



The Sizewell C Project

9.10.25 Initial Statement of Common Ground - National 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 a development consent order ('DCO') to the Planning Inspectorate ('PINS') under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project.

1.1.2 This second draft SoCG (Revision 02) has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and the National Trust ('the Trust'). This current version (Revision 02) reflects the Trust's position as set out in an email dated 22/03/2021. The ExA should note that this version of the SoCG has not been reviewed and signed off by the Trust.

1.1.3 This SoCG has evolved through a programme of engagement as detailed in Section 2.

1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties, so far as they relate to the matters of concern ("uncommon ground") for the National Trust, 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').

1.2.2 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').

1.2.3 Paragraph 58 of the DCLG Guidance states:

"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence"

- 1.2.4 The aim of this SoCG is therefore to inform the Examining Authority and provide a clear position of the state and extent of discussions and agreement between SZC Co. and the National Trust on matters relating to the Sizewell C Project.
- 1.2.5 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 <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>).
- 1.3 **Parties to this Statement of Common Ground**
- 1.3.1 SZC Co. has submitted an application for development consent to build and operate a new nuclear power station, Sizewell C, along with the associated development required to enable construction and operation.
- 1.3.2 The National Trust (The Trust) is an independent charity that looks after beautiful countryside and historic buildings in England, Wales and Northern Ireland. Should the Trust acquire land or buildings that it considers to be of outstanding quality, Parliament has created a statutory mechanism that enables our Trustees to declare that land “inalienable”. This means that the land is so important to the nation that it cannot be sold or mortgaged, rather it must remain in the care of the Trust, in perpetuity. Once declared inalienable this designation cannot be reversed. This is one way in which the Trust is able to deliver on its charitable purpose of preserving some of the nation’s most treasured places for everyone, for ever. The Trust owns 140 hectares of land at Dunwich Heath and Beach, which is located approximately 3 kilometres north of the proposed Sizewell C site. Dunwich Heath is a surviving fragment of lowland heath – one of the UK’s rarest habitats. It is subject to international and national designations. The majority of the land was declared inalienable in 1967 demonstrating the importance of the land and the Trust’s commitment to care for it permanently for the nation.
- 1.3.3 Collectively SZC Co. and the Trust are referred to as ‘the parties’.
- 1.3.4 This SoCG focuses on “uncommon ground” / concerns of the Trust and this second draft is based on responses submitted in the relevant representation to PINS, received by PINS on 28-9-20 and published here: <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/?ipcsection=relreps&relrep=41494> and feedback provided by the Trust to SZC Co’s first draft of the SoCG dated 24th February 2021 received by SZC Co on 22 March 2021.

1.4 Structure of this Statement of Common Ground

1.4.1 Chapter 2 provides schedules which detail the matters of concern to The Trust and SZC Co.'s response. It also identifies where discussions are ongoing.

1.4.2 **Appendix A** provides a summary of engagement undertaken to establish this SoCG.

2 POSITION OF THE PARTIES

Table 2.1 Position of the Parties - SZC Co. and National Trust

Ref.	Matter	Book ref.	National Trust Position	SZC Co. Position	Further Action / Additional references.	Agreed / Not Agreed / In Progress ¹
MATTERS RAISED IN THE 28/9/20 RELEVANT REP & IN AN EMAIL SENT BY NATIONAL TRUST TO SZC CO ON 22/3/21						
Overarching						
NT_Ov1	Principle of development		Ov1.1 The Trust does not object to the principle of the development as we acknowledge the NPS for Nuclear Power Generation (EN-6) identifies Sizewell as a potentially suitable site for a nuclear power station. However, we believe that the current proposal risks unacceptably damaging the integrity and beauty of our site at Dunwich Heath and the wider landscape.	Ov1.1 The position on the principle of the development is noted and welcomed. Book 6, Volume 2 and the ES Addendum submitted in January 2021 provide a robust assessment of the likely significant effects of the proposed development and identifies appropriate mitigation and / or compensation. It is understood that NT has yet to complete its review of the ES Addendum in the Jan 2021 change application. It is envisaged that the next update of this SoCG will address all of NT's outstanding concerns where possible.	Next version to capture all of the Trust's outstanding concerns.	In Progress
Recreation and Tourism (Book 6, Volume 2, Chapters 9 (Socio-economics) and 10 (Amenity and Recreation plus Shadow HRA (Doc Ref. 5.10))						
NT_RT1	Recreational Displacement: impact on visitor capacity, enjoyment and infrastructure at Dunwich Heath and Beach		RT1.1 The NT believes that recreational displacement will occur as a result of the proposed development and will impact on the NT's land at Dunwich Heath and Beach. RT1.2 The NT consider that the approach taken to the assessment of impacts arising from visitor displacement are underestimated and not precautionary. RT1.3 The NT notes the submission of proposed changes by EDF to the Examining Authority and will confirm its position on this matter should these changes be accepted. RT1.4 The NT consider that mitigation is required to enable the NT to manage and engage with additional visitors and improve its visitor infrastructure to cope with increased demand. The NT are in discussions with EDF about a Resilience Fund and a Monitoring and Mitigation Plan. The NT have commented on a second draft version of the Monitoring and Mitigation Plan and provided EDF with a list of measures which could be included in the Resilience Fund. This is yet to be agreed. RT1.5 The NT notes mention of Terrestrial Ecology Monitoring & Mitigation Plan in Requirement 4 in the draft DCO . However it is unclear how the Dunwich Heath Monitoring and Mitigation Plan relates to this Requirement and whether it would be secured through the draft DCO. RT1.6 It is unclear whether the Dunwich Heath Monitoring and Mitigation Plan will be secured through the s.106 agreement . The	RT1.1 SZC Co agrees that recreational displacement is likely to occur, but increases experienced at European sites including NT's land at Dunwich Heath and the beach are likely to be small in the context of the existing visitor numbers. The HRA concludes that adverse effects on integrity would not arise as a result of disturbance due to increases in recreational pressure. Mitigation measures implemented as part of the Sizewell C Project, including the Rights of Way and Access Strategy, which includes enhancements at Kenton Hills and Aldhurst farm, would minimise the displacement of people away from the proposed development area. In addition, the proposed recreational monitoring and mitigation plans described at E1.5 would be deployed on a precautionary basis. RT1.2 See response to RT1.1 and E.1.2 and response to ExQ AR.1.12 submitted at Deadline D2. RT1.3 Noted – we look forward to further engagement to progress this SoCG upon review of accepted change. RT1.4 SZC Co. would like to understand NT's specific concern on tourism visitors, noting that other tourism stakeholders are concerned about a	Further engagement on the resilience fund and proposed MMPs. Meeting offered to explain securing mechanisms as outlined in MRM.	In Progress

