being drafted up for Deadline 7. The Implementation Plan sets out the proposed sequencing for the AD schemes from the commencement of construction. The Parties will continue discuss the proposed B1122 Early Years Mitigation that is set out in the Deed of Obligation. 	<p>SZC Co's Position Not agreed.</p> <p>B1122 Action Group's Position Not agreed.</p>
5.	Worker accommodation 'campus'	<ul style="list-style-type: none"> Impact on local communities Site selection and alternatives not adequately considered No legacy benefit 	<ul style="list-style-type: none"> Further details of the site selection process are set out in the Site Selection Report provided in Appendix A of the Planning Statement (Doc Ref. 8.4) [APP-591] and the Accommodation Strategy (Doc Ref. 8.10) [APP-613]. The strategy 	<p>SZC Co's Position Not agreed.</p>

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			<p>is to provide for a blend of accommodation types, alongside provision within the Section 106 Agreement for a Housing Fund.</p> <ul style="list-style-type: none"> Appendix A of the Design and Access Statement (Doc Ref. 8.1) [REP5-075] 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. 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. The facilities include a full-size 3G pitch suitable for football, non-contact rugby and hockey and two multi-use games areas suitable for basketball, netball, tennis and football. Following the construction period, these facilities would remain as a legacy benefit in Leiston. 	<p>B1122 Action Group's Position Not agreed.</p>

APPENDIX A: ENGAGEMENT ON THE SOCG

- A.1.1. The preparation of this SoCG has been informed by a programme of discussions between the parties, as are summarised in **Table A.1**.

Table A.1: SOCG meetings held between the parties

Date	Details of the Meeting
26/05/21	SoCG Meeting 1
31/08/21	SoCG Meeting 2

SIGNATURES

Signed:



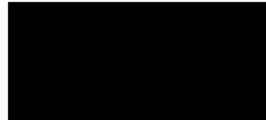
Print Name: CHARLES MACDOWELL

Job Title: CHAIR

Date: 12 OCT 2021

Duly authorised for and on behalf of B1122 Action Group

Signed:



Print Name: Carly Vince

Job Title: Chief Planning Officer

Date: 12-10-21

Duly authorised for and on behalf of SZC Co.