



**National  
Trust**

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2nd June 2021

By email: [sizewellc@planninginspectorate.gov.uk](mailto: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: Responses to Examiner's Written Questions  
(ExQ1)**

Please find attached the National Trust's responses to the Examiner's Written Questions (ExQ1) which were published on 21 April 2021, in respect of the application for a Development Consent Order for the proposed Sizewell C Nuclear Power Station.

Yours faithfully

*Nina Crabb*

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Nationa Trust Resposes to Examining Authority’s Written Questions (EXQ1)

ExQ1	Question to:	Question:
<b>AR.1</b>	<b>Amenity and recreation</b>	
AR.1.12	The Applicant, ESC, SCC, National Trust, RSPB	<p><b>Displacement of Tourists/Visitors</b></p> <p>The National Trust [RR-877] and RSPB [RR-1059] indicate that they do not consider the displacement of tourists and visitors from the current pattern of visiting has been undertaken in a way which could be regarded as precautionary, it could therefore underestimate the effects on both the National Trust land at Dunwich, and the RSPB Minsmere site but also elsewhere:</p> <p>(i) Please respond to this concern.</p> <p>(ii) The National Trust and RSPB are seeking a commitment to mitigation, monitoring of activity and potential compensation – please advise on any progress that has been made in this regard.</p>
	<b>Response</b> (from National Trust)	<p>(i)</p> <p><u>Realistic v Precautionary Approach</u></p> <p>EDF have taken two approaches to estimate additional visits to locations as a result of displacement of existing users from the Sizewell area and the construction workforce; a realistic and a precautionary approach.</p> <p><u>The methodology for calculating the realistic approach</u> is set out in Para.3.2.28, pdf page 438, marked page 38 of Annex A Recreational Disturbance Evidence Base contained in 5.10 Shadow Habitats Regulations Assessment Volume 1: Screening and Appropriate Assessment Part 4 of 5, Appendix E Recreational Disturbance Assessment (Minsmere to Walkberswick SPA/SAC). This applies a percentage increase (2.33% which represents the number of respondents to the Visitor Survey who named Dunwich Heath as a location they would be displaced to) to represent displacement to Dunwich Heath based on the applicants estimated annual visitor numbers to Dunwich Heath. We disagree with this approach as it would not be visitors to our site that would be displaced to our site.</p> <p><u>The methodology for calculating the precautionary approach</u> is set out in Para.3.2.30, pdf page 439, marked page 39 of the document referenced above in para.6.8. For Dunwich Heath it applies the same 2.33% to an estimated figure of 500,000 visits/year in the Sizewell survey area. As set out in Para 3.2.27, (i. Calculation of annual visits to the area)</p>

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		<p>of Annex A: Recreational Disturbance Evidence Base (see PDF page 438, printed page 38) this 500,000 figure is a rounding down of estimated annual levels of use (517,246) based on counts at each of the seven 2014 Sizewell C visitor surveys locations, with no explanation as to why a rounded down figure is deemed precautionary.</p> <p>The National Trust is further concerned that the use of 2.33% does not represent a precautionary approach to the calculation of recreational displacement to Dunwich Heath. This is because this figure does not make any allowance for:</p> <ul style="list-style-type: none"> <li>• The 56 respondents (10.89% of the total no. of respondents) who stated they would be displaced but did not name a location</li> <li>• The 13 respondents (2.5% of the total no. of respondents) who said they were not sure they would be displaced by the development</li> <li>• The 18 respondents (3.5% of the total no. of respondents) who did not provide a response on displacement</li> </ul> <p>The NT accepts that it would be unrealistic to fully uplift the percentage increase in visitors at Dunwich Heath to reflect these three bullet points as these respondents are referring to the wider Sizewell area. However, we feel an appropriate approach that would be precautionary would have been to accommodate an allowance for this uncertainty in EDF's methodology. Given Dunwich Heath is one of the six locations identified as being most frequently mentioned (Para. 4.1.22 Appendix A of Volume 2 Main Development Site Chapter 15 Amenity and Recreation Appendices 15A - 15J Part 1 of 3 link to doc) by respondents as an alternative location for recreation, it would be seem reasonable to apportion this number across six sites.</p> <p>The realistic approach that the applicant has used to inform their assessments gives a displacement figure of 4,288 for Dunwich Heath. However, we are of the opinion that using the precautionary approach set out by the applicant and factoring in adjustments to resolve both the rounding down and the uncertainty contained within the survey as explained above, would provide a figure for recreational displacement closer to 26,000 additional annual visits to Dunwich Heath.</p> <p>The National Trust is also of the opinion that the additional infrastructure proposed as a result of the changes to the application (notably the addition of a new temporary beach landing facility and conveyor which would cross the beach in front of the application site, requiring walkers to pass underneath it) would further deter people from Sizewell and displace visitors to other locations. The extent and impact of the development now</p>

