

Wendy McKay

Lead member of the Panel of Examining Inspectors
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN
sizewellc@planninginspectorate.gov.uk
cc. michele.gregory@planninginspectorate.gov.uk

Our Ref: 20026727

Your Ref: EN010012

Date: 3 September 2021

By email only

Dear Ms McKay

Planning Act 2008 – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 6: Acoustic Fish Deterrent Report

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for the Sizewell C Project

For Deadline 7 (3rd September) the Examining Authority (ExA) have requested comments on [REP5-123] the Acoustic Fish Deterrent Report submitted by NNBSGenCo (SzC) Ltd at Deadline 5.

There are a number of environmental issues associated with direct cooling water systems arising from water abstraction. These include fish and invertebrate impingement and entrainment. The use of fish deterrent devices, including Acoustic Fish Deterrents (AFD), have the potential to substantially reduce the numbers of fish impinged.

In considering the environmental impacts of water abstraction National Planning Policy Statements EN-1 (para 5.3.18) and EN-6 (paras 3.7.5, 3.7.6 and 3.7.7) ensures that best practice in planning, design, mitigation and compensation are followed.

Although the Environment Agency are unable to advise on the engineering and safety considerations stated with the report, we wish to highlight some concerns regarding the environmental evidence used to preclude the deployment of AFD at Sizewell C.

High Turbidity Levels

Data provided in the report highlights high turbidity levels, which considered to be a key restriction to safe underwater operation and maintenance of AFD. We consider that the report does not explain that these data are taken from the period of highest turbidity (Nov-Mar) and does not reflect the lower turbidity found in other months of the year.

We accept that winter is the period of highest turbidity. The data used to reinforce the turbidity issue around the SZC area is biased towards sampling at period of expected highest turbidity. We have no evidence that high turbidity persists throughout the year, and in [APP-318] Chapter 22 Marine Ecology Appendix 22A, 2.2.1 (pg 12) it is noted that turbidity is high in several months of the year in the general inshore area, but it is considerably reduced in May

through to August. So sediment loads are highest in winter and decrease as the plankton growing season starts in spring.

Given that within the report no mention is made of turbidity at other times of the year. We consider that evaluation as to the practicalities (including safety) of maintenance operations at these other times of the year should be undertaken.

Yours sincerely



Simon Barlow
Project Manager
Sizewell C Nuclear New Build
Environment Agency

