

From: [REDACTED]
To: [SizewellC](#)
Subject: Eastern IFCA comments following Issue Specific Hearing 7 (ISH7) on Biodiversity and Ecology (Parts 1 and 2)
Date: 23 July 2021 14:08:52
Attachments: [2021_07_Eastern_IFCA_comments_re_Sizewell_C.pdf](#)

Dear Sir

Attached please find a document setting out Eastern IFCA comments following our participation in the Issue Specific Hearing 7 (ISH7) on Biodiversity and Ecology (Parts 1 and 2).

Thank you for including us in this process.

If you have any questions, or would like any further information, please feel free to contact me.

Best regards

Stephen Thompson

Eastern Inshore Fisheries & Conservation Authority

Marine Science Officer

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Eastern Inshore Fisheries and Conservation Authority, 6 North Lynn Business Village,
Bergen Way, King's Lynn, Norfolk PE30 2JG



DUE TO THE COVID-19 OUTBREAK, FOR THE FORSEEABLE FUTURE ALL EASTERN IFCA STAFF WILL BE WORKING FROM HOME. DURING THIS PERIOD THE EASTERN IFCA OFFICE WILL BE CLOSED TO VISITORS AND ALL MEETINGS WILL BE CARRIED OUT REMOTELY. IF YOU WISH TO SPEAK WITH ME DURING THIS PERIOD, PLEASE USE THE MOBILE NUMBER ABOVE. THANK YOU FOR YOUR UNDERSTANDING.

 HM Government

NHS



HANDS



FACE



SPACE

**Sizewell C Case Team
National Infrastructure Planning
The Planning Inspectorate**

<https://infrastructure.planninginspectorate.gov.uk>

Submitted by email only to sizewellc@planninginspectorate.gov.uk

23 July 2021

1.1 The role of Eastern IFCA is to lead, champion and manage a sustainable marine environment and inshore fisheries within our district, which extends from the Humber to Harwich, and six nautical miles out to sea. As the proposed works associated with the Sizewell C project fall within those boundaries, and the project may generate effects which interact with our core role, we consider it appropriate that Eastern IFCA comment on the proposed project.

1.2 Due to the wide range and geographic / ecological features that the proposed activities will interact with, and the very considerable body of literature that the application has generated, we have limited our examination and comments to those areas directly related to our organisational remit.

2.1 We are neutral on the question of the desirability / acceptability of nuclear power *per se*, and take no organisational position on this.

3.1 Of the items that are directly related to EIFCA remit which were included in the Agenda for Issue Specific Hearing 7 (ISH7) on Biodiversity and Ecology (Parts 1 and 2), our position is –

4.2 Fish, including migratory fish –

4.2.1 We recognise that there will inevitably be some mortality of fish caused by the operation of this power station.

4.2.2 We recognise the efforts made by the project proposers to mitigate this, but also that many of the important aspects of this mitigation are untested and there is no opportunity to test them before they become operational.

4.2.3 We do not consider that the impacts of the power station on fish stocks can be compared to those from commercial fishing activity, as there are management measures available for commercial fishing (spatial, temporal and method limitations / restrictions) which can be applied in a reactionary manner as and when issues are identified. These options are not available for a nuclear power station, which will continuously operate in the same place in the same manner for many decades.

4.2.4 We do not consider that the effects on fish populations over a wide area such as ICES areas is appropriate, and that more local consideration is required. We recognise the efforts made in this regard by the applicants.

4.2.5 We consider that, considering the lack of certainty of the effectiveness of the mitigation measures, that there should be an effective ongoing monitoring of fish impinged and entrained within the power station water flow, and results of this monitoring should be made openly available. There should be provision for future compensatory measures if this monitoring indicates that actual impacts exceed the predicted impacts.

4.2.6 We defer to the Environment Agency for specific consideration of the aspects of impacts on migratory fish which are within their remit.

4.2.7 We defer to Natural England for specific consideration of the aspects of impacts on fish biology and populations connected with the management of Marine Protected Areas.

5.1 Acoustic Fish Deterrents. (AFDs)

5.2 These would seem to be effective against just those species of fish that are most likely to be impinged in the Sizewell plant at the highest levels (clupeiids).

5.3 We note that comment was made during Issue Specific Hearing 7 (ISH7) Part 2 to the effect that the initial plan to fit AFDs at the Hinkley Point (HP) nuclear power station were dropped due to the assessed risk to divers involved in installing and servicing the AFD units.

5.4 Whilst we are of course concerned over any threats to health and safety of employees in any capacity, we note that an expert in AFDs said during ISH7 Part 2 that service intervals for AFDs are now longer than those on which the HP assessment were made, and that there are options for servicing AFDs by means of remotely operated vehicles (ROVs).

5.5 During ISH7 Part 2, Counsel for the applicant stated that the same considerations in connection with diver safety as assessed for HP would apply at Sizewell, due to the environment being the same. We are aware that some of the factors which could impact on diver safety – for example, water currents and underwater visibility – can be very different at the locations of the two power stations. We therefore question whether the assumption that identical risks would apply to diving operations at the two sites is justified.

5.6 Therefore, we consider that the use of AFDs should be seriously considered as a valuable addition to the suite of mitigation measures.

6.1 Fisheries

6.2 We are concerned as to how impacts on fish stocks may directly affect commercial fisheries – now, and over the multi-decade operation of the plant. We accept that in most cases this is unlikely, but also that there is residual uncertainty over the effectiveness of proposed mitigation measures. We therefore re-iterate our position that there should be on-going monitoring of the effects of power station – both directly as to number of fish impinged / entrained, and effects on fisheries – and compensatory mechanisms put in place if actual impacts exceed predicted impacts.

6.3 We are concerned over limitations on access to fisheries. We understand that there will be some localised limitations due to e.g., locally based inshore fishermen.

6.4 We consider it very important that developers open and maintain effective dialogue with all fishing interests who may be affected by a project (commercial fishers, recreational fishers and charter boat operators). We recognise the efforts made by the applicant in this regard. We consider it important that due weight is given to the concerns of this sector, and that dialogue is a genuine two way process.

7.1 Equivalent Adult Values (and similar)

7.2 We recognise the efforts that the developers have put in place to examine effects in various ways, and that each of these enables clearer understanding of calculated impacts in different ways.

7.3 We comment that there are additional, similar approaches which can have value in conceptualising the impact from an activity such as water abstraction. One which could be useful in the case of Sizewell C is that of considering the creation of an amount of productive habitat (such as saltmarsh, or seagrass beds) wherein the productivity of the habitat created matches the impacts to particular life stages – usually small juveniles – of fish impacted by an activity. This could have value as a compensatory activity if in operation of the plant, impacts are detected which are above those predicted.

8.1 Please do not hesitate to contact me should you have any queries on the above response.

Yours sincerely,



Stephen Thompson

Marine Science Officer

Eastern Inshore Fisheries and Conservation Authority