



# The Sizewell C Project

## 9.10.25 Statement of Common Ground - National Trust

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## 1 INTRODUCTION

### 1.1 Status of the SOCG

1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of the application for a development consent order ('DCO') to the Planning Inspectorate ('PINS') under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project.

1.1.2 This third draft SoCG (Revision 03) has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and the National Trust ('the Trust') and agreed on TBC 2021 for submission to PINS at Deadline D6 of the examination programme.

1.1.3 This SoCG has evolved through a programme of engagement and series of versions as detailed in Section 2.

### 1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties, so far as they relate to the matters of concern ("uncommon ground") for the National Trust, arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project').

1.2.2 This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.3 Paragraph 58 of the DCLG Guidance states:

1.2.4 "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence"

1.2.5 The aim of this SoCG is therefore to inform the Examining Authority and provide a clear position of the state and extent of discussions and agreement between SZC Co. and the National Trust on matters relating to the Sizewell C Project.

- 1.2.6 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>).

## 1.3 Parties to this Statement of Common Ground

- 1.3.1 SZC Co. has submitted an application for development consent to build and operate a new nuclear power station, Sizewell C, along with the associated development required to enable construction and operation.

- 1.3.2 The National Trust (The Trust) is an independent charity that looks after beautiful countryside and historic buildings in England, Wales and Northern Ireland. Should the Trust acquire land or buildings that it considers to be of outstanding quality, Parliament has created a statutory mechanism that enables our Trustees to declare that land “inalienable”. This means that the land is so important to the nation that it cannot be sold or mortgaged, rather it must remain in the care of the Trust, in perpetuity. Once declared inalienable this designation cannot be reversed. This is one way in which the Trust is able to deliver on its charitable purpose of preserving some of the nation’s most treasured places for everyone, for ever. The Trust owns 140 hectares of land at Dunwich Heath and Beach, which is located approximately 3 kilometres north of the proposed Sizewell C site. Dunwich Heath is a surviving fragment of lowland heath – one of the UK’s rarest habitats. It is subject to international and national designations. The majority of the land was declared inalienable in 1967 demonstrating the importance of the land and the Trust’s commitment to care for it permanently for the nation.

- 1.3.3 Collectively SZC Co. and the Trust are referred to as ‘the parties’.

- 1.3.4 This SoCG focuses on “uncommon ground” / concerns of the Trust and this third draft is based on responses submitted in the relevant representation to PINS, received by PINS on TBC and published here: <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/?ipcsection=relreps&relrep=41494> and feedback provided by the Trust to SZC Co’s second draft of the SoCG dated 21st May 2021 received by SZC Co on 2 August 2021.

## 1.4 Structure of this Statement of Common Ground

- 1.4.1 Chapter 2 provides schedules which detail the matters of concern to The Trust and SZC Co.’s response. It also identifies where discussions are ongoing.

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- 1.4.2 Appendix A provides a summary of engagement undertaken to establish this SoCG.



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## 2 POSITION OF PARTIES

**Table 2.1 Position of the Parties – SZC Co. and National Trust**

Ref.	Matter	Book ref.	National Trust Position	SZC Co. Position	Further Action / Additional references.	Agreed / Not Agreed / In Progress <sup>1</sup>
<b>Overarching</b>						
NT_Ov1	Principle of development		<b>Ov1.1</b> The Trust does not object to the principle of the development as we acknowledge the NPS for Nuclear Power Generation (EN-6) identifies Sizewell as a potentially suitable site for a nuclear power station. However, we believe that the current proposal risks unacceptably damaging the integrity and beauty of our site at Dunwich Heath and the wider landscape.	<b>Ov1.1</b> The position on the principle of the development is noted and welcomed. SZC Co.'s position is that all likely significant effects have been properly assessed in the Environmental Statement that is before the examination. This includes impacts on Dunwich Heath and the wider landscape. SZC Co. considers that appropriate mitigation has been identified and we will continue to engage constructively with National Trust on appropriate compensation for residual effects.		In Progress
<b>Recreation and Tourism (Book 6, Volume 2, Chapters 9 (Socio-economics) and 10 (Amenity and Recreation plus Shadow HRA (Doc Ref. 5.10))</b>						
NT_RT1	Recreational Displacement: impact on visitor capacity, enjoyment and infrastructure at Dunwich Heath and Beach  The rights of way and access strategy for the EDF Energy estate, including enhancements at Kenton Hills and Aldhurst farm, are proposed to minimise displacement of people away from the proposed development area. In addition, payment to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) would compensate for any residual effects and a suite of other improvements are proposed to the Rights of Way network which will be agreed with SCC and ESC, all		<b>RT1.1</b> The NT believes that recreational displacement will occur as a result of the proposed development and will impact on the NT's land at Dunwich Heath and Beach. <b>RT1.2</b> 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. We are aware the applicant submitted further information at D5 which we will respond to at D7. Furthermore the applicant has advised the Trust that it will provide further clarification on recreational displacement w.c. 2nd August. <b>RT1.4</b> The NT consider that mitigation is required to enable the NT to manage and engage with additional visitors and improve its visitor infrastructure to cope with increased demand. The NT are in discussions with EDF about a Resilience Fund and a Monitoring and Mitigation Plan. The NT will comment at D7 on the third draft version of the Monitoring and Mitigation Plan provided by EDF. We welcome the continued revision of this plan to ensure its adequacy. This is yet to be agreed.	<b>RT1.1</b> SZC Co. agrees that recreational displacement is likely to occur, but increases experienced at European sites including NT's land at Dunwich Heath and the beach are likely to be small in the context of the existing visitor numbers and are assessed in the ES as being not significant. <b>RT1.2</b> See response to RT1.1 and E.1.2. <b>RT1.4</b> We welcome further engagement with the National Trust on the update to the proposed Terrestrial Ecology Monitoring & Mitigation Plan (TEMMP) submitted at Deadline 5. We await feedback from NT on any remaining concerns. SZC Co. look forward to receiving NT's comments on the third revision of the Monitoring and Mitigation Plan (MMP) for Minsmere – Walberswick and Sandlings (North), submitted at Deadline 5, and hope that this can now be agreed. <b>RT1.5</b> The Monitoring & Mitigation Plan for Minsmere & Dunwich Heath (now renamed as the 'MMP for Minsmere – Walberswick and Sandlings (North)') would be secured		In Progress