¹ This column does not need to be filled out in the initial stages, the principal purpose at this stage is to set out the position of the parties

Ref.	Matter	Book ref.	National Trust Position	SZC Co. Position	Further Action / Additional references.	Agreed / Not Agreed / In Progress ¹
			NT notes that Schedule 13 (Resilience Funds) includes a provision for a National Trust Dunwich Heath and Coastguard Cottages Resilience Fund. The National Trust is in discussion with EDF about this matter but it is yet to be agreed.	<p>decrease in tourism visitors but NT seems to be concerned about an increase in visitors and change in visitor segmentation. This is not identified by the tourism assessment in Volume 2, Chapter 9 of the ES or by the Suffolk Coast DMO's survey. It would be useful to understand what evidence NT is therefore relying on for this.</p> <p>More generally, SZC Co. is proposing a Tourism Fund and a separate Resilience Fund for National Trust Coastguard Cottages & Dunwich Heath to mitigate uncertainties and any residual impact caused by the Sizewell C Project.</p> <p>SZC Co. has shared a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme Manager Role), governance. These matters are largely agreed with outstanding positions on the scale of the Fund, and the potential for early (pre-DCO) release. SZC Co's position is that while the Ipsos MORI and DMO surveys undertaken in advance of the application 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). Evidence from HPC provides strong support for the gap between ex ante survey and reality, noting that the aim of the Tourism and Resilience Funds will be to avoid any loss.</p> <p>SZC Co welcomes receipt of the National Trust's proposed measures for the Resilience Fund. SZC Co has provided feedback to the Trust and further engagement is required to reach agreement.</p> <p>We welcomed engagement with the National Trust on the proposed 2nd draft version of the Terrestrial Ecology Monitoring & Mitigation Plan (TEMMP). An updated version of the TEMMP was submitted to PINS at Deadline 1 that takes account of the matters discussed. We await confirmation from NT if this is now agreed.</p> <p>RT1.5 The Monitoring & Mitigation Plan for Minsmere & Dunwich Heath (now renamed and extended to the 'Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and</p>		

