

**Minsmere Levels Stakeholders Group,
Stop Sizewell C and
Theberton and Eastbridge Parish Council
Issue Specific Hearing 6
Oral Contribution by Cllr. Paul Collins**

Coastal Geomorphology

Please note any text highlighted with bold and italic emphasis in the following submission represents additional information not conveyed in the oral submission.

2. The assessment of the coastal impacts of the Proposed Development:

- a) Whether the potential coastal impacts of the Proposed Development can be satisfactorily assessed from the information submitted by the Applicant?**
- b) If not, what additional information would be required?**
 - I think Bill Parker and Paul Patterson just alluded to the whole design and the underpinnings of the hard coastal defence and the ground improvement. This feature is very sketchy somewhat sketchy at the moment, needs to be fleshed out in much more detail, because the types of soils and the area where this very heavy structure will sit is going to be very prone to movement and collapse. We really need to ensure that this is not the case, because as well as protecting the coast and if it failed, would be a significant problem for the station going forward. So, I think that's something that is missing currently. And hopefully that will appear at deadline five. Perhaps that's something you can raise as well. The only other point that has been made in various documents and perhaps draw our attention to it again, is in terms of the soft coastal defence that's being proposed. Some of the cobbles and various fills that are going to be used for this particular feature are very different to the existing beach, and that can cause its own problems. So, I'm not sure how much of that has actually been taken into account and we would like we would ask that that be looked at again, also.
- c) Update on the additional details of the hard coastal sea defence feature (HCDF) design to be provided at Deadline 5.**
 - We await the release of additional plans at Deadline 5 and reserve our comments until that has been made available and assessed.
- d) The assessment principles adopted by the Applicant.**
 - We think the one thing that sort has been touched on but perhaps not strongly, and but it has come through from what Alison Andrews said from Alde and Ore Association said and that is we are still concerned about the level of assessment going beyond the three kilometre boundary the applicant are using here, which is centred at Sizewell C. This only takes it up as far as Minsmere Sluice and down to the Ness at Thorpeness effectively. Even in the applicant's own submissions during consultations about removing the original jetty proposal, one of

the reasons they actually gave for its removal was that they knew there were impacts further down at Aldeburgh and along Thorpeness to the south. So, it's sort of incongruous that we're here talking about this small portion of the coast, where even their own submissions say that there have been coastal responses further down the coast to operations at Sizewell. That's also borne out by some of the details that we, along with Bill Parker and Stop Sizewell C and provided by our own academic reviewers. So, I think that's a point which is, in terms of assessment principles. It's a major principle that's missing.

- I would just endorse what Mr. Parker and the other speakers have said. We do really want to make sure this is properly monitored up and down the coast. And whilst the major impacts may not be clear at this point, from the small amount of monitoring and predicting that has been done by the applicant, it doesn't mean that the long term effects over a long period of time are not going to be significant.

3. The implications of the Proposed Development on the strategies for managing the coast as set out in the Shoreline Management Plan (SMP)?

- a) The SMP policy boundary between MIN 12.2 and 13.1.**
 - No comments on this issue
- b) The MIN 13.1 policy to 'Hold the Line to 2105', and whether the more seaward position of the HCDF and the SCDF for Sizewell C relative to the Sizewell A and B sites would be in conflict with the SMP.**
 - *It is clear the new frontage of the Hard Coastal Defence goes significantly seaward of the existing Bent Hills defence for Sizewell B. The new Soft Coastal Defence overlays and extends further seaward than the existing sacrificial dune. Both features are advanced with respect to the defences at Sizewell A & B and are thus in conflict with the "Hold the Line to 2105" SMP policy. We would support National Trust assertions in this regard especially as it is unclear what effect this advance will have on the coast both north and south of Sizewell.*

4. Potential impacts on coastal processes and geomorphology including those arising from the proposed HCDF and the soft coastal sea defence (SCDF) and the temporary and permanent beach landing facilities (BLFs) and associated activities:

- a) The potential for consequential adverse and/ or beneficial impacts on coastal processes arising from these features and activities.**
 - See comments below and we await the amended plans for HCDF and BLF at Deadline 5
- b) The vulnerability of the coastline to erosion with particular regard to the role played by the Sizewell-Dunwich banks and the Coralline Crag outcrop.**
 - We would refer to the work submitted by Stop Sizewell C from academics based in Belfast University and papers submitted by Nick Scarr.
- c) The spatial scale of the coastal processes assessment and whether the geomorphic context should be regarded as extending beyond Sizewell Bay?**