<sup>1</sup> This column does not need to be filled out in the initial stages, the principal purpose at this stage is to set out the position of the parties

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	of which would be funded through the proposed Deed of Obligation.		<p><b>RT1.5</b> The NT notes that there is a Monitoring &amp; Mitigation Plan for Minsmere - Walberswick and Sandlings (North) and that this is secured through the <b>Deed of Obligation</b>. We note however that there is some variation in the naming of this document within the document itself and in the Deed of Obligation. We would welcome consistency of naming to ensure clarity for all parties that provisions made within the document can be relied upon. We further note the provision of two funds to be administered by East Suffolk Council and we welcome confirmation that the National Trust would be able to access both funds. Discussions are ongoing regarding the scope of the MMP mitigation, triggers and funding. This is yet to be agreed.</p> <p><b>RT1.6</b> The NT notes that Schedule 13 (Third Party Resilience Funds) includes a provision for a National Trust Dunwich Heath and Coastguard Cottages Resilience Fund. The National Trust is in discussion with EDF about this matter but it is yet to be agreed.</p>	<p>in the Deed of Obligation. This is now named consistently within the MMP itself, and in the Deed of Obligation.</p> <p><b>RT1.6</b> The Monitoring &amp; Mitigation Plan for Minsmere &amp; Dunwich Heath (now renamed and extended to the 'MMP for Minsmere – Walberswick and Sandlings (North)' would be secured under the Deed of Obligation. The measures to be included under the Resilience Fund for National Trust Coastguard Cottages &amp; Dunwich Heath are under discussion between the Parties – see RT1.4. In agreeing the measures that are to be included in the resilience fund, SZC Co is keen to ensure that there is no overlap in provision between the various mitigation measures secured under the DCO and within the Deed of Obligation.</p>		
<b>Impacts on Ecology (Book 6, Volume 2, Chapter 14) and Shadow Habitats Regulations Assessment Report (Doc Ref. 5.10)</b>						
NT_E1	Recreational Displacement: impacts on ecology and designated sites at Dunwich Heath and Beach and the wider SPA		<p><b>E1.1</b> The NT believes as set out in our Written Representation that recreational displacement arising from the proposed development has the potential to adversely impact upon UK and European protected species and habitats at Dunwich Heath and Beach and at a landscape scale across the wider SAC and SPA.</p> <p><b>E1.2</b> The NT considers that the impacts arising from the displacement of visitors have not been adequately assessed in the ES and HRA against ecological receptors with some ecological receptors not having been considered. The NT does not agree with EDF's assumptions on visitor behaviours. The applicant has discussed with the National Trust in late July 2021 further revisions/explanations of recreational disturbance numbers that are to be submitted at a future deadline.</p>	<p><b>E1.1</b> SZC Co's position as per the Shadow HRA is that adverse effect on integrity would not arise as a result of disturbance due to increase in recreational pressure subject to the proposed mitigation.</p> <p><b>E1.2</b> SZC Co disagrees – a precautionary approach was used in the assessment of potential increases in visitors to European sites for recreation such as walking and cycling in the Shadow HRA Report (i.e. numbers used are considered to be greater than would actually occur). A full explanation of why the approach is considered precautionary has been provided in response to ExQ1 (AR.1.12), with the key reasons being:</p> <ul style="list-style-type: none"> <li>Actual numbers of displaced users of recreational resources to European sites are likely to be significantly less than the figures used in the assessment.</li> <li>Figures for construction workers at European sites are precautionary because they are based on the peak,</li> </ul>		In Progress



