



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

**Natural England's Comments on the Applicant's Comments at Deadline 6 on  
submissions from earlier deadlines and subsequent written submissions to  
ISH1-ISH6 [REP6-025]**

**AND**

**Deadline 6 Submission - Comments at Deadline 6 on Submission from Earlier  
Submissions and Subsequent Written Submissions to ISH1-ISH6 – Appendices  
[REP6-024]**

Planning Inspectorate Reference: EN010012

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6<sup>th</sup> August 2021

**Natural England’s Comments on: Comments at Deadline 6 on submissions from earlier deadlines and subsequent written submissions to ISH1-ISH6**

**[REP6-025]**

**AND**

**Deadline 6 Submission - Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent Written Submissions to ISH1-ISH6 – Appendices**

**[REP6-024]**

Reference	Issue / Impact
General Comment	Natural England welcome this note, which we found very useful.
1.2.34 - 35	<p><b>EAV/SPF – comparing to an annual SSB</b></p> <p><i>“The issue with the SPF extension is how to relate the multi-annual summed losses against a relevant annual population threshold. Critically, as it is not an annual rate, the SPF cannot be compared against an annual spawning population. To do so would result in inflated estimates as losses are compiled over multiple years (repeat spawning).”</i></p> <p>NE continues to support the EA’s suggested use of an extended approach.</p> <p>As recognised by the applicant, the ongoing extractive pressure does act over multiple years. The entrapment reduces the adults present across multiple year classes (eg: fewer 1 yr olds, fewer 2 yr olds, fewer 3 yr olds, and so on). So it does reduce the number of first-time spawners, and similarly the number of second and third time spawners actively breeding in any given year.</p> <p>NE prefers the extension method because it reflects the losses from all year classes in a given year, not just the first-time spawners. This is apt for an annual impact estimate attempting to contextualise impacts for such a long-lived project. It gives a more realistic picture of, and estimated value to, the lost adult spawning potential from a given year during the operation for Sizewell C. The extension method remains an annual estimate, and so can be compared against an annually estimated baseline population such as SSB.</p> <p>Why include multi-year spawning, and why would it be significantly different from estimating just first-year spawners? Fish tend to</p>

	<p>become more fecund as they age/grow larger. Natural mortality and other factors (like fishing) do mean that typically there are fewer older/larger fish in a population. However, due to their fecundity, those individuals contribute more to the spawning potential of the population.</p> <p>The balance of how important older spawners are depends on the species, population, and the pressures acting on that population.</p>
1.2.39	<p><b>EAV – stock size (seabass)</b></p> <p>We welcome the commitment to run a multi-year, long-term evaluation of population trends and to assess the significance of annual impingement to these trends. We agree seabass is a good example as, in addition to the reasons already given, it is a long-lived fish which is slow to mature, with juveniles being heavily reliant on estuarine and coastal nursery habitats. These characteristics mean that the population is relatively more vulnerable to entrapment impacts.</p>
1.3	<p><b>Stock size:</b></p> <p>Welcome the explanation as a useful overview of NNBS position. We have no additional comments for this section. NE comments on this topic are focussed on the most recent changes between Rev 04 and Rev 05 of SPP103.</p>