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		<p>proposed is therefore different from that which was used to inform the questions posed as part of the Sizewell C Visitor Surveys undertaken in 2014. Given this and preceding points made in this document the Trust remains concerned that figures used in the assessments are not precautionary.</p> <p><u>Visits by the construction workforce</u></p> <p>The applicant has sought to quantify the number of visits made to Dunwich Heath by the construction workforce in their application. The National Trust has concerns about the methodology used to estimate the use of the countryside by the workforce and believe the resultant estimates are exceptionally low and not precautionary.</p> <p>It is stated in Para 3.3.17, PDF page 447, number page 47 of Annex A: Recreational Disturbance Evidence Base (Link) that a mid-range estimate (between what is uncertain) has been set at around 10% to represent the likelihood of campus, private rented sector and tourist accommodation based workers (who do not have dogs with them – this is 4,800 workers) visiting outdoor informal recreational resources around Sizewell once a week. The National Trust believes the use of the 10% figure is very low and would question whether it represents a precautionary approach to estimating the number of additional visits to the countryside that could be made by the construction workforce. It is of note that the 2018/19 MENE report (Monitor of Engagement with the Natural Environment: Headline report and technical reports 2018 to 2019) states 65% of adults spend time in the natural environment at least once a week. The use of this figure would clearly increase the number of estimated visits to Dunwich Heath by the construction workforce without dogs by 6.5 times. We remain unclear as to the justification and evidence on which the 10% figure has been based.</p> <p>The 10% figure is then multiplied to reflect a theoretical number of annual visits and adjusted down to allow for shift patterns and holidays. To make this figure site specific a percentage has been derived for each named location from a survey of Non-home based outage workers in 2016 (see para 15.6.52, pdf page 64, number page 61, Environmental Statement - Volume 2, Chapter 15, Amenity and Recreation) Link which asked workers where they visited in 'the countryside around Sizewell', as well as 'other' and 'open space, park or playing field in town or village'. Given the long lead-in time for this development proposal it is of concern to the Trust that the assessment of visits to the countryside (including our site) by the construction workforce is reliant on a single survey of construction workers. Given the applicants unique position to access this type of audience</p>

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		<p>the Trust would have expected the applicant to draw on a more comprehensive evidence base in support of estimates contained within its submission.</p> <p><u>Uncertainty over use of figures in documents</u></p> <p>The Trust is also concerned that the use of figures by the applicant is inconsistent and it is difficult to follow where and how these figures have been used. This is compounded when different totals are used, for example;</p> <p>It is stated in 6.3 Volume 2 Main Development Site Chapter 14 Terrestrial Ecology and Ornithology Appendix 14B1 Plants and Habitats Synthesis Report Para 1.3.52 pdf page 23, marked page 20, that 'The Recreational Disturbance Evidence Base has estimated that the total number of additional visits to the wider countryside by the construction workforce would be 60,000 per year.' This figure is then assigned to key locations but does not add up to the number specified.</p> <p>Table 3.9: Estimated numbers of construction worker visits to locations per year included in Annex A: Recreational disturbance evidence base of Appendix E: Recreational Disturbance Assessment (PDF page 450) does not include a total column that aggregates the numbers of visits by workers without dogs and workers with dogs. If it did it would state a figure of 32,706 for total visits by construction workers. This does not accord with the above total figure (60,000) contained within the Plants and Habitats Synthesis Report or its breakdown of key locations.</p> <p>Table 2.1 of the Shadow HRA report Appendix E: Recreational Disturbance Assessment (PDF page 320) does not include in its total the visits by construction workers with dogs. The inconsistent use of figures is of great concern when trying to establish whether the approach adopted by the applicant is precautionary and when seeking clarity over the figures applied to consideration of our site. We currently have a range of visits by construction workers quoted to be 327 or 2,000. We presume this disparity makes it difficult for EDF, other managers of sites and regulators to clearly understand the impacts or mitigation requirements related to recreational displacement. We have asked for clarity on this matter from EDF but have yet to receive a clear and concise explanation regarding the use of figures in each assessment.</p>