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			<p><b>E1.3</b> Accordingly, the conclusions of no adverse effect on site integrity for the European qualifying species and habitats are unqualified.</p> <p><b>E1.5</b> The NT considers monitoring and mitigation is required to ensure that the ecological importance of Dunwich Heath is not impacted by increased footfall. The NT are in discussions with EDF about the Monitoring and Mitigation Plan for Minsmere – Walberswick and Sandlings (North) and access to funding. The NT have received a third draft version of the Monitoring and Mitigation Plan and provided EDF with a list of environmental measures which could be included in relevant funds. This is yet to be agreed.</p> <p><b>E1.6</b> The NT notes there is a Monitoring &amp; Mitigation Plan for Minsmere - Walberswick and Sandlings (North) and that this is secured through the <b>Deed of Obligation</b>. We note however that there is some variation in the naming of this document within the document itself and in the Deed of Obligation. We would welcome consistency of naming to ensure clarity for all parties that provisions made within the document can be relied upon. We further note the provision of two funds to be administered by East Suffolk Council and we welcome confirmation that the National Trust would be able to access both funds. Discussions are ongoing regarding the scope of the MMP mitigation, triggers and funding. This is yet to be agreed.</p> <p><b>E1.7</b> The NT notes that Schedule 11 (Natural Environment) of the <b>draft Deed of Obligation</b> makes provision for a European Sites Access Contingency Fund, for a Minsmere and Sandlings (North) Contingency Fund and that Schedule 13 (Third Party Resilience Funds) makes provision for the National Trust Dunwich Heath and Coastguard Cottages Resilience Fund. The NT understands that it would be excluded from the European Sites Access Contingency Fund under current proposals and that we would be able to access the Minsmere and Sandlings (North) Contingency Fund to mitigation impacts on designated features at Dunwich Heath and Beach.</p>	<p>maximum workforce which would only last for approximately 2 years of the 12 year construction phase.</p> <ul style="list-style-type: none"> <li>Figures used for construction workers potentially recreating at European sites are likely to be less than the figures used in the assessment.</li> </ul> <p>SZC Co developed the baseline survey and assessment approach, and preliminary assessment findings, with ecological stakeholders in the Evidence Plan process. This included assumptions on visitor behaviour.</p> <p>A meeting was held with the National Trust on 28 July 2021, and with Natural England and the RSPB on 30 July 2021, to discuss the degree of recreational displacement. SZC Co. is leading on preparation of a draft statement on recreational displacement numbers which will be provided to the National Trust, Natural England and the RSPB for their inputs, so that a joint statement on the four parties positions (SZC Co., the National Trust, Natural England and the RSPB) can be submitted to the ExA at a subsequent deadline.</p> <p><b>E1.3</b> Noted. SZC Co disagrees – a detailed Recreation Evidence Base has been produced with a summary outlined in the Plants and Habitats Synthesis Report (see Appendix 14B1 of Volume 2, Chapter 14 of the ES).</p> <p><b>E1.5</b> This is also SZC Co's position. See RT1.5. For clarity, monitoring and mitigation proposals for European sites which may be impacted by recreational displacement have been developed and reported in two plans. These plans are as follows:</p> <ul style="list-style-type: none"> <li>Monitoring and Mitigation Plan for Minsmere - Walberswick and Sandlings (North).</li> <li>Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary.</li> </ul> <p>The monitoring approach and potential mitigation measures set out in the Monitoring and Mitigation Plan for Minsmere - Walberswick and Sandlings (North) have been discussed in detail with ecological stakeholders.</p>		

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			The NT is in discussion with EDF about this matter but it is yet to be agreed.	<p>SZC Co. look forward to receiving NT's comments on the third revision of the MMP for Minsmere – Walberswick and Sandlings (North), submitted at Deadline 5, and hope that this can now be agreed.</p> <p><b>E1.6</b> See response to RT1.5.</p> <p><b>E1.7</b> National Trust's understanding of the scope of Schedules 11 &amp; 13 in the Deed of Obligation is confirmed. In relation to Schedule 11 it would be the responsibility of the Environment Review Group, taking account of the recommendations of the Ecology Working Group also established under the same to deploy additional mitigation secured under the European Sites Access Contingency Fund based on the results of the European site monitoring and mitigation plans referred to in E1.5. The National Trust Dunwich Heath and Coastguard Cottages Resilience Fund would be for the Trust to use as it sees fit in accordance with the agreed provisions.</p>		
NT_E2	Recreational Displacement: provision of alternative greenspace		<p><b>E2.1</b> The NT believes that recreational displacement arising from the development should not all be directed to designated sites.</p> <p><b>E2.2</b> The NT acknowledges the provision and enhancement of Kenton Hills and Aldhurst Farm. We note the provision of the Aldhurst Farm Technical Note submitted at D5 and that the primary aim was to provide replacement habitat to compensate for the loss of habitat within Sizewell Marshes SSSI ahead of the construction of Sizewell C. We note the secondary aim of the site to create opportunities for quiet public recreation in a manner that does not compromise the above habitats management objectives. We note the statement in paragraph 1.5.8 that this could alleviate impacts on European designated sites however this is not expressed as a core aim of the provision and purpose of the site. For example it is unclear if there is a target number of visits to European sites that are avoided by the provision of this site and what number would constitute success. We note the reference to Natural England's guidance on SANG's.</p>	<p><b>E2.1</b> Recreational displacement would not all be directed to European sites, although a precautionary approach was used in the Shadow Habitats Regulations Assessment Report as explained in response to E1.2 &amp; E1.3 above. The proposed monitoring and mitigation plans referred to in E1.5, that would be secured under the Deed of Obligation, are designed to monitor actual recreational pressure within European sites on a precautionary basis. Additional mitigation secured under the Deed of Obligation would be deployed as appropriate to counter any observed increase in recreational pressure due to Sizewell C.</p> <p><b>E2.2</b> SZC Co's position is that the proposed Rights of Way and Access Strategy for the EDF Energy estate, including enhancements at Kenton Hills and Aldhurst farm, would minimise the displacement of people away from the proposed development area. In addition, the proposed mitigation measures, and recreational monitoring and mitigation plans described at RT1.1 and E1.5 would be deployed on a precautionary basis. Being located on the edge of Leiston, the 67 ha Aldhurst farm is readily accessible to residents within the town who can travel</p>		In Progress

