



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

Natural England's Comments on the Water Monitoring Plan

Planning Inspectorate Reference: EN010012

24th September 2021

Natural England's comments on Revision 1.0 Water Monitoring Plan [REP7-075]

- 1.1 It is essential to properly assess the risk of any changes to water levels arising from the proposals to the nationally important habitats and species for which Sizewell Marshes SSSI is notified, and fully consider and agree any necessary mitigation/compensation measures to ensure that adverse effects do not occur.
- 1.2 For further detailed comment containing the context and background of this issue, please see Part II, Issue 11 of Natural England's Relevant Representation [RR-0878].
- 1.3 Natural England has reviewed the Deadline 7 submission by the Applicant titled 'Deadline 7 Submission - 9.87 Water Monitoring Plan - Revision 1.0' [REP7-075] and has the following comments.
- 1.4 Trigger water levels have been derived for the P series of boreholes (Peat Piezometers) only, with a winter (Nov-Feb) minimum of the 30th percentile of baseline, and a summer (Mar-Oct) minimum of the 30th percentile and maximum of the 70th percentile of the baseline. No rationale has been presented for the selection of these apparently arbitrary threshold levels.
- 1.5 No trigger levels have been defined for the other boreholes (i.e. those monitoring geological horizons other than the peat) or the surface water monitoring locations. It would be beneficial to define how the monitoring from these locations would be used, especially in the event of greater-than-predicted effects being observed.
- 1.6 Similarly, the strategy states that the proposed water quality monitoring will not be used as a trigger for action. Whilst it may not be appropriate to define specific triggers for action, any changes to water quality should be considered as part of the proposed twice-yearly review and, where unanticipated changes to quality are observed, action may be required.
- 1.7 The Water Monitoring and Response Strategy states that "*The monitoring plan would include a mitigation toolkit which would identify the type of mitigation that would be put in place if defined trigger levels were reached*" as well as other similar statements. However, the Water Monitoring Plan states only that "*Monitoring would be reported to the ERG, who would provide advice on whether the trigger levels had been reached, the intervention and the action that may be required. SZC Co. would then implement the advice of the ERG*". It is therefore considered that the two documents are not consistent and that the proposals of the Water Monitoring and Response Strategy have not been fully realised. Further detail of the mitigation for different trigger levels being hit should be provided to meet this requirement, rather than relying on the Environment Review Group to define mitigation if and when trigger levels have been hit.

- 1.8 The Water Monitoring Plan states “ *when water levels are below the bed level at the location of the control structure, they would ultimately be governed by the prevailing natural hydraulic gradient in the wider groundwater system.*” The implication of this is that when water levels within the ditch network fall below a certain level the proposed control structure loses the ability to regulate water levels. The effect this would have on the ability to respond to trigger levels being hit is not explored in the document and this presents a potential risk to the effectiveness of the proposed mitigation. Further details on this would be beneficial.
- 1.9 The Water Monitoring Plan includes reference to a proposed control structure and a Water Level Management Plan. It is understood that the Water Level Management Plan is being developed between the Applicant, NGL and RSPB. The Plan states “ *Whilst not required to facilitate the implementation of the Water Monitoring Plan*” . Whilst true, the proposed mitigation will need to be considered in the context of the Water Level Management Plan, and without having seen this document further comment cannot yet be provided by Natural England on whether or not adverse effects on Sizewell Marshes SSSI from the proposal is likely . Further, the design of the proposed water control structure has not yet been received (note that REP5-120 did provide some options for the control structure, but not a site specific design).