Ref.	Matter	Book ref.	National Trust Position	SZC Co. Position	Further Action / Additional references.	Agreed / Not Agreed / In Progress ¹
				<p>Sandlings (North) European Site ' would be secured in the s106. This defines monitoring, using surveyors, mechanical counters and other techniques and mitigation measures at Sandlings SPA (Aldringham Common section), the Minsmere-Walberswick SPA and the Minsmere-Walberswick Heath and Marshes SAC to determine and mitigate the impacts of any additional recreational disturbance associated with the Project. It also includes an embedded warden resource, signage and other measures which would be implemented in any event. Deployment of additional mitigation measures that are secured through the s106 would be determined by the 'Environment Review Group' taking into account the advice received from the Ecology Working Group also set up in the s106.</p> <p>RT1.6 The Monitoring & Mitigation Plan for Minsmere & Dunwich Heath (now renamed and extended to the 'Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North) European Site ' would be secured under the s106. The measures to be included under the Resilience Fund for National Trust Coastguard Cottages & Dunwich Heath are under discussion between the Parties – see RT1.4. In agreeing the measures that are to be included in the resilience fund, SZC Co is keen to ensure that there is no overlap in provision between the various mitigation measures secured under the DCO and within the s106.</p>		
Impacts on Ecology (Book 6, Volume 2, Chapter 14) and Shadow Habitats Regulations Assessment Report (Doc Ref. 5.10)						
NT_E1	Recreational Displacement: impacts on ecology and designated sites at Dunwich Heath and Beach and the wider SPA		<p>E1.1 The NT believes that recreational displacement arising from the proposed development has the potential to adversely impact upon UK and European protected species and habitats at Dunwich Heath and Beach and at a landscape scale across the wider SAC and SPA.</p> <p>E1.2 The NT considers that the impacts arising from the displacement of visitors have not been adequately assessed in the ES and HRA against ecological receptors with some ecological receptors not having been considered. The NT does not agree with EDF's assumptions on visitor behaviours.</p> <p>E1.3 Accordingly, the conclusions of no adverse effect on site integrity for the European qualifying species and habitats are unqualified.</p>	<p>E1.1 SZC Co's position as per the Shadow HRA is that adverse effect on integrity would not arise as a result of disturbance due to increase in recreational pressure.</p> <p>E1.2 SZC Co disagrees – a precautionary approach was used in the assessment of potential increases in visitors to European sites for recreation such as walking and cycling in the Shadow HRA Report (i.e. numbers used are considered to be greater than would actually occur). A full explanation of why the approach is considered precautionary has been provided in response to ExQ1 (AR.1.12), with the key reasons being:</p> <ul style="list-style-type: none"> Actual numbers of displaced users of recreational resources to European sites are likely to 	Further engagement on commitments and securing mechanisms.	In Progress

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			<p>E1.4 The NT notes the submission of proposed changes by EDF to the Examining Authority and will confirm its position on this matter should these changes be accepted.</p> <p>E1.5 The NT considers monitoring and mitigation is required to ensure that the ecological importance of Dunwich Heath is not impacted by increased footfall. The NT are in discussions with EDF about a Dunwich Heath Monitoring and Mitigation Plan and access to funding. The NT have commented on a second draft version of the Monitoring and Mitigation Plan and provided EDF with a list of environmental measures which could be included in relevant funds. This is yet to be agreed.</p> <p>E1.6 The NT notes mention of Terrestrial Ecology Monitoring & Mitigation Plan in Requirement 4 in the draft DCO. However it is unclear how the Dunwich Heath Monitoring and Mitigation Plan relates to this Requirement and whether it would be secured through the draft DCO.</p> <p>E1.7 The NT notes that Schedule 11 (Natural Environment) of the draft s.106 agreement makes provision for a European Sites Access Contingency Fund and that Schedule 13 makes provision for the National Trust Dunwich Heath and Coastguard Cottages Resilience Fund. The NT understands that it would be excluded from the European Sites Access Contingency Fund under current proposals. It is unclear how the Dunwich Heath Monitoring and Mitigation Plan would be secured and how mitigation for impacts on designated features at Dunwich Heath would be funded. The NT is in discussion with EDF about this matter but it is yet to be agreed.</p>	<p>be significantly less than the figures used in the assessment.</p> <ul style="list-style-type: none"> Figures for construction workers at European sites are precautionary because they are based on the peak, maximum workforce which would only last for approximately 2 years of the 12 year construction phase. Figures used for construction workers potentially recreating at European sites are likely to be less than the figures used in the assessment. <p>SZC Co developed the baseline survey and assessment approach, and preliminary assessment findings, with ecological stakeholders in the Evidence Plan process. This included assumptions on visitor behaviour.</p> <p>E1.3 Noted. SZC Co disagrees – a detailed Recreation Evidence Base has been produced with a summary outlined in the Plants and Habitats Synthesis Report (see Appendix 14B1 of Volume 2, Chapter 14 of the ES).</p> <p>E1.4 Noted. We look forward to further engagement with the Trust on these matters in due course, now that the change application has been accepted by the ExA.</p> <p>E1.5 This is also SZC Co's position. See RT1.5. For clarity, monitoring and mitigation proposals for European sites which may be impacted by recreational displacement have been developed and reported in two plans. These plans are as follows:</p> <ul style="list-style-type: none"> Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North) European Site. Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries. <p>The monitoring approach and potential mitigation measures set out in the Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North) European Site have been discussed in detail with ecological stakeholders at meetings held on 18 and 22 February 2021. The updated version of this plan, which provides details of proposed monitoring (methods, locations) and mitigation measures (including funded wardening) has recently been shared with the Parties (and other ecological stakeholders) and will be updated before being submitted to Examination.</p>		