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			<p>We note the statement that the applicants makes regarding their view on the applicability of this guidance but it is unclear whether they are relying on figures derived from this approach or not. We are unclear as to how the 2019 survey results referenced in 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 1.6.2. We remain of the review that the NT has not seen any evidence of the assessment of the capacity and adequacy of these sites.</p> <p><b>E2.3</b> The NT considers that monitoring of these sites to deliver mitigation for recreational displacement is required. The NT is now aware that there are proposals to undertake visitor surveys at Aldhurst Farm both pre-construction and during construction however these are not reflected in Section 4 of the MMP or in the proposed survey locations. As such we would expect to see these and further measures included in the monitoring plan to establish the sites relative success or otherwise in achieving its purpose. If the monitoring of these sites is not to be included in the MMP we would want to know where it will be set out and how this commitment would be secured.</p> <p><b>E2.4</b> Should the assessment or monitoring 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 and in close proximity to Sizewell.</p> <p><b>E2.5</b> The NT notes that there is currently no provision in the <b>draft DCO</b> or <b>draft Deed of Obligation</b> to cover the monitoring and mitigation set out in E2.3 and E2.4 above.</p>	<p>there on foot or via a short journey by car (a small car park has been constructed at the Abbey road entrance, and will be enlarged at the commencement of construction). Open access areas have been provided where dogs can be safely exercised on or off leads. A network of high quality footpaths have been created within the site that strengthen public access links between the town and the existing and enhanced PRow and permissive footpath network within the rest of the EDF Energy estate. It is not correct to suggest that provision of recreational space within Aldhurst farm to help reduce reactreational displacement to European sites is not a core aim of the site. The recreational space has been designed specifically to be appealing to existing recreational users of Sizewell Beach, especially dog walkers; large open access areas have been specially created so that dogs can be safely exercised off leads. Further enhancements will be implemented as set out in the the Aldhurst Farm Technical Note submitted at Deadline 5 [REP5-126]. As noted at paragraphs 1.6.1 and 1.6.2 of the Aldhurst Farm Technical Note, SANGS is not applicable for the Sizewell C Project, and is not necessary.</p> <p>Aldhurst Farm will provide alternative recreational space for use by Sizewell C construction workers and displaced people, and the visitor surveys referred to in paragraph 1.6.3 illustrate that the site has good capacity for additional recreational use by construction workers and displaced visitors, who may otherwise have visited European sites. The means of measuring capacity of SANGS advocated by Natural England for residential development is not applicable to construction workers or displaced people, and therefore a target number of visits to European sites that are avoided by the provision of this site is not calculated.</p> <p><b>E2.3</b> SZC Co. has not included either Aldhurst Farm or Kenton Hills as locations within the Monitoring and Mitigation Plans as they sit outside of the designated sites.</p>		

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				<p>SZC Co. will monitor both of these locations as stated (see also 2.5 below) .</p> <p><b>E2.4</b> SZC Co's position is that impacts associated with potential increases in recreational pressure have been adequately mitigated through a combination of monitoring and mitigation plans referred to in response to E1.5, the enhanced Kenton Hills / Aldhurst farm, enhancements to the wider PRoW network being agreed with SCC and ESC, and the Suffolk RAMS payment made to ESC (in respect of campus and caravan site based workers) for the reasons stated above.</p> <p><b>E2.5</b> There is no such provision in the Deed of Obligation because the monitoring of Aldhurst Farm and Kenton Hills does not influence the content or the nature of the monitoring or mitigation deployed under the Monitoring and Mitigation Plans. In the event that Aldhurst Farm and Kenton Hills are, as expected, successful in mitigating displacement to European sites, this effect would then be detected at the European sites and less mitigation would be required at those sites.</p>		
<b>Landscape and Visual Impacts (Book 6, Volume 2, Chapter 13)</b>						
NT_LV1	Landscape and Visual Impacts on our land at Dunwich Heath and Beach and the wider AONB		<p><b>LV1.1</b> The elevated position of the National Trust's site provides the best vantage point for the Sizewell C site. The development will significantly and adversely impact on the setting and views from Dunwich Heath and the wider AONB both during construction and operation, as demonstrated in the submitted LVIA. At ISH5 (Landscape, Visual Impact and Design) the NT sought a commitment from the applicant to provide computer generated images and photomontages of the craneage to provide a better understanding of the impacts of the proposal. It is understood from the hearing that EDF have undertaken to provide these images.</p> <p><b>LV1.2</b> As stated within our Written Representation and at ISH5 the Trust does not agree with the assessment conclusion that landscape and visual effects would only occur over localised sections of the AONB and Heritage</p>	<p><b>LV1.1</b> SZC Co. has given careful consideration to the design and appearance of the Sizewell C site in the views from coastal and elevated locations, including at Dunwich Heath and the National Trust's Coastguard Cottages, and has sought to minimise and mitigate landscape and visual effects and effects on the natural beauty and special qualities of the AONB through an iterative design process and application of agreed design principles. SZC Co also notes that the approach to the selection of viewpoints and to preparing visualisations was agreed during consultation with SCC, ESC, Natural England and the Suffolk Coast and Heaths AONB. Consultation was also undertaken with the National Trust on the location of viewpoints at Dunwich Heath. Full details of consultation undertaken and agreement reached with LVIA consultees is provided in Volume 2, Appendix 13H of the ES (Doc Ref 6.3).</p>		In Progress



