



The Sizewell C Project

9.10.34 Statement of Common Ground - Suffolk Coastal Friends of the Earth

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SIZEWELL C PROJECT
STATEMENT OF COMMON GROUND
SUFFOLK COASTAL FRIENDS OF THE EARTH

NOT PROTECTIVELY MARKED

SIGNATURES

This Statement of Common Ground is agreed between SZC Co. and Suffolk Coastal Friends of the Earth the day specified below.

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Duly authorised for and on behalf of Suffolk Coastal Friends of the Earth

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Duly authorised for and on behalf of SZC Co.

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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 05, dated 12 October 2021, has been prepared following discussions on 8 October 2021 between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Suffolk Coastal Friends of the Earth ('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. Appendix A summarises the 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	Suffolk Friends of the Earth on Sizewell's Position	SZC Co.'s Position	Position of the Parties
1.	Mitigation for rare species			
	1.1 Baseline Surveys	We agree that steps have been taken to identify the potential significant effects on the environment, in terms of comprehensive surveys, although some of these are out of date so that conclusions drawn are unreliable. We welcome the new surveys put forward, but are disappointed that the fungi surveys are still awaited and that we will not be able to respond to these within the examination timetable.	We welcome SFoE's comments on the surveys; we are confident that they provide a robust basis for impact assessment. Further reassurance surveys are being undertaken this year for invertebrates and fungi, amongst other species, to further enhance the baseline evidence base. However, they will not affect the conclusions of the Environmental Statement or other assessments.	Agreed in part.
	1.2 Land-take from Sizewell Marshes SSSI	We do not agree that the mitigation measures proposed would sufficiently avoid, reduce or satisfactorily compensate for the LSEs on habitats and wildlife within this protected landscape and wider countryside. As regards land take, we are especially concerned by how much this has increased over the nine years of consultation and do not agree that it is 'acceptable'. If trees can be retained west of the SSSI crossing, that would be helpful.	Permanent land-take within Sizewell Marshes SSSI has been estimated to be approximately 5.74 ha. Temporary land-take has been estimated to be up to 1.99 ha approximately and would be reduced as far as practicable, to retain trees in the corridor west of the SSSI crossing and appropriate measures would be taken to minimise harm where construction access is required e.g. use of bog matting, e.g. under the overhead transmission lines. Construction works would be restricted to the station-side of the sheet pile barrier wall that would run around the perimeter of the permanent land-take where feasible. The only exceptions would be works in relation to ditch tie-ins along the diverted Sizewell drain and restringing of the overhead transmission lines by National Grid.	Not agreed.
	1.3 Adequacy of habitat compensation proposals	It is agreed that Aldhurst farm provides some compensation for the proposed loss of reedbed and ditch habitat although we believe that mitigation for rare invertebrates with special requirements is inadequate. We have also noted in REP5-273 and REP7-233 that the proposed acid grassland and heathland have been unsuccessful due to poor management. We understand that further surveys have been carried out of the proposed fen meadow compensation sites. However, it is the expert opinion of our consultant hydrologists and aquatic botanist that fen meadow creation at these sites is unlikely to be successful.	Mitigation for rare invertebrates is addressed in a number of ways depending on the habitats. Invertebrates of wet woodlands are addressed through the Wet Woodland Strategy, in which these habitats will be co-located at the fen meadow sites. These wet woodland locations are defined in the Fen Meadow Plan – REP6-026 . Extensive surveys have been undertaken at the fen meadow sites, see Fen Meadow Plan – REP6-026 and Fen Meadow Baseline reports – 2018: REP4-007 2019: APP-258 . Natural England state that having reviewed the baseline reports, fen meadow is 'feasible' - see Paragraph 2.2 of REP6-042 . The creation of the new wet woodland habitats and the new fen meadow habitats is secured by Requirement in the DCO. This means that there is a legal obligation upon SZC Co to deliver the two strategies as defined. Both strategies include monitoring and final plans will include more detail of the monitoring proposals.	Agreed in part.

