



**National
Trust**

██████████@nationaltrust.org.uk
3rd September 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 7 Submission: Responses to Examiner's Written Questions
(ExQ2)**

Please find attached the National Trust's responses to the Examiner's Written Questions (ExQ2) which were published on 3rd August 2021, in respect of the application for a Development Consent Order for the proposed Sizewell C Nuclear Power Station.

Yours faithfully

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

ExQ1	Question to:	Question:
CG.2	Coastal Geomorphology	
CG.2.6	ESC, MMO, EA, NE, RSPB, National Trust, Alde and Ore Association, Mr Bill Parker	<p>Impacts on coastal processes</p> <p>At DL5 the Applicant submitted a revised version of the CPMMP [REP5-059]. Please indicate whether there are any further concerns:</p> <p>(i) as regards the wording of that draft plan including in relation to the geographical extent of the proposed monitoring, the means of monitoring and future mitigation to maintain the shingle transport corridor and mitigation triggers?</p> <p>(ii) in relation to the funding of the monitoring and mitigation process by the Applicant and the duration for that to process and funding to be in place?</p> <p>(iii) the means of securing and enforcing the CPMMP provisions?</p> <p>(iv) whether this now satisfactorily addresses the details sought of the proposed secondary mitigation in the event that the SCDF-supported sediment pathway across the site frontage is interrupted?</p> <p>(vi) whether any further changes/provisions are required to safeguard the Coralline Crag from avoidable unnatural deterioration?</p>
	Response (from National Trust)	<p>We remain concerned about uncertainty contained in assessments and so do not believe the assertion within the Executive Summary of the CPMMP that the scope of the plan covers 'any potential significant effects on coastal geomorphic features (receptors)'. We believe it is necessary to extend the geographical extent of monitoring to address uncertainty and that means monitoring from the start of the development through to the end of decommissioning of the site. We are of the opinion that both monitoring of the bathymetry and beach should extend to the National Trust shoreline and adjacent sub tidal area (incorporating sedimentary bars).</p> <p>The reference in the CPMMP to the maintenance of the shingle transport corridor along the SZC frontage appears to remain a limited definition related to the intertidal beach processes only. It does not appear to reflect the potential impacts to bar system from dredging, interaction to structures, or interaction to vessel movements or indeed (in addition) linkage to sediment transport directions which might be altered by changes to the morphology of the upper beach and foreshore particularly as this develops over time and in the longer term. We consider this could be adequately mitigated by extending the monitoring to include the National Trust frontage and this would address our concerns</p>

ExQ1	Question to:	Question:
		<p>regarding the uncertainty of assessments and allow relationships to changes to geomorphology identified above to be considered both in the wider context of the Greater Sizewell Bay. It would also be helpful to maintain records that can assist in determining (if such uncertain outcomes arise), how they behave and influence the long-term coastal geomorphology. The NT feel this could be achieved by the applicant agreeing to carry out a bathymetric survey and drone survey of the beach and cliff along the frontage of our land ownership every 5 years, with this commitment being set out in the Coastal Processes Monitoring and Mitigation Plan. This would provide an ongoing set of information showing the reality of any change and allay our concerns about uncertainty.</p> <p>We remain concerned about assessments made of long-term changes to coastal geomorphology and many of those matters have been deferred again until deadline 7, when yet further information will be issued out in a piece-meal fashion. We note that several of the sub-questions under this item are dependent upon knowledge of information to be included in these future submissions by the applicant and/or are more relevant to other interested parties. As such we will provide our views on these matters at future deadlines if appropriate.</p>
HE.2.5 Historic environment (terrestrial and marine)		
HE.2.5	National Trust	<p>MDS: Coastguard Cottages Noting the response of the Applicant to ExQ1 HE.1.16 [REP2-100], are you in agreement that important views from the observation tower will remain unaffected and that the proposed development will not prevent the appreciation of the historic interest of the observation tower?</p>
	Response (from National Trust)	<p>The National Trust disagrees that important views from the observation tower will remain unaffected and that the proposed development will not prevent the appreciation of the historic interest of the observation tower.</p> <p>The former Coastguards observation tower (known as 'the lookout') is part of a set of terraced structures which includes the former coastguard cottages. The observation tower is attached to the row of cottages and form one continuous building. Their former use was inter-related, and the building remains as a single entity in the same ownership.</p> <p>The bank of windows at first floor level within the observation tower which the applicant refers to wraps around both the eastern and the southern elevations of this part of the building and therefore not only looks out to sea but also looks directly in a southerly direction of the proposed Sizewell C site. Therefore, when you are in the observation tower</p>

