



The Sizewell C Project Case Team  
National Infrastructure Planning  
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(By email only)

10 September 2021

Planning Inspectorate Reference: EN010012  
Our Identification Number: 20025459

Dear Sir or Madam,

**Planning Act 2008 – Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project**

**Summary of Marine Management Organisation (“MMO”) comments on the detailed agenda for Issue Specific Hearing (“ISH 11”) on Flooding, Water and Coastal Processes.**

Following submission of the detailed agenda for ISH 11 the MMO provides the following comments on the agenda items.

This written response is submitted without prejudice to any future representation the MMO may make about the Development Consent Order (“DCO”) Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

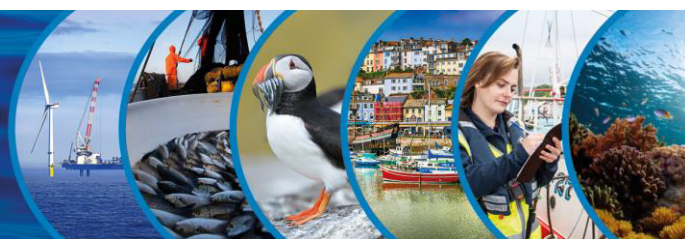
**1. Agenda Item 2: Water Supply**

1.1 The MMO is currently reviewing the details of the new DCO change submission (change 19) regarding the construction of a temporary desalination plant. The MMO will aim to provide comment on this by Deadline 9.

**2. Agenda Item 7: Water Framework Directive Compliance Assessment**

2.1 The MMO defer to the Environment Agency for comments on the appropriateness of the Water Framework Directive Compliance Assessment.

**3. Agenda Item 8: Coastal Processes Update**



## **Modelling for the Soft Coastal Defence Feature (“SCDF”) design**

- 3.1 Based on the SCDF modelling that the MMO have reviewed [REP2-115 and REP3-048] the MMO cannot conclude that there will not be a negative impact on the neighbouring coastline and nearshore morphology caused by the SCDF if a much coarser material is used for the sacrificial outer layer, in comparison to the native sediment in the area. See our detailed comments on this in section 5.1 of REP6-039, and section 3.1 of REP6-040.
- 3.2 As a result of our review of the modelling for the SCDF, the MMO does not agree that using coarser material for the sacrificial outer layer of the SCDF is the best option at this stage. The modelling concludes that the use of a finer sediment will only involve a limited number of recharges (6 or 7 times over the course of the operational phase), and therefore the MMO does not consider that the use of a much coarser material is justified based on the concerns we have raised.
- 3.3 Furthermore, due to the high uncertainty of the impact on the surrounding foreshores from the SCDF, the area coverage of the monitoring surveys proposed in the Coastal Processes Monitoring and Mitigation Plan (“CPMMP”) should be carefully considered, and should possibly be extended further than initially indicated by the modelling to monitor impacts on the wider area.
- 3.4 The MMO is aware that two further reports regarding the SCDF were submitted at Deadline 7 [REP7-045 and REP7-101]. MMO are currently reviewing these reports and will provide any comments we have by Deadline 9.

## **DML controls**

- 3.5 Currently there is a condition (Condition 17(5)) on the DML [REP2-013] which requires a CPMMP to be submitted and approved by the MMO prior to the commencement of the licensed activities on the DML. The MMO supports the inclusion of this condition, however we do not agree with the current wording used which states that the CPMMP will be “deemed discharged” once East Suffolk Council (“ESC”) have approved the plan under Requirement 7A. The MMO would not usually defer our decision to sign off such a plan as it will contain monitoring and mitigation requirements for the Offshore cooling water infrastructure; Nearshore outfalls; and Beach Landing Facilities which are within the MMO’s remit. The MMO would wish to analyse the proposals and approve them in accordance with our regulatory remit to minimise impacts on the marine environment. The MMO propose that the Applicant either submits the full CPMMP to be approved by both MMO and ESC prior to works commencing, or the Applicant splits the plan in relation to our individual regulatory remits and submits these separate plans for approval to the respective regulators.
- 3.6 The MMO require changes to the dredging and disposal conditions on the DML [REP7-006] (Conditions 35 – 37) to control impacts on coastal processes. The maximum annual dredging and disposal volumes must be stated on the DML. There must also be a condition that pre and post dredge surveys must be undertaken so that the MMO can confirm that the dredging has been carried out in line with the licensed dredge depth, area and within acceptable volume limits.



## **CPMMP**

- 3.7 The MMO considers that the dredging at the permanent BLF will cause the largest impact on Coastal Processes. The MMO notes that some impacts in the offshore region are likely, such as an increased risk of interrupting the sediment transport pathway for the Outer Bar without an appropriate sediment management plan. The magnitude and extent of these changes are uncertain at this point due to the absence of a sediment transport model. The MMO notes that a more detailed sediment management plan will be agreed via future iterations of the CPMMP and impacts will be monitored and mitigated via this plan to confirm the impact assessment predictions in the Application. The MMO is content with this approach.
- 3.8 The MMO has reviewed revision 2 of the CPMMP [REP5-059] and have the following comments.
- 3.9 The MMO welcomes the increase in the frequency of the monitoring proposed for the Beach Landing Facility (BLF) and Marine Bulk Import Facility (MBIF), which involves bathymetric surveys of an area 1km either side of the BLF and MBIF pre and post reprofiling, and at least once per month initially during construction. However, as there is uncertainty in the response of the outer longshore bar to the continued maintenance dredging related to the permanent BLF, the MMO advises that there should also be annual surveys for the duration of the construction phase to monitor the outer longshore bar.
- 3.10 The MMO welcomes that section 5.3.2 states that the pre and post dredging surveys would assess whether sediment mounds from capital plough dredging disperse. However, MMO advise that the following should also be assessed via these surveys:
- 1) the response of the dredged slope into the outer longshore bar with any consequences for the longshore bar crest level and;
  - 2) the potential infill rate in the dredged area for the BLF.
- 3.11 The MMO's previous comments [comment 3.3.5 in REP2-140] regarding monitoring of scour development around the offshore cooling water infrastructure remain. The MMO advises that the assumption within section 3.3 that the scour around the offshore cooling water infrastructure will reach equilibrium in 3 months is subject to uncertainty. If the 6-month survey shows scour development continuing (in depth or extent), then further surveys will be needed until the equilibrium is reached – or mitigation measures are put in place. This should be stated in the CPMMP so that it is clear to future readers that further monitoring could be required after 6 months should the scour continue to develop.
- 3.12 The MMO welcomes that some further details of the approach for example target accuracies are now included. However, the MMO advises that section 2.2.2 should include a view on the target accuracies, horizontal and vertical, and hence a view on the uncertainty in the observed beach volume. We note Section 2.3 now includes a section on accuracy and horizontal resolution. A similar approach for Section 2.2.2 is



requested. Sections 4.3, 5.3 should also include a view on the target accuracies, horizontal and vertical.

3.13 In relation to Section 4.3 MMO advise that if there is a potential scour protection to be used for the nearshore outfalls then this should be stated in the CPMMP.

3.14 Throughout the report the MMO advises that it would be helpful to include illustrations of the proposed monitoring areas and the anticipated areas of scour.

Yours faithfully,

[Redacted signature block]

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