



Michele Gregory
The Planning Inspectorate
National Infrastructure Planning
(By email only)

27 January 2021

Our reference: DCO/2013/00021

Your reference: EN010012

Dear Michele Gregory,

The Sizewell C New Nuclear Power Station Project - Development Consent Order (DCO) application and proposed DCO changes submission

The Marine Management Organisation (MMO) would like to highlight concerns it shares with the Department for Environment, Food and Rural Affairs (Defra) Group regarding the lack of detail in the Sizewell C DCO Application submitted to the Planning Inspectorate (PINS) on 27 May 2020, and a lack of detail in the subsequent proposed DCO changes application submitted to PINS this month. The MMO is concerned about how this may affect the ability of our organisations to provide advice to the Examining Authority as part of the examination process, mainly due to the challenging timescales involved.

On 20 January 2020, the Defra organisations (Environment Agency, Natural England, and MMO) approached the Planning Inspectorate to highlight key areas of environmental risk prior to the application being submitted (please find the meeting note [here](#)). Since that meeting, it remains the view of the MMO and the Defra group that there is still a lack of agreement on a number of key issues; there is outstanding information required to support the DCO Application that Defra are yet to review and there are further changes proposed which have been insufficiently assessed.

The MMO was invited to participate in a public consultation on the proposed DCO changes between 18 November and 18 December 2020. The MMO provided comments on the changes, as best as possible given the volume of materials and time available and outlined further information that would be required to draw robust conclusions regarding these changes. This has caused further concern about the scale of the evidence that is yet to be submitted in support of these changes to enable Defra to undertake assessments on the associated environmental impacts.

The MMO acknowledge PINS have already received letters from the Environment Agency (8 January 2021) and Natural England (12 January 2021) relating to these concerns, and in response has also received a letter from NNB Generation Company (SZC) Limited (the Applicant) on 13 January 2021. Whilst the Applicant has engaged closely with the MMO



throughout the application process so far, the outputs of this engagement are not as thorough and robust as would have been hoped for, or indeed expected, at this stage in the examination process.

The MMO is concerned that there will not be enough time to review the evidence for the original DCO application, and the additional evidence for the DCO changes application, effectively to ensure that it is adequate for the purposes of examination. This is due to the large number of updates, and further information that will be presented later in the engagement process. If there is not sufficient time made available for the Defra group to properly assess this additional information, then there is a possibility that we may not be able to advise the Examining Authority, individually or collectively, on all the information it requires from us to fully assess the effects of the proposed changes being made to the application.

The MMO respectfully requests that prior to the preliminary hearing and beginning of examination, PINS will ensure all of the necessary information and evidence to inform the required environmental assessments for the Changes Application and original DCO application is provided, and there is sufficient time allowed for the statutory, and non-statutory consultees to adequately review and respond to these significant additional impact assessments. Further, if the information is not forthcoming in a timely manner, that PINS will consider a change to the examination timeline. This will enable organisations to be prepared to provide the most effective information to the Examining Authority during the examination process.

The MMO wishes to stress there is no objection to the proposed changes to the project, but raising our concerns (which echo those of the Defra group and are based on evidence sighted to date) about substantial workloads with short timescales, which may affect the ability of our organisation to provide robust advice to the Examining Authority and fulfilling our role as Regulator with responsibility for protecting the marine environment.

If you require any further information, please do not hesitate to contact me using the details provided below. In the meantime, the MMO awaits your response regarding our request.

Kind regards,

[REDACTED]
Luella Williamson
Marine Licensing Case Manager

[REDACTED] [@marinemanagement.org.uk](mailto:luella.williamson@marinemanagement.org.uk)

Cc Ellen MacKenzie Marine Licensing Case Officer, MMO
Tim Dixon Marine Licensing Senior Case Manager, MMO
Victoria Pointer Head of Marine Licensing Operations, MMO
Trudi Wakelin Director of Marine Licensing, Planning and Blue Belt, MMO

