Date: 24 September 2021

Our ref: SIZE-SP004 / 20025411 (NE internal ref: 368644)

Your ref: EN010012



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#### Wendy McKay

Lead member of the Panel of Examining Inspectors National Infrastructure Planning Temple Quay House 2 The Square Bristol, BS1 6PN

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BY EMAIL ONLY

Dear Ms McKay

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

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.

The following constitutes Natural England's formal statutory response for Examination Deadline 8.

## 1. Natural England's Deadline 8 Submissions

- 1.1. Natural England are submitting the following documents at Deadline 8:
- EN010012\_368644\_SZC\_NE's Comments on Draft Sabellaria Reef Management and Monitoring Plan
- EN010012\_368644\_SZC\_NE's Comments on Monitoring and Mitigation Plan for Sandlings
- EN010012\_368644\_SZC\_NE's Comments on Revision 1.0 Draft Fish Monitoring Plan
- EN010012\_368644\_SZC\_NE's Comments on Revision 2.0 Outline Vessel Management Plan
- EN010012\_368644\_SZC\_NE's Comments on Revision 5-8 of DCO-DML and Deed of Obligation
- EN010012\_368644\_SZC\_NE's Comments on the Permanent and Temporary Beach

- Landing Facility and SSSI Crossing Plans
- EN010012\_368644 SZC NE's Comments on the Site Water Supply Strategy
- EN010012\_368644 SZC NE's Comments on the Water Monitoring Plan
- EN010012\_368644\_SZC\_NE's Response to the Examining Authority's Third Questions
- EN010012\_368644\_SZC\_NE's Response to Examining Authority's Request for Further Information on Marsh Harrier
- EN010012 368644 SZC NE's Comments on Fen Meadow Plan
- EN010012\_368644\_SZC\_NE's Comments on White Fronted Geese Survey Report

# 2. Attendance at Issue Specific Hearing (ISH) 15

- 2.1. Natural England note the addition of ISH 15 on Tuesday 5<sup>th</sup> October 2021