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To: [SizewellC](#)
Cc: [REDACTED]
Subject: EN010012 - Development Consent for the Sizewell C Project: Natural England Written submission to Deadline B
Date: 07 April 2021 16:00:23
Attachments: [image001.png](#)
[SZC DCO Natural England Procedural Deadline B Response.pdf](#)

Dear Wendy McKay,

Thank you for the invitation to provide comment on Part 1 of the Preliminary Meeting, as set out in your Rule 6 Letter.

Please find attached Natural England's formal response, which we hope you will find helpful.

Feel free to contact me should you have any queries.

Kind regards,

Ben Walker

Ben Walker
Lead Marine Advisor
(He/Him)

Norfolk and Suffolk Area Team

[REDACTED]

[REDACTED]

www.gov.uk/natural-england



During the current coronavirus situation, Natural England staff are working remotely and from some offices to provide our services and support our customers and stakeholders. Although some offices and our Mail Hub are now open, please continue to send any documents by email or contact us by phone to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

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Date: 07 April 2021
Our ref: SIZE-SP004 / 20025411
Your ref: EN010012



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Wendy McKay

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cc. Michele.gregory@planninginspectorate.gov.uk

BY EMAIL ONLY

Dear Ms McKay

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

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project

Natural England (NE) is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The following constitutes Natural England's formal statutory response to Part 1 of the Preliminary Meeting.

Natural England's attendance at Part 2 of the Preliminary Meeting

Should it take place, Natural England do not wish to make oral submissions at Part 2 of the Preliminary Meeting on Wednesday 14th April 2021, and will continue to submit written responses. Our non-attendance at meetings at any stage should not be construed as a lack of concern on outstanding issues, or a lack of willingness to engage.

Natural England's Comments on Part 1 of the Preliminary Meeting:

1 Agenda Item 3: The ExA's Remarks About the Examination Process

- 1.1 Natural England note the ExA's request for written views on preferences for future examination events to be held virtually, in-person, or through a blended approach of the two. While in-person meetings may become possible as the year progresses, we would request that the ability to join events virtually be maintained given the ongoing COVID-19 pandemic, and the wide geographic spread of NE staff involved.

2 Agenda Item 4: Initial Assessment of Principal Issues (IAP)

- 2.1 Natural England welcome that the ExA is minded to include the topic of Coastal Geomorphology as a Principal Issue, as set out in the Detailed Agenda for Part 1 of the Preliminary Meeting.
- Natural England can confirm that we received a coastal geomorphology modelling report for the permanent and temporary Beach Landing Facilities (BLF) on Monday 29th March 2021. However, at the time of writing, full coastal geomorphological modelling reports for the altered Coastal Defence Features (CDF) and in-combination assessments of the two are still outstanding.

3 Agenda Item 5: The Applicant's Proposed Changes to the Application

- 3.1 Natural England note representations made on behalf of the applicant by Mr John Rhodes (Transcript: Day 2 Session 2) referring to the proposed changes to the Beach Landing Facilities and Coastal Defence Features. In his remarks, Mr Rhodes states that a '*full and compliant assessment*' on coastal processes was submitted in the applicant's January submission. Mr Rhodes also states that modelling of the impacts the changed BLFs and CDFs may have on coastal processes was shared with members of the Marine Technical Forum the previous week. Natural England disagrees with this assessment.
- 3.2 Whilst Natural England did attend a Marine Technical Forum where initial outlines of coastal geomorphology modelling were presented in the light of substantial changes to the application; At the time of Part 1 of the Preliminary Meeting, full reports of the modelling outputs for either proposed change had not been provided. We have since received 'TR543 Modelling of the Temporary and Permanent BLF at SZC' from the applicant on Monday 29th March 2021 and will require sufficient time to assess and comment on any conclusions made. Additionally, we are still yet to receive modelling for the Coastal Defence Features. We were informed by the applicant that '2D modelling reports' on the changed Coastal Defence Features would be made available to us by the end of May, meaning we will not have had the opportunity to review them prior to submitting our Written Representations at Deadline 2 (26th May). These reports are essential for us to determine if the proposed changes to the BLF and CDFs will have a major impact on protected sites.
- 3.3 The absence of the CDF geomorphology modelling reports sufficiently ahead of time prevents a proper in-combination assessment being undertaken with the BLF which will be used to inform the Habitat Regulation Assessment. These reports are fundamental, and essential for us to be able to advise the ExA on the implications of these changes on protected sites.

This concludes Natural England advice at this time which we hope you will find helpful.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to this letter only please contact Jack Haynes on 0208 02 64857. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Jack Haynes
Senior Adviser
Norfolk & Suffolk Area Team

Ben Walker
Lead Adviser
Norfolk & Suffolk Area Team