



The Sizewell C Project Case Team
National Infrastructure Planning
sizewellc@planninginspectorate.gov.uk
(By email only)

07 April 2021

Your reference: EN010012
Our Identification Number:
20025459

Dear Sir or Madam,

Planning Act 2008 – Section 88 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Procedural Deadline B Response

On 10 March 2021 the Marine Management Organisation (MMO) provided a written submission in response to the Rule 6 Letter notice, received under section 88 of the Planning Act 2008, for the Development Consent Order (DCO) application for the Sizewell C Project.

The Marine Management Organisation (MMO) attended the Preliminary Meeting Part 1 for the application on 23 March 2021 and observed the livestream of the continued event on 24 March 2021. In addition to the comments previously submitted in our response to the Rule 6 Letter, please find outlined below, a further written submission from the MMO regarding the Examination procedure and timetable. This submission is in response to matters raised orally at the Preliminary Meeting Part 1 held across the 23 and 24 March 2021.

1. Preliminary Meeting Part 2 Attendance

1.1 The MMO will be attending the Preliminary Meeting Part 2 on 14 April 2021. The MMO reserve the right to be heard orally at this meeting on any matters within our remit. The MMO will confirm during oral introductions at the meeting who will speak on behalf of the organisation. Please can the following be invited to the meeting:

- Lindsey Mullan, Marine Licensing Senior Case Manager -
[REDACTED]@marinemanagement.org.uk
- Luella Williamson, Marine Licensing Case Manager -
[REDACTED]@marinemanagement.org.uk
- Ellen Mackenzie, Marine Licensing Case Officer –
[REDACTED]@marinemanagement.org.uk



2. Comments on the Preliminary Meeting Part 1 Agenda item 4 - Initial Assessment of Principal Issues

2.1 The MMO advised previously that the topic of coastal geomorphology should be given focus as a principle issue in the Examination because the proposed temporary and permanent Beach Landing Facilities and the Hard and Soft Coastal Defences have the potential to cause significant impacts on coastal processes. The MMO welcomes the Examining Authority's (ExA) response that they are minded to consider this as a separate principle issue for the Examination. The MMO would like to confirm that the report containing the modelling of the temporary and permanent Beach Landing Facilities was only received on the 29 March 2021, and that, at the time of writing, we are still awaiting full details of the changes to the Coastal Defences, including expected geomorphological modelling, and a comprehensive updated assessment of the impacts of these project elements. As such, focus on the coastal geomorphology topic would be beneficial to ensure this impact is properly scrutinised. For further comment please refer to section 3.1 below.

3. Comments on the Preliminary Meeting Agenda item 5 - The Applicant's Proposed Changes to the Application

3.1 The MMO notes that in the 'Preliminary Meeting Part 1 (Day 2 Session 2) - Transcript - 24 March 2021', John Rhodes, on behalf of the applicant, discussed the proposed changes to the Beach Landing Facilities and the Coastal Defences. It was stated that the January 2021 changes submission included '*a full and compliant assessment*' of the impacts on coastal processes for the changes to the above project elements. It was also stated that modelling of the impacts to coastal processes was '*shared with the marine technical forum stakeholders*' and '*the report is just being finalised*' and could be submitted as part of the Examination if helpful. The MMO would like to emphasise that we only received the modelling of the Beach Landing Facilities and associated scour protection on 29 March 2021. Although the MMO attended a Marine Technical Forum where an outline of the modelling outputs was presented, details of the modelling had not yet been made available, and as such we have not had a chance to substantially review them. We are also still awaiting a full assessment of the changes to the Coastal Defences, alongside supportive modelling. The geomorphological modelling is an essential part of the Environmental Impact Assessment for these project elements and is required to ensure that the MMO are able to provide robust advice to the ExA. The MMO will be unable to effectively advise on the materiality of the proposed changes until we have reviewed this additional information with sufficient time. Therefore, we disagree that '*a full and compliant assessment*' of the impacts of the changes on coastal processes was provided in January 2021. Additionally, the MMO advises that this modelling should be submitted to the ExA and shared as part of the Examination.

3.2 The MMO's views on how the ExA could examine the changes remains unchanged from our response at Deadline A: "*The MMO note that the ExA asked how the changes could be examined. The MMO considers that although it is unclear as to the scale (see point above) of the materiality of the changes at this stage, they could be considered within the bounds of the initial proposal, with the largest change within the MMO's remit being the addition of a temporary Beach Landing Facility. As such, the MMO is of the opinion that the proposed changes could be considered alongside the current proposal, but it is advised that the changes, and how they impact the environmental statement*



conclusions, are clearly presented throughout. The MMO further advise that the changes should be fully considered, assessed and submitted prior to the examination, to allow for one set of hearings for the entire project as a whole.”

4. Comments on the Preliminary Meeting Agenda item 6 - Draft Examination Timetable

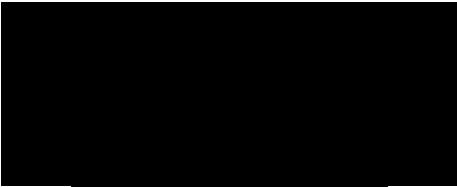
- 4.1 The MMO would like to further request that the Issue Specific Hearings (ISH) are split into marine matters (below Mean High Water Springs) and terrestrial matters to minimise the need for MMO to be in attendance for subjects that are not relevant to our remit. The MMO is a public body and must ensure that our resource is managed efficiently. Due to the large scale of terrestrial development involved in this project, it would be of benefit to the MMO if the marine matters were grouped together consecutively in ISH.
- 4.2 In accordance with this the MMO will only be attending Examination hearings that are relevant to our jurisdiction. Confirmation of the MMO's attendance at hearings will be issued on receipt of each agenda.
- 4.3 The MMO notes that there were discussions at the Preliminary Meeting Part 1 for hearings to be held in person. Whilst we recognise that the application documents and Examination hearings should be made available to the public in an accessible format, the MMO maintains a preference for virtual hearings, or the ability to take part virtually (blended hearings) due to the COVID-19 pandemic. Further, due to the location of the development, virtual hearings would increase the capacity for the MMO to attend hearings and reduce the environmental impact of the hearings themselves.
- 4.4 The MMO also notes that there were requests for the Statement of Common Ground deadlines to be brought forward in the Examination Timetable. The MMO is content with the proposed dates currently outlined within the draft Timetable for submission of Statements of Common Ground. Due to resourcing, and the practicality for our final comments being captured as close to the end of examination as possible, the MMO would prefer these dates not to be moved forward.

5. General Comments on the Preliminary Meeting Part 1

- 5.1 The MMO notes that during the Preliminary Meeting Part 1, the purpose of the meeting and the agenda items being discussed, were not often made clear to participants, and as such, the discussion seemed to regularly stray away from the agenda. This led to the meeting rolling over and taking two full days. Building on the points raised in section 4.1, the MMO would request that the agenda is managed effectively and followed in a clear and concise way in future hearings. If you require any further information, please do not hesitate to contact me using the details provided below.

Yours faithfully,





Ellen Mackenzie
Marine Licensing Case Officer



[@marinemanagement.org.uk](mailto:ellen.mackenzie@marinemanagement.org.uk)

