



**National
Trust**

Nina.Crabb@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

Please find attached our Deadline 7 Submission 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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1 Scope of this response

- 1.1. The National Trust has compiled this Procedural Deadline 7 Submission to set out its views on the following matters and recently submitted documents;
 2. The Monitoring and Mitigation Plan for Minsmere - Walberswick European site and Sandlings (North) European site which covers our property at Dunwich Heath and Beach submitted at Deadline 5.
 3. The Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites (Rev.1) submitted at Deadline 5
 4. Aldhurst Farm Technical Note (Rev.1) submitted at Deadline 5
 5. Issue Specific Hearing 10 (ISH10) on Biodiversity and Ecology
 6. The National Trust Resilience Fund
 7. Draft Statement of Common Ground with the National Trust
 8. Coastal Geomorphology

2 The Monitoring and Mitigation Plan for Minsmere - Walberswick European site and Sandlings (North) European site which covers our property at Dunwich Heath and Beach submitted at Deadline 5.

- 2.1. The National Trust welcomes the draft Mitigation and Monitoring Plans for the European Sites North and South of the proposed power station which are aimed at responding to the impact of the development as well as the anticipated uplift in recreational usage due to displacement around the development site and the uplift in the number of workers using the area. We are keen that that these plans effectively avoid adverse impact on our nearby properties (Dunwich Heath and Orford Ness) and other sites.
- 2.2. The applicant submitted an updated draft version of the Monitoring and Mitigation Plan for Minsmere - Walberswick European site and Sandlings (North) European site at Deadline 5 ([REP5-105](#)). This is incorrectly labelled as the 'Minsmere Monitoring and Mitigation Plan' on the title of the document and on PINS website. Following this submission, the National Trust met with the applicant's consultants on 28th July 2021 to discuss concerns about the way in which the number of displaced visitors and construction workers were calculated and used to inform the HRA and aforementioned Monitoring and Mitigation Plan. Prior to the meeting the applicant's consultants sent a draft 'Statement on Recreational Disturbance Numbers' and a spreadsheet

containing calculations and tables associated with the recreational evidence base to the Shadow HRA.

- 2.3. Following discussions at the meeting, we sent the applicant's consultants our comments on their approaches to estimating numbers associated with recreational displacement that would arise as a consequence of the proposed SZC development (on 19th August 2021). These comments are attached as Appendix A of this response. The calculation of these figures remains a matter of disagreement, and at the time of writing, we remain of the opinion that the applicant has not presented the worst-case scenario or applied a precautionary approach.
- 2.4. Whilst we are grateful for the continuing discussions with the applicant on the monitoring and mitigation plan, our detailed comments on the applicants figures included as Appendix A to this response emphasises concerns we have previously highlighted regarding the limitations of the low sample size of the survey data being used including the age of the survey data and the duration of surveys. This appendix also states (in para 1.6.3, p.1) that respondents may have responded differently had they been presented with information and images of the nature and scale of development now being considered.
- 2.5. We also remain concerned, as previously set out in Para 3.22, page 5 of our Deadline 3 response ([REP3-070](#)) about the inadequate level of wardening provision currently proposed by the applicant and its relationship to the Dunwich Heath and Coastguard Cottages Resilience Fund. We have made the applicant aware of these concerns.
- 2.6. Also highlighted in the Appendix is our view that for figures to be precautionary they should represent a worst-case scenario that informs the assessment of the likelihood and severity of impacts on European sites as well as the appropriateness and need for mitigation and subsequent triggers for intervention. It is of note that the applicant has proposed in revision 2 of the Monitoring and Mitigation Plan for Minsmere - Walberswick European site and Sandlings (North) European site ([REP5-105](#)) an initial trigger level of a 5% increase of visitors to a site, over baseline visits, at which the need for further investigation and potential additional mitigation measures would be assessed by the Environment Review Group in consultation with the Ecology Working Group, (see para 4.3.3 PDF page 18). Whilst we understand that the applicant states it will be open to the Environmental Review Group to refine or modify that initial trigger we are concerned that the peak numbers identified in the applicants adjusted calculations highlight an estimated increase over existing visits at Dunwich of between 5.69% to 5.9%. This initial trigger level is clearly very close to the maximum number of additional visits that the applicant would seek to rely on and as such the Trust remains concerned is not precautionary.