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	1.4 Governance/ securing mechanisms	All the proposed mitigation plans rely on successful achievement of target conditions. We, the public, have to trust that the Applicant will carry out the plans as stated. While we understand that the proposed compensation habitats are secured in the DCO, we remain unconvinced that the new compensation sites will achieve SSSI quality, to the standard of that lost.	In relation to monitoring of sites, habitats and species in the vicinity of the development sites, this is set out in detail in the Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP), which is also secured by requirement. All of the above strategies and plans are controlled by a governance process defined within the plans.	Not Agreed.
	1.5 SSSI Crossing	We have seen the new designs for the SSSI crossing. However, despite the improvements, it remains our view that a three-span bridge would be considerably less damaging.	A three span bridge is not acceptable to SZC Co. because it would take 6-12 months longer to construct than the proposed single span bridge. SZC Co. has been engaging with the Environment Agency and other stakeholders on the design on the proposed crossing which has been optimised to minimise environmental impact. This includes raising the soffit level of the structure to provide at least 6m clearance above Leiston drain and reducing the width of the bridge from 40m to 15m at the end of construction to reduce shading.	Not Agreed.
2.	Eco-hydrology of Sizewell Marshes SSSI			
	2.1 Dewatering/ drainage effects on Sizewell Marshes SSSI	We cannot agree that the ecohydrological effects would be sufficiently limited, bearing in mind the vast size and depth of the construction works. While it may be possible to retain satisfactory water levels, we remain particularly concerned about changes to water quality. We refer you to the hydrological reports supplied by our consultants: REP2-463 , REP5-271 , REP7-234 and REP8-269 .	SZC Co.'s position is that there would be no likely significant adverse effect on the ecohydrology of Sizewell Marshes SSSI. Impacts on hydrology would be mitigated through use of the proposed cut-off wall around the deep excavations and the sheet pile wall that would be installed along the toe of proposed platform. In addition, we propose to install one or more water control structures along the diverted Sizewell drain with fine tuning capability to help maintain water levels within the optimum range. The summary note Mechanisms of Change in Groundwater in the Sizewell Marshes SSSI is provided as Appendix B to SZC Co. Comments on Written Representations Appendices [REP3-043] . The technical note Sizewell Drain Water Management Control Structure is provided as Appendix C to SZC Co. Comments on Submissions from Earlier Deadlines (Deadlines 2-4) [REP5-120] .	Not Agreed.
	2.2 Effects of SSSI crossing	The new bridge design is a modest improvement on the culvert and causeway, but we would still like to see a much more open structure that would interfere less with the natural drainage. Our hydrological advisers tell us that these natural flows would change due to the new structure, so we cannot agree that the hydrological function would continue to be 'normal'.	SZC Co assures SFoE that the proposed SSSI crossing would not have any significant adverse effects on the hydrology of Sizewell Marshes and this position has been agreed with the regulators. The assessment on hydrology is included as part of Volume 2, Chapter 19 of the Environmental Statement [APP-297] .	Not Agreed.