ExQ1	Question to:	Question:
		<p>(ii)</p> <p>The applicant has stated in discussions and correspondence with the National Trust and RSPB that it will provide a Resilience Fund to mitigate impacts and address risks caused by the Sizewell C development on National Trust land at Dunwich Heath and RSPB land at Minsmere and that both organisations would also have access to other mitigation funds. Provision for Third Party Resilience Funds is set out in Schedule 13 of the Draft Section 106 Agreement draft dated 7 April 2021.</p> <p>The National Trust sent the applicant a list of suggested scope and measures which it considered could be covered by the fund on 8th March 2021. At a meeting with the applicant on 18th March 2021, the applicant advised that it would respond to the suggested scope and measures. After follow up requests from the NT, the applicant advised on 21st May 2021 that they had considered the proposed measures and set out their initial response. However, this unfortunately coincided with the time when we were working towards finalising our Written Representation ready for submission on 2nd June. The NT has therefore not had the opportunity to review this. The National Trust welcomes further engagement with the applicant and will be providing dates for further discussion following 2nd June. Therefore the scope and content of this fund is not yet agreed.</p> <p>The applicant has also indicated that the National Trust would have access to the following monitoring and mitigation:</p> <p><u>Minsmere and Sandlings (North) Recreational Monitoring Plan and Natural Environment Fund</u></p> <p>The purpose of this plan is to mitigate for risks and possible effects of any net additional users at across its geographic scope. This scope covers the National Trust Dunwich Heath and Beach site. Measures to reduce the potential disturbance on designated species and habitats, as well as impacts on our operational infrastructure are likely to be required.</p> <p>The National Trust has had several meetings with the applicant’s consultants to discuss the monitoring and mitigation plan and welcomes this engagement to develop effective measures. The National Trust was provided with an initial draft of the document on 19 August 2020. This draft lack any real content. At a meeting with EDF on the 16 November 2020 the National Trust provided an indication of what monitoring and mitigation measures</p>

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		<p>would be expected to manage any negative impacts on Dunwich Heath and the wider site SAC/SPA/SSSI features. A second draft of EDF's document was received on 26 January 2020 following which further comments in writing were provided by the Trust on 16 February 2020.</p> <p>A third draft of the Monitoring and Mitigation Plan now titled for Minsmere-Walberswick European sites and Sandlings (North) European site was circulated by the applicant to stakeholders on 12 May 2021. This provides greater detail of survey and mitigation proposals. As of 2 June 2021 the NT has not yet had the opportunity to respond in writing to this latest draft and therefore all matters of concern remain not agreed and that we are hopeful of more engagement following the submission of this written representation.</p> <p>It is our understanding that Minsmere and Sandlings (North) Recreational Monitoring Plan would be secured through the s.106 Agreement. Measures included in this plan could be funded through the Dunwich Heath Resilience Fund or the Natural Environment Fund. The National Trust has been engaged with other stakeholders and the local authorities about the scope of the Natural Environment fund. However, the local authorities are leading on this and therefore the NT has not been involved in recent discussions with the applicant about this. Therefore the scope and content of the monitoring and mitigation plan and these funds are not yet agreed.</p> <p><u>Tourism Fund</u></p> <p>A Tourism Fund is proposed to reduce the risk of perceived changes in visitor behaviour in the Suffolk coast area from materialising e.g. through development of or support for a tourism strategy/action plan, future research and monitoring, marketing and promotional activities, and capital investment.</p> <p>The National Trust has been engaged with other stakeholders and the local authorities about the scope of this fund. However, the local authorities are leading on this and the NT has not been involved in recent discussions with the applicant.</p>

ExQ1	Question to:	Question:
AR.1.37	National Trust, The Applicant (part (ii) only)	<p><b>Displacement of Visitors</b></p> <p>(i) Please explain where the figure of 88,000 additional visitors as specified by the National Trust [RR- 877] originates</p> <p>(ii) Does the Applicant agree this would represent a reasonable figure for additional visitor numbers?</p>
	<b>Response</b>	<p>(i)</p> <p>The figure of 88,000 additional visits originates from an email dated 16th November 2020 from the applicant's consultant (see Appendix B of our Written Representation) advising the Trust of an error in the numbers of recreational visits quoted in Shadow HRA. The email states that for the SACs (and Ramsar site for habitats features), the shadow HRA uses the applicant's figures from the realistic scenario rather than the precautionary scenario, which should have been used. For example the Shadow HRA states that any increase due to recreational users displaced from the Sizewell area is estimated to be approximately 20,000 recreational visits per annum. The applicant's consultant has advised that this figure should be 88,623 visits per annum.</p> <p>The NT believes that in Table 2.1 of the Shadow Habitats Regulations Assessment Volume 1: Screening and Appropriate Assessment Part 4 of 5 Appendix E, Annex A: Recreational Disturbance Assessment (Minsmere to Walkberswick SPA/SAC) the 'Precautionary' approach is shown in column 7, which shows the increase in visits/year per named site based on 500,000 visits to the Sizewell Area. Although the total for each SPA/SAC is not provided in the table if you manually add the total increase in visits for each site in the Minsmere to Walberswick SPA/SAC you would arrive at a figure of 88,623 visits/year, with 11,839 of these being to Dunwich Heath. Our assumption as to how this figure has been arrived at has yet to be confirmed by the applicant.</p> <p>In the same email from the applicant's consultant of the 16th November another error in the figures was highlighted. This stated that in the Minsmere to Walberswick Heaths and Marshes SAC the Shadow Habitats Regulations Assessment Volume 1: Screening and Appropriate Assessment Part 1 of 5 (Rev. 1.0, dated May 2020) that the figure quoting total annual recreational visits to the car park locations which give access to the SAC is incorrect. It is advised this figure should be 1,129,882 recreational visits per year not the 1,114,206 recreational visits per year quoted in para.7.7.34.</p> <p>For both these errors the applicant's consultants' stated in the email of the 16th November 2020 that the correction would be included in the errata that would be submitted to PINS</p>