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				<p>E1.6 These are two separate monitoring plans. The Terrestrial Ecology Monitoring & Mitigation Plan (TEMMP) relates only to land within the order limits that would be under SZC Co's control. The Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North) European Site would be secured under the s106 because it applies to third party land, including land under the ownership of RSPB Minsmere and the National Trust. SZC Co understands that the Trust is not opposed in principle to these plans, although it would be helpful if this could be confirmed.</p> <p>E1.7 National Trust's understanding of the scope of Schedules 11 & 13 in the s106 is confirmed. In relation to Schedule 11 it would be the responsibility of the Environment Review Group, taking account of the recommendations of the Ecology Working Group also established under the s106 to deploy additional mitigation secured under the European Sites Access Contingency Fund based on the results of the European site monitoring and mitigation plans referred to in E1.5. The National Trust Dunwich Heath and Coastguard Cottages Resilience Fund would be for the Trust to use as it sees fit in accordance with the agreed provisions.</p>		
NT_E2	Recreational Displacement: provision of alternative greenspace		<p>E2.1 The NT believes that recreational displacement arising from the development should not all be directed to designated sites. NT to explain.</p> <p>E2.2 The NT acknowledges the provision and enhancement of Kenton Hills and Aldhurst Farm, however the NT has not seen any evidence of the assessment of the capacity and adequacy of these sites.</p> <p>E2.3 The NT considers that monitoring of these sites to deliver their intended purpose is required. The NT is not aware that the monitoring of these sites is covered by any of the Monitoring and Mitigation Plans proposed by EDF.</p> <p>E2.4 Should the assessment or monitoring show that further mitigation is required to protect the ecological robustness and integrity of protected habitats and species, provision of additional destination greenspace should be provided on undesignated land and in close proximity to Sizewell.</p> <p>E2.5 The NT notes that there is currently no provision in the draft DCO or draft s.106 agreement to cover the above.</p>	<p>E2.1 Recreational displacement would not all be directed to European sites, although a precautionary approach was used in the Shadow Habitats Regulations Assessment Report as explained in response to E1.2 & E1.3 above. The proposed monitoring and mitigation plans referred to in E1.5, that would be secured under the s106, are designed to monitor actual recreational pressure within European sites on a precautionary basis. Additional mitigation secured under the s106 would be deployed as appropriate to counter any observed increase in recreational pressure due to Sizewell C.</p> <p>E2.2 SZC Co's position is that mitigation measures implemented as part of the Sizewell C Project, including the proposed Rights of Way and Access Strategy, including enhancements at Kenton Hills and Aldhurst farm, would minimise the displacement of people away from the proposed development area. In addition, the proposed recreational monitoring and mitigation plans described at E1.5 would be deployed on a precautionary basis. Being located in Leiston, the 67 ha Aldhurst farm is readily accessible to residents within the town who can travel there on foot</p>	SZC Co to confirm details of recreational surveys for Kenton Hills and Aldhurst farm and propose how this would be secured.	In Progress

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				<p>or via a short journey by car (a small car park is to be constructed at the Abbey road entrance). Open access areas have been provided where dogs can be safely exercised on or off leads. A network of footpaths are being created within the site that will strengthen public access links between the town and the existing and enhanced PRow and permissive footpath network within the rest of the EDF Energy estate and the wider landscape. It would be helpful if the Trust could explain what further evidence it is seeking in relation to capacity and adequacy, given that no significant recreational disturbance impact has been assessed and that monitoring and mitigation plans are also proposed on a precautionary basis, secured under the s106.</p> <p>E2.3 SZC Co. has not included either Aldhurst Farm or Kenton Hills as locations within the Monitoring and Mitigation Plans as they sit outside of the designated sites. SZC Co. has undertaken baseline visitor surveys in 2019, of the areas within Aldhurst Farm to be designated Open Access land (results included in Volume 2, Chapter 15 (Amenity and Recreation), Appendix 15 D [APP-270]), and will undertake further surveys in 2021 and 2022 (pre-construction) and during construction to monitor recreational use. SZC Co. will monitor both of these locations and is investigating how best to capture this commitment within the application.</p> <p>E2.4 SZC Co's position is that impacts associated with potential increases in recreational pressure have been adequately mitigated through a combination of measures including monitoring and mitigation plans referred to in response to E1.5, the enhanced Kenton Hills / Aldhurst farm and the Suffolk RAMS payment made to ESC (in respect of campus workers and workers residing in the Land East of Eastlands Industrial Estate (LEEIE) caravan site) for the reasons stated above.</p> <p>E2.5 There is no such provision in the s106 as currently drafted because the measures already secured under the s106 are precautionary.</p>		
Landscape and Visual Impacts (Book 6, Volume 2, Chapter 13)						
NT_LV1	Landscape and Visual Impacts on our land at Dunwich Heath and Beach and the wider AONB		LV1.1 The elevated position of the National Trust's site provides the best vantage point for the Sizewell C site. The development will significantly and adversely impact on the setting and views from Dunwich Heath and the wider AONB both during construction and operation, as demonstrated in the submitted LVIA.	LV1.1 SZC Co. has given careful consideration to the design and appearance of the Sizewell C site in the views from coastal and elevated locations, including at Dunwich Heath and the National Trust's Coastguard Cottages, and has sought to minimise and mitigate landscape and visual effects and	Further engagement on scope of resilience fund	In Progress

