

**Wendy McKay**

**Our Ref:** 20026727

Lead member of the Panel of Examining Inspectors  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN  
[sizewellc@planninginspectorate.gov.uk](mailto:sizewellc@planninginspectorate.gov.uk)  
cc. [REDACTED] [@planninginspectorate.gov.uk](mailto:[REDACTED]@planninginspectorate.gov.uk)

**Your Ref:** EN010012

**Date:** 06 August 2021

**By email only**

Dear Ms McKay

**Planning Act 2008 – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 5: Comments on Coastal Geomorphology Reports**

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

For Deadline 6 (6<sup>th</sup> August) the Examining Authority (ExA) have requested comments on additional reports submitted up to NNBGenCo (SzC) Ltd Deadline 5. In addition, we wish to provide comments on the reports submitted relating to Proposed Changes 16 and 17 with regards to Terrestrial Ecology. We wish to provide feedback on the following reports:

- Volume 1: Second ES Addendum Chapter 2: Main Development Site
- Volume 1: Second ES Addendum Chapter 3: Two Village Bypass
- Permanent and Temporary Beach Landing Facility and SSSI Crossing Plans – Plans Not For Approval – Part 2 of 2
- Two Village Bypass Landscape and Ecological Management Plan
- Sizewell Link Road Landscape and Ecological Management Plan
- Terrestrial Ecology Monitoring and Mitigation Plan

Yours sincerely

[REDACTED]  
Simon Barlow  
Project Manager  
Sizewell C Nuclear New Build  
Environment Agency

Tel: 020302 58491

[REDACTED] [@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)

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## Appendix A: Environment Agency comments on Terrestrial Ecology Reports

Reference	Issue	Impact	Solution
<b>Volume 1: Second ES Addendum Chapter 2: Main Development Site</b>			
2.2.21	The re-positioned culvert would make the crossing more attractive and effective for mammals to use and fencing is proposed to guide mammals to the crossing. The level of the mammal crossing would take account of the flood modelling in the Leiston Drain area.	We welcome the optimisation of the proposed mammal culvert on Lovers Lane to encourage the use of this feature. We also recommend that ditch habitat be created to connect this culvert to the Leiston Beck watercourse on both sides of the Lovers Lane to encourage the use of this feature further.	Include connecting ditch networks either side of the Lovers Lane to guide mammals to this crossing point.
<b>Volume 1: Second ES Addendum Chapter 3: Two Village Bypass</b>			
3.2.6 - 3.2.7	The proposed change is to reduce the length of the flood relief culverts through the River Alde overbridge east embankment from 70m in length to 50m in length. The shorter flood relief culverts would mean that the flood relief culverts would more likely be used by mammals. Therefore, the separate mammal culvert to the east of the flood relief culverts would no longer be provided, and instead, the eastern flood relief culvert would include a mammal migration ledge.	We welcome the proposed shortening of the flood relief culverts to 50m. The proposed inclusion of a mammal ledge instead of the separate mammal culvert to the east will be acceptable provided it can facilitate the passage of mammals during a 1:100 year flood event as a minimum.	Ensure safe mammal passage can be achieved during 1:100 year flood event as a minimum.
<b>Permanent and Temporary Beach Landing Facility and SSSI Crossing Plans – Plans Not For Approval – Part 2 of 2</b>			
SZC-SZ0100-XX-000-DRW-100207	The SSSI crossing design option proposed for the construction phase shows a drainage pipe under the crossing sited at 5m above the Leiston Beck. This drainage pipe will negate	The proposed SSSI crossing design optimisation of raising the soffit height to 6.8m above the Leiston Beck is a positive change, as is the reduction of width to 15m post construction, and the inclusion of an ecologically and aesthetically acceptable colour scheme. Presently the applicant has	Provide a SSSI crossing design that provides a clearance from the Leiston Beck to the soffit of the crossing of 6.8m for

	<p>the positive change from raising the soffit height and would reduce the clearance under the crossing down to 5m, which we consider to be unacceptable, this would not reduce the risk of deterioration to invertebrates to an acceptable level.</p>	<p>submitted different SSSI crossing design drawings for the construction phase and the operational phase. The option proposed for the construction phase shows a drainage pipe under the crossing sited at 5m above the Leiston Beck. The drainage pipe needs to be removed so that a clearance of 6.8m can be achieved for the entire construction phase, rather than being an adaptive measure that is made for the operational phase. If the drainage pipe is not relocated it will negate the positive change achieved from raising the soffit height and would reduce the clearance under the crossing down to 5m, we consider this to be unacceptable, this would not reduce the risk of deterioration to invertebrates to an acceptable level. Our preferred option remains that of the wide span bridge as this would further reduce impacts to the ecology of the area including invertebrates. The applicant has indicated to us that they will be submitting a revised SSSI crossing design for the construction phase which would remove this drainage pipe at deadline 7.</p>	<p>the entire construction phase rather than being an adaptive measure that is made for the operational phase.</p>
<b>Two Village Bypass Landscape and Ecological Management Plan</b>			
4.3.10	<p>Following completion of construction, an area of approximately 2.77ha of existing improved grassland adjacent to the River Alde crossing within the site boundary would be enhanced to create floodplain grassland to mitigate for the loss of improved floodplain grassland during construction. The existing floodplain grassland within this area is of low value, comprising predominantly a sown agricultural ley of perennial ryegrass and the focus would be on the creation of higher quality habitats, through improving both the diversity of the grassland sward</p>	<p>We welcome the commitment to provide mitigation for the loss of floodplain grazing meadow from the construction of the two village bypass, and the creation of more diverse and higher value habitats. We request that a more detailed description of how this will be achieved is included in this plan, including details of the species that would be used to achieve this higher value habitat.</p>	<p>Provide a more detailed description of how the habitat would be improved, including details of the species that would be used to achieve greater diversity.</p>

	and the habitats within ditches close to the River Alde.		
4.3.11	New wetland channels would mitigate the loss of approximately 143m of ditch associated with the land take from the proposed bypass footprint in this location which form the most valuable element of the existing floodplain grassland.	We welcome the commitment to provide mitigation for the loss of watercourses as a result of the two village bypass. We request that a more detailed description of how this will be achieved is included in this plan, including details of how the newly created watercourses would be designed to maximise their benefit to biodiversity.	Provide a more detailed description of how the watercourses would be designed in order to achieve greater value for biodiversity.
<b>Sizewell Link Road Landscape and Ecological Management Plan</b>			
Entire document	Missing details of mitigation and compensation for impacts to watercourses.	We defer comment on the Sizewell Link Road Landscape and Ecology Management Plan, as it does not contain details of appropriate mitigation and compensation for impacts to watercourses from the construction and operation of this road. We understand that the applicant is currently developing their approach on this matter. We are expecting a revised version of this document to be submitted which will include these details and we will provide comments at that time.	Provide updated plan, which includes details of mitigation for the loss of watercourses
<b>Terrestrial Ecology Monitoring and Mitigation Plan</b>			
5.6	Does not make reference to potential presence of water vole and otters on the Sizewell Link Road.	Measures should be in place to prevent incidental mortality at the locations of watercourses on the Sizewell Link Road. Monitoring of watercourse mitigation and enhancements should be undertaken to assess if these areas are being used by these species post construction.	Put measures in place to prevent incidental mortality of these species during the construction period. Identify suitable monitoring to determine if watercourse mitigation and enhancements are being used by these species post construction.