ExQ1	Question to:	Question:
		at the time the changes to the application were submitted. The National Trust has been unable to find the location of this corrected information in the changes to the application which were submitted in January 2021. The National Trust has sought to clarify if this information has been included with the applicant, but has not received a response. The National Trust therefore remains concerned that figures reported in the submission documents are incorrect and not precautionary.
HE.1.19	ESC, SCCAS, Historic England, National Trust	<p><b>Enhancement of the Permanent Beach Landing Facility (BLF) (Change 2)</b>            Due to the proposed enhancement of the permanent BLF, it is stated that increased visibility of construction plant is likely from the Coastguard Cottages, Leiston Abbey first site and from the edges of the Aldeburgh and Southwold Conservation Areas. Are you satisfied that, as detailed in [AS-181], such an increase in visibility would not alter the level of significance of effect on the above assets?</p> <p><b>Response</b>            The NT agrees that the changes to the permanent BLF will increase visibility of construction plant from Coastguard Cottages, due to the elevated position of our site with clear views to the south encompassing the construction site. This impact needs to be considered in combination with the increased vessel movements and birthing which it would facilitate, the additional proposed lighting, and the extension further seaward. We note the view of East Suffolk Council in the Local Impact Report which states "This development creates a magnitude of change here greater than experienced by any other heritage asset, resulting from the intensification of the industrialisation of this part of the coastline and subsequent reduction in the undeveloped coastal landscape which currently contributes to an appreciation of the Coastguard Cottages". We agree with the Council's position that challenges the conclusion of the ES 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.</p>
HE.1.20	ESC, SCCAS, Historic England, National Trust	<p><b>Temporary Beach Landing Facility (BLF) (Change 2)</b>            Are you satisfied that the construction of the temporary BLF would be seen within the wider context of construction related activity and visibility would be relatively limited? Do you concur that as a consequence of such limited visibility the level of significance of the effects on Coastguard Cottages, Leiston Abbey first site and from the edges of the Aldeburgh and Southwold Conservation Areas would not change to that detailed in the initial assessment findings in [APP-272]?</p> <p><b>Response</b>            Whilst the construction (and presence) of the temporary BLF would be seen within the context of other construction activity, we do not consider that visibility would be relatively limited. Although it would be located to the south of the permanent BLF, the structure would be approximately 500 metres in length, include a jetty head up to 62 metres in width and a temporary conveyor which would cross the beach into the main development</p>

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		<p>site. Taken together, the cumulative impact of both BLF's and associated infrastructure would significantly increase the amount of development which would be seen on the beach in front of the Sizewell C site and extending seaward. The mooring and movement of large vessels will also add visual clutter within the seascape and the additional lighting required will have a greater impact on the night sky. The development will have a greater footprint and extend over a much larger area than originally proposed.</p> <p>All of this would be visible within the setting of Coastguard Cottages, the location of which affords elevated views of the landscape and seascape towards the Sizewell C site. We do not consider that visibility of the additional temporary BLF and associated infrastructure would be limited. Furthermore, it would not be possible to mitigate the impact of development extending seaward from our site. Accordingly, we are of the opinion that this would have a greater impact on the setting of Coastguard Cottages and level of effects on significance would be greater as referred to by East Suffolk Council in the Local Impact Report which states "This development creates a magnitude of change here greater than experienced by any other heritage asset, resulting from the intensification of the industrialisation of this part of the coastline and subsequent reduction in the undeveloped coastal landscape which currently contributes to an appreciation of the Coastguard Cottages".</p>