Ref.	Matter	Suffolk Friends of the Earth on Sizewell's Position	SZC Co.'s Position	Position of the Parties
		<p>We have no doubt that the company would endeavour to follow best practice according to the Design Manual for Roads and Bridges. However, all roads cause pollution. Our research tells us that no SuDs drainage systems are 100% effective. It is a real worry that pollutants would inevitably drain into the neighbouring designated sites.</p> <p>We understand about the flooding risks, and hope that by working with the Environment Agency, you will be able to resolve these issues satisfactorily. However, it should be noted that the agency remains deeply concerned about the ecological damage that would be caused by this road crossing, as do we.</p>	<p>All highways drainage, including that from the SSSI Crossing itself, will be managed in accordance with appropriate guidance (e.g. Design Manual for Roads and Bridges), allowing for climate change allowance in respect of future capacity. This also includes for the potential pollutant loads and requirement to mitigate this in the context of the sensitive neighbouring habitat, for which a pollution indices assessment (e.g. Highways England HEWRAT assessment) would be undertaken to support the detailed design. Further details are set out in the ES Addendum (Doc Ref 6.14), Main Development Site Flood Risk Assessment Addendum [AS-157], Outline Drainage Strategy (Doc Ref. 6.3) [REP2-033] and Drainage Strategy submitted at Deadline 7 (Doc Ref. 6.3 2A(B)).</p> <p>The Environment Agency is satisfied that the ecological impacts of the optimised 'single span' SSSI crossing have been reduced to acceptable levels.</p>	
3.	Rare invertebrates	<p>Having studied the documents regarding invertebrates, we do not agree that it is possible to mitigate for the loss of the rarest species. Many of these have specialist requirements that are not replicated at the new Aldhurst Farm site nor elsewhere. We refer you to our Written Representation on this subject: REP2-461. We welcome the proposals for more Sandlings on the Goose Hill site post construction, but regret the extensive loss of woodland and the sheltered rides, of high value for reptiles and invertebrates such as the rare White Admiral butterfly. Simply creating more rides at Kenton Hills does not make up for the significant loss of habitat at Goose Hill within the County Wildlife Site, designated in part for its ornithological importance. The proposed planting of trees is insufficient in both extent and quality.</p> <p>The heathland at Aldhurst Farm is no longer present due to total colonisation of ragwort, which was then removed, after public complaint, along with the heather brashings. Studio Fields is more successful because until recently it was cared for by Suffolk Wildlife Trust. We need to see this same standard of care from Sizewell C Co. This has not been demonstrated to us.</p>	<p>Species-specific mitigation plans and method statements have been developed for all protected species found to be present within the site. Habitat replacement carried out at Aldhurst farm and Studio field (Sizewell gap) used a number of techniques to facilitate colonisation of the new habitats by rare invertebrates including 'seeding' the wetland with ditch slubbings from neighbouring SSSIs and spreading heather brashings over the arable conversion areas to encourage establishment of sandlings mosaic and introduce natural Sandlings seedbank and invertebrates. The maturing dry grassland/sandlings habitat is developing a notable invertebrate fauna. The habitats proposed on existing arable land within the temporary construction area, as set out in the outline Landscape and Ecology Management Plan (oLEMP) (Doc Ref. 8.2) [REP1-010], can only be established once construction works have finished and the temporary construction area has been removed. This proposed habitat 'mosaic' would have a higher biodiversity value than the existing habitats.</p> <p>SZC Co will create additional rides and glades within the Kenton Hills woodlands to support foraging bats and these habitats will be of benefit to species such as White Admirals which feed and hold territories along these features and whose caterpillars feed on honeysuckle which thrives in such habitats. Developing heathland is present at Aldhurst farm. We do not understand what is meant by 'removal' of the heather brashings. These were spread over the fields a few years ago. Over time the brashings will rot down into the soil. They have not been 'removed'. We welcome recognition that heathland is developing successfully at Studio field. The heather was introduced using the same method as at Aldhurst farm (spreading heather brashings) and is at a more advanced stage because habitat creation there started a number of years before.</p>	Not Agreed.
4.	Biodiversity Net Gain	<p>Despite repeated requests you have finally supplied the metric spreadsheets. However, as only a few days of the examination remain, it has not been possible for our group members to scrutinise these. We refer you instead to the D10 document supplied by our adviser, Dominic Woodfield of Bioscan, which gives examples of how baseline scores have been incorrectly assessed. You have given us no time to</p>	<p>The guidance used includes the relevant Defra / Natural England guidance and also the UK Habitat Classification Working Group (2018) guidance This has been followed to the letter by the consultants undertaking the work. A peer review was also undertaken of the work and confirms this.</p> <p>The following updated Biodiversity Net Gain Reports have been issued into the Examination:</p>	Not Agreed.