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			<p>LV1.2 The Trust does not agree with the assessment conclusion that landscape and visual effects would only occur over localised sections of the AONB and Heritage Coast and that the effects during operation on these designations is not significant.</p> <p>LV1.3 The NT notes the submission of proposed changes by EDF to the Examining Authority and will confirm its position on this matter should these changes be accepted.</p> <p>LV1.4 Insufficient information has been provided to demonstrate how the applicant will mitigate/compensate the visual impacts of the development for the extent of its lifetime.</p> <p>LV1.5 Given the magnitude of visual impact at Dunwich Heath, the NT considers that it is imperative that it is able to access funds to implement interventions either alone or in partnership to mitigate/compensate for this impact and that monitoring is secured through requirements.</p> <p>EDF have indicated that the NT will be able to access a mitigation fund but this is yet to be agreed. Suggested measures on this matter have been provided to EDF.</p> <p>LV1.6 The NT notes that it is named as a consultee to East Suffolk Council in Requirement 12 of the draft DCO. The NT is currently reviewing its position on this.</p> <p>LV1.7 The NT notes that the draft s.106 agreement includes a Landscape Fund in Schedule 11 (Natural Environment) which the NT would have access to, particularly if measures could be delivered through partnership working in the wider protected landscape. The NT also notes that Schedule 13 (Resilience Funds) includes a provision for a National Trust Dunwich Heath and Coastguard Cottages Resilience Fund which could fund on-site mitigation/compensation. The National Trust is in discussion with EDF about this matter but it is yet to be agreed.</p>	<p>effects on the natural beauty and special qualities of the AONB through an iterative design process and application of agreed design principles. SZC Co also notes that the approach to the selection of viewpoints and to preparing visualisations was agreed during consultation with SCC, ESC, Natural England and the Suffolk Coast and Heaths AONB. Consultation was also undertaken with the National Trust on the location of viewpoints at Dunwich Heath. Full details of consultation undertaken and agreement reached with LVIA consultees is provided in Volume 2, Appendix 13H of the ES (Doc Ref 6.3). Additional visualisations not included within the DCO (relating to the accommodation campus and land off King Georges Avenue, Leiston for the construction phase of the main development site) were prepared at the request of the Planning Inspectorate (Procedural Decision Notice 4) and submitted in January 2021.</p> <p>LV1.2 SZC Co disagrees. The ES conclusion is robust and is supported by the evidence included in the LVIA. This demonstrates that significant adverse effects would be limited to the immediate AONB during construction and operation, - as recorded in the LVIA (Doc Ref 6.3). The proposals would not compromise the designated area as a whole. Indeed, nuclear infrastructure has been a feature of the AONB since its designation with SZA being in place before the AONB itself was designated. Energy infrastructure has and will continue to be a feature of this part of the AONB without compromising the ability of the ANOB to fulfil its statutory function.</p> <p>LV1.3 Noted. We look forward to further engagement with the Trust on these matters in due course, now that the change application has been accepted by the ExA.</p> <p>LV1.4 SZC Co. has provided embedded mitigation as set out in Volume 2, Chapter 13 of the ES and in the Design and Access Statement (Doc Ref. 8.1), to reduce adverse effects, to ensure that the 'behaviour' of the power station in the AONB is aligned with that of the existing SZA and SZB power stations and support the integration of the SZC power station into the coastal landscape. This includes:</p>		

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				<ul style="list-style-type: none"> Careful design of proposed turbine halls, including consideration of colour and materials with reference to an environmental colour study. Careful design of proposed sea defences as naturalistic dune features similar to those on the coast in the immediate area. Retention of existing woodland areas surrounding the site to secure screening of the proposal in the wider landscape. <p>The proposals include provision of screening of a substantial amount of lower level development on the main nuclear island reducing visual effects and are sympathetic to the character of the coastline, combined with a focus on the design and appearance of turbine halls as the primary structures that respond to the existing SZA and SZB power stations along a common alignment. SZC Co. also commits to implementing a management plan for the EDF Energy Estate that includes for the long-term protection and enhancement of existing and new woodland areas which support low level screening. See LV1.5 re. proposed compensation.</p> <p>LV1.5 With regard to compensation for impacts that cannot be mitigated, SZC Co. confirms that the s106 includes a fund that is specifically intended to compensate for residual impacts arising on landscape character, views and the Suffolk Coast and Heaths AONB/Suffolk Heritage Coast. The governance, structure and scale of this fund is the subject of ongoing discussions with stakeholders. SZC Co. is proposing a National Trust Dunwich Heath and Coastguard Cottages resilience fund to mitigate for significant impacts and address risks caused by the Sizewell C Project. The NT will be able to deploy that fund for works within land under its control it considers helpful in reducing effects.</p> <p>LV1.6 Noted and agreed. We look forward to further engagement with the Trust on this matter in due course.</p> <p>LV1.7 Noted and agreed. We look forward to further engagement with the Trust on these funds in due course.</p>		

