



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

**Natural England's Comments on the Southern North Sea Site Integrity Plan**

Planning Inspectorate Reference: EN010012

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3<sup>rd</sup> September 2021

## **Natural England Comments on the Southern North Sea Site Integrity Plan**

### **[AS-178]**

#### **General comment**

In line with Site Integrity Plans (SIP) produced for other plans and projects within and adjacent to the Southern North Sea SAC, Natural England would consider this SIP a draft that should be revisited and finalised prior to construction activities commencing. This will allow for a more refined, accurate in-combination assessment to be undertaken using more up to date information regarding the scheduling of works for other plans and projects. This may help to reduce the worst-case scenario and the total percentage spatial footprint of activities in-combination.

#### **Detailed comments**

- 1.2.5 – NE acknowledges it is not yet known whether any UXO clearance works will be required, however other projects in the area of the proposed works have identified and had to clear UXO so there is a realistic chance that this will also be the case for piling works at Sizewell C. Therefore, the detonation of one UXO at Sizewell should be included in the in-combination assessment.
- 2.1.5 – Reference not found.
- Table 2.1 – Please could clarification be provided as to how the figure of 332.5km<sup>2</sup> for piling at the BLF has been arrived at? Does this reflect the proximity of the piling activity to the shore?
- 2.2.6 – Reference not found.
- Table 2.3 – NE disagree with the conclusion of no potential for adverse effect on the SNS SAC based on the ‘most likely’ scenario of 50 days as this duration cannot be guaranteed and conclusions should be based on the worst case scenario of 110 days. Therefore to ensure no adverse effect, piling for the BLF should not be undertaken in-combination with OWF monopile installation or UXO clearance works and works should be scheduled to achieve this. This also applies to the final scenario in table 2.3.
- Table 2.4 - NE disagree with the conclusion of no potential for adverse effect on the SNS SAC based on the ‘most likely’ scenario of 60 days as this duration cannot be guaranteed and conclusions should be based on the worst case scenario of 110 days. Therefore to ensure no adverse effect, piling for the BLF should not be undertaken in-combination with OWF monopile installation or UXO clearance works and works should be scheduled to achieve this. This also applies to the final scenario in table 2.4.
- Section 3 – Whilst NE recognises and welcomes the proposed use of a hydrohammer, mitigation and management should be based on the worst case scenario provided here and therefore, management of the scheduling of

activities is required to ensure there is no adverse effect on the integrity of the SNS SAC as per our advice above.