- See item 2 (d) and 4 (b) above
- d) Whether other locations, such as Southwold, Thorpeness and Aldeburgh, should be included in the baseline monitoring and mitigation proposals?**
 - See items 2 (d) and 4 (b) above
- e) The potential impacts upon the Minsmere frontage, and the role of the Minsmere sluice.**
 - I think there are two things I want to raise. Partly it goes back to a statement that was made earlier by Dr. Dolphin. I just like to check something because the answer to this would probably have some impact on the Minsmere Sluice as well as other parts of the frontage and that is, do we understand correctly that the modelling that they've now presented for Sizewell is with the Sizewell Dunwich Bank removed as a you as a result of using the wave rider buoy, wave climate from outside, the Sizewell Dunwich Bank complex on the inshore wave climate. 'm trying to figure out whether what they're saying is truly a worst case or what it is. And if it's a worst case, obviously, then, if the if the impacts are still low according to that modelling and the flood risk assessment, then that would be a significant piece of information. We can't at the moment, see where all that information is, and wonder whether that's something that they're about to release in deadline five or at some future deadline. And also, is there a new expert geomorphological assessment being done as a result of that?
- f) For the permanent BLF, during the construction phase, the impacts of any dredging, and the barge berthing platform.**
 - No comments on this issue
- g) Cumulative impacts.**
 - I guess the other aspect is that the changes are about to come in particular about the permanent Beach Landing Facility and the withdrawal or, or changes or should I say to the hard coastal defence, at that northern corner will make a difference, as well as how that will be changed at any later adaptive process would be something we would have to wait and see. So, I think basically, we have to wait and see what comes next at Deadline 5.

5. The adequacy of the proposed climate change adaptation measures, and the resilience of the Proposed Development to ongoing and potential future coastal change during the Project's operational life and any decommissioning period including:

- a) The scope for the HCDF to undergo design adaptation to maintain nuclear safety against predicted sea level rises.**
 - We await the release of additional plans at Deadline 5 and reserve our comments until that has been made available and assessed
- b) The resilience of the Proposed Development, taking account of climate change, in response to shoreline evolution and change scenarios over the anticipated site life.**
 - We await the release of additional plans at Deadline 5 and reserve our comments until that has been made available and assessed

6. Mitigation and controls including the Coastal Processes Monitoring and Mitigation Plan (CPMMP):

- a) Draft DCO Requirement 2, and the Code of Construction Practice (CoCP), Part B, Section 12.**
 - No comments on this issue
- b) Draft DCO Requirement 7A and the CPMMP.**
 - No comments on this issue
- c) Draft DCO Requirement 12B.**
 - No comments on this issue
- d) Draft DCO Article 86.**
 - No comments on this issue
- e) Whether any additional requirements, including those relating to the Marine Technical Forum (MTF), the MAP, the BLF and funding arrangements would be necessary to address adverse physical changes to the coast?**
 - No comments on this issue
- f) Whether it would be necessary and reasonable to make provision in the draft DCO for the removal of the HCDF at decommissioning?**
 - If the hard coastal defence is removed, we end up with the cut-off wall as being the only thing that's there. I'm pretty certain that nobody intends to remove the cut-off wall because the wall is something like seven metres above ordnance datum, certainly on three sides.
 - There are also references to the cut-off wall being four metres above ordnance datum on the seaward side, which would seem to me to be somewhat of a risk as far as what is left on the platform at the end of at the end of that period.
 - The cut-off wall is not really something which would encourage any sort of natural process to return, should the sea come anywhere near that structure. It might be good for sitting on the edge of it and dipping your fishing rod into the into the sea to catch something, but even then, I have some concerns about that. So, I'm sort of puzzled by this requirement. That's without going into the detail of how you remove all of the ground conditioning and everything else that's below the Hard Coastal Defence.
 - It's an interesting point, and maybe providing funds that it could be done but it'll be an interesting calculation as to how much that might cost. But the idea that that would somehow restore natural processes to me sounds just, well, laughable. Sorry.
 - Just one small point, perhaps I should have said earlier was whether they're looking at funding to remove that, at whatever stage that is. If it's unable to be removed, there should be a funding strategy, which actually makes it maintainable for the period of time that it's necessary to maintain it. That doesn't seem to be in there at all, unless they're going to change the nature of that fund to actually do that. But I still go back to the point that removing it leaves you with a concrete wall. It doesn't leave you with a natural coast at all.