



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

**Natural England's briefing note on the detailed agenda for
Issue Specific Hearing 15 on the Proposed Temporary
Desalination Plant**

Planning Inspectorate Reference: EN010012

30th September 2021

Detailed agenda for Issue Specific Hearing 15 on the proposed temporary desalination plant

1. Welcome, introductions and arrangements for the Hearing

Reference will be made in Agenda items 2, 3, and 4 to the Applicant's and IP's responses to ExQ3, the comments on those responses provided at Deadline 8, and other relevant submissions and responses up to and including Deadline 9.

1.1 Natural England has no comment on this agenda item.

2. Water Supply update

Following the discussion at ISH11, the parties to provide an update on the Water Supply Strategy with particular reference to: (a) Period prior to the temporary desalination plant being operational; (b) Period of operation of the temporary desalination plant, including the transfer of the temporary plant to the Temporary Construction Area; and (c) Period when Temporary Construction Area is being reinstated and operation of the Proposed Development.

2.1 Natural England would expect further information to be provided by the Applicant and/or water company with definitive identification of sources of supply and the environmental implications of these (and any associated infrastructure) in order to assess, understand and potentially mitigate the impacts this demand will have upon internationally and nationally protected sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and Sites of Special Scientific Interest (SSSIs) and the water environment within the Northern/Central Water Resource Zone (WRZ). Similarly, we would expect a similar level of scrutiny on the impacts of utilising other sources of water supply as mentioned in the Water Strategy document (e.g. the tankered water supply prior to the operation of the temporary desalination plant). Without such evidence, Natural England is unable to advise on whether or not this key element of the project proposals may have impacts on wider protected sites in the Northern/Central WRZ which are not currently assessed within the Development Consent Order (DCO). Consideration should also be given to the impacts to wider protected sites (again, some of which may not be assessed within the DCO) from any pipeline works and other associated infrastructure required to get the water to the proposal site. It is crucial that these impacts are fully assessed by either the Applicant or the water company and further information provided to Natural England for review on the potential impacts from abstraction to protected sites. Impacts to protected species and protected landscapes (i.e. the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) should also be fully assessed.

2.2 We understand that the currently anticipated worst case scenario 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 protected sites.

3 The Environmental Assessment and the environmental implications of the proposed temporary desalination plant including matters relevant to the Habitats Regulations Assessment:

(a) The additional environmental assessments and supporting documentation submitted in connection with the proposed temporary desalination plant.

(b) Transport implications, including the Heavy Good Vehicle (HGV) deliveries and any Abnormal Invisble Loads (AILs) associated with the water tankers during the early stages of Sizewell C construction, and the construction and demolition of the temporary desalination plant.

(c) Noise and vibration, including that associated with the additional construction plant and activities within the main development site and additional activities within the marine area and having regard to any additional impacts upon relevant internationally and nationally designated sites.

(d) Air quality, including those associated with the introduction of additional on-site diesel generators within the main development site and any additional impacts upon relevant internationally and nationally designated sites.

(e) Coastal Geomorphology, including any effects arising from the introduction of new infrastructure and construction activities within the marine environment, with particular regard to the effect of intake and outfall headworks on coastal processes and any additional impacts upon relevant internationally and nationally designated sites.

(f) Landscape and visual implications, including the impact of equipment associated with the temporary desalination plant, with particular regard to any additional landscape impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) associated with the construction and siting of a containerised desalination module.

(g) Marine historic environment implications, including the impact of horizontal directional drilling and dredging with particular regard to buried archaeological remains.

(h) Marine water quality, sediments, and ecology, including the Water Framework Directive and any effects arising from the introduction of new infrastructure and construction activities within the marine environment, and impacts of use, abstraction, discharge and hypersaline water on relevant internationally and nationally designated sites.

(i) Terrestrial ecology and ornithology, including any additional effects upon marine birds and mammals and upon relevant internationally and nationally designated sites.

(j) Any other relevant environmental implications, including any additional in-combination or cumulative impacts.

3.1 We would like to draw the ExA's attention to the Applicant's Environmental Statement (ES) Addendum Fourth Addendum [REP7-030] which outlines further work undertaken to assess the impacts of the proposed temporary desalination

plant and new water supply strategy. We note that several impacts which have been brought forward through the screening process are deemed to need no further assessment as they have been captured in the original assessment work. However, in many of these instances very little justification is given for these decisions, making our review of these conclusions impossible at this stage.

- 3.2 For example, air quality impacts are judged to have “no changes to the baseline as a result of Proposed Change 19.”, despite the addition of further diesel generators to those initially proposed. Previous assessment by the applicant have predicted potentially significant effects to the interest features of Minsmere-Walberswick (Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site and Site of Special Scientific Interest (SSSI)) and Sizewell Marshes SSSI.
- 3.3 It is explained that any change in nutrient nitrogen has the potential to impact 3% of the designated site resulting in a low magnitude of impact. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.
- 3.4 Natural England was assured by the Applicant that this is a worst-case scenario and would not reflect the routine operating situation, therefore the likelihood of this significant impact occurring would be low. It is difficult to understand how the addition of multiple diesel generators which would be running for a greater duration annually would not change these scenarios and require no further detailed assessment.
- 3.5 Natural England advise that further justification and consideration is given to this issue and others where no further detailed assessment has been undertaken.
- 3.6 We would suggest particular consideration is given to cumulative effects on landscape to the Suffolk Coast and Heath AONB from noise, disturbance and increased infrastructure.

4 General Habitats Regulations Assessment matters not covered under item 3 above

(a) Physical interaction between species and project infrastructure - effects on bird, marine mammal and fish qualifying features of relevant European sites.

(b) Direct habitat loss and direct/indirect habitat fragmentation effects on marine mammal qualifying features of relevant European sites.

(c) The views of Natural England, the Environment Agency, MMO, RSPB and other IPs on the third addendum to the Shadow HRA report [REP7-279] and any relevant subsequent HRA material.

- 4.1 Natural England has no comments on items a) or b)
- 4.2 Natural England’s primary concern is the level of detailed assessment given to air quality impacts on Minsmere and Walberswick Ramsar, SPA and SAC.

4.3 Natural England also raise the potential for there to be further European sites impacted by water abstraction which could be scoped into the assessment depending on where tankered and eventually mains water is sourced from.

5 The DCO, DoO and other control documents

(a) Are any changes over and above those in Revision 9 of the DCO and versions current at Deadline 7 of the DoO and other control documents needed?

(b) Practicalities of review and submission of any revisions.

5.1 Natural England has no comment on this agenda item.

6 Any other matters relevant to the agenda

6.1 Natural England has no comment on this agenda item.

7 Close of Hearing

7.1 Natural England has no comment on this agenda item.