- 2.7. Accordingly, at the time of writing, the Monitoring and Mitigation Plan for Minsmere - Walberswick European site and Sandlings (North) European site is the subject of ongoing discussions between the applicant, National Trust and other relevant stakeholders.

3 The Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites (Rev.1) submitted at Deadline 5

- 3.1. The document submitted at Deadline 5 is the first draft that the National Trust has seen of the Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites ([REP5-122](#)).
- 3.2. The 2014 recreational usage survey results indicated alternative locations by those respondents who thought they would be displaced from the Sizewell area due to the proposed development. Respondents listed Thorpeness as the most popular alternative location with Aldeburgh as the 4th most popular. Both these locations have important designated vegetated shingle features.
- 3.3. Reference is made in the Plan to vegetated shingle located on '*Beach frontage south of Aldeburgh, fronting the River Alde*'. It is not clear where this is. The vegetated shingle feature is mainly on the seaward side of the shingle spit that extends south. As the River Alde becomes the River Ore downstream, away from riverwalls the vegetated shingle features does appear on the river side, and indeed all the way across the spit on Orford Ness. Orford Ness is managed by the National Trust. It is a landform unique within Britain in combining a shingle spit with a cusped foreland. The site supports nationally scarce plants, British Red Data Book invertebrates, and notable assemblages of breeding and wintering wetland birds).
- 3.4. Orford Ness from Slaughden south forms part of the Orfordness - Shingle Street SAC, internationally important for its vegetated shingle and saline lagoons features. This designation is not mentioned in the plan, although the Alde-Ore Estuary Ramsar designation is. At Slaughden the SSSI/SAC shingle features are in Unfavourable Condition due to inappropriate coastal management with loss of vegetated substrate within the unit as a result of anthropogenic activities, including walkers.
- 3.5. It is important to understand that the proposed Sizewell C development could also potentially lead to an uplift in numbers using the Alde-Ore Estuary SSSI/ Orfordness-Shingle Street SAC and put vegetated shingle features at risk south of Slaughden. The habitat at this location is vulnerable, particularly as it may draw access as a wild place compared to the more formal and dog free beach at Aldeburgh. The National Trust currently discourages access on our land at this location (for wildlife and management reasons) through gating and signage. However, this is regularly contravened.

- 3.6. Like the RSPB, we support the provision of monitoring in this location as well as the consideration of mitigation measures should the monitoring show an increase in use.
- 3.7. The Monitoring and Mitigation Plan does not cover non-European features. It is unclear how or whether mitigation and monitoring of impacts on species and habitats other than those that are features of the European sites, as required by the EIA, will be addressed and secured. For example, Leiston-Aldeburgh SSSI is notified for vegetated shingle. It is under significant recreational pressure (particularly around the Shell Sculpture at Aldeburgh). The impact of additional recreational usage there needs to be considered carefully in relation to the sites condition recovery, particularly as it is named most frequently as alternative location in the applicant's survey.
- 3.8. The National Trust are happy to continue discussions with the applicant on this matter but reserve the right to comment on further iterations of this plan as necessary.