ExQ1	Question to:	Question:
		<p>you are afforded clear views of both the north sea and views to the south across the lower-level RSPB Minsmere land of Sizewell A and B and the proposed Sizewell C site. In addition, there are a further six first floor windows within the southern elevation of Coastguard Cottages which face towards the Sizewell C site. Views of the large-scale development both on land and out into the sea will be prominent from the observation tower and further industrialise this part of the Heritage Coast.</p> <p>Furthermore, the applicant's LVIA separately concludes a major adverse impact on views from Coastguard cottages (which includes the observation tower). The observation tower was built to provide seaward and north and south views along the coast. The observation tower was all about coastal views.</p> <p>We agree with the applicant's statement that the proposed development will appear closer and larger to Coastguards Cottage than the existing Sizewell power station complex. But we do not agree that the westward curve in the coastline means that the existing and proposed power stations will not affect the ability to have clear views along the coast to the south.</p> <p>The historic interest of the tower is not only drawn from its prominent location and views out to sea, as suggested by the applicant. The former use of the structure as a whole (including the cottages), its prominent and elevated location on the coastline, its isolated position and the views of the Coastguards Cottages from within the landscape and across the coastline all contribute towards its significance.</p> <p>Chapter 16 (Terrestrial Historic Environment) of the applicant's submitted ES (Link to document) states that the construction works associated with the proposed development would be "prominently visible" from the Cottages. It also states that works on the main construction area would present a more cluttered, and busy appearance, which would present a sense of change in the setting of the asset and "would slightly affect the contribution of the setting to the historic interests of the asset, primarily by affecting the sense of seclusion, and would detract from the viewer's aesthetic appreciation of the asset, particularly when the cottages are viewed from the north, where the proposed development would be juxtaposed with the cottages against the horizon" (Para.16.6.101).</p>

ExQ1	Question to:	Question:
		<p>As the applicant sets out in the response to HE.1.16 (ExQ1), the undeveloped nature of this part of the coastline contributes to the heritage significance of Coastguard Cottages. However, it goes on to draw attention to the important visual relationship with the North Sea. Whilst we do not disagree with this, the setting, which contributes to the significance of the buildings is a much wider area, including the coastline in both directions. We accept that part of Sizewell is already developed, but such a large-scale development as the one proposed, which includes large protrusions into the sea, will further erode the isolation and significance of Coastguard Cottages and have a negative impact on their setting. Consideration should also be given to the cumulative impact of Sizewell A, B and C, which is encroaching northwards, towards Dunwich Heath.</p> <p>The NT acknowledges that the applicant is proposing a contribution within the Dunwich Heath Resilience Fund to enable the NT to carry out enhancements to, and interpretation of Coastguards Cottages to better explain the nature, significance, and value of the non-designated heritage asset.</p>
LI.2 Landscape impact, visual effects and design		
LI.2.1	SCC, ESC, Natural England, The AONB Partnership, National Trust, Stop Sizewell C, TASC	<p>Additional Construction Visualisations</p> <p>Additional illustrative day and night-time construction photomontage visualisations are to be produced from four Representative Viewpoints [REP5-117]. Please comment on the suitability of the selected locations.</p>
	<p>Response (from National Trust)</p>	<p>The National Trust is content with this selection of viewpoints, including viewpoint 17. The NT would like to see realistic montages for periods during the construction, when the applicant knows certain activities are programmed and so certain cranes and lighting will be in place. As stated in section 1.5.4 of Rep5-117 the information clearly exists for the applicants to provide what is being asked, without over-stating or over-playing the response.</p>
LI.2.22	ESC, SCC, Natural England, The AONB Partnership, National Trust	<p>Design and Access Statement –Overarching Design Principles and Detailed Built Development Principles</p> <p>Several amendments and additions have been made to Tables 5.1 and 5.3 of the DAS [REP5-070]. Please review and comment on the amendments and additions.</p>
	<p>Response (from National Trust)</p>	<p>Table 5.1 Overarching Design Principles</p> <p>The National Trust has no comments to make on the additions to the Overarching Design Principles (Sustainability, Principles 76-78).</p>