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			<p>Coast and that the effects during operation on these designations is not significant. The Trust stated that the view (from Viewpoint 17) looks at the full breadth of the AONB from east to west. Therefore, the impacts that are experienced from that viewpoint are full east to west impacts on the AONB and this highlights the importance of the AONB as a single entity. The integrity of the AONB is its ability to deliver its statutory purposes based on it being a single entity.</p> <p><b>LV1.4</b> Insufficient information has been provided to demonstrate how the applicant will mitigate/compensate the visual impacts of the development for the extent of its lifetime. Given the scale of the impacts, and the conclusions of the LVIA regarding both operation and construction, the Trust's view is that many of these impacts cannot be mitigated at Dunwich Heath and Beach. Given the nature of the site and the orientation of Coastguards Cottages (which face towards the Sizewell C site) there would undoubtedly be very significant residual impacts. There are a lot of impacts that the applicant will not be able to mitigate. We accept that the colour and finishes of some of the principal buildings will provide some embedded mitigation and that landscaping at Kenton and Goose Hills will mitigate some of the low-level clutter.</p> <p><b>LV1.5</b> Given the magnitude of visual impact at Dunwich Heath, the NT considers that it is imperative that it is able to access funds to implement interventions either alone or in partnership to mitigate/compensate for this impact and that monitoring is secured through requirements. The Trust also acknowledged that it is in discussion with the applicant about a Dunwich Heath Resilience Fund, but this would only deliver small scale mitigation measures, such as staff resource to have conversations with visitors about what is happening in the landscape and some small infrastructure provision/improvements which may detract from views of the construction site.</p>	<p>Additional visualisations not included within the DCO (relating to the accommodation campus and land off King Georges Avenue, Leiston for the construction phase of the main development site) were prepared at the request of the Planning Inspectorate (Procedural Decision Notice 4) and submitted in January 2021.</p> <p>Following ISH5, SZC Co. has committed to providing additional visualisations, including from Coastguard Cottages, at Deadline 7.</p> <p><b>LV1.2</b> SZC Co disagrees. The ES conclusion is robust and is supported by the evidence included in the LVIA. This demonstrates that significant adverse effects would be limited to the immediate AONB during construction and operation, - as recorded in the LVIA (Doc Ref 6.3). The proposals would not compromise the designated area as a whole. Indeed, nuclear infrastructure has been a feature of the AONB since its designation with SZA being in place before the AONB itself was designated. Energy infrastructure has and will continue to be a feature of this part of the AONB without compromising the ability of the ANOB to fulfil its statutory function. This was presented by SZC Co. at ISH5.</p> <p><b>LV1.4</b> SZC Co. has provided embedded mitigation as set out in Volume 2, Chapter 13 of the ES and in the Design and Access Statement (Doc Ref. 8.1), to reduce adverse effects, to ensure that the 'behaviour' of the power station in the AONB is aligned with that of the existing SZA and SZB power stations and support the integration of the SZC power station into the coastal landscape.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>Careful design of proposed turbine halls, including consideration of colour and materials with reference to an environmental colour study.</li> <li>Careful design of proposed sea defences as naturalistic dune features similar to those on the coast in the immediate area.</li> </ul>		

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			<p>EDF have agreed that the NT will be able to access a mitigation fund as set out in LV1.7 below. Suggested measures on this matter have been provided to EDF.</p> <p><b>LV1.6</b> The NT notes that it is named as a consultee to East Suffolk Council in Requirement 12 of the <b>draft DCO</b>. The NT agrees that it is named in this requirement.</p> <p><b>LV1.7</b> The NT notes that the <b>draft Deed of Obligation</b> includes a Natural Environment Improvement Fund in Schedule 11 (Natural Environment) which the NT would have access to, particularly if measures could be delivered through partnership working in the wider protected landscape. The NT also notes that Schedule 13 (Third Party Resilience Funds) includes a provision for a National Trust Dunwich Heath and Coastguard Cottages Resilience Fund which could fund on-site mitigation/compensation. The National Trust is in discussion with EDF about this matter but it is yet to be agreed.</p>	<ul style="list-style-type: none"> <li>Retention of existing woodland areas surrounding the site to secure screening of the proposal in the wider landscape.</li> </ul> <p>The proposals include provision of screening of a substantial amount of lower level development on the main nuclear island reducing visual effects and are sympathetic to the character of the coastline, combined with a focus on the design and appearance of turbine halls as the primary structures that respond to the existing SZA and SZB power stations along a common alignment. SZC Co. also commits to implementing a management plan for the EDF Energy Estate that includes for the long-term protection and enhancement of existing and new woodland areas which support low level screening. See LV1.5 re. proposed compensation. SZC Co. welcomes the recognition that the colour and finishes of some of the principal buildings will provide embedded mitigation and that landscaping at Kenton and Goose Hills will mitigate some of the low-level clutter</p> <p><b>LV1.5</b> With regard to compensation for impacts that cannot be mitigated, SZC Co. confirms that the s106 includes a fund that is specifically intended to compensate for residual impacts arising on landscape character, views and the Suffolk Coast and Heaths AONB/Suffolk Heritage Coast. The governance, structure and scale of this fund is the subject of ongoing discussions with stakeholders. SZC Co. is proposing a National Trust Dunwich Heath and Coastguard Cottages resilience fund to mitigate for significant impacts and address risks caused by the Sizewell C Project. The NT will be able to deploy that fund for works within land under its control it considers helpful in reducing effects.</p> <p><b>LV1.6</b> Noted thank you.</p> <p><b>LV1.7</b> Noted. We look forward to further engagement with the Trust on these funds .</p>		
Coastal Geomorphology and Long-Term Change (Book 6, Volume 2, Chapter 20)						