4 Aldhurst Farm Technical Note submitted at Deadline 5

- 4.1. The National Trust notes the applicant's submission of the Aldhurst Farm Technical Note ([REP5-126](#)) submitted at D5. We note that para 1.3.7 on pdf page 5 of the Technical Note states "The original primary aim of the site was to provide mitigation for SSSI loss within the Sizewell Marshes SSSI." We further note reference in para 1.3.8 on pdf page 5 of the Technical Note to the key original objectives of the Aldhurst Farm Landscape and Ecology Management Plan. We note that the majority of these objectives relate to the provision of replacement habitat to compensate for the loss of habitat within Sizewell Marshes SSSI ahead of the construction of Sizewell C. We note one objective that related to the creation of opportunities for quiet public recreation in a manner that does not compromise the sites habitats management objectives.
- 4.2. We note the statement in paragraph 1.5.8 pdf page 10 of the Technical Note that further use of Aldhurst Farm for recreation could alleviate impacts on European designated sites. It is our understanding however, that this is not currently expressed as an objective of the provision and purpose of the site. Should this be included as an objective within a revised Landscape and Ecology Management Plan for the site (which is stated in paragraph 1.3.6, pdf page 5 as being updated to account for the recreational proposals submitted under Condition 25 of the original planning application), then the National Trust would be keen to understand what would be required to achieve this objective. For example, it is unclear if there is a target number of visits to European sites that would be avoided by the provision of this site and what number of visits avoided would constitute success. We have previously set out concerns about the

capacity and adequacy of Aldhurst Farm to mitigate recreational displacement in para.8.3 of our Written Representation ([REP2-151](#)).

- 4.3. We note mention in paragraph 1.3.9 on pdf page 6 of the applicants intention to resubmit the discharged recreation plans to East Suffolk Council to account for additional enhancements to the site. Whilst we understand the purpose of updating the Landscape and Ecology Management Plan to "give additional clarity, certainty and longevity for these twin, mutually compatible outcomes." we note the caveat included in one of the objectives of the original plan that states the need to "create opportunities for quiet public recreation in a manner that does not compromise the above habitats management objectives". As such we would anticipate that the site would have a capacity or threshold for recreational beyond which the sites habitat objectives could be compromised and as such would like to understand the degree to which the recreational enhancements can provide meaningful mitigation of increased recreational visits to European Sites arising as a consequence of the development.
- 4.4. As such we note the reference in the Technical Note (paragraph 1.6.2 on pdf page 12) to Natural England's guidance on SANG's and the applicant's statement regarding their view on the applicability of this guidance. It is unclear whether they are relying on figures derived from this approach to arrive at a capacity figure or not. We are also unclear as to how the 2019 survey results referenced in para. 1.6.3 and the frequency of use figures derived from these results relate to the high-level capacity figures previous quoted by the applicant in para. 1.6.2. We remain of the review that the National Trust has not yet seen any evidence of the assessment of the capacity and adequacy of these sites in fulfilling an assumed objective (that of mitigating recreational visits to European sites arising from the development) within a yet to be submitted/accepted Landscape and Ecology Plan currently under review. We are also unclear as to this plan's status under the current examination and the degree therefore that it can be relied upon to provide mitigation.
- 4.5. We note the mention in paragraph 1.6.3, pdf page 13 regarding the proposal to undertake further visitor surveys in 2021 and 2022 as well as during construction to understand the effectiveness of the access improvements in providing a recreational resource for construction workers and visitors, who may otherwise have visited European sites. The Technical Note does not go into any further detail regarding monitoring. The monitoring of recreational use at Aldhurst Farm is also noted in 9.4 Terrestrial Ecology Monitoring and Mitigation Plan Clean Version - Revision 2 ([REP5-088](#)), in paragraph 3.1.11, iii. Aldhurst Farm wetlands, though again no further detail is provided. Whilst these mentions are welcomed it would be useful to understand their alignment to the monitoring proposed at European sites (specifically the Minsmere to Walberswick European Site and Sandlings (North) European Site) to ensure a consistency of data is collected and can be compared.

5 Issue Specific Hearing 10 (ISH10) on Biodiversity and Ecology

- 5.1. Following Issue Specific Hearing 10 (ISH10) held on 27th August 2021, the National Trust notes that the Examining Authority issued a table listing the relevant European sites, qualifying features and potential impacts under dispute. The Examining Authority has asked for statutory consultees and other Interested Parties to complete the table, confirming their position, by Deadline 7 (3rd September 2021).
- 5.2. Unfortunately, the National Trust are unable to meet this deadline due to our key adviser being on annual leave between these dates. The National Trust therefore respectfully requests that the Ex.A accepts a submission from us by 10th September 2021.