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Coastal Geomorphology and Long-Term Change (Book 6, Volume 2, Chapter 20)						
NT_CP1	Impacts on NT land and infrastructure at Dunwich Heath and Beach from accelerated coastal change arising from the development.		<p>CP1.1 The National Trust is concerned about impacts on its land and infrastructure at Dunwich Heath and Beach from accelerated coastal change arising from the development.</p> <p>CP1.2 The NT acknowledges that the assessment of long-term coastal change involves a high degree of uncertainty. The NT believes the application does not adequately assess the potential range of impacts the proposal may have on long term coastal geomorphological processes. As a near neighbour the NT feels this arises due to a focus in the assessment of the risk to the nuclear power station itself only, rather than an assessment of the role the development may have in affecting coastal change on this part of the coast. The Trust is therefore concerned that there are potential/possible impacts of the proposal on our site during the lifetime of the development that have not been fully explored as part of an integrated and holistic assessment.</p> <p>CP1.3 The NT notes the submission of proposed changes by EDF to the Examining Authority and will confirm its position on this matter should these changes be accepted.</p> <p>CP1.4 The NT notes a Sizewell C Coastal Processes Monitoring and Mitigation Plan (CPMMP) has been submitted to the Examining Authority. The NT has not been engaged in any specific discussions about this plan. Having reviewed this the NT notes that there is no provision for monitoring, mitigating or compensating impacts arising from the development's influence on NT land or designated sites extending more than 1.5 km beyond the centre of the development site.</p> <p>CP1.5 The NT believes EDF should monitor coastal change for the lifetime of the development (through to full decommissioning) and include the designated sites to the north of the development site up to the northern boundary of our land. Mitigation/compensation proposals should be linked to specific triggers and / or associated to thresholds of long-term coastal change. This is yet to be agreed. Suggested measures on this matter have been provided to EDF.</p> <p>CP1.6 The NT notes that Requirement 7a of the draft DCO makes provision for Coastal Processes Monitoring and Mitigation Plan (CPMMP). The NT does not agree that its land at Dunwich Heath and Beach should be excluded from this plan and believes it should be a stakeholder in its development and review.</p> <p>CP1.7 The NT is concerned that there is no provision in the draft s.106 agreement for mitigation/compensation should the monitoring show that there is an impact on third party land from the development.</p>	<p>CP1.1 SZC Co's position, as evidenced in Volume 2, Chapter 20 of the ES and in the ES Addendum, is that the Sizewell C Project would have no effects on coastal change in relation to the Minsmere SPA/SAC frontage. This conclusion is supported by the results of detailed modelling of the BLFs carried out after submission of the ES addendum as documented in the Cefas Report TR543 that was submitted to PINS at Procedural Deadline 2. If the Trust has any remaining concerns about potential coastal change effects in relation to its land at Dunwich Heath and the beach, it would be helpful to understand what evidence it has that gives rise to these concerns.</p> <p>CP1.2 SZC Co disagrees – please see CP1.1 & CP1.4.</p> <p>CP1.3 Noted – we look forward to further engagement to progress this SoCG upon review of accepted change.</p> <p>CP1.4 The proposed CPMMP doesn't extend to NT land at Dunwich Heath / the beach as no plausible impact on them has been identified in the ES.</p> <p>CP1.5 The Coastal Processes MMP (Volume 3, Appendix 2.15.A of the ES Addendum [AS-237]) is scheduled to run until the end of decommissioning. Ten years beforehand (around 2130), a final assessment will be made based on the actual coastal setting, conservation designations, marine and coastal processes and function of the HCDF (if present) at that time. This assessment would be included in the Cessation Report (a future component of SZC Co's monitoring and mitigation) and would be based upon decades of coastal change data, which is needed to identify and assess any residual effects and, if required, make assessments for compensation (see Section 9 of the Coastal Processes MMP (Volume 3, Appendix 2.15.A of the ES Addendum [AS-237])). These assessments are timed for the end of SZC Co's operational life and return of the site to the relevant decommissioning body. Beach recharge would be linked to specific triggers and the evidence base for setting these is under investigation. A preliminary Cefas Report TR531 'Storm Response Modelling – Preliminary evidence toward setting volumetric thresholds for SCDF recharge' is to be submitted to PINS at Deadline D2. The latest draft Coastal</p>	Meeting offered to discuss CPMMP	In Progress

