

Wendy McKay

Lead member of the Panel of Examining Inspectors
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cc: [REDACTED]

Our Ref: 20026727

Your Ref: EN010012

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By email only

Dear Ms McKay

Planning Act 2008 – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 8: Comments Change 19: Temporary Desalination Plant

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

For Deadline 8 (24th September) the Examining Authority (ExA) have requested comments on documents submitted by NNBSGenCo (SzC) Ltd at Deadline 7 to support change 19: Temporary Desalination Plant.

In reviewing the proposed change the Environment Agency has reviewed [REP7-037] Site Water Supply Strategy - Revision 2.0; [REP7-031 to 034] Fourth Environmental Statement Addendum and Appendices; [REP7-284] WFD Assessment Report Second Addendum - Revision 1.0; and [REP7-282] Eels Regulations Compliance Assessment First Addendum - Revision 1.0.

Currently, there is uncertainty as to when the desalination plant would be decommissioned and removed from site. Much of the environmental assessment submitted considers the potential impacts up to the end of the construction phase of development, however there are statements that indicate that operation may extend into commissioning and up to operational phases of development. We consider clarity should be provided and, if necessary, further environmental assessment undertaken.

Water Quality and Marine Ecology

Discharges to the marine environment from construction and operation of the desalination plant will be controlled and monitored by permits, the applications for which shall need to be submitted to the Environment Agency under the Environmental Permitting (England and Wales) Regulations 2016. These permits have not yet been submitted. The interpretation and data we use in our own assessments may vary from that supplied in the applicant's Environmental Statement. We will consider the discharge, alone and in combination (within project) and in combination with other plans or projects, for HRA purposes as well as Water Framework Directive Compliance assessments in the determination of those permit(s), when submitted.

Eels Regulations Compliance Assessment

We welcome the proposed screening of the intake required for the desalination plan. We consider however that brine discharges could mask freshwater signals for migrating glass eels and reduce glass eels entering adjacent waterbodies such as the Minsmere Old River and Blyth. On this basis, any environmental permit submission should consider saline plume modelling to assess this potential impact.

Air Quality

The Environment Agency is responsible for regulating the sources of air pollution under the Environmental Permitting Regulation 2016 (as amended). The introduction of further diesel generators may add to the existing cumulative effect of diesels being used in the construction period. We encourage the use of diesel generators within the construction programme to be looked at holistically, and for the project to adopt alternative means of electricity production that are less carbon intensive – so as to reduce impacts to air quality.

For the purposes of permitting, there is the need to clarify the number of diesel generators being installed. These could be regarded as a medium combustion plant (if greater than 1MWth), but depending on aggregation rules it may be considered that they trigger the threshold for an Industrial Emissions Directive installation (greater than 20MWth).

We consider that the applicant should begin the process of determining how the aggregation of diesel generation on the construction site, and for the operation of the desalination plant, will be assessed – so as to determine what additional environmental permits may be required from the Environment Agency during construction and commissioning.

Yours sincerely



Simon Barlow
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Environment Agency