6 The National Trust Resilience Fund

- 6.1. The National Trust has been in discussions with the applicant about concerns arising from the development and impacts on Dunwich Heath and the wider AONB for a number of years. The National Trust is pleased that the applicant acknowledges our concerns about the impact of the development on the capacity, infrastructure and visitor experience of our site and is proposing a Resilience Fund (to be secured through the Deed of Obligation) to mitigate these impacts.
- 6.2. The National Trust met with the applicant on 1st September 2021 to further discuss this fund. We are pleased that we are in broad agreement about the principles of what the fund would cover. However, we are still discussing the detail of this fund and relevant financial contributions and it is hoped that we will be able to reach agreement on this by Deadline 8.

7 Draft Statement of Common Ground

- 7.1. The National Trust responded to the second draft Statement of Common Ground on 2nd August 2021. The applicant updated this with their comments and submitted this at Deadline 6 (6th August 2021). Discussions on outstanding matters are ongoing and we anticipate that an updated version will be submitted at Deadline 8.

8 Coastal Geomorphology

- 8.1. The National Trust notes that there has been a constant drip feed of new and updated information, plans, documents and assessments during the

examination period which has made it difficult to follow the evidence submitted on this topic. It has also put significant pressure on our limited resources as a charity to be able to review and respond to these.

- 8.2. We note from comments submitted by the applicant at Deadline 6 ([REP6-024](#)) that further information is due to be submitted by the applicant at Deadline 7, just six weeks before the end of the six-month examination. This includes an updated report to accompany revised plans for the HCDF which were submitted at Deadline 5, the outcomes of further modelling of the SCDF, responses to issues raised by the National Trust at Deadline 3, updates to BEEMS Technical Reports TR545 and TR544.
- 8.3. Our overriding issue is that there is a large degree of uncertainty around coastal change (as set out in our Written Representation and Deadline 3 submission) and the impact this could have on our frontage at Dunwich Heath and Beach.
- 8.4. We consider that our concerns could be resolved simply. 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. If the applicant were agreeable to this, we consider we could reach common ground on this matter.

Appendix A: National Trust response to EDF's 'Statement on Recreational Disturbance Numbers' and Recreational Displacement email received 6th August 2021.

- i. The comments below are provided in response to a request made by EDF on the 6th August 2021 to provide comments on their approaches to estimating numbers associated with recreational displacement that would arise as a consequence of the proposed SZC development. The request was supported by a draft Statement on Recreational Disturbance Numbers and a spreadsheet containing calculations and tables associated with the recreational evidence base to the Shadow HRA. Our comments below are based on these documents.
- ii. The National Trust has previously provided comments on the recreational disturbance evidence base as part of our Relevant Representation, Written Representation and responses to ExAQ1 and Deadline 3 submissions.

a) Displaced people

- 1.6.1. The National Trust are pleased that the Estimate approach now uses the 517,246 visits to the Sizewell area given the figures previously used were based on a rounded down number.
- 1.6.2. The National Trust is not convinced that the survey responses provided by people who said they would be displaced and gave a named location are being processed in a manner that would provide a robust precautionary view on recreational displacement. In arriving at our view we understand that all mentions of locations have been treated equally by EDF. This means that if 1 respondent provided 1 named location as part of the survey that their view would be weighted as 0.55% of the total number of responses naming locations within and outside European sites (182) or 0.63% of the total number of responses naming locations within or near European sites (158) despite the fact they are 1.05% of the total number of respondents (95).
- 1.6.3. It is unclear if respondents to the survey would have understood how their responses would be used and weighted to estimate impacts on European sites. This is particularly relevant as we are still receiving iterations of this data at this late stage in the examination. This emphasises concerns we have previously highlighted regarding the limitations of the low sample size of the survey data being used including the age of the survey data and the duration of surveys. The age of the data is of particular concern given the wealth of information still being submitted through the examination process that would not have been able to accompany the original questionnaires and survey. Furthermore, respondents may have responded differently had they been presented with information and images of the nature and scale of development now being considered.
- 1.6.4. The calculation of the % of survey visitors that would be displaced to location and the use of this figure as a multiplier of the total estimated visits to the Sizewell area to arrive at a figure that represents the extra visits per year to each location is clearly crucial. Whilst EDF have highlighted to the National Trust that they feel these figures are less relevant as mitigation is proposed to address issues arising from recreational displacement, we feel this underplays the important role these figures have in supporting the assessment of impacts through the Shadow HRA process as well as the need for the figures to be truly precautionary. This is

particularly relevant when there is likely to be a wide margin of error associated within the primary survey data collected given the small sample size.

