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**Transcript of Oral Contribution to
Issue Specific Hearing 6 (ISH6)
on Coastal Geomorphology

for the
Royal Society for the Protection of Birds
and Suffolk Wildlife Trust**

**Submitted for Deadline 5
23 July 2021**

Planning Act 2008 (as amended)

In the matter of:

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

**Planning Inspectorate Ref: EN010012
RSPB Registration Identification Ref: 20026628
Suffolk Wildlife Trust Registration Identification Ref: 20026359**

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Transcript of oral contribution to Issue Specific Hearing 6 (ISH6) on Coastal Geomorphology Adam Rowlands representing the RSPB/SWT

1. **Agenda item: 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: (e) The potential impacts upon the Minsmere frontage, and the role of the Minsmere sluice

The RSPB/SWT Adam Rowlands input:

- 1.1. With regard to the Minsmere frontage, as we have raised in our Written Representation¹ and Deadline, 3 submission², we wish to ensure consideration of the nature conservation interest of the protected site and the potential relationship to coastal processes. We are conscious that this issue appears not to be considered in the biodiversity ISH7 agenda for Thursday and Friday. We are grateful that the Applicant has taken it into consideration for the Coastal Processes Monitoring and Mitigation Plan³. We are also grateful, as others have said today, that it appears that any impact along the Minsmere frontage is predicted to be minor and beneficial and that the Applicant has agreed to extend the monitoring of the coastal processes along the Minsmere frontage, up to and including the Minsmere sluice, as a precautionary measure.
- 1.2. Our main concern, and we know that Natural England as well have raised concerns around this interest feature⁴, is that the vegetated shingle that is currently present along that southern Minsmere frontage, which is an internationally important recognised feature, part of the Special Area of Conservation (SAC) and a Ramsar feature does not appear to have been acknowledged. In fact, the Applicant has repeated in several of the documents submitted recently⁵, and as part of the environmental assessment⁶, that it has concluded the vegetated shingle feature was lost in 2010, which is based on an inaccurate conclusion drawn from the Natural England site assessment. It is correct that a geographical site unit of the Site of Special Scientific Interest has been lost, but it is inaccurate to conclude from this that the vegetated shingle interest feature has also been lost.
- 1.3. We feel that the baseline survey monitoring cannot be considered as accurate because the vegetated shingle SAC and Ramsar feature on the southern Minsmere frontage has been concluded to have been lost in 2010 when in reality it has persisted since then and is still present. We have provided that evidence in our Written Representation⁷ and Deadline 3 submissions⁸.

¹ [REP2-506] RSPB/SWT Written Representation paras 3.113 – 3.116

² [REP3-074] Comments on Other Submissions (submitted at Deadline 2) for the Royal Society for the Protection of Birds and Suffolk Wildlife Trust para 5.2 p15 to para 5.8 p16

³ [AS-237] Coastal Processes Monitoring and Mitigation Plan - 6.14 Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 2 Main Development Site Appendix 2.15.A Coastal Geomorphology and Hydrodynamics

⁴ [REP2-153] Natural England Deadline 2 Submission - Written Representation (WR) Issue 28

⁵ E.g. [REP2-115] section 1.1 p.13 9.12 One dimensional modelling of Soft Coastal Defence Feature (SCDF) - Revision 1.0 & [REP3-032] p.8 TR544 Preliminary design and maintenance requirements for the Sizewell C Coastal Defence Feature - Revision 2.0

⁶ [APP-312] Section 1.1 p.15 Volume 2 Main Development Site Chapter 20 Coastal Geomorphology and Hydrodynamics Appendix 20A Coastal Geomorphology and Hydrodynamics: Synthesis for Environmental Impact Assessment

⁷ [REP2-506] RSPB/SWT Written Representation paras 3.133 – 3.135

⁸ [REP3-074] Comments on Other Submissions (submitted at Deadline 2) for the Royal Society for the Protection of Birds and Suffolk Wildlife Trust para 5.9 p16 to para 5.13 p18

- 1.4. Our greatest concern is that the vegetated shingle feature is related to the dynamic processes of the beach frontage, and particularly to the supra-tidal shingle - the finer grain shingle and sand that moves around on that frontage. And that actually some of the mitigation measures, as has been discussed earlier, could impact on the movement of the supra-tidal shingle, and ultimately, therefore, impact on the vegetated shingle interest feature. So, we just want to make sure that this taken into consideration as part of the coastal processes monitoring. At present, we are not aware of any examples where the proposed mitigation measures of recharge, recycling or bypassing have actually worked successfully in areas where these vegetated shingle habitats are present. As raised in our Written Representation⁹, thus raises concerns that we have yet to see a viable mitigation strategy that's been proposed by the applicant

Applicant's response

- 1.5. We note that the applicant was unable to provide a response to these concerns, but did acknowledge that the project is anticipated to have an impact on sediment transport along the southern Minsmere frontage. A further response was promised at ISH 7 (which did not materialise) or in writing. We therefore anticipate a written response to the concerns we have raised.

2. **Agenda item: 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

(b) Draft DCO Requirement 7A and the CPMMP

- 2.1. Due to ISH7 not specifically including coastal processes but just wanted to flag that as far as we are aware the CPMMP [\[AS-237\]](#) (as it confirms on page 1 is drafted by CEFAS) will be the plan for any management, mitigation and monitoring for the coast and its processes and we are not aware of any other plan for monitoring and mitigate for coastal vegetation and the protected sites and their features – so to brief highlight within the CPMMP specifically 2.2.3 includes

“Video methods (Section 2.1) will also be explored for their potential to track substrate and vegetation”

- 2.2. And Section 7 – does include confirmation of updates to be provided and specialised vegetation surveying and monitoring of Suffolk County Wildlife Site - we have raised points in our D3 submission (REP3-073 para 5.2) that although outside the Special Area of Conservation, longshore drift can carry the SAC feature southward and therefore this area is functionally linked to that SAC.
- 2.3. Also Figure 6, page 20, includes vegetation with section 8, page 38 helpfully confirming that further baseline reports will be completed pre-construction – and we wish to flag the need to ensure this includes consideration of the protected sites if no other mitigation and monitoring plan is being proposed. This is separate to our concerns with the lack of protected sites survey work done for the assessment.
- 2.4. Again, we appreciate the amount of monitoring being proposed but our final point would be to ensure within the CPMMP, section 8, page 40

⁹ [\[REP2-506\]](#) RSPB/SWT Written Representation paras 3.146 – 3.156

*“• Post-mitigation assessment report.... assess effectiveness of mitigation... (including the borrow areas for beach recycling and bypassing) and the effects to neighbouring shorelines. It would **recommend whether additional monitoring is needed**.... guide any future recommendations based on any failings and successes observed.”*

- 2.5. Again, we are grateful for the Applicant’s confirmation s.6.5.4, CPMMP of avoiding impacts on protected sites but still think it is important to ensure specific consideration of potential impacts on protected sites and their features is included for any additional mitigation required – as set out in our WR¹⁰.
- 2.6. We will continue to discuss these matters with the Applicant as its reference to TEMMP¹¹ (secured via DCO Sch 2 requirement 4) table 3.2, (electronic page 29) – does not cover the points we were making and has insufficient detail nor proposed processes.

¹⁰ [REP2-506] RSPB/SWT Written Representation paras 3.111 – 3.116

¹¹ [EN010012-003974-Sizewell C Project - Other- Deadline 1 submission - Terrestrial Ecology Monitoring and Mitigation Plan.pdf \(planninginspectorate.gov.uk\)](#)