



National
Trust

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9th July 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

Submission in lieu of attendance at Issue Specific Hearing 6 (ISH6) on Coastal Geomorphology

Thank you for the invitation from the Examining Authority (ExA) to speak at Issue Specific Hearing 6. We note that the National Trust are listed as an Interested Party that the ExA would like to hear from at the Hearing. Unfortunately, our technical consultant is unable to attend this Hearing. However, we have reviewed the detailed agenda and would like to offer our comments in writing on the agenda items we consider to be of relevance to the National Trust. We are of course happy to address any further points in writing as part of the subsequent issue of the Examiner's Written Questions.

I can confirm that the National Trust will be attending Issue Specific Hearing 5 (ISH5) on Landscape and Visual Impact and Design and Issue Specific Hearing 7 (ISH7) on Biodiversity and Ecology.

Agenda Item 2. The assessment of the coastal impacts of the Proposed Development:

(a) Whether the potential coastal impacts of the Proposed Development can be satisfactorily assessed from the information submitted by the Applicant?

It is the National Trust's view that the Proposed Development has not been satisfactorily assessed by the Applicant for reasons set out in our Relevant Representation, Written Representation and the Deadline 3 response. As of early July 2021 the Trust feels there are still missing elements of information such as detailed designs for the HCDF. Furthermore, the Trust believes the successive submission of additional information on coastal processes,

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structures and management techniques at each deadline has not aided the systematic consideration of the overall proposal. For example, significant new reports such as 1d assessments and 2d assessments of the same feature (the soft coastal defence feature) have been issued within 6 weeks of each other, a further 3 detailed documents concerning coastal matters have been submitted at Deadline 3. This presents a significant challenge for third parties to review such technical documents so close together and does not give us confidence that assumptions contained within previous assessments have been drawn upon to inform (or updated to reflect) recent findings or that they won't be altered again once further information is forthcoming.

(b) If not, what additional information would be required?

Once all elements of the proposed development are defined and not subject to further substantive change we feel the development should be subject to a full Expert Geomorphological Assessment (carried out in line with Defra guidance) submitted to the Examining Authority to cover the full lifetime and decommissioning of the development. We feel it would be imperative to have a report that looks specifically at the totality of all the assessments into the individual components that have been undertaken to date so that the cumulative (integrated) impacts attributable to the development can be acknowledged.

(c) Update on the additional details of the hard coastal sea defence feature (HCDF) design to be provided at Deadline 5.

The Trust feels that the design for the HCDF should be complete by this stage of the examination into a development of such significance. The Trusts feels that the discussion of coastal process and geomorphology topics at an Issue Specific Hearing without the provision of full details of the HCDF limits the scope of detail that can be covered. We are conscious that this may mean the applicant defers answering relevant questions in this hearing to the submission of yet further information later in the examination. We would welcome an opportunity to provide responses on the additional detail of the HCDF once it is forthcoming and accompanied by all relevant assessments.

(d) The assessment principles adopted by the Applicant

The National Trust is concerned that the modelling looks at short horizons rather than the full lifetime of the development including decommissioning. We feel that a number of variables included in the assessments undertaken by the applicant have been fixed whereas they are unlikely to be fixed over the lifetime of the development. This is set out in more detail in our previous written submissions.

Agenda Item 3. The implications of the Proposed Development on the strategies for managing the coast as set out in the Shoreline Management Plan (SMP)?

(b) The MIN 13.1 policy to 'Hold the Line to 2105', and whether the more seaward position of the HCDF and the SCDF for Sizewell C relative to the Sizewell A and B sites would be in conflict with the SMP.

As highlighted in our Written Representation (see paragraphs 10.6 to 10.11) the National Trust believes the more seaward position of the HCDF and SCDF for Sizewell C are in conflict with the SMP.

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Agenda Item 4. Potential impacts on coastal processes and geomorphology including those arising from the proposed HCDF and the soft coastal sea defence (SCDF) and the temporary and permanent beach landing facilities (BLFs) and associated activities:

(a) The potential for consequential adverse and/or beneficial impacts on coastal processes arising from these features and activities.

The Trust has set out our concerns in our previous written submissions however we note that the applicant's assessments acknowledge that there are large scale coastal processes that operate on this coastline and that therefore potential impacts on coastal processes and geomorphology exist. The Trust believes the applicant has not fully explored the impact of the development on these processes but favoured short horizon modelling exercises to assess localised impacts.

(c) The spatial scale of the coastal processes assessment and whether the geomorphic context should be regarded as extending beyond Sizewell Bay?

See our previous written submissions however we do not currently believe the applicant has used the Greater Sizewell Bay extent in all the assessments, hence this carries over into their assumptions behind the extent of monitoring proposed, i.e. it is limited in its geographic scope.

(d) Whether other locations, such as Southwold, Thorpeness and Aldeburgh, should be included in the baseline monitoring and mitigation proposals?

As stated in our previous written submissions we believe the current monitoring and mitigation extent is far too limited. We consider that this should include our frontage at Dunwich Heath.

(g) Cumulative impacts.

Please see previous answer to Agenda Item 2 (b) above.

Agenda Item 5. The adequacy of the proposed climate change adaptation measures, and the resilience of the Proposed Development to ongoing and potential future coastal change during the Project's operational life and any decommissioning period including:

(b) The resilience of the Proposed Development, taking account of climate change, in response to shoreline evolution and change scenarios over the anticipated site life.

Please see our previous written submissions (specifically paragraph 10.13 of our Written Representation) where we highlight that the focus of the assessments to date are on the risk to the power station itself whereas we are concerned that greater emphasis should be placed on the role the development may have in affecting coastal change on this part of the coast (including potential impacts on third parties such as the National Trust Dunwich Heath).

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Agenda Item 6. Mitigation and controls including the Coastal Processes Monitoring and Mitigation Plan (CPMMP):

(b) Draft DCO Requirement 7A and the CPMMP.

For the reasons set out in our Written Representation, Deadline 3 submission and this letter, the National Trust strongly believes that the scope of the CPMMP should include the designated sites to the north of the development site up to the northern boundary of our land and should monitor long term coastal change over the full lifetime of the development through to full decommissioning.

(e) Whether any additional requirements, including those relating to the Marine Technical Forum (MTF), the MAP, the BLF and funding arrangements would be necessary to address adverse physical changes to the coast?

The Trust believes that the membership of MTF needs to include independent roles and to also include landowners who may be impacted by the development over its lifetime and decommissioning (such as the National Trust). As stated in 10.24 of our Written Representation some consideration needs to be given to the provision of a relevant funding mechanism for appropriate mitigation/compensation should monitoring evidence impacts on our land attributable to the development.

(f) Whether it would be necessary and reasonable to make provision in the draft DCO for the removal of the HCDF at decommissioning?

The National Trust considers it is necessary and reasonable to make provision in the draft DCO for the removal of the HCDF at decommissioning. This is due to the unique and special nature of the heritage coast and designated landscape within which the development site is located. We believe this removal should include the removal of the HCDF along with all other associated infrastructure.

I trust this information is helpful to the Examining Authority. We will further respond at Deadline 4 to the additional information regarding coastal matters submitted by the applicant at Deadline 3.

Yours faithfully



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