- 1.6.5. In this respect the Trust would see precautionary to mean that the figures should represent a worst-case scenario that informs the assessment of the likelihood and severity of impacts on European sites as well as the appropriateness and need for mitigation and subsequent triggers for intervention. As such the figures should represent a peak rather than an average and should explore what the worst-case impact for each location would be.
- 1.6.6. It is of note that whilst for Dunwich Heath the visitor numbers used in column 2 titled 'Existing visitor numbers to location' align broadly with our understanding of historic visitor numbers, that other sites figures are based on broad assumptions that provide estimated visitor numbers that fall into bandings of 60,000 and 150,000 visits per annum to each location.
- 1.6.7. The early 'precautionary' figure used by EDF for recreational displacement at Dunwich Heath (submitted at D2) is based on 12 mentions of the site by the 95 respondents who said they would be displaced and included named locations in their response. This figure was expressed as a percentage (2.33%) and applied to a theoretical 500,000 visits to the Sizewell area. ($500,000 / 100 \times 2.33$) This provides a figure of 11,650 additional visits per annum to Dunwich Heath. This figure did not make any allowance for;
 - The 56 respondents (10.89% of the total no. of respondents) who stated they would be displaced but did not name a location - Para 4.1.23, PDF page 35, printed page 33, SZC Public Access Visitor Surveys 2014 [Link](#)
 - The 13 respondents (2.5% of the total no. of respondents) who said they were not sure they would be displaced by the development - See p.33 Figure 4.6 of above linked doc
 - The 18 respondents (3.5% of the total no. of respondents) who did not provide a response on displacement – this is a reverse calculation of the % remaining of the total as in some tables the bullet point is expressed as either 2.5% or 3%. When expressed as 2.5% no account is made for the missing 0.5% anywhere in the documentation. – for example Para 5.1.18, PDF page 60, printed page 58, SZC Public Access Visitor Surveys 2014 [Link](#)
- 1.6.8. It is clear the 56 respondents who stated they would be displaced need to be accounted for in any precautionary assessment of visitor displacement. Furthermore, give the small sample size and the age of data of the survey to represent a truly worst-case scenario it would be useful to ensure that people who were not sure they would be displaced should be accommodated also. It is difficult to know the rationale behind why those who provided no response did so. However again, it is difficult to understand why they should all be discounted given the lack of understanding on their reasoning.
- 1.6.9. As stated previously it is important to understand the worst-case scenario for all sites regarding recreational displacement so it would be useful to present an understanding of a range of scenarios and to articulate the worst case for each location. For example, it is possible to divide the cohorts who did not name a location in their response by the 6 principle locations identified as being most visited. This would provide a theoretical worst case (based on current survey data) for these sites. It would also be worth dividing them in accordance with the span of responses received by those who did name a location as this would likely provide a worst-case for those sites outside of the most popular locations. This

is reasonable as the exercise is not to arrive an average year for each site but a worst case for each location so as to determine the potential for adverse impacts. Some example calculations for Dunwich Heath are presented below for the scenario that divides these cohorts by the six most popular locations mentioned in Para 4.1.22, PDF page 35, printed page 33, SZC Public Access Visitor Surveys 2014 [Link](#).

