



**National
Trust**

██████████@nationaltrust.org.uk
22nd 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**

Procedural Deadline 5 Submission

Please find attached a post hearing written submission of our oral case presented at Issue Specific Hearing 5 (ISH5) Landscape and Visual Impact and Design on 13th July 2021.

Yours faithfully

██████████

Nina Crabb BSc (Hons), PGDip, MRTPI
Regional Planning Adviser (East of England)

National Trust
Regional Office
Westley Bottom
Bury St Edmunds
Suffolk
IP33 3WD

President: HRH The Prince of Wales
Regional Chair: Inga Grimsey
Director for Midlands & East of England: Paul Forecast

Registered office:
Heelis, Kemble Drive, Swindon
Wiltshire SN2 2NA
Registered charity number 205846

Written submission of the National Trusts oral case presented at Issue Specific Hearing 5 (ISH5) Landscape and Visual Impact and Design

1. Introduction

- 1.1. The National Trust (The Trust) attended Issue Specific Hearing 5 held on 13 July 2021, represented by Nick Collinson (National Trust General Manager for Suffolk and Essex Coast, including Dunwich Heath and Beach) who spoke on the following agenda items:
- Agenda Item 2: The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)
 - Agenda Item 3: Landscape and Visual Impact Assessment (LVIA)
 - Agenda Item 6: Main development site design considerations

2. Agenda Item 2: The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)

- 2.1. The National Trust highlighted the important interrelationship between the integrity of the AONB and its ability to deliver its purposes, and the major significant and adverse impacts on Viewpoint 17 from Coastguards Cottages at Dunwich Heath (as identified in the LVIA). Viewpoint 17 from Coastguard Cottages looks directly south towards the application site. It has very prominent views and the impacts are set out clearly in the submitted Environment Statement, for both the construction and operation phases of the development.
- 2.2. The Trust stated that the view (from Viewpoint 17) looks at the full breadth of the AONB from east to west. Therefore, the impacts that are experienced from that viewpoint are full east to west impacts on the AONB and this highlights the importance of the AONB as a single entity. The integrity of the AONB is its ability to deliver its statutory purposes based on it being a single entity.
- 2.3. The Trust commented on how the Suffolk Coast and Heaths AONB is a long narrow designation, not a round one and that the integrity of the AONB and this development at its narrowest point is a very significant matter. The development would result in a number of new features in the designated landscape (including new Beach Landing Facilities, new roads, very large new buildings (which have no design narrative with the existing Sizewell B power station) and new power lines). These are additional features, which potentially serve to cut the AONB in half and will have a significant impact during both construction and operation of the nuclear power station if consent is granted.

3. Agenda Item 3: Landscape and Visual Impact Assessment (LVIA)

- 3.1. The National Trust stated that it agreed with the AONB Partnership that visualisations similar to those provided at the DCO examination of the proposed Wylfa Nuclear

Cont/d

Power Station would provide a better understanding of the impacts of the proposal. The Trust advised that given the adverse impacts on Viewpoint 17 the wire diagrams presented in the application are not sufficient to understand the true significance of impact, particularly for the construction phase and the craneage associated with this. As stated previously this is the narrowest point of the AONB and we need a clear understanding on what the impacts of craneage would be.

- 3.2. The Trust advised that it specifically asked the Examining Authority for the Wylfa DCO application for computer generated images (CGIs) and photo montages of the craneage, and the Examining Authority agreed to ask the applicant to provide them. The purpose was to provide a better understanding of the real visual impact on a National Trust property adjacent to the site. Such images for the Sizewell C proposal would help with an understanding of the true significance from a community and a visitor point of view of the visual impact at Dunwich Heath and Beach. The Trust welcomes over 175,000 visitors a year to this site. This is a very significant viewpoint with a very prominent view of the construction site, so it is important to understand what this development and associated craneage would look like both during the daytime but also night-time. This a dark sky area so understanding the impact of heavily lit craneage is important.
- 3.3. The Trust also commented that it understands that the applicant has provided photo montages of the craneage at Hickley Point C site but does not think that Hinkley is a sufficient proxy for Sizewell C. The Sizewell C site is different and is located wholly within an AONB. Viewpoint 17 looks east to west across the full breadth of the AONB and so proper photomontages in the way that were presented for the Wylfa development would be helpful.

4. Agenda Item 6: Main development site design considerations

- 4.1. The AONB Partnership raised concern about light pollution on the dark skies of the AONB. The National Trust followed and stated that the difference between the Hinkley Point C site and the Sizewell C site in terms of the landscape status is important, as discussed earlier in the hearing, but the dark sky status is also important. The Suffolk Coast is a dark sky area, and the Trust runs very popular stargazing events as part of its operation. Over 100 people attend several times a year to enjoy, specifically the dark skies that are afforded on the Suffolk coast. The proposed development will impact on such events if it is built.
- 4.2. Concerning the Landscape and Visual Impact Assessment, the Trust stated that it agrees with the conclusions about the visual impact of the development on Viewpoint 17. Further, that the conclusions give the Trust great concern, given the importance of Dunwich Heath and the alienability of it as National Trust land. The applicant itself identifies that this is one of the most prominent viewpoints which would overlook the construction site and that it is a valued AONB viewpoint.

Cont/d

- 4.3. In response to the Examiner's question about what specific information is missing and how this would assist in understanding the project, the Trust referred to the additional photo montages discussed under Agenda Item 3. This would particularly assist the Trust, its members and visitors in understanding the project better. Dunwich Heath and Beach is a very popular site and a popular part of the Suffolk coast. It can be very difficult to have conversations with members and visitors about the impacts of the development from the wire line images that were submitted with the application. Better construction images (such as those provided for the Wylfa development) would help enormously.
- 4.4. In terms of the operation of the site, the Trust advised that it has not been involved in any discussions about the finishes and colour of some of the principal buildings proposed. The Trust would welcome such involvement, given the impact from Viewpoint 17.
- 4.5. Given the scale of the impacts, and the conclusions of the LVIA regarding both operation and construction, the Trust's view is that many of these impacts cannot be mitigated at Dunwich Heath and Beach. Given the nature of the site and the orientation of Coastguards Cottages (which face towards the Sizewell C site) there would undoubtedly be very significant residual impacts. There are a lot of impacts that the applicant will not be able to mitigate. We accept that the colour and finishes of some of the principal buildings will provide some embedded mitigation and that landscaping at Kenton and Goose Hills will mitigate some of the low-level clutter. The Trust also acknowledged that it is in discussion with the applicant about a Dunwich Heath Resilience Fund, but this would only deliver small scale mitigation measures, such as staff resource to have conversations with visitors about what is happening in the landscape and some small infrastructure provision/improvements which may detract from views of the construction site.
- 4.6. The Trust highlighted the importance of the Natural Environment Fund, which is proposed by the applicant, in terms of mitigating the impact of the development on the AONB (including Dunwich Heath as it is a valued AONB viewpoint). It will not be possible to fully mitigate the impacts of the development at Dunwich Heath itself. Dunwich Heath is a heathland SSSI and so it is not a site where tree planting is suitable. Therefore, the open view of the application site will remain. The Natural Environment Fund is a mechanism to provide interventions in the wider AONB landscape.

Cont/d