

From: [REDACTED]
To: [REDACTED] SizewellC
Subject: FW: 363033- Natural England's response to the Sizewell C Proposed Changes Consultation_August2021
Date: 14 September 2021 14:47:13
Attachments: [image001.png](#)
[363033- Natural England's response to the Sizewell C Proposed Changes Consultation_August2021 .pdf](#)

Sian, this was an oversight on our part, for which I apologise. I wanted to make you aware of this in the short-term and we will submit an addendum to the consultation document to address this and submit it formally. The error arose as they sent it to me directly and not to the contact for responses so we are confident this is a single issue. Happy to discuss if helpful. C

Carly Vince

Chief Planning Officer



From: Haynes, Jack [REDACTED]
Sent: 14 September 2021 14:34
To: Carly Vince [REDACTED]
Cc: Lewis, Alan [REDACTED]; George DiMascio [REDACTED]
Steve Mannings [REDACTED]; Walker, Ben
[REDACTED] Walkden, Niall
[REDACTED]
Subject: FW: 363033- Natural England's response to the Sizewell C Proposed Changes Consultation_August2021

Hi Carly,

We noticed from that the Planning Inspectorate's recent [Procedural Decision relating to Change Request 19](#) that, with regards your informal consultation on the change, they state "*There was no response from either the Marine Management Organisation or Natural England*"

Bio.3.7 of the [Examining Authority's third written questions and requests for information \(ExQ3\)](#) also states that "*The ExA understands that Natural England and the MMO did not respond to the consultation. Please will they both set out their responses to the proposed changes?*".

Clearly we did take the time to provide you with a response to the consultation (as below) so are looking for some clarification on how this misunderstanding has come about please – the appended consultation responses don't seem to be in the Examination Library yet so it's unclear as to whether it's your error or the ExAs. Either way, we will of course be correcting these statements in our answer to Bio.3.7 but would appreciate it if you could also do so before then.

Thanks,

Jack

Jack Haynes

Senior Adviser
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From: Walkden, Niall [REDACTED]
Sent: 25 August 2021 15:16
To: Carly Vince [REDACTED]
Cc: Lewis, Alan [REDACTED]; George DiMascio [REDACTED]
'Steve Mannings' [REDACTED]; Walker, Ben [REDACTED]
[REDACTED]; Haynes, Jack [REDACTED]
Subject: 363033- Natural England's response to the Sizewell C Proposed Changes Consultation_August2021

Dear Carly,

Please find attached our response to the above consultation. Please do not hesitate to ask if you have any further questions.

Kind Regards,

Niall Walkden
Lead Adviser | Sustainable Development | Norfolk & Suffolk
Dragonfly House, 2 Gilders Way, Norwich NR3 1UB
[REDACTED]
[REDACTED]

www.gov.uk/natural-england

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Date: 25 August 2021
Our ref: 363033



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BY EMAIL ONLY

Dear Ms Vince

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 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 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