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				<p>Processes MMP is provided in Volume 3, Appendix 2.15.A of the ES Addendum [AS-237]). Drafting and agreement is intentionally an iterative process, secured by DCO (Requirement 7A) and Marine Licence (Condition 17) (Doc Ref. 3.1(C)). Further updates will be submitted into the examination as appropriate.</p> <p>CP1.6 SZC Co disagrees with the Trust on this issue. This is because we do not consider there to be a plausible risk of coastal change caused by the proposed development affecting the Trust's land at Dunwich or the beach. On this basis we do not think it appropriate for the Trust to be a member of the Marine Technical Forum (MTF). However we welcome the Trust's feedback on the evolving CPMMP during the examination process.</p> <p>CP1.7 Noted. SZC Co's position is that proposed monitoring and mitigation measures should be necessary and proportionate to the impacts. Our position is that there is no plausible risk of coastal change caused by the proposed development affecting third party land, including that belonging to the Trust, with the proposed CPMMP in place as proposed.</p>		
Tourism						
NT_T1	Impact on tourism on the Suffolk Coast		<p>T1.1 The NT believes that the proposed development will impact on tourism on the Suffolk Coast. As a tourist destination and the operator of holiday cottages within the Coastguard Cottages building, the NT are concerned there will be changes in audience segments and behaviours.</p> <p>T1.2 The NT acknowledges EDF's assessment and conclusions and agrees that there is a need for a Tourism Fund.</p> <p>T1.3 The NT believes access to the Fund to cover the duration of the construction phase of development (predicted to last 12 years) will enable the NT to engage with changing visitor segments to explain Sizewell C to visitors and to promote Dunwich Heath as a place to visit (working with partners if necessary). This is yet to be agreed. Suggested measures on this matter have been provided to EDF.</p> <p>T1.4 The NT notes that Schedule 15 (Tourism) of the draft s.106 agreement makes provision for a Tourism Fund and that the National Trust would have access to this fund.</p> <p>T1.5 There are no issues of concern relating to the draft DCO on this matter.</p>	<p>T1.1 / T1.2 Volume 2, Chapter 9 (Socio-economics) of the ES (Doc Ref. 6.3) 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</p>	Further engagement on proposed Tourism fund	In Progress

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				<p>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 (the potential for perception of changes to for example. traffic, where this is already an influencer on propensity to visit).</p> <p>T1.3 SZC Co. welcomes receipt of the National Trust's proposed list of measures for the Resilience Fund, which were set out in a spreadsheet and looks forward to agreeing the scope and quantum of the Resilience Fund. SZC Co. concurs with the use of the Resilience Fund during the construction phase. Note however, the comments on the tourism assessment above (RT1.4) regarding NT's predicted increase in visitor numbers and change in visitor segmentation.</p> <p>T1.4 / T1.5 Noted thank you.</p>		
Historic Environment						
NT_HE1	Impacts from the development on the non-designated heritage assets		<p>HE1.1 The NT believes that there will be impacts from the development and industrialisation of this part of the Heritage Coast on the setting and community value (past and present) of the NT owned Coastguard Cottages and their environs.</p> <p>HE1.2 The NT and East Suffolk Council consider that Coastguard Cottages are a 'Non-Designated Heritage Asset' and are part of the character and heritage of this part of the East Suffolk coastline. This also acknowledges the important use of this site during World War 2.</p> <p>HE1.3 The NT notes the submission of proposed changes by EDF to the Examining Authority and will confirm its position on this matter should these changes be accepted.</p> <p>HE1.4 The NT are in discussions with EDF about access to the Heritage Fund included in Schedule 7 of the draft s.106. agreement which will enable the NT to assess and carry out heritage enhancements in and around Coastguard Cottages. Measures may also be funded from the National Trust Dunwich Heath and Coastguard Cottages Resilience Fund. This is yet to be agreed. Suggested measures on this matter have been provided to EDF.</p> <p>HE1.5 There are no issues of concern relating to the draft DCO on this matter.</p>	<p>HE 1.1. / HE 1.2 / HE 1.4 The coastguard cottages at Dunwich Heath are non-designated heritage assets and have been assessed as of medium significance, reflecting their significance on a local and regional level.</p> <p>The observation tower was built at this prominent location to afford long ranging views out to sea and along the coast, so that vessels and distress signals might be observed and acted upon. The cottages were built to provide accommodation for those working at the observation tower. Thus, the heritage significance of the two parts of this group of buildings is different. Whilst both have architectural interest as a recognised style of buildings along the eastern English coast, the observation tower has additional interest deriving from the architectural features which allow the function of the building, such as the bank of windows looking out across the North Sea, to be discerned.</p> <p>The historic interest of the observation tower is drawn from its prominent location and its views out to sea, which provide a clear link to the historic use of the building. In contrast, the historic interest of the cottages is primarily drawn from its relationship with the observation tower. The cottages are in this setting purely because of the observation tower.</p>	Further engagement on proposed Heritage fund	In Progress



