



The Sizewell C Project

5.1 Consultation Report Fifth Addendum

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1 INTRODUCTION

- 1.1.1 NNB Generation Company (SZC) Limited ('SZC Co.') submitted an application to the Planning Inspectorate under the Planning Act 2008 (the 'Act') for a Development Consent Order for the Sizewell C Project ('Project') on 27 May 2020 ('Application'). The Application was accepted for examination on 24 June 2020.
- 1.1.2 A **Consultation Report** [[APP-068](#)] and its addenda [[AS-153](#), [REP3-010](#), [REP5-044](#) and [REP7-278](#)] have been submitted by SZC Co. to provide details of the consultation that has been undertaken in respect of the Project.
- 1.1.3 The **Consultation Report Fourth Addendum** [[REP7-278](#)] contains (amongst other things) details of the non-statutory consultation carried out between 3 August and 27 August 2021 regarding Proposed Change 19 to the Application, being a change to the Water Supply Strategy to propose new temporary infrastructure for the desalination and treatment of seawater to produce potable water suitable for construction-related activities until the Sizewell transfer main is delivered and operational. Proposed Change 19 was accepted for examination by the Examining Authority on 10 September 2021 [[PD-050](#)].
- 1.1.4 Due to an administrative error, the **Consultation Report Fourth Addendum** [[REP7-278](#)] did not provide the details of a consultation response received from Natural England on 25 August 2021. This **Consultation Report Fifth Addendum** has been prepared to identify the comments that were received from Natural England and to explain how SZC Co. has had regard to those comments.

2 FEEDBACK RECEIVED AND HOW SZC CO. HAD REGARD TO IT

2.1 Analysis of the responses to the consultation on Proposed Change 19

2.1.1 A total of 149 responses were received by SZC Co. to the non-statutory consultation on Proposed Change 19. **Annex A** of the **Consultation Report Fourth Addendum** [REP7-278] contains copies of 148 responses. A copy of the response received from Natural England is provided in **Annex A** of this **Consultation Report Fifth Addendum**.

2.1.2 Natural England's response was submitted by email to a member of the SZC Co. project team, rather than to the email address specified in the Proposed Change 19 Consultation Document. The information provided in **Table 5.1** of the **Consultation Report Fourth Addendum** [REP7-278] has been updated to incorporate the response received from Natural England, as follows:

Table 2.1: Responses received by method

Response Type	Count
Online response form	51
Email	96 97
Post	1
Collection	0
Total Responses	148 149

2.2 How SZC Co. has had regard to Natural England's response

2.2.1 **Table 2.2** sets out the consultation feedback received from Natural England and SZC Co.'s responses to it.

Table 2.2: Consultation feedback and SZC Co. responses

Responses with this code	Theme	SZC Co. response
69	Concerns about the proposed plan to use HGV deliveries for water while the proposed desalination plant is not operational. Potential concerns	The proposed water tanker deliveries would remain within the HGV limits set for the Project. Therefore, there would be no increase above

Responses with this code	Theme	SZC Co. response
	mentioned include: - increased traffic congestion leading to stress on local busy rural roads (e.g. B1122 and A12) and to increased impacts on local community, air quality, noise and vibrations; - the impacts considered being the greater while the Sizewell Link Road is not complete; and - questioning how HGV traffic will remain within the HGV caps.	levels that have already been assessed and the conclusions of the Consolidated Transport Assessment [REP4-005] and the Environmental Statement , as updated by the Fourth ES Addendum [REP7-030] , and the transport mitigation proposals would all remain unchanged. Because of this there would be no increase in environmental impact associated with the proposed water trucks, beyond that which is already assessed in the above documents.
14	Concerns about the proposed desalination plant on the grounds that it would have a negative visual and landscape impact stated in general terms, which have not yet been assessed. Impacts mentioned include: - potential high wall for noise mitigation from the plant and diesel generators; - the appearance of the desalination plant building; - potential water tower or tanks; and - potentially moving the	The height of the equipment associated with the temporary desalination plant would be up to 10m above ground level, which remains significantly below the maximum construction height parameters established for the relevant zones within the construction site that it is proposed to be located within. As a result, the Proposed Change 19 would not introduce new landscape or visual receptors that would

