



The Sizewell C Project

9.10.33 Initial Statement of Common Ground - Suffolk Coast Destination Management Organisation

Revision: 1.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

June 2021

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



CONTENTS

1	INTRODUCTION	1
1.1	Status of the SOCG	1
1.2	Purpose of this document	1
1.3	Structure of this Statement of Common Ground	1
2	POSITION OF THE PARTIES	2

TABLES

Table 2.1	Position of the Parties	3
Table 2.2	SOCG meetings held between the parties	6

PLATES

None provided

FIGURES

None provided

APPENDICES

APPENDIX A:	ENGAGEMENT ON THE SOCG	6
-------------	------------------------------	---

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 1, dated 2 June 2021, has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') and shared with The Suffolk Coast Destination Management Organisation ('TSC').

1.1.2 Due to resource constraints at TSC, given the extremely busy period of re-opening for tourism businesses happening at this time, no meetings have yet been held to discuss this. Therefore subsequent versions will be submitted later in the Examination.

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 the Parties

Ref.	Matter	SZC Co.'s Position	TSC's Position	Further Action Required	Agreed / Not Agreed / In Progress
Relevant Representation					
		<p>The Suffolk Coast Destination Management Organisation (TSC) is a member of the Tourism Working Group (TWG) set up by SZC Co., in the pre-application phase of the project. SZC Co. is grateful for TSC's input to date and we look forward to working with TSC as part of the TWG through the construction phase.</p> <p>Through engagement, SZC Co. and TSC (along with other stakeholders) have shared baseline information, technical methodology and assessments of the scale of the tourist economy in terms of jobs and spend in order to understand its proportional value to the area, but also its variability and resilience to external changes over time. This has formed important context for the assessment of potential effects, which SZC Co. has incorporated into the Economic Statement (Doc Ref 8.9). TSC's approach to estimating value and volume of the sector forms part of that.</p>	Not yet agreed. Discussions ongoing between TSC and applicant prior to seeking TSC agreement.		In progress
		<p>SZC Co.'s position is that while the Ipsos MORI and TSC surveys provide helpful context for the sensitivities that potential and returning visitors may have to change - and therefore can inform the types of activities a Tourism Fund should address - ex-ante stated preference perception surveys cannot be used as a means of estimating quantitative changes in visitor behaviour or economic cost (reported changes in propensity to visit and spend aren't uniform). Showing people images of HPC - as TSC survey did - and then asking how it might affect their holiday choices in five or seven years time is not reliable and cannot be used to quantify actual changes in visitor behaviour (NB the latter is a general survey point, not just the TSC/Ipsos MORI surveys). Evidence from HPC provides strong support for the gap between ex ante survey and reality.</p> <p>SZC Co. and Ipsos MORI have been clear that the SZC Co. commissioned survey was not intended to be used to quantify the scale of economic cost, but to understand sensitivities to change stated by those who consider (with a clear understanding of the area and the Sizewell C Project's effects) that their intention to visit might change, in order to target effective measures through a Tourism Fund. SZC Co. notes that TSC's survey draws similar conclusions in this regard, underlining the importance of support for promotional and marketing activities to reduce the risk of stated intentions arising.</p> <p>SZC Co. also considers that the detail and methodology underlying the TSC's survey doesn't support the £24m p/a impact claim.</p>	Not yet agreed. Discussions ongoing between TSC and applicant prior to seeking TSC agreement.		In progress

Ref.	Matter	SZC Co.'s Position	TSC's Position	Further Action Required	Agreed / Not Agreed / In Progress
		<p>In terms of Tourism Fund spending - promotional and marketing activities are key (TSC survey makes this particularly clear) – funding for infrastructure e.g. cycleways needs to be considered in the round with regard to other funds and measures being agreed.</p> <p>SZC Co has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), governance (including via a SERG sub-group). These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early (pre-DCO) release.</p>			
		<p>Book 6, Volume 2, Chapter 9 (Socio-economics) assesses the impacts on tourism and sets out that: there is limited empirical evidence that the Sizewell C Project would lead to a quantifiable reduction in visitor numbers, a change in visitor behaviour, expenditure or business viability in the sector over and above normal variation. The tourist economy is subject to substantial volatility year-on-year, and is affected by externalities beyond the effects of a single project such as Sizewell C. There is no empirical evidence that the construction of Sizewell B had a substantial effect on the sector within the Suffolk coast area, or that – with a well-managed and effective mitigation package via a Tourism Fund – the construction of Hinkley Point C is having a substantial effect in Somerset. However, engagement with local tourism stakeholders, review of environmental effects and mitigation identified across this ES, and SZC Co.'s understanding of perceived visitor sensitivities based on quantitative survey of previous and potential visitors has identified that without mitigation there is potential for: very local effects on businesses and activities where there is a combination of significant residual environmental effects; and perception-related effects as a result of sensitivities to different aspects of the Sizewell C Project.</p> <p>SZC Co. is therefore proposing a Tourism Fund. SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation and governance with the Councils, who we understand are consulting with the wider TWG. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early (pre-DCO) release - these outstanding matters will be progressed in the coming weeks.</p> <p>More widely, a Natural Environment Fund is proposed to maintain the amenity and accessibility of the AONB within the locality of Sizewell C and the wider environs of the AONB. The details of this fund are under discussion with the Councils / AONB.</p>	<p>Not yet agreed. Discussions ongoing between TSC and applicant prior to seeking TSC agreement.</p>		In progress



SIZEWELL C PROJECT – STATEMENT OF COMMON GROUND
SUFFOLK COAST DMO

NOT PROTECTIVELY MARKED

Ref.	Matter	SZC Co.'s Position	TSC's Position	Further Action Required	Agreed / Not Agreed / In Progress
		Cumulative impacts are assessed in Book 6, Volume 10, Chapter 4: https://sizewellcdco.co.uk/wp-content/uploads/2020/06/SZC_Bk6_ES_V10_Ch4_Cumulative_Effects.pdf	Not yet agreed. Discussions ongoing between TSC and applicant prior to seeking TSC agreement.		In progress
		Responses to specific concerns are provided above. SZC Co. looks forward to working with TSC to scope the Tourism Fund (noting that marketing campaigns are a proposed use of the fund) and as part of the TWG throughout the construction phase.	Not yet agreed. Discussions ongoing between TSC and applicant prior to seeking TSC agreement.		In progress

NOT PROTECTIVELY MARKED

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
Tourism Working Group Meetings	
30/07/2020	Overview of tourism assessment - Tourism Working Group
26/08/2020	Q+A session on tourism assessment and discussion on Tourism Fund - Tourism Working Group
23/09/2020	Tourism working group catch up, following which it was agreed that the Councils would work with other members of the group (excluding the Applicant) to discuss the scope and quantum of the Tourism Fund. Further discussions on this matter have been with ESC and SCC only.
TSC only meetings	
N/A	No specific meetings on this SoCG have taken place to date.