



Together Against Sizewell C

APPLICATION BY NNB GENERATION COMPANY (SZC) LIMITED
FOR A DCO GRANTING CONSENT FOR THE SIZEWELL C PROJECT

TOGETHER AGAINST SIZEWELL C (TASC) IP NO. 20026424

DEADLINE 6 SUBMISSION

COMMENTS RELATING TO THE APPLICANT'S D5 SUBMISSIONS REP5-111 & REP5 118

RELATING TO ISH 6 : COASTAL GEOMORPHOLOGY

TASC's comments below are supplementary to our D5 submissions on ISH6 in REP5-297.

REP5-111 9.46 Written Summaries of Oral Submissions made at ISH6

1. **Ref para 1.2.2** TASC require reassurance that the Applicant's modelling will be assessing storm conditions arriving from the north-east and assess a situation where the Dunwich Bank potentially no longer exists and covers the period until the site is returned to a greenfield site, if at all possible. TASC question why the Applicant has presented a design of the SCDF when modelling for future predictions/scenarios are incomplete. TASC would like the Applicant to clarify their statement that includes "the ability to maintain the soft coastal defence feature"- in this context does 'maintain' mean keeping the SCDF intact with no remedial work required or that the SCDF will be capable of being replaced when it is washed away?
2. **Ref para 1.2.4** Given that the location and size of the sea defences have been continuously changing throughout the DCO process, it gives TASC no confidence that the Applicant knows how to effectively protect the site, its staff and the dangerous materials stored, from the advancing seas nor the Applicant's assessment that neighbouring properties will be unaffected by the impacts of its own sea defences and other beach structures. If all the changed versions of the sea defences to date are within the proposed parameters, does it allow the Applicant, if the DCO gains approval, the ability to choose whatever version it likes, even though the chosen version could be one that has a greater adverse impact on: the AONB landscape and its special qualities; the Heritage Coast; the English Coast Path; the flora and fauna etc? TASC repeat the opinion that the sea defences are so fundamental to safety that they must not be hidden in the Rochdale envelope. Our concerns are only exacerbated by Mr Dolphin's comments in **para 1.2.19** where he states that "reassessment would be required" if [although TASC would say 'when' rather than 'if'], "changes go beyond the Rochdale envelope".

REP5-118 9.53 Revision: 1.0 Written Submissions Responding to Actions Arising from ISH6: Coastal Geomorphology (14 July 2021)

3. **Para 1.10.1** refers to the diagrams of the sea defences mentioned in Appendix A of document 9.53. In TASC's opinion, the diagrams are extremely poor, being hard to decipher as you cannot tell which line is which, even when using a magnifying glass! Absolutely useless as almost impossible to ascertain any detail.
4. **Para 1.11.3** refers to "the natural function of the geomorphic system over the operations and decommissioning phases". TASC cannot see how this statement is justified when the Applicant is proposing to introduce thousands (perhaps millions?) of tonnes of aggregates, including those not 'naturally' found on the Sizewell shore through replenishment of the SCDF.
5. **Para 1.11.6** states that the coastal defences are viable up to 2099 but how can a potentially compromised design, which has not been adequately assessed, be considered appropriate? It seems from other IPs, including representations from Bill Parker [REP5-191], Nick Scarr [REP5-129] and the Alde and Ore Association [REP5—187], that the Applicant's modelling falls short by under-assessing the risk of erosion and therefore flood-risk. Having ignored the distinct possibility of the loss of the Dunwich Bank, by ignoring historic coastal changes in the region, by failing to assess wave impacts correctly, the Applicant cannot be certain that the Sizewell Coast will not revert to its historic state of extensive erosion.
6. Rather than undertaking comprehensive modelling which would likely show a greater risk of erosion, the Applicant is proposing a plan of adaptive management of the sea defences which, in TASC's opinion, is merely pushing any potential problems into the future. As Sizewell's offshore geomorphology cannot be controlled, there is a reasonable expectation that severe erosion is possible, meaning catastrophic impacts cannot be ruled out, in which case adaptive management cannot be relied upon as an effective tool.