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		<p>understand how you have reached your conclusions, so we are left doubting their veracity. Other good practice principles have been ignored. For example, you have claimed net gain for the reptile compensation sites in contravention of Principle 7 to be 'additional' – and ensure that claims exceed existing obligations.</p> <p>For more detailed comments see our written submissions on your claims for BNG.</p>	<ul style="list-style-type: none"> Main Development Site BNG Report [REP1-004] Sizewell Link Road BNG Report [REP5-090] Two Village Bypass BNG Report [REP1-018] Yoxford Roundabout BNG Report [REP5-092] <p>These provide greater detail on the approach and the assumptions (e.g. target condition) than was available in the application versions.</p>	
5.	Effects of new roads			Not Agreed.
	5.1 Objection to new roads	<p>Friends of the Earth are entirely opposed to the building of new roads, due to the chronic damage to the environment as well as to the climate. While we appreciate that both the Link Road and Two Villages Bypass have been requested by both local residents and Suffolk County Council, we have not supported these proposals. Hundreds of thousands of wild animals and millions of birds are killed on our roads each year. More would be killed on these new roads, especially at 60mph. Bypasses are particularly damaging to wildlife, as the remaining arc is generally not sufficiently large to support viable colonies. These become separated by the road from other colonies and individuals cannot disperse to find mates. They thereby become weakened and eventually die out.</p>	<p>The proposed new access road is a regulatory requirement; all new nuclear power station sites must have two separate accesses. The routing of the proposed road would run primarily through arable land. Important ecological habitats have been avoided as far as possible and it would cross Sizewell Marshes SSSI at the narrowest feasible point to minimise land-take from the designation.</p>	
	5.2 Speed limits	<p>We agree that the speed limit on the Sizewell Gap road should be reduced to 40mph and are pleased at this suggestion. We would like to see the new detailed plans for the proposed reductions here and on the access road. We are consulting with a roads ecologist about the provision of a green bridge or underpass between the SSSI crossing and the access hub. If the speed limit is indeed permanently reduced to 20 mph on the access road, then we would wish to know how this would be enforced. How would you prevent speeding? What would the speed limit be during construction?</p>	<p>It is proposed to reduce the permanent speed limit on Lover's Lane in the Traffic Regulation Measures Schedule 14 of the Development Consent Order to 40mph from the junction with B1122 Abbey Road to 520m east of the Valley Road King George's Avenue. During the construction phase it is proposed to temporarily reduce the Lover's Lane speed limit to 30 mph from the junction with B1122 Abbey Road to 100m south of the Valley Road junction.</p>	Agreed (in relation to Sizewell gap road).
	5.3 SSSI Crossing	<p>While we agree that otters and water voles may be able to use the passage under the SSSI crossing, we do not agree that it would be suitable for other mammal species.</p>	<p>Please refer to response to issue ref 1.4.</p>	Not Agreed.

