

24th 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 8 Submission: Responses to Examiner's Written Questions
(ExQ3)**

Please find attached the National Trust's responses to the Examiner's Written Questions (ExQ3) which were published on 9th September 2021, in respect of the application for a Development Consent Order for the proposed Sizewell C Nuclear Power Station.

Yours faithfully



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

ExQ3	Question to:	Question:
HW.3 Health and wellbeing		
HW.3.1	Applicant, NE, RSPB/SWT, ESC, SCC, AONB Partnership, National Trust	<p>Displacement of Visitors</p> <p>Doc 9.94 submitted at D7 is a helpful summary of the different positions in respect of the potential for the displacement of visitors during the construction period.</p> <p>NE are continuing to recommend that SANG would be necessary and appropriate and this appears to be endorsed by RSPB/SWT.</p> <p>(i) In light of the continuing difference of view, please advise how you consider the effects on recreational amenity and whether the difference in figures which appears to remain, would lead to a different conclusion of effects on amenity and recreation issues.</p> <p>(ii) What do you consider would be necessary to overcome the possible adverse effects (if there are any) and how could this mitigation be secured?</p>
	Response (from National Trust)	<p>(i) The NT consider that the approach taken to the assessment of impacts arising from visitor displacement are underestimated and not precautionary. We are currently not agreed on the degree of recreational displacement as assessed by the applicant. As such this does not change our position regarding impacts on ecology and designated sites. Please note our detailed comments are set out in Appendix E of REP7-087, PDF page 27 submitted at D7.</p> <p>With regards to the impacts arising from recreational displacement and visits by the construction workforce on our visitor capacity, enjoyment and infrastructure at Dunwich Heath and Beach we have held further discussions with the applicant. We are now satisfied that the proposed Resilience Fund for Dunwich Heath and Coastguard Cottages would reduce residual impacts on NT land and assets at this site to manageable levels. This is subject to the agreed quantum appearing in a revised Deed of Obligation as well as appropriate mechanisms for enforcing the terms of the DoO, timescales for payment and any issues of conditionality being resolved.</p> <p>(ii) The Trust considers some mitigation measures are still required to exclude adverse effects on the integrity of the Minsmere-Walberswick and Sandlings European sites. These are set out below;</p> <p>The National Trust welcomes the development of the Monitoring and Mitigation Plan for Minsmere-Walberswick and Sandlings North European sites. We note the inclusion of a</p>

		<p>number of monitoring and mitigation provisions that we have previously sought. However as set out in our submission at D7 we remain concerned about the level of wardening provision currently proposed by the applicant in the MMP. We would wish to see this level increased and as such are seeking further discussions with the applicant regarding the adequacy of this provision and how it will be delivered across multiple landholdings in different ownership. We are also seeking further detail on triggers and the timeliness of delivery of mitigation measures included within the plan.</p> <p>Whilst the National Trust acknowledges the provision and enhancement of Kenton Hills and Aldhurst Farm we remain of the view that we have not seen any evidence of the assessment of the capacity and adequacy of these sites in mitigating recreational visits to European sites. We have set out our position regarding these sites in the updated Statement of Common Ground to be submitted by the applicant at D8. By way of summary, we remain of the view that should the assessment or monitoring of the Kenton Hills and Aldhurst Farm sites show that further mitigation is required to protect the ecological robustness and integrity of protected habitats and species, provision of additional destination greenspace should be provided on undesignated land in close proximity to Sizewell. In the absence of any assessment of capacity we believe additional greenspace is needed to reduce any potential impacts. Our detailed comments are set out in REP7-137.</p>
HE.3 Historic environment (terrestrial and marine)		
HE.3.2	National Trust	<p>First Written questions – Temporary and Permanent Beach Landing Facilities</p> <p>In response to second written questions HE.1.19 and HE.1.20 at Deadline 7, the Applicant stated the National Trust has:</p> <ul style="list-style-type: none"> (i) overstated the nature and effects of the enhancement of the permanent beach landing facility; and (ii) overstated the potential visibility of the temporary beach landing facility and associated infrastructure. <p>Please provide a response to the above.</p>
	Response (from National Trust)	<p>The National Trust disagrees. Our site at Dunwich Heath will have an elevated view of this infrastructure which will be significant in scale and will extend out into the North Sea. As stated at Issue Specific Hearing 5 the National Trust does not consider that the applicant has submitted adequate visualisations to show the true scale and impact of the development, particularly during construction. It is understood</p>

		that additional visualisations will be submitted by the application at Deadline 8. We await these and will comment further once these have been submitted.
LI.3 Landscape impact, visual effects and design		
LI.3.1	ESC, SCC, AONB Partnership, National Trust, Natural England	Design and Access Statement – Detailed Built Development Principles In response to FWQ LI.2.13 and LI.2.14 the Applicant has detailed amendments to Principles 56 and 57. Please review and provide a response to the appropriateness of the additional text.
	Response (from National Trust)	<p>Principle 56 refers to the cladding for the turbine halls and has been amended to state that the colour palette will be discussed and agreed with East Suffolk Council. The applicant's response to LI.2.13 states that wording of this Principle will be updated in the final version of the Design and Access Statement submitted at Deadline 10 to state that the colour palette and profile will be discussed as agreed with ESC as part of pre-submission discussion/design review.</p> <p>As set out in our response to Q LI.2.22 of ExQ2, 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 samples, montages and mock-ups to demonstrate what these would look like from Dunwich Heath. The National Trust request that it is named as a consultee in Design and Access Statement or Requirement, as appropriate. The Trust agrees with the AONB position that given the importance of the cladding for mitigation of the project it is considered that the AONB study, Selection and Use of Colour in Design informs the decision and that any approach is agreed with a wide range of stakeholders to secure the most appropriate materials and colour to maximise mitigation.</p> <p>Principle 57 refers to the external treatment of the interim spent fuel store. It is noted that the applicant's response to LI.2.14 states that the Reserved Matters applications shall include details of the available colour options, including an explanation of how the proposed colour choice has responded to the building's setting. We support the proposed amendment to the wording of this principle to ensure that the design will have regard to the AONB and its immediate landscape context, acknowledge the long design life of the building in its material selection and design response, recognising its elevated status relative to other ancillary buildings. We note that this revised wording to the Design Principle will be included in the final version of the Design and Access Statement which is yet to be submitted. We also concur with the AONB that the applicant</p>

		<p>should draw on the AONB study Selection and Use of Colour in Design to inform choice of colour and that this should be agreed by a wide range of stakeholders.</p> <p>We are pleased 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>
LI.3.2	ESC, SCC, AONB Partnership, National Trust, Natural England	<p>Estate Wide Management Plan for the EDF Energy Estate</p> <p>At Deadline 7 the Applicant submitted an Estate Wide Management Plan for the EDF Energy Estate (Doc 9.88). Please review and comment on the content and likely effectiveness of the plan. Are you content with the wording of Requirement 5C within the draft DCO (Doc 3.1 Revision 8.0)?</p>
	Response (from National Trust)	<p>The National Trust defers to the view of the Councils who will be responsible for ensuring compliance with this document.</p> <p>We would however see added value in future engagement on the delivery of the vision included in this document and specifically the aspiration to complement the landscapes to the north at the RSPB Minsmere Reserve and our property at Dunwich Heath as referred to in paragraph 2.3.2, PDF page 6 of the Estate Wide Management Plan for the EDF Energy Estate.</p>