SIZEWELL C PROJECT – STATEMENT OF COMMON GROUND
NATIONAL TRUST

NOT PROTECTIVELY MARKED

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				<p>The principal elevation of the terraced cottages is to the north, with backyards and outshots on the southern side of the cottages. Views along the coast to the north include Cliff House and the caravan park at Dunwich. Views along the coast to the south include Sizewell A and B and would include the proposed Sizewell C power station. Significantly, in contrast, the principal elevation of the observation tower is to the east, out to sea. The observation tower's observation room has a large bank of windows on its eastern façade and smaller sets on its southern and northern. These permit uninterrupted views across the North Sea. They also allow views along the shoreline in either direction. It is this visual relationship with the North Sea that contributes most to the historic interest of this group of buildings.</p> <p>Architectural interest of both the cottages and the observation tower is experienced primarily in close proximity, allowing architectural details, such as the arrangement of windows, to be appreciated. However, the general form of the building group, which does contribute some architectural interest can be seen from further afield. The proposed development will not affect architectural interest.</p> <p>The important views from the observation tower to the North Sea and along the shoreline will be unaffected by the proposed development. Views to the east and north will experience no change. Views to the south will experience a magnitude of change, with the proposed development appearing closer and larger than the existing Sizewell power station complex. However, the existing and proposed power stations, due to a slight westward curve in the coastline, appear a little inland in views from the observation tower. Thus, their visibility does not affect the ability to have clear views along the coast to the south. Whilst there will be a low magnitude of change to this view, it will not prevent the appreciation of the historic interest of the observation tower.</p> <p>Views south from the cottages do not contribute as much to their historic interest, which is instead focussed on the relationship with the observation tower. There will be no effect to this relationship from the proposed development.</p>		

NOT PROTECTIVELY MARKED

Ref.	Matter	Book ref.	National Trust Position	SZC Co. Position	Further Action / Additional references.	Agreed / Not Agreed / In Progress ¹
				<p>The undeveloped nature of this part of the coastline contributes to the heritage significance of these buildings, not only by allowing architectural interest to be experienced, but also contributing to historic interest through foregrounding the important visual relationship with the North Sea. The area of the setting in which the proposed development would appear can, however, not be considered to be undeveloped, and the distance at which the proposed development would be seen would allow the remoteness and open nature of Dunwich Heath to remain, preserving this aspect of the setting's contribution to heritage significance.</p> <p>The assessment in Volume 2, Chapter 16 (Terrestrial Historic Environment) of the ES (Doc Ref. 6.3) [APP-272], of a low magnitude of change to a non-designated heritage asset of medium significance resulting in a minor adverse effect, remains appropriate. As this effect is not significant, no mitigation is proposed.</p> <p>HE1.3 The changes have now been accepted but there is no change to to assessment above as a result of the changes.</p> <p>HE1.5 Noted, thank you.</p>		
NT_HE2	Impacts from the development on archaeology		<p>HE2.1 The NT believes there may be indirect impacts on archaeology on its site at Dunwich Heath arising from any mitigation works which require ground works.</p> <p>HE2.2 These indirect impacts have not been considered or assessed as part of the current submission as the mitigation works are not yet known and remain difficult to quantify until such measures are agreed.</p> <p>HE2.3 Once measures are agreed the potential for impacts on archaeology may require a Watching Brief and possibly further archaeological investigation.</p> <p>HE2.4 The NT believe these costs would be closely associated with any agree mitigation for other matters set out above and secured through the National Trust Dunwich Heath and Coastguard Cottages Resilience Fund.</p> <p>HE2.5 There are no issues of concern relating to the draft DCO on this matter.</p>	<p>HE2.1 NT to explain - do NT mean <u>direct</u> impact on archaeology (i.e. disturbance of below ground remains, if present) from ground works on the Dunwich Heath site? Please specify what ground works this is referring to.</p> <p>HE2.2 / HE2.3 / HE 2.4 No ground works at Dunwich Heath are proposed as part of the DCO application hence no assessment or mitigation was required.</p> <p>Should ground works be agreed as part of one of the Funds, then the cost of any archaeological mitigation should be costed into the measures. Suffolk County Council Archaeology Service should be consulted and would need to agree - and potentially monitor - any archaeological works, including reporting. It would be for SCCAS to advise whether a Watching Brief would be appropriate, which in turn would depend on the scope and location of the works.</p> <p>HE2.5 Noted thank you.</p>	No further engagement planned.	

APPENDIX A: ENGAGEMENT ON THE SOCG

- A.1.1. The preparation of this SoCG has been informed by a programme of discussions between SZC Co. and the Trust. The relevant meetings are summarised in **Table 2.2**.

Table 2.2 SOCG meetings held between SZC Co. and the National Trust

Date	Details of the Meeting
7 July 2020	Intro to new NT lead and agree way forward for engagement
5 August 2020	Meeting to address landscape questions / issues
7 September 2020	Meeting to address recreational disturbance questions / issues
9 September 2020	Meeting to address coastal processes questions / issues
17 September 2020	Follow up discussion on recreational disturbance questions / issues
5 October 2020	Meeting to address tourism questions / issues plus follow up discussion on coastal
3 November 2020	Meeting to discuss the resilience fund and approach to the statement of common ground
18 February 2021	Discussion on the draft Monitoring and Mitigation Plan for Minsmere and Dunwich Heath (recreational disturbance)
22 February 2021	A meeting to discuss mitigation for recreational disturbance
18 March 2021	Progress meeting to develop SoCG for D2