Scenario	Variables considered	% used and equations to get to %	Equation to arrive at result	Result
1	The no. of mentions of a site by 95 respondents who stated they would be displaced	2.33 $100/514 \times 12 = 2.33$	$517,246 / 100 \times 2.33$	12,052
2	As above + an equal division (across the most popular 6 sites) of the 56 respondents who stated they would be displaced but didn't give a location	4.15 $56/6 = 9.33'$ $100/514 \times 9.33' = 1.82$ $2.33 + 1.82 = 4.15$	$517,246 / 100 \times 4.15$	21,466
3	As scenario 1&2 + an equal division (across the most popular 6 sites) of the 13 respondents who were not sure they would be displaced	4.57 $13/6 = 2.17$ $100/514 \times 2.17 = 0.42$ $4.15 + 0.42 = 4.57$	$517,246 / 100 \times 4.57$	23,638
4	As scenario 1,2&3 above + an equal division (across the most popular 6 sites) of the 18 respondents who did not provide a response on the issue of displacement	5.15 $18/6 = 3$ $100/514 \times 3 = 0.58$ $4.57 + 0.58 = 5.15$	$517,246 / 100 \times 5.15$	26,638

1.6.10. The National Trust notes that SZC Co. have asked us to indicate which of their 2 approaches we support. However, we feel unable to answer at this stage because whilst approach 1 provides the highest values of the two approaches, it has yet to fully account for all the variables we have identified in this and previous responses. As such we would wish to see

appropriate amendments to approach 1 that accommodate our comments or a more comprehensive and up-to-date dataset on which to base their calculations.

b) Construction workers

1.6.11. In the email of the 6th August 2021 two actions related to constructions worker figures were highlighted;

2. Provide reference to SZC Co.'s stated position on 10% of construction workers who do not have dogs visiting countryside locations such as European sites once a week.
3. Provide reference on the Sizewell B Outage worker surveys referred to for informing locations SZC construction workers are likely to visit.

1.6.12. It is the Trust's view that this was not an accurate reflection of the request discussed. The Trust asked specifically for evidence that supported EDFs assertions regarding the 10% figure used for construction workers who do not have dogs visiting countryside locations such as European sites once a week. We believe 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. EDF's email of the 6 August 2021 does not highlight any specific evidence supporting the 10% figure other than demographic data (published in 2010) that we were previously aware EDF had procured from Sport England. This data refers to organised sports not outdoor recreation in a wider context. Therefore, as stated in our Written Representation we remain unclear as to the evidence on which the 10% figure has been based and feel more up-to-date evidence that relates to construction workers should be provided to justify the use of this figure. Furthermore, as stated in our Written Representation 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.

1.6.13. In addition, whilst reference to the Outage worker surveys is useful the Trust have previously referred to these in our earlier submissions, specifically our Written Representation. The question asked in the latest meeting with EDF was in line with our position set out in the Written Representation that sought to understand why the figures provided are reliant on a single survey of outage workers. As stated in our Written Representation "Given the applicant's unique position to access this type of audience the Trust would have expected the applicant to draw on a more comprehensive evidence base in support of estimates contained within its submission." On the basis that no new information or evidence has been forthcoming on this matter since the submission of our Written Representation the National Trust remains of the view that we do not consider that the figures of construction worker visits are precautionary and are indeed concerned they represent a vast underestimation.

c) Conclusion

1.6.14. The National Trust believes that recreational displacement and visits to designated sites by the construction workforce have been underestimated. Specifically, EDFs figures in the 2nd approach seem likely to be a larger underestimate than the 1st approach highlighted. We

have yet to see any further information that would change our views as articulated in our Written Representation and other submissions.

- 1.6.15. We welcome the continued development of the Minsmere – Walberswick and Sandlings (North) Monitoring and Mitigation plan and its aim to ensure that adverse effect on the integrity of the referenced European sites does not arise as a consequence of recreational disturbance. However, we remain concerned that this document needs to be informed by a truly precautionary approach to estimating the level of recreational pressure arising as a consequence of the development. Furthermore, as stated in our Deadline 3 submission, the National Trust believes that recreational displacement and additional visits to the countryside by construction workers arising from the development should not all be directed to designated sites and as such would wish to see adequate Suitable Alternative Natural Green Space (SANG) provision included as mitigation. We also support the points raised by the RSPB and SWT in relation to recreational displacement and visits by the construction workers.

National Trust, 19th August 2021