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	5.4 Impacts on birds	<p>We do not therefore agree that the bridge structure would provide connectivity for all species. Underpasses are only successful if they are placed at the animals' established foraging routes.</p> <p>Even then, research shows that populations of species are lowered. We also remain concerned about the impacts on invertebrates and small fish.</p> <p>We disagree that your mitigation proposals would reduce impacts on birds. Peer-reviewed research indicates that populations are reduced by up to 30% within 1km either side of any road (see our WR on this subject, REP2-462). While we understand that sea and rail will play a role in transport, the fact is that the Access Road will remain as a permanent risk to wildlife and ongoing barrier to their movement.</p>	<p>The EA, Natural England and both councils agree with SZC Co. that the 40m wide bridge will not create a barrier to water voles or otters.</p> <p>The EA and most other stakeholders including NE agree that the ecological effects of the optimised 'single span' SSSI crossing have been reduced to acceptable levels.</p> <p>SZC Co. does not understand the point about marshy ground – this is the case with the existing ground in this area, so any mammal moving along the length of the Leiston drain for example would encounter identical underfoot conditions. The Sizewell C site access itself road will be similar in width to the Sizewell B access road. No substantive fragmentation or mortality to wildlife is likely with these road widths and speeds, such as to require and underpass or a green bridge.</p> <p>The Sizewell link road will traverse intensive arable land which currently supports a low density breeding bird population. The replacement habitats, including grassland, woodland, hedgerow and scrub planting, in the soft estate will be of greater value to breeding birds. The road itself will be little different to the existing B1122 and therefore no greater barrier to the movement of wildlife.</p> <p>More widely, the potential cumulative impacts on the farmland birds of the project as a whole, combined with other projects, during construction of the road, is identified as an adverse significant effect. This will be mitigated by a farmland birds fund, defined through the Deed of Obligation.</p> <p>The Sizewell C site access itself road will be 20mph and similar in width to the Sizewell B access road. No substantive bird fragmentation or mortality is likely with these road widths and speeds.</p>	Not Agreed.
6.	Coastal erosion and flooding	<p>Our members are extremely nervous about the building of another nuclear power station on our rapidly eroding and changing coastline, especially with climate change and rising seas. Forecasts concerning coastal management have been shown to be wrong, e.g. Thorpeness was considered to be stable, until a storm severely eroded the cliffs so that revetments had to be quickly put in place. There has recently been another serious cliff fall here and the need for further extensive revetments.</p> <p>BEEMS technical report TR311 admits that there is no model that can take account of the many and complex variables. This is extremely worrying. We do not agree that Sizewell will continue to be a safe site for more nuclear power generation, especially bearing in mind the very long timeframe to post-decommissioning.</p>	<p>SZC Co. recognises that the coastline adjacent to the proposed development is part of a changing coastline and our assessments have investigated the potential impact of the proposed power station. SZC Co. has also had to assess the impacts of a potentially changing shoreline on the safety of the power station. EDF has a long history of coastal studies in this area as part of the ongoing shoreline management group of the adjacent power station (Sizewell B) and have a detailed understanding of the local system. Using our own studies and the opinions of independent coastal geomorphological experts, our assessments show that the construction and operation of the proposed power station will not have a significant impact on coastal process either to the north or south of the site. The proposed hard coastal defence feature has been designed to withstand a design basis 1:10 000 year coastal flooding event over the lifetime of the plant, and decommissioning, with an allowance for climate change. An adaptive design is also proposed that would allow for the defences to be raised should climate change and sea level rise be even greater than assumed. The coastal defences have been designed to "work with nature" and the Soft Coastal defence Feature is designed to be sacrificial, allowing for erosion, with sediment lost from the soft coastal defence being recharged.</p>	Not Agreed.

