THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

The Sizewell C Project

Natural England's Comments on the Preliminary Design and Maintenance Requirements for the Sizewell C Coastal Defence Feature

Planning Inspectorate Reference: EN010012

23rd July 2021

Preliminary Design and Maintenance Requirements for the Sizewell C Coastal Defence Feature [REP3-032]

Detailed Comments:

2.1 *'HCDF exposure is not expected as the SCDF would be maintained by SZC Co. over the operation and decommissioning phases.'*

Natural England advise that 'not expected' is not considered sufficient in a HRA to ascertain no LSE on Minsmere. This would be expected to be subject to further scrutiny. An expose HCDF is likely to have an effect on Minsmere, whether this would be an Adverse Effect on Integrity would require further assessment. Timing of how quickly the HCDF can be recharged would also need assessing.

3.1.2.1 ***'****This result suggests that the permanent BLF frontage may require SCDF recharge 6 – 7 times during the operation phase.'*

Natural England advise that is a lot of sediment, with a lot of uncertainty surrounding where it is to come from. We request further clarification on the questions below.
Is it available to the applicant? Has it already been secured? Is it anticipated to be subject to dredging? Will a stockpile be kept in reserve for urgent top-ups?

3.1.2.2 *'However, net erosion over years to decades, most likely due to storm events with partial volumetric recovery, would make some areas more prone over time. Assuming basic erosion trends remain consistent, monitored gradual erosion will provide a useful early marker for the location of future recharge and likely volumes.'*

'Some areas' that are referred to as more prone to erosion is to the north of the site, where the BLF is situated. Natural England advise that clear and precautionary triggers for the whole frontage and particularly this area are required to avoid impacts to Minsmere to the north.

3.1.2.2 *'Coastal Processes Monitoring and Mitigation Plan, and be assessed on a decadal basis alongside the actual progression of sea level rise to ascertain whether sea level rise and the likely demand for recharge is greater or less than that predicted, and to revise plans and expectations accordingly as part of a structed Adaptive Environmental Assessment and Management process under the CPMMP.*

While monitoring alone is not sufficient mitigation with a HRA, it will inform the frequency and timing of beach recharge. Natural England's confidence in this assessment is underpinned on a clear and well written 'Coastal Processes Monitoring and Mitigation Plan'.

3.1.2.3 '*Therefore, rapidly recharging this relatively short section of coast will be important to prevent erosion following an unlikely second BfE style storm sequence.'*

Natural England advise that the Coastal Processes Monitoring and Mitigation Plan needs to be clear on how quickly erosion can be prevented after a storm event to ensure exposure of the HCDF does not begin to effect Minsmere and wider sediment transport processes. Links

back to comment on 3.1.2.1 regarding a stockpile of sediment.

4. ***'****The specifications and triggers in the CPMMP can be adjusted to reflect environmental conditions and performance, thereby accounting for any uncertainties in SCDF response or future pressures (e.g., sea level rise) as part of a structured Adaptive Environmental Assessment and Management process.'*

Using the precautionary principle some of this work investigating triggers to deal with the uncertainty in the Soft Coastal Defence Feature will have to be undertaken up front for the HRA to ascertain no LSE.