



National
Trust

██████████@nationaltrust.org.uk
2nd June 2021

By email: sizewellc@planninginspectorate.gov.uk

Your Ref: EN010012

Our Ref: 20026265

Dear Sir/Madam

**Application by NNB Generation Company (SZC) Limited for an Order Granting
Development Consent for The Sizewell C Project**

Procedural Deadline 2 Submission: Summary of Written Representation

Please find attached a summary of our Written Representation in respect of the application for a Development Consent Order for the proposed Sizewell C Nuclear Power Station.

Yours faithfully

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National Trust Summary of Written Representation

1. This summary has been drafted in support of the National Trust's Written Representation that sets out our key areas of interest/concern in response to the proposal for a new nuclear power station at Sizewell C. An overview of these key areas is set out below from paragraph 3.
2. The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The National Trust owns 140 hectares of land at Dunwich Heath and Beach, which is located approximately 3 kilometres from the Sizewell C site, within the designated Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The elevated position of the National Trust's site provides the best vantage point for the Sizewell C site. Our site welcomes approximately 175,000 visitors per year.

Recreational Displacement: Impact on the visitor capacity, enjoyment and infrastructure of our site at Dunwich Heath and Beach

3. The National Trust is concerned about an increase in visitors to Dunwich Heath and Beach as a result of the proposed development and the pressure that that this would place upon visitor infrastructure and the ability of National Trust staff to be able to engage with visitors. This increase would arise from local visitors, particularly dog walkers, due to displacement from Sizewell during construction, recreational visits by the construction workers. The National Trust consider that the approach taken to the assessment of impacts arising from visitor displacement are underestimated and not precautionary. The extent and impact of the development now proposed is greater than that which was used to inform the questions posed as part of the Sizewell C Visitor Surveys undertaken in 2014. Therefore, if Development Consent is granted, it is imperative that ring-fenced mitigation funding is provided to enable us to monitor, manage and engage with the predicted increase in visitors and demand. The Trust should not be forced into a position where pressure is put on charitable resources due to circumstances beyond our control for us to adequately mitigate.

Recreational Displacement: Impacts on ecology and designated sites at Dunwich Heath and Beach and the wider Minsmere-Walberswick SSSI, SAC, SPA and Ramsar site

4. The National Trust 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 through disturbance and damage to the natural environment leading to impacts such as risk of trampling, fire, contamination, littering and at a landscape scale across the wider SAC and SPA. We are concerned that the impact of visitor displacement to Dunwich Heath and Beach on wildlife and ecology has not been adequately assessed in the Shadow HRA and Environmental Statement, largely due to flawed data and survey methodology, a lack of precautionary approach and due to some ecological features not having been considered. Accordingly, the conclusions of no adverse effect on site integrity for the European qualifying species and habitats are unqualified.
5. The National Trust considers monitoring and mitigation is required to ensure that the ecological importance of Dunwich Heath is not impacted by increased footfall. This should

identify all necessary avoidance, mitigation, compensation, offset and enhancement and monitoring measures with regards to species affected by the development and must take into account both the direct and indirect impacts. Dunwich Heath must be included in the proposals for an Ecological Management and Monitoring Plan (EMMP) to enhance existing recreational management measures and minimise the potential for recreational disturbance on :

- Heathland breeding birds (Nightjar, Dartford Warbler, Stone Curlew and Woodlark)
- Vegetated shingle
- Heathland

Recreational Displacement: Provision of alternative greenspace

6. The National Trust believes that recreational displacement arising from the development should not all be directed to designated sites. We acknowledge the provision and enhancement of Kenton Hills and Aldhurst Farm, however we have not seen any evidence of the assessment of the capacity and adequacy of these sites.
7. The National Trust considers that monitoring of these sites to deliver their intended purpose is required. 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.

