



The Sizewell C Project

9.10.31 Initial Statement of Common Ground - English Heritage Trust

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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 01, dated 20-5-21, 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'. Subsequent versions will be necessary following further discussion between 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, 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 | Further Action Required | Agreed / Not Agreed / In Progress |
|--------------------------------|---|--|---|--|-----------------------------------|
| Relevant Representation | | | | | |
| EH1 | 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. | This is noted. In recognition of the fact that EHT and Pro Corda perform different function in relation to the Leiston Abbey second site, two separate SoCGs, and separate contributions have been proposed under the S106 agreement: a heritage contribution for EHT and a resilience fund for Pro Corda. | <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.</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 S106 contributions for its work (for heritage management and conservation), and for Pro Corda.</p> <p>Appropriate financial contributions, through the S106 agreement, for EHT can help to offset the harm to the the site by improving the visitor</p> | Principle of approach agreed - scope and quantum of specific S106 contributions to be discussed further. | In progress |

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| | | | <p>experience in many ways. This will, in turn, help visitors to better understand the site, and better reveal the site's significance.</p> <p>Most critically S106 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.</p> | | |
| 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 (Book 6, Volume 2, Chapter 16) and rail chapters (Book 6, Volume 9, Chapter 9) of the ES.</p> <p><u>MDS construction</u></p> <p>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"> • Change in design to offset roundabout on B1122 and allow for enhanced screening. • Design of lighting to minimise light spill. • Amended campus design west of Eastbridge Road to increase separation from asset. • Retained landscape buffers between accommodation campus and asset. • Strengthened planting in hedgerow to Abbey Lane. • Enhanced connectivity with Leiston Abbey (first site) via Suffolk Coast Path diversion. • Best-practice noise mitigation during construction. <p>Following these, the construction phase impacts are assessed as:</p> <ul style="list-style-type: none"> • 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). | <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 will continue to be discussed through the DCO process, but S106 discussions continue on a 'without prejudice' basis.</p> <p>EHT is concerned about the effect on the Abbey site both during the construction phase and once the new development is fully operational. The setting of the Abbey site, and the understanding and appreciation of it by visitors, will be harmed both in the short and long term.</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. Given the length of the construction phase for the project, EHT is also concerned about any legacy or long lasting effects on Leiston Abbey second site. These effects will need to be managed, and mitigated.</p> <p>In addition, during the operational phase given the size and scale of the development proposals, permanent changes to the local road network, and</p> | <p>Principle of S106 contribution for construction phase agreed - exact scope and quantum to be discussed further.</p> <p>Magnitude of long-term adverse effects not yet agreed. SZC Co. is assessing minor adverse (not significant) effects on setting for the operational phase - EHT are considering whether they agree or feel this should be higher.</p> | In progress. |

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| | | <ul style="list-style-type: none"> 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. <p><u>MDS Operation</u> 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> 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"> 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). No effects are predicted elsewhere on the site. <p><u>Rail Operation / Removal and Reinstatement</u> 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"> 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). | <p>increased traffic there are concerns about the long term effects on the site. The new power station will be visible on the horizon and the setting of the site will be harmed by the noise, smell and visibility of increased road traffic.</p> <p>To help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT is proposing a comprehensive "Sustainable Conservation, Vision and Stewardship Management Plan" (SCVSMP) 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 SCVSMP for Leiston Abbey second site with SZC Co. (as appended to this SoCG) and suggests that this is used as the basis for agreeing the necessary financial contribution that could be capable of reducing the scale of effects upon the scheduled monument and the associated listed buildings.</p> | | |

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|--|---|---|---|--|-----------------------------------|
| | | <ul style="list-style-type: none"> Minor adverse (not significant) impacts are assessed elsewhere on site with no additional heritage mitigation required. <p>No effects are predicted during removal and reinstatement.</p> <p><u>Project Wide</u></p> <ul style="list-style-type: none"> 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). Minor adverse (not significant) impacts are assessed elsewhere on site with no additional heritage mitigation required. No project-wide effects are predicted following removal and reinstatement of the Green Rail Route. | | | |
| 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. | Work is ongoing with EHT and Pro Corda to define what the S106 contributions should be, both for heritage and the Pro Corda resilience fund. We note that EHT are working hard in the background to define a set of proposals and look forward to discussing these once received. | EHT has shared a draft "Sustainable Conservation, Vision and Stewardship Management Plan" 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. | Approach agreed - exact scope and quantum of S106 contribution under discussion. | In progress. |
| Matters raised by the Examining Authority | | | | | |
| EH4 | The SoCG should address all the issues raised by English Heritage in their relevant representation [RR-0371]. | Addressed above. | Addressed above. | Addressed above. | In progress. |
| 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 |

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|------|---|---|---|-------------------------|-----------------------------------|
| | | <ul style="list-style-type: none"> Scheduled Monuments, Grade I and II* listed assets, marine (below mean high water mark) archaeology, peat strategy - Historic England. Grade II listed assets, Conservation Areas - Conservation Officer, East Suffolk Council. Buried archaeology, peat strategy - Suffolk County Council Archaeology Service. This is in line with these stakeholders' remits. <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. | To be set out in this SoCG, with contribution to be set out in the Section 106 agreement. | To be set out in this SoCG, with contribution to be set out in the Section 106 agreement. | In progress. | In progress. |

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 SCVSMP |