Ref.	Matter	Book ref.	National Trust Position	SZC Co. Position	Further Action / Additional references.	Agreed / Not Agreed / In Progress <sup>1</sup>
NT_CP1	Impacts on NT land and infrastructure at Dunwich Heath and Beach from accelerated coastal change arising from the development.		<p><b>CP1.1</b> As set out in our Written Representation the National Trust is concerned about impacts on its land and infrastructure at Dunwich Heath and Beach from accelerated coastal change arising from the development. We believe it is the applicant's responsibility to demonstrate that the development will not have an indirect or direct impact on our land and coastal frontage.</p> <p><b>CP1.2</b> The NT acknowledges that the assessment of long-term coastal change involves a high degree of uncertainty. The NT believes the application does not adequately assess the potential range of impacts the proposal may have on long term coastal geomorphological processes. As a near neighbour the NT feels this arises due to a focus in the assessment of the risk to the nuclear power station itself only, rather than an assessment of the role the development may have in affecting coastal change on this part of the coast. The Trust is therefore concerned that there are potential/possible impacts of the proposal on our site during the lifetime of the development that have not been fully explored as part of an integrated and holistic assessment.</p> <p><b>CP1.3</b> The NT notes the submission of further information on coastal matters by EDF at D5 and that there is still outstanding information to be submitted at a later date. The Trust feels we are unable at this stage to fully assess the impact on our site arising from the development given that at this late stage in the examination we are still awaiting further studies and detailed designs. We are therefore unable to reach agreement on this matter.</p> <p><b>CP1.4</b> The NT notes a Sizewell C Coastal Processes Monitoring and Mitigation Plan (CPMMP) has been submitted to the Examining Authority. The NT has not been engaged in any specific discussions about this plan. Having reviewed this the NT notes that there is no provision for monitoring, mitigating or compensating impacts arising from the development's influence on NT land or designated sites extending more than 1.5 km</p>	<p>A full written response to the National Trust Written Representations has been provided at Deadline 6 (see Doc Ref: 9.63, Appendix G).</p> <p><b>CP1.1</b> SZC Co's position, as evidenced in Volume 2, Chapter 20 of the ES and in the ES Addendum, is that the Sizewell C Project would have no effects on coastal change in relation to the Minsmere SPA/SAC frontage. This conclusion is supported by the results of detailed modelling of the BLFs carried out after submission of the ES addendum as documented in the Cefas Report TR543 that was submitted to PINS at Procedural Deadline 2. If the Trust has any remaining concerns about potential coastal change effects in relation to its land at Dunwich Heath and the beach, it would be helpful to understand what evidence it has that gives rise to these concerns.</p> <p><b>CP1.2</b> SZC Co disagrees – please see CP1.1 &amp; CP1.4.</p> <p><b>CP1.3</b> SZC Co.'s position is that effects on coastal processes have been fully assessed in the Environmental Statement and there is no evidence to suggest any impacts at the national Trust frontage. In the absence of any evidence that is provided by the Trust to the contrary we do not understand why agreement can't be reached.</p> <p><b>CP1.4</b> Impact extent has been identified and assessed in Volume 2 Chapter 20 of the ES [APP-311] and does not suggest impacts will reach the National Trust frontage. The proposed CPMMP therefore doesn't extend to NT land at Dunwich Heath / the beach as no plausible impact on them has been identified in the ES. See also response to National Trust WRs (Doc Ref: 9.63 Appendix G)..</p> <p><b>CP1.5</b> SZC Co is of the view that the spatial extent of the Coastal Processes MMP (Volume 3, Appendix 2.15.A of the ES Addendum [AS-237]) is appropriate and does not need to extend to the NT northern boundary (see CP1.4). The Coastal Processes MMP [REP5-059] is scheduled to run until the end of decommissioning. Ten years beforehand (around 2130), a final assessment will be made based on the actual coastal setting, conservation</p>		In Progress

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			<p>beyond the centre of the development site. We believe the current monitoring and mitigation extent is far too limited. We consider that this should include our frontage at Dunwich Heath. This is a point of uncommon ground with the applicant.</p> <p><b>CP1.5</b> The NT believes EDF should monitor coastal change for the lifetime of the development (through to full decommissioning) and include the designated sites to the north of the development site up to the northern boundary of our land. Mitigation/compensation proposals should be linked to specific triggers and / or associated to thresholds of long-term coastal change. Suggested measures on this matter have been provided to EDF. This is a point of uncommon ground with the applicant.</p> <p><b>CP1.6</b> The NT notes that Requirement 7a of the <b>draft DCO</b> makes provision for Coastal Processes Monitoring and Mitigation Plan (CPMMP). The NT does not agree that its land at Dunwich Heath and Beach should be excluded from this plan and believes it should be a stakeholder in its development and review. This is a point of uncommon ground with the applicant.</p> <p><b>CP1.7</b> The NT is concerned that there is no provision in the <b>draft Deed of Obligation</b> for mitigation/compensation should the monitoring show that there is an impact on third party land from the development.</p>	<p>designations, marine and coastal processes and function of the HCDF (if present) at that time. This assessment would be included in the Cessation Report (a future component of SZC Co's monitoring and mitigation) and would be based upon decades of coastal change data, which is needed to identify and assess any residual effects and, if required, make assessments for compensation (see Section 9 of the Coastal Processes MMP (Volume 3, Appendix 2.15.A of the ES Addendum [AS-237])). These assessments are timed for the end of SZC Co's operational life and return of the site to the relevant decommissioning body. Beach recharge would be linked to specific triggers and the evidence base for setting these is under investigation. Two reports have been submitted to the examination at Deadline 3 that demonstrate the sustainability of the SCDF: BEEMS Technical Reports TR544 [REP3-032] and TR545 [REP3-048]. Outputs from these reports have been taken forward into the latest version of the Coastal Processes MMP, which was submitted at Deadline 5 [REP5-059]). Drafting of the Coastal Processes MMP, and its agreement, is intentionally an iterative process, secured by DCO (Requirement 7A) and Marine Licence (Condition 17) (Doc Ref. 3.1(C)). The viability of the SCDF through the decommissioning phase to 2140 is being determined and updates to BEEMS Technical Reports TR544 [REP3-032] and TR545 [REP3-048] will be submitted to the examination at Deadline 7..</p> <p><b>CP1.6</b> SZC Co disagrees with the Trust on this issue. . See response at CP1.4. On this basis we do not think it appropriate for the Trust to be a member of the Marine Technical Forum (MTF) (see also response at Doc Ref: 9.63 Appendix G). However we welcome the Trust's feedback on the evolving CPMMP during the examination process.</p> <p><b>CP1.7</b> Noted. SZC Co's position is that proposed monitoring and mitigation measures should be necessary and proportionate to the impacts. Our position is that</p>		