Landscape and Visual Impacts on our land at Dunwich Heath and Beach and the wider AONB

8. The National Trust consider that the proposal by virtue of its scale, generic design and location would have a significant, long-term and adverse effect on the setting and views from Dunwich Heath and Beach (landscape and seascape), as well as on the character AONB and the Heritage Coast. We consider that the effect of the development would be the highest in terms of visual impact and shows a major alteration to qualities or characteristics of the landscape and seascape that will be fundamentally and permanently changed.
9. The LVIA submitted with the application identifies that the development would have a long-term (construction phase) and permanent (operational phase) major, significant and adverse impact on views from the area around Coastguard Cottages. The changes to the development which were submitted in January 2021 significantly increase the overall footprint of the development seawards and industrialisation of this part of the coast. This further compounds our concerns about the harmful impact of the development on views from Dunwich Heath and Beach and the AONB, particularly during construction. We are also concerned about the generic design of the proposal and how this will sit within a highly designated landscape. Further, we are concerned that the applicant has not provided sufficient detailed designs to show the true scale of the development and enable a holistic assessment of the landscape and visual impacts. We are of the opinion that it would not be possible to fully mitigate the impacts on our site due to its location and character. We consider that 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.

Coastal Geomorphology and Long Term Coastal Change

10. The National Trust land holding at Dunwich Heath includes the ownership of approximately 1.5 km of coastline. The National Trust is concerned about the long-term impacts on its land and infrastructure at Dunwich Heath and Beach arising from coastal change that is a direct or indirect consequence of the development.
11. The National Trust acknowledges that the assessment of long-term coastal change involves a high degree of uncertainty. The National Trust 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 National Trust 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 latter being a requirement of national policy. 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. Further, we consider that due to the absence of design and assessment information relating to the coastal defence features we are prevented from being able to fully review and assess the proposals and their impact on our stretch of coast.
12. The National Trust 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.

Impact on Tourism on the Suffolk Coast

13. The National Trust 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 National Trust are concerned there will be changes in audience segments and behaviours. The National Trust believes access to funding (via both the Dunwich Heath Resilience Fund and the Tourism Fund) to cover the duration of the construction phase of development will enable the National Trust to engage with a changing visitor experience (including for those staying at the National Trust's holiday cottages) and changing visitor segments, through marketing. This will enable staff to explain Sizewell C to visitors (particularly those visitors not aligned with our charitable purposes) and to promote Dunwich Heath as a place to visit (working with partners if necessary) and to undertake interventions at Coastguard Cottages.

Historic Environment; Impacts from the development on non-designated heritage assets and impacts from the development on archaeology

14. The National Trust believes that there will be impacts from the development and subsequent industrialisation of this part of the Heritage Coast on the setting of the National Trust owned Coastguard Cottages, which are considered to be a Non-Designated Heritage

Asset and their environs. The significance of the site and buildings are reflected in their use during World War 2.

15. The development (including the proposed changes) will change the coastal landscape and setting of Coastguard Cottages. We consider that the magnitude change would have a greater impact on the significance of the Cottages than has been reported in the applicant's assessment. We agree with the Council's position that challenges the conclusion of the Environmental Statement with regard to the significance of effect on Coastguard Cottages and we concur that in our view there will be a medium magnitude of impact leading to a moderate adverse effect for our asset of medium heritage significance. The National Trust believes the impact on the setting of the cottages may require access to funding to enable us to assess the need for and to carry out heritage enhancements to better interpret the significance of the site.

Monitoring/Mitigation/Compensation

16. The National Trust has had several meetings with the applicant's consultants to discuss the proposal, evidence supporting the submission, monitoring and mitigation plans as well as a draft Statement of Common Ground. We welcome this engagement to develop effective measures and believe it is imperative that appropriate monitoring, mitigation and compensation is provided to enable us to monitor, manage and engage with the predicted increase in visitors and potential impacts on our site as set out above and explained further in our Written Representation. The National Trust has received a number of recent updates to the monitoring and mitigation plans and Statement of Common Ground (as set out in the Written Representation). As such we have not yet had the opportunity to respond in writing to these latest drafts and therefore can confirm to the examiner(s) that all matters of concern remain not agreed and that we are hopeful of more engagement following the submission of this written representation.