



National
Trust

██████████@nationaltrust.org.uk
15th 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

Submission in lieu of attendance at Issue Specific Hearing 13 (ISH13) Landscape, Visual Impact, Design and Terrestrial Heritage

Thank you for the invitation from the Examining Authority (ExA) to speak at Issue Specific Hearing 13. We note that the National Trust is listed as an Interested Party that the ExA would like to hear from at the Hearing. Unfortunately, due to resource constraints we are unable to attend this Hearing. However, we have reviewed the detailed agenda and would like to offer our comments in writing on the agenda item we consider to be of relevance to the National Trust. We will review the recording of the Hearing and address any further points in our response at Deadline 8 if necessary.

Agenda Item 5: Terrestrial Heritage

- National Trust Coastguard Cottage Impacts
 - o Remaining areas of disagreement
 - o Additional monitoring and mitigation suggestions

Coastguard Cottages are identified as a 'Non-Designated Heritage Asset' of medium heritage significance by the applicant in Chapter 16 (Terrestrial Historic Environment) of the submitted Environmental Statement ([APP-272](#)) and by East Suffolk Council in the East Suffolk Council/Suffolk County Council Joint Local Impact Report ([REP1-045](#)). The National Trust agrees with this.

The Environmental Statement (Section 16.6) sets out the applicant's view that the development would give rise to a change to the non-designated heritage asset. It states that the impact of the development on Coastguard Cottages during construction would be of low magnitude, medium-term

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temporary and there would be a minor adverse effect, which would not be significant. During operation, it sets out that the impact would be lasting and give rise to a low magnitude impact, resulting in a minor adverse effect which would not be significant. On this basis no mitigation was proposed.

The Council's Local Impact Report (Para.12.33) identifies that the greatest permanent effects on any heritage assets will be experienced by Dunwich Heath Coastguard Cottages. It concludes that there will be a medium magnitude of impact leading to a moderate adverse effect for an asset of medium heritage significance, contrary to the conclusions of the applicant's Environmental Statement.

The National Trust set out concerns regarding the impact of the development on the setting and significance of Coastguard Cottages in our Written Representation submitted at Deadline 2 ([REP2-150](#), Para.12.1-12.10) and explained why we concurred with East Suffolk Council's view that the development would give rise to a medium magnitude of impact leading to a moderate adverse effect on our asset.

Accordingly, the scale of impact of the proposed development on the heritage significance of Coastguard Cottages remains an area of disagreement between the National Trust and the applicant.

At a meeting between the National Trust and the applicant on 1st September 2021, the applicant advised the National Trust that following discussions with East Suffolk Council that it would include a contribution of £10,000 within the Dunwich Heath Resilience Fund for the enhancement and interpretation of Coastguard Cottages. This has been reflected in the applicant's Deadline 7 submission ([REP7-061](#)). At Section 2.18 the applicant comments on the Councils' Local Impact Report. It states that in terms of Coastguard Cottages, "while ESC and SZC Co. have different views on the significance of the effect, the parties have agreed that it would be appropriate to offer a contribution for National Trust to undertake enhanced interpretation of Coastguard Cottages, including renewal and updating of the information panels on the second floor of the café. ESC has advised that this interpretation should focus on consideration of the asset in its wider context as one of a chain of coastguard lookouts along the Suffolk coast, known for its shifting sandbanks and gravel spits".

At the same meeting on 1st September 2021 the applicant advised the National Trust that it would provide us with a technical note on the historic environment. This has not yet been received.

The National Trust is currently in discussions with the applicant about the Dunwich Heath Resilience Fund. Whilst we are in broad agreement about the scope of the fund, discussions about the full quantum of the fund are ongoing. We are minded to agree that the proposed contribution toward heritage would be acceptable but await the detail of the technical note before confirming. Our position on this will be confirmed in an updated Statement of Common Ground which we understand the applicant intends to submit at Deadline 8.

We do not consider that monitoring is necessary in terms of heritage impacts on Coastguard Cottages.

This sets out our current position on heritage and trust that this is helpful to the Examining Authority.

Yours faithfully



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