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				there is no plausible risk of coastal change caused by the proposed development affecting third party land, including that belonging to the Trust, with the proposed CPMMP in place as proposed.		
<b>Tourism</b>						
NT_T1	Impact on tourism on the Suffolk Coast		<p><b>T1.1</b> The NT believes that the proposed development will impact on tourism on the Suffolk Coast. As a tourist destination and the operator of holiday cottages within the Coastguard Cottages building, the NT are concerned there will be changes in audience segments and behaviours.</p> <p><b>T1.2</b> The NT acknowledges EDF's assessment and conclusions and agrees that there is a need for a Tourism Fund. This is a point of common ground.</p> <p><b>T1.3</b> The NT also notes that Schedule 13 (Third Party Resilience Funds) includes a provision for a National Trust Dunwich Heath and Coastguard Cottages Resilience Fund which could fund on-site mitigation/compensation. The NT believes access to funding to cover the duration of the construction phase of development (predicted to last 12 years) will enable the NT to engage with changing visitor segments to explain Sizewell C to visitors and to promote Dunwich Heath as a place to visit (working with partners if necessary). Suggested measures on this matter have been provided to EDF.</p> <p><b>T1.4</b> The NT notes that Schedule 15 (Tourism) of the <b>draft Deed of Obligation</b> makes provision for a Tourism Fund and that the National Trust would have access to this fund.</p> <p><b>T1.5</b> There are no issues of concern relating to the <b>draft DCO</b> on this matter.</p>	<p><b>T1.1 / T1.2</b> Noted – thank-you.</p> <p><b>T1.3</b> SZC Co. welcomes receipt of the National Trust's proposed list of measures for the Resilience Fund, which were set out in a spreadsheet and looks forward to agreeing the scope and quantum of the Resilience Fund. SZC Co. concurs with the use of the Resilience Fund during the construction phase. Note however, the comments on the tourism assessment above (<b>RT1.4</b>) regarding NT's predicted increase in visitor numbers and and change in visitor segmentation.</p> <p><b>T1.4 / T1.5</b> Noted thank you.</p>		Agreed with the exception of measures to be included in the resilience fund, where discussions are ongoing.

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<b>Historic Environment</b>						
NT_HE1	Impacts from the development on the non-designated heritage assets		<p><b>HE1.1</b> As set out in our Written Representation the NT believes that there will be impacts from the development and industrialisation of this part of the Heritage Coast on the setting and community value (past and present) of the NT owned Coastguard Cottages and their environs.</p> <p><b>HE1.2</b> The NT and East Suffolk Council consider that Coastguard Cottages are a 'Non-Designated Heritage Asset' and are part of the character and heritage of this part of the East Suffolk coastline. This also acknowledges the important use of this site during World War 2.</p> <p><b>HE1.3</b> The NT notes the submission of proposed changes by EDF to the Examining Authority and confirmed its position on this matter in its Written Representation and answer to ExQ1. We further note East Suffolk's Council's view as articulated at ISH5 that views from Coastguard Cottages will be adversely impacted and require mitigation. Their view is that there is an overlap between landscape and heritage impacts, which would be greater at Coastguard Cottages than experienced by any other heritage asset.</p> <p><b>HE1.4</b> The NT are in discussions with EDF about access to funding which will enable the NT to assess and carry out heritage enhancements in and around Coastguard Cottages. Measures may be funded from the National Trust Dunwich Heath and Coastguard Cottages Resilience Fund. This is yet to be agreed. Suggested measures on this matter have been provided to EDF.</p> <p><b>HE1.5</b> There are no issues of concern relating to the <b>draft DCO</b> on this matter.</p>	<p><b>HE 1.1. / HE 1.2 / HE 1.4</b> The coastguard cottages at Dunwich Heath are non-designated heritage assets and have been assessed as of medium significance, reflecting their significance on a local and regional level.</p> <p>The observation tower was built at this prominent location to afford long ranging views out to sea and along the coast, so that vessels and distress signals might be observed and acted upon. The cottages were built to provide accommodation for those working at the observation tower. Thus, the heritage significance of the two parts of this group of buildings is different. Whilst both have architectural interest as a recognised style of buildings along the eastern English coast, the observation tower has additional interest deriving from the architectural features which allow the function of the building, such as the bank of windows looking out across the North Sea, to be discerned.</p> <p>The historic interest of the observation tower is drawn from its prominent location and its views out to sea, which provide a clear link to the historic use of the building. In contrast, the historic interest of the cottages is primarily drawn from its relationship with the observation tower. The cottages are in this setting purely because of the observation tower.</p> <p>The principal elevation of the terraced cottages is to the north, with backyards and outshots on the southern side of the cottages. Views along the coast to the north include Cliff House and the caravan park at Dunwich. Views along the coast to the south include Sizewell A and B and would include the proposed Sizewell C power station. Significantly, in contrast, the principal elevation of the observation tower is to the east, out to sea. The observation tower's observation room has a large bank of windows on its eastern façade and smaller sets on its southern and northern. These permit uninterrupted views across the North Sea. They also allow views along the</p>		In Progress

