



**National  
Trust**

12th October 2021

By email: [sizewellc@planninginspectorate.gov.uk](mailto: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 10 Submission**

Please find attached our Deadline 10 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 10 Submission to set out its views on the following matters and recently submitted documents;
- i. 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 8.
  - ii. Informal Recreation and Green Space Proposals submitted at Deadline 8
  - iii. Additional visualisations submitted at Deadline 8
  - iv. Coastal Processes
  - v. Draft Statement of Common Ground with the National Trust

## 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.**

The comments in this section relate to the Monitoring and Mitigation Plan for Minsmere - Walberswick European site and Sandlings (North) European site Revision 7, which is an updated version of that appended to the draft Deed of Obligation submitted at Deadline 8. ([REP8-087](#))

The National Trust welcomes the proposed appointment of a minimum 4 FTE warden roles as initial upfront mitigation included as part of the plan. The proposed visitor and ecological monitoring proposals appear to be adequate to inform on the potential of increased recreational impacts on the sites.

However, it is not clear how the formal visitor and ecological monitoring will be undertaken as part of the plan, paragraph 5.3.2 of the document reports that wardens will lead survey and monitoring work. The Trust would expect this work to be contracted to specialist undertakers and not be the responsibility of the wardens proposed, although the warden's observations of any change in habitat and species condition resulting from increased recreational activity or changes in behaviours will be important. Clarity on how survey work is managed and commissioned is sought.

We also note that the plan continues to place emphasis on Minsmere as the key location of Breeding Nightjar (Table 4.3) with no mention of Dunwich Heath which supports  $\frac{1}{3}$  of the Minsmere-Walberswick SPA population or  $\frac{1}{4}$  if you exclude Mount Pleasant (non SSSI/SPA although functionally linked). We have raised this issue in previous correspondence.

The NT also acknowledges that there are proposals to undertake visitor surveys at Aldhurst Farm both pre-construction and during construction. We note that SZC Co. commits to making provision for this in the "Informal Recreation and Green Space Plan" secured under the Deed of Obligation.

### 3 Informal Recreation and Green Space Proposals Report submitted at Deadline 8

The Trust welcomes the provision of additional green space in the form of enhanced linear routes, a mountain bike trail and the provision of additional parking. We are supportive of these additions providing their installation and use doesn't impact on other ecological mitigation proposed.

As stated in our updated Statement of Common Ground and previous submissions, if these measures are provided in support of mitigating visits by the construction workforce to nearby European sites we believe their role in this outcome should be defined and monitored to ensure the degree to which they achieve their intended purpose. We acknowledge the report indicates that the additional proposals set out in the report will be secured through a new provision within the draft Development Consent Order.

### 4 Additional visualisations submitted at Deadline 8

While welcomed, we are disappointed that the additional visualisations ([REP8-327](#)) do not show full width of the development from Viewpoint 17 and therefore do not reflect the wireline visualisations submitted previously which do show the full view (as shown below).



Having reviewed the night-time visualisations we consider that the night-time lighting of the site will have an impact on our holiday accommodation and also

our star gazing events (which are unlikely to be worth hosting during the construction period).

## **5 Coastal Processes**

As set out in our Statement of Common Ground, the topic of Coastal Processes remains a matter of disagreement between the Trust and the applicant. As also set out in our Written Representation the National Trust is concerned about impacts on our land and infrastructure at Dunwich Heath and Beach from accelerated or altered coastal change arising from the development.

The NT concurs with the developer that the assessment of long-term coastal change involves a high degree of uncertainty. However, the NT remains of the view that the application does not adequately assess the potential range of impacts the proposal may have on long-term coastal geomorphological processes nor present mitigation for the uncertainty involved. The detail of our concerns is set out in our responses.

The NT notes there is still outstanding information being submitted at Deadline 10. We believe that the piecemeal submission of coastal processes documentation throughout the examination has presented challenges to interested parties in gaining a full and clear picture of the applicant's proposals for this topic and has not integrated the impacts of all facets of the development. There have also been substantial changes to the proposal that could impact coastal processes that have been submitted throughout the examination (including the provision of the additional Beach Landing Facility and the movement of the position of the Hard Coastal Defence Feature as well as recently introducing a desalination plant).

We remain concerned that the starting principles set out in the applicant's original studies have not been revisited following our detailed comments and therefore further studies have carried forward such matters and compounded our initial view as they have been based on assumptions we have taken issue with at earlier stages in the process. We are also of the view that there has been no single assessment of all elements that could impact on coastal processes proposed. As such we believe a number of matters have been looked at in isolation and not in combination, covering both the during construction and operation phases of the development. The detail behind this view is contained within our previous comments.

Given our view on the challenges of assessing long-term coastal change we believe the current Coastal Processes Monitoring and Mitigation Plan (CPMMP) extent is far too limited and hence does not mitigate the long-term consequences of the development. We consider that the CPMMP should include the full extent of the NT frontage at Dunwich Heath both alongshore

and to the offshore bar sequence seawards of the frontage and that NT should be a stakeholder in the on-going review of monitoring data and information, and its future development or change. This is a point of uncommon ground with the applicant.

We also note that none of the proposed changes that have been introduced during the examination have sought to address any matters raised by NT. Whilst the applicant may present the inflexibility of its position as a reflection of its purported evidence led approach we also identify that they recognise the evidence cannot be defined with certainty for the long term and so we believe it can also be construed as an unwillingness to revisit the narrowness of the principles of assessment initially adopted by them. The disbenefits to the applicant of having to revisit these principles would have been the need to revisit their assessments of impacts on coastal processes and/or to widen the scope of monitoring and mitigation proposals. Irrespective we remain in a position that we believe there is potential for alteration of coastal processes and geomorphology over the life of the project that could impact on the coast at our property and so seek rectification of this.

## **6 Draft Statement of Common Ground with the National Trust**

A final version of the Statement of Common Ground between the National Trust and the applicant will be submitted by the applicant at Deadline 10.