MINSMERE LEVELS STAKEHOLDERS GROUP THEBERTON AND EASTBRIDGE ACTION GROUP on SIZEWELL C and

THEBERTON AND EASTBRIDGE PARISH COUNCIL

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National Planning Casework Unit 5 St Philips Place Colmore Row Birmingham B3 2PW

25 August 2023

Dear Sir/Madam,

Applications for Call-in

East Suffolk District Council Ref DC/23/2660/DRR

Applicant: NNB Generation Company (SZC) Ltd - Niki Pieri

Proposal: Discharge of Requirement 12 (Main Development Site (MDS) Coastal Processes Monitoring and Mitigation (Terrestrial) Plan (CPMMP) of Sizewell C Development Consent Order

East Suffolk District Council Ref DC/23/2673/CON

Applicant: Marine Management Organisation - Jack Coe

Proposal: Discharge of Condition 14 of the Deemed Marine Licence - Coastal

Processes Monitoring and Mitigation Plan (CPMMP)

Theberton and Eastbridge Action Group on Sizewell C (TEAGS), Minsmere Levels Stakeholders Group (MLSG) and Theberton and Eastbridge Parish Council (the PC) request that the above Discharge of Requirements applications be called-in and for it to be considered by a planning inquiry.

The referred to Discharge of Requirements requested for the Coastal Processes Monitoring and Mitigation Plan has been requested before any approved Hard and Soft Coastal Defence Design (Development Consent Order Requirement 19) and location has been agreed.

This application is putting "the cart before the horse".

All along the Suffolk coast we have significant issues with erosion, both constant and episodic. This has been observed in front of the proposed Sizewell C site even since the DCO Examination concluded.

It is accepted that any structures which significantly extend beyond the natural sweep of the coastline gives rise to both upstream and downstream impacts of erosion and/or accretion and where the structure is mobile, it will begin eroding immediately following exposure to the natural longshore drift process.

The last plan submitted to the Planning Inspectorate's Examination of the Sizewell C Development Consent Order shows that the Hard Coastal Defence (HCDF) at its most southeastern point will be situated significantly east (seaward) of the existing natural embayment profile between Minsmere Sluice, north of the site, and Thorpeness to the south of the proposed Sizewell C site.

We believe that this application does involve matters of significant national interest and policy and meets the 'Caborn principle';

• The potential for significant effects beyond their immediate boundary, in respect of the adjacent coastline and sand dune defences for RSPB, Sizewell A and B defences and Sizewell village. Further impacts both north and south cannot be ruled out.

There are further reasons why we consider that this application should be called-in;

- It is irrational to propose the CPMMP when a final approved design for the structure has not yet been submitted.
- The designs and plans shown in the CPMMP document have no clear geographical positioning plans.
- The CPMMP plans show the Soft Coastal Defence (SCDF) extending at least 60 metres from the toe of the HCDF and well beyond the existing natural sweep of Sizewell Bay.
- Based on plans submitted to the PINS DCO Examination the most southeasterly extent of
 the Hard Coastal Defence is situated on the Sizewell B Salient, a structure that the
 applicant states will "relax" (erode) back to the natural sweep of Sizewell Bay within a
 couple of years of Sizewell B ceasing operation. Assuming this happens the HCDF toe is at
 significant risk of being exposed and increasingly threatening the overall integrity of the
 structure.
- Whilst the CPMMP plan does not superimpose the HCDF/SCDF structure on the existing profile of the coastline, those in the DCO submissions do. However, in the past two years that profile has significantly eroded and changed adding further concern that the proposals in the CPMMP without an approved HCDF/SCDF design are theoretical and have no practical foundation. Until the HCDF/SCDF structure is finally designed to ensure minimum impact on the coast, the structure, as submitted to the DCO in combination with the plans in the CPMMP, will only add to coastal impacts across the greater Sizewell Bay area and are potentially unsustainable.

As a group of concerned organisations we are concerned that by submitting this request for Discharge of Requirements, the applicant is applying with a plan that has no reference to an actual coastal defence structure which is a critical to both the SZC project but also to the neighbouring designated sites and communities along this fragile coast.

Kind regards

Paul Collins

On behalf of Minsmere Levels Stakeholders Group, Theberton and Eastbridge Action Group on Sizewell C and Theberton and Eastbridge Parish Council