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				<p>shoreline in either direction. It is this visual relationship with the North Sea that contributes most to the historic interest of this group of buildings.</p> <p>Architectural interest of both the cottages and the observation tower is experienced primarily in close proximity, allowing architectural details, such as the arrangement of windows, to be appreciated. However, the general form of the building group, which does contribute some architectural interest can be seen from further afield. The proposed development will not affect architectural interest.</p> <p>The important views from the observation tower to the North Sea and along the shoreline will be unaffected by the proposed development. Views to the east and north will experience no change. Views to the south will experience a magnitude of change, with the proposed development appearing closer and larger than the existing Sizewell power station complex. However, the existing and proposed power stations, due to a slight westward curve in the coastline, appear a little inland in views from the observation tower. Thus, their visibility does not affect the ability to have clear views along the coast to the south. Whilst there will be a low magnitude of change to this view, it will not prevent the appreciation of the historic interest of the observation tower.</p> <p>Views south from the cottages do not contribute as much to their historic interest, which is instead focussed on the relationship with the observation tower. There will be no effect to this relationship from the proposed development.</p> <p>The undeveloped nature of this part of the coastline contributes to the heritage significance of these buildings, not only by allowing architectural interest to be experienced, but also contributing to historic interest through foregrounding the important visual relationship with the North Sea. The area of the setting in which the proposed development would appear can, however, not be considered to be undeveloped, and the distance at which the proposed development would be seen would</p>		

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				<p>allow the remoteness and open nature of Dunwich Heath to remain, preserving this aspect of the setting's contribution to heritage significance.</p> <p>The assessment in Volume 2, Chapter 16 (Terrestrial Historic Environment) of the ES (Doc Ref. 6.3) [APP-272], of a low magnitude of change to a non-designated heritage asset of medium significance resulting in a minor adverse effect, remains appropriate. As this effect is not significant, no mitigation is proposed.</p> <p><b>HE1.3</b> The changes have now been accepted but there is no change to to assessment above as a result of the changes.</p> <p><b>HE1.5</b> Noted, thank you.</p>		
NT_HE2	Impacts from the development on archaeology		<p><b>HE2.1</b> The NT believes there may be the potential for direct impacts on archaeology on its site at Dunwich Heath arising from mitigation works which require ground works. This includes mitigation arising from provisions within the Dunwich Heath and Coastguard Cottages Resilience Fund.</p> <p><b>HE2.2</b> The mitigation works are not yet known and remain difficult to quantify until such measures are agreed.</p> <p><b>HE2.3</b> Once measures are agreed the potential for impacts on archaeology may require a Watching Brief and possibly further archaeological investigation.</p> <p><b>HE2.4</b> The NT believe these costs would be closely associated with any agreed mitigation for other matters set out above and secured through the National Trust Dunwich Heath and Coastguard Cottages Resilience Fund. The National Trust wishes to ensure that the fund is flexible enough to accommodate changes to the mitigation fund should features of archaeological interest be discovered during the course of implementing agreed measures.</p> <p><b>HE2.5</b> There are no issues of concern relating to the <b>draft DCO</b> on this matter.</p>	<p><b>HE2.1</b> SZC Co. look forward to further engagement with the Trust on the measures to be included within the Dunwich Heath and Coastguard Cottages Resilience Fund and give further consideration to this matter oin the context of these discussions.</p> <p><b>HE2.2 / HE2.3 / HE 2.4</b> SZC Co. does not currently assume that there would be any ground works at Dunwich Heath are proposed although if this were to change as noted above this position would be reconsidered as appropriate. However it is envisaged that any such potential ground works would be very small scale in nature and therefore unlikely to give rise to significant adverse effects.</p> <p>other than</p> <p>Should ground works be agreed as part of one of the Funds, then the cost of any archaeological mitigation should be costed into the measures. Suffolk County Council Archaeology Service should be consulted and would need to agree - and potentially monitor - any archaeological works, including reporting. It would be for SCCAS to advise whether a Watching Brief would be appropriate, which in turn would depend on the scope and location of the works.</p>		





SIZEWELL C PROJECT –  
STATEMENT OF COMMON GROUND – SZC CO. AND NATIONAL TRUST

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				HE2.5 Noted thank you.		

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## APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of discussions between SZC Co. and the Trust. The relevant meetings are summarised in Table 2.2.

**Table 2.2: SOCG meetings held between SZC Co. and the National Trust**

Date	Details of the Meeting
7 July 2020	Intro to new NT lead and agree way forward for engagement
5 August 2020	Meeting to address landscape questions / issues
7 September 2020	Meeting to address recreational disturbance questions / issues
9 September 2020	Meeting to address coastal processes questions / issues
17 September 2020	Follow up discussion on recreational disturbance questions / issues
5 October 2020	Meeting to address tourism questions / issues plus follow up discussion on coastal
3 November 2020	Meeting to discuss the resilience fund and approach to the statement of common ground
18 February 2021	Discussion on the draft Monitoring and Mitigation Plan for Minsmere and Dunwich Heath (recreational disturbance)
22 February 2021	A meeting to discuss mitigation for recreational disturbance
18 March 2021	Progress meeting to develop SoCG for D2
6th July 2032	Progress meeting to develop SoCG for D6. Matters discussed included updated positions on coastal processes, recreational displacement & the Minsmere MMP, LVIA impacts and coastguard cottages, and tourism
28 July 2021	Meeting on recreational displacement – displacement calculations and MMP