ExQ1	Question to:	Question:
		<p>Table 5.3 Built Development Principles</p> <p>Principle 56: The NT notes that the colour palette for the cladding for the turbine halls will be discussed and agreed with East Suffolk Council. Given the elevated views of the development site from Dunwich Heath and that the turbine halls will be the tallest structures within the site, the NT would welcome involvement in these discussions. The applicant should provide montages and mock-ups to demonstrate what these would look like from Dunwich Heath.</p> <p>Principle 57 and 80: These refer to the external treatment of the interim spent fuel store and the main access building. It is noted that Reserved Matters applications will include details of the exterior design and colour choice. The NT would welcome notification of, and consultation on these applications. We note that we are listed as a consultee in Requirement 12 (Main development site: Reserved Matters) of the draft Development Consent Order submitted at Deadline 5 which relates to the intermediate level fuel store, interim spent fuel store, visitor centre and administrative buildings.</p> <p>Principle 75: This states that the land take and seaward extent of the HCDF will be minimised as far as practicable. The NT will comment separately on the design of the HCDF submitted at Deadline 3.</p> <p>Principle 81: This refers to the mechanism for establishing shingle and sand dune habitat on the new coastal defences. The NT considers that both the depth and structure of placed material is important. The National Trust's experience at Orford Ness (south of Sizewell) is that once shingle structure is disturbed (ie by machine movements, digging, scrapping, etc) the natural structure of ridges and swales that supports shingle vegetation is destroyed as the shingle sizing is mixed and the fines that hold water are lost and vegetation has trouble re-establishing. Only natural processing of shingle through wave action can restore the structure fully. Furthermore, there is an issue of depth. If the placed material is thin this will tend to reduce the ability to retain fines as they get winnowed out. It is difficult to guarantee recovery and therefore monitoring of these features over time is important to ensure that the effects of change are recorded, and true establishment is achieved. A veneer of sediment is much more ephemeral and prone to removal from the structural element below than sediment with depth.</p> <p>Principle 79: This refers to the choice of colour for hard elements of the SSSI Crossing that are visible from public viewpoints. The NT considers it appropriate that it should have</p>

ExQ1	Question to:	Question:
		regard to the 'Guidance on the Selection and use of Colour in Development' published by the Suffolk Coast and Heaths AONB'.
LI.2.23	ESC, SCC, Natural England, The AONB Partnership, National Trust	<p>Design and Access Statement –Overarching Design Principles In respect of Overarching Design Principles 17-21 [REP5-070], are you satisfied that the proposed design of the MDS meets the objectives of these principles?</p>
	<p>Response (from National Trust)</p>	<p>The National Trust does not consider that the proposed design of the MDS meets the objectives of the Overarching Design Principles 17-21 as set out in REP5-070.</p> <p>Design Principles 18 and 19 state that the Sizewell C development will complement existing structures within the landscape (most notably Sizewell A and B) and will balance proportions and impacts across the site. Further detail about this is set out in Sections 6.11 and 6.12 of the document. By virtue of the number, scale and design of the structures, the National Trust does not consider that the proposed development would achieve this.</p> <p>We do not agree that it would sit within the landscape as an integrated part of the coastline. It would instead significantly extend the industrial development northwards and be of a scale and design which does not respect the AONB within which it will sit.</p> <p>We do not agree with the applicant's assertion that Sizewell C would emphasise and enhance the visual success of Sizewell A and B (albeit this is a subjective view) within the landscape by utilising its larger volumes to complement the existing coastal forms. Whilst we acknowledge that it is not possible or appropriate to hide the development, we fail to understand how larger volume buildings and structures on a site which is double the size of the Sizewell A and B sites complement the existing development at Sizewell. Rather, it is at odds with, and will have greater prominence within the landscape than the structures of Sizewell A and B. We do not consider this balances the proportions and impacts across the sites, as set out in Design Principle 19.</p> <p>We do not consider that the Sizewell C structures would complement the existing Sizewell A and B structures. Similarities appear to be drawn on the basis that the development is in alignment with the Sizewell B dome, the turbine halls are on a north-south axis, the turbine halls and reactor domes are comparable in scale to the main nuclear safety buildings of Sizewell A and B and a further two reactors are proposed in addition to two that already exist. A significant amount of the design is fixed due to safety, efficiency and security</p>

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		<p>requirements and is also replicated from the Hinkley Point C design. This has influenced the masterplan and prevents a development which can be designed to be sensitive to the designated landscape. It is difficult to see how the design is sensitive to 'place', apart from the size of the site being reduced slightly compared to Hinkley in order to minimise impact on the SSSI. In our opinion the approach the applicant has taken to design has not adequately considered the AONB. If it had, a twin reactor and design replication from Hinkley would never have been seriously considered appropriate for this location at Sizewell.</p> <p>The Design and Access statement acknowledges that the structures are exposed to long distance views (Para.6.13.3). The NT considers this is relevant to our site at Dunwich Heath given the elevated position of our site with views towards the proposed development and the conclusions of the LVIA. Design Principle 21 indicates that techniques will be utilised to reduce the perceived scale of buildings from distance. The accompanying text at Para.6.14.2 refers to a long distance as approx. 1.5km. Dunwich Heath is approximately 3km from the site. The turbine halls and reactor domes will be large prominent structures, up to 51 metres in height with matt concrete facades. Many of the other buildings and structures will be aluminium clad orthogonal blocks which range in height, up to 40 metres. The techniques proposed to be used to reduce the perceived scale include shadow gaps between cladding panels, reduced size human scale openings and preventing high level access around the buildings. The NT is of the opinion that this will do little to reduce the visual impact of the development from distance.</p>