Responses with this code	Theme	SZC Co. response
	desalination plant on a higher ground	alter the baseline recorded or give rise to any discernible change in the landscape and visual effects to those set out within the assessments at Volume 2, Chapter 13 of the ES [APP-216] as updated by the subsequent ES Addenda (AS-181 , REP5-064) and Volume 1, Chapter 2 of the Fourth ES Addendum [REP7-030] .
13	Concerns about Proposed Change 19 on the grounds that the desalination process would have a negative impact on coastal processes, which has not yet been assessed. Issues identified include: - the hydraulic force of the discharges into the seawater; - the directional dredging; and - the position of the intake and outfall pipes, causing potential change in level and stability of the seabed.	Construction of the pipelines will be by Horizontal Directional Drilling (HDD), meaning that the only disturbance for coastal geomorphology will be at the intake and outfall headworks, which will be above the seabed level. These works can be considered similar to the headworks for the Fish Recovery & Return (FRR) pipe within the scope of the original assessment. The intake and outfall pipes for the desalination plant have been extended further seaward following further assessment. The headworks for the outfall would be located approximately 385m seaward of the hard

Responses with this code	Theme	SZC Co. response
		coastal defence feature and the headworks for the intake would be located approximately 485m seaward of the same reference point. Both structures would therefore be located seaward of the outer sand bar. The pipe extensions are proposed to reach deeper water to maximise dispersion of the saline plume and minimise recirculation.
15	Concerns about the proposed desalination plant on the grounds that it would have a negative visual and landscape impact stated in general terms, which have not yet been assessed. Impacts mentioned include: - potential high wall for noise mitigation from the plant and diesel generators; - the appearance of the desalination plant building; - potential water tower or tanks; and - potentially moving the desalination plant on a higher ground.	The height of the equipment associated with the temporary desalination plant would be up to 10m above ground level, which remains significantly below the maximum construction height parameters established for the relevant zones within the construction site that it is proposed to be located within. As a result, Proposed Change 19 would not introduce new landscape or visual receptors that would alter the baseline recorded or give rise to any discernible change in the landscape and visual effects to those set out within the assessments at

Responses with this code	Theme	SZC Co. response
		Volume 2, Chapter 13 of the ES [APP-216] as updated by the subsequent ES Addenda (AS-181, REP5-064] and Volume 1, Chapter 2 of the Fourth ES Addendum [REP7-030].
89	Concerns about the proposed desalination plant on the grounds that it would have a negative impact on marine wildlife and ecology, which has not yet been assessed. Potential impacts mentioned include: - seawater pollution from the brine and chemicals discharge causing disturbance of mineral balance and algae bloom; - change in the seabed, including dredging; and - impact on marine flora and fauna, especially on small creatures causing imbalance in the food-web of larger species.	The Fourth ES Addendum [REP7-030] was submitted into the examination in support of the change request at Deadline 7. It demonstrates that there would be no significant adverse effects on marine wildlife and ecology as a result of Proposed Change 19.
1	Impacts on designated sites from water abstraction for tankered water supply.	The water tankers would be filled from locations outside of the local Blyth Water Resource Zone (WRZ) where existing licensed headroom exists, in discussion with relevant water supply companies including Northumbrian Water Limited and Anglian Water. A

Responses with this code	Theme	SZC Co. response
		number of potential tanker filling sites have been identified as outlined in ISH11 Written Submissions Responding to Actions (REP7-070). As such there would be no new abstraction and no potential effect on designated sites.

2.3 Conclusion on Proposed Change 19 consultation

2.3.1 SZC Co. has reviewed and considered all relevant responses to the consultation on Proposed Change 19, including the response received from Natural England, as explained in detail within the tables at **Appendix I** of the **Consultation Report Fourth Addendum** ([REP7-278](#)) and **Table 2.2** of this document.