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			Further details on the proposed 'hard' and 'soft' coastal defence features are provided in the Sizewell C Coastal Defences Design Report [REP2-116] and Preliminary design and maintenance requirements for the Sizewell C Coastal Defence Feature (Revision 2.0) [REP3-032] , respectively.	
7.	Suffolk Shingle Beaches County Wildlife Site	We pointed out at our meeting that there were no details concerning the storage of substrate for later use on the rock armour, on the assumption that the rare plants would re-grow. We would like to know where it would be stored, under what conditions and for how long. It was agreed that this information would be forthcoming. We also wish to see further scientific work carried out as to whether collection and freeze-drying of seeds, following the Sizewell B example, or other particular storage methods, would be more successful than the piling up of substrate. We have not been able to find any further information on seedbank storage, promised for D8. This is very disappointing.	The approach to mitigation for the Shingle Beaches CWS is explained in the ES (refer to Volume 2, Chapter 14 of the ES (Doc Ref. 6.3) [AS-033]), the oLEMP (refer to (Doc Ref. 8.2) [REP1-010]). The relevant monitoring of the re-establishment is covered in the Terrestrial Ecology Monitoring and Mitigation Plan [REP5-088] . We acknowledge that further information has been requested on the handling and storage of shingle containing the seedbank for the existing vegetation that is to be used in restoration.	Not Agreed.
8.	Impacts of the cooling system on marine wildlife 8.1 Operation of cooling water system	We have been supporting the group TASC by providing them with our research into impacts on fish, and will not ourselves be submitting a WR on this topic. However, we remain deeply concerned about loss of so much marine wildlife and consider it to be unacceptable, especially bearing in mind the ongoing effects on birds within this Outer Thames Special Protection Area. In addition, the newly proposed water strategy, to include a desalination plant, would add to the environmental impacts. We refer you to our two reports provided at D8 ([REP8-268]) and D10 that outline likely effects on both the Waveney Natura 2000 catchment within the Broads National Park and also on protected species within the Outer Thames SPA and Southern North Sea SAC. We profoundly disagree that no significant adverse effects would occur, as peer-reviewed research clearly demonstrates the opposite.	An assessment of the likely effects of the cooling water system is provided within Volume 2, Chapter 21 of the ES (Doc Ref. 6.3) [APP-314] . The discharge would not affect local water quality significantly nor cause a nuisance. Pelagic fish, such as herring and sprat, tend not to survive impingement on the power station drum screen filters due to damage to their delicate scales. However many, more robust fish species do survive. Return of the dead fish to the local marine environment is preferable to their removal to waste as it provides food for other marine species (i.e. returns the biomass). An assessment of the likely effects of removing fish and crustaceans in the cooling water system is provided within Volume 2, Chapter 22 of the ES (Doc Ref. 6.3) [APP-317] and demonstrates that there would not be a significant impact on fish stocks or, therefore, local fishermen's livelihoods. An assessment of the likely effects of the cooling water discharge on marine fish and crustaceans is provided within Volume 2, Chapter 21 of the ES (Doc Ref. 6.3) [APP-314] and demonstrates that local water quality is not significantly affected. The heat and chemical loadings in the discharge are diluted very rapidly as the discharge moves away from the outfall. As the discharge is thermally buoyant it rises to the surface rapidly and thus, away from crustaceans such as crabs and lobsters that live on the seabed. The discharge will need to comply with the stringent assessment process performed by the Environment Agency in order for it to be approved for the Water Discharge Activity permit. The 4 th ES addendum submitted in support of the accepted Change 19 application for the proposed temporary desalination plant demonstrates that no new or materially different likely significant adverse environmental effects would occur.	Not Agreed.
	8.2 Underwater noise	We trust that the MMO will examine the proposals concerning protected harbour porpoise within the Southern North Sea SAC. Underwater		Not Agreed.

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		noise has been increasingly harming marine mammals, and the pile-driving, dredging, movement of barges and persistent noise from the cooling system etc would all add to this.	<p>Several reports have been provided to the ExA during the course of the examination at the request of the MMO to facilitate their assessment of impacts of underwater noise to marine mammals (and fish). These are:</p> <ul style="list-style-type: none"> • Southern North Sea Site Integrity Plan (see Appendix 9A [AS-178]); • Marine Mammal Mitigation Protocol (Revision 2.0) submitted at Deadline 3 [REP3-013]. This corresponds to Condition 40 of the draft Deemed Marine Licence; and • Underwater Noise Report [REP5-124]. 	

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
24 May 2021	Meeting to discuss potential areas of common ground / key areas of concern and plan to develop SoCG
26 May 2021	Updated position received by email from FoE
28 May 2021	Second draft version of SoCG issued to FoE
01 June 2021	Agreement reached on Rev 3 version for D2 submission
25 August 2021	Meeting to discuss matters outstanding
08 October 2021	Discussions to finalise SoCG for Deadline 10