

Wendy McKay

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Our Ref: 20026727

Your Ref: EN010012

Date: 12 October 2021

By email only

Dear Ms McKay

Planning Act 2008 – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 10: Comments on Deadline 8 Submission - 9.99 Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 - Appendices Part 1 - Revision 1.0

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

For Deadline 10 (12th October) the Examining Authority (ExA) have requested comments on additional reports submitted by NNBGenCo (SzC) Ltd at Deadline 8. We wish to provide comments on the following reports:

- [REP8-119] Deadline 8 Submission - 9.99 Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 - Appendices Part 1 - Revision 1.0. Appendix D: Embedded Flood Risk Mitigation Measures
- [REP8-125] Deadline 8 Submission - 9.104 Written Submissions responding to actions arising from Issue Specific Hearing 11: Flooding, Water and Coastal Processes (14 September 2021). Appendix 3: Summary of Landowner Engagement On The Main Development Site Coastal Flood Risk.

Embedded Flood Risk Mitigation Measures

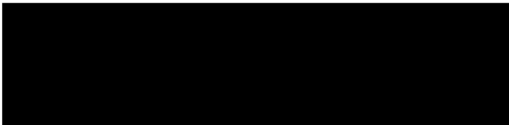
The Embedded Flood Risk Mitigation Measures document details the mitigation measures included to date, comprising the alterations to the SSSI Crossing design, and the inclusion of the Flood Mitigation Area, and explains why these measures were chosen, and why no further mitigation options are feasible. We therefore consider that in accordance with EN1 5.7.17 the applicant has reduced the offsite flood risk impacts arising from the development as much as is feasible, and therefore the decision maker should decide whether the remaining offsite impacts are acceptable. The remaining offsite impacts comprise the increase in flood depths to a maximum of 0.2m on land owned by RSPB in the 0.5% (1 in 200) annual probability flood event in the year 2090, on land which is already at risk of flooding to a depth of over 1.5m, and the increase in flood extents to very small areas of land on the edge of the existing flood risk area, with a depth of flooding of up to 0.05m.

Summary of Landowner Engagement On The Main Development Site Coastal Flood Risk

With regards to the obtaining of landowner permission for the remaining offsite impacts, Appendix 3 of the Written Submissions arising from Issue Specific Hearing 11 (SZC_Bk9_9.104) contains a summary of landowner engagement on the Main Development Site coastal flood risk. This explains that engagement is ongoing with the landowners affected by the areas of additional flooding either directly in meetings or via their agents. It also explains that the landowners who have attended meetings have been unconcerned about the increase in flood depths, which they perceive to be an imperceptible difference in flooding in extreme events and contiguous with land that would already be flooded. This is encouraging, and we therefore have no concerns regarding the small areas of increased flood risk. The decision maker should determine if this is considered to be acceptable.

The document also states that Natural England have been briefed regarding the flood risk impacts on RSPB land, and have not yet responded. We have no objections regarding this increase in flood risk to land already at deep depths of flooding, but consider that RSPB and Natural England should determine if there are any adverse impacts arising from this increase in flood depths, and the decision maker should determine whether it is acceptable.

Yours sincerely



Simon Barlow
Project Manager
Sizewell C Nuclear New Build
Environment Agency