APPENDIX A: COPY OF NATURAL ENGLAND'S CONSULTATION RESPONSE

Date: 25 August 2021
Our ref: 363033



Customer Services
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T [REDACTED]



info@sizewellc.co.uk

BY EMAIL ONLY

Dear Ms [REDACTED]

Sizewell C Consultation on Proposed Changes (August 2021)

Thank you for seeking our advice on the above in your consultation dated 02 August 2021 which we received the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

You will be aware that the we submitted Written Representations [REP2-153] (our ref: 350822, dated 2nd June 2021) in response to the Sizewell C Project Development Consent Order (DCO) application within which we raised and reiterated a number of outstanding concerns in the context of our remit. These are also reflected in our Statement of Common Ground (SoCG) with SZC Co [REP2-071] (dated June 2021) which we are in the process of updating based on the latest information which has been made available, with the continued aim of progressing as many of these as possible.

This current consultation includes the addition of a new water supply strategy requiring a new desalination plant and associated operations. It is disappointing for such a major change with potentially far reaching implications in terms of our remit to be introduced at this late stage within the Examination. As you are aware, we are also concurrently engaging in the DCO Examination process for which there are regular submissions of new information to review with the aim of progressing our existing outstanding concerns. We also note that this informal consultation period is shorter than the 28 days recommended in PINS advice note AN16. The added resource pressure of reviewing further changes makes it difficult for us to scrutinise the large amount of documentation being submitted to the Examination at each deadline.

Nevertheless, we remain committed to advising you with best endeavours to resolve and reach common ground as far as is possible over the coming months, and offer the advice set out in this letter on that basis.

This change has the potential to alter the existing environmental impact assessments and/or add to the potential impact pathways for a number of outstanding issues that are we are currently advising on. While the consultation document outlines a number of potential impacts arising from the change proposal and finds no significant effects requiring mitigation, we advise that further assessment and supporting documentation is required to confirm this, including on:

- Additional air quality impacts on relevant internationally and nationally designated sites caused by increased Heavy Good Vehicle (HGV) movements;
- Additional air quality impacts on relevant internationally and nationally designated sites caused by additional diesel generators;
- Impacts of installation of pipes on the England Coast Path;
- Impacts of installation/drilling of pipes, intakes and outfalls on relevant internationally and nationally designated sites;
- Impacts from chlorine and other bio-fouling treatments on relevant internationally and nationally designated sites;
- Impacts of hypersaline water on relevant internationally and nationally designated sites;
- Effects of dredging on relevant internationally and nationally designated sites;;
- Impacts of discharge into the marine environment on relevant internationally and nationally designated sites;
- Additional landscape impacts to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) associated with the construction and siting of a containerised desalination module;
- Impacts from additional marine noise created by vessel traffic, dredging and drilling on relevant internationally and nationally designated sites;
- Effect of intake and outfall headworks on coastal processes and any additional impacts to relevant internationally and nationally designated sites.
- Impacts on designated sites from water abstraction for tankered water supply

We would also like to draw your attention to previous work submitted by SZC Co in January 2021 which discounted desalination as an option for the following reasons:

“This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).” (Table 1.2 in 6.14 Environmental Addendum Appendices, Chapter 2 Main Development Site, Appendix 2.2D. Water Supply Strategy, January 2021).

Clearly there is potential for a number of impacts from the proposed change and it is therefore essential that these impacts are fully assessed (or revisited in the context of your previous concerns as highlighted in Table 1.2), and made available within the Examination as soon as possible so they can be examined fully.

We understand that the currently anticipated worst case is that the desalination plant would be in use for the entire construction phase, and advise that further extension into the operational phase would require further detailed assessment given the potential for the additional cumulative/in combination impacts this would present with regards to the operational infrastructure, in particular to the relevant internationally and nationally designated sites.

Please note that all comments in this response are made without prejudice to any future comments we may wish to make on all Sizewell C-related consultations.

We also reserve the right to show a copy of this letter, and subsequent correspondence, to the Planning Inspectorate, in order that they may be aware of our concerns.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Yours sincerely

Natural England
25 August 2021