



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

Natural England's Comments on Revision 1.0 Draft Fish Monitoring Plan

Planning Inspectorate Reference: EN010012

24th September 2021

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[REP7-077]

Summary

- Natural England welcome the provision of a Fish Monitoring Plan, as we have requested from the Applicant previously.
- Natural England advise there is not enough detail regarding future monitoring at Sizewell C over the proposed operational lifetime of the station.
- Monitoring appears to only be proposed for 3 years. We request clarity on whether or not this is the case; if so we would consider this to be insufficient.
- We believe there is a lack of detail regarding what the Applicant's contingency plan is if there proves to be a significant difference between predicted and actual fish mortality.
- Natural England advises that all data produced by the Fish Monitoring Plan should be made publicly available, and secured in the terms of reference for the Marine Technical Forum (MTF).

Detailed Comments

1. Paragraph 2.2.1 – We advise that the efficacy of the Fish Return & Recovery system (FRR) needs to be compared against predicted (both lethal and sublethal) impacts.
2. Paragraph 2.2.2 – Sampling for a period of three years is considered by Natural England to be acceptable for Sizewell B, but we advise that this is insufficient for Sizewell C. There is not enough detail regarding future monitoring of Sizewell C over the lifetime of the proposed development. We request clarification on whether or not the Applicant is suggesting there is only going to be three years of monitoring undertaken.
 - 2.1. Natural England advise that monitoring should be a minimum of every three years for comprehensive entrapment monitoring, with samples ideally being taken on the same day for entrained and impinged fish, over the lifetime of the proposed development. Monitoring should increase to annually if the data indicates significant differences between predicted and actual entrapment figures.
 - 2.2. We advise that all data produced should be made publicly available, and secured in the terms of reference for the MTF.

3. Paragraph 2.3 – Natural England request clarity on how results would be reviewed '*in consultation with the MTF*'. Would data simply be presented, or would the Marine Technical Forum (MTF) collectively decide on whether or not monitoring was considered satisfactory?

3.1. Natural England advise that the Terms of Reference for the MTF be included in the Fish Monitoring Plan. This is in order to define the organisations involved in the MTF, their roles, and how decisions are to be made.

4. Paragraph 3.1.2 – Proposed entrainment sampling is considered by Natural England to be insufficient. We advise that it should be undertaken a minimum of once every three years over the lifetime of the proposed development and increase to annually if significant differences between predicted and actual entrainment figures become apparent. This should be undertaken on the same year as impingement sampling, and on the same date so that a full analysis of species life stages can be collected.
5. Paragraph 3.1.3 – Natural England advise that 'Survivability' should be included in observations to be recorded for each species.
6. Paragraph 3.1.5 – As we have advised under comment 2.2 above, all data should be made publicly available and secured in the terms of reference for the MTF, in addition to being reported to the MTF.
7. Paragraph 5.2 – Natural England support the Environment Agency's advice that smelt monitoring should be included on the River Blyth.

7.1. We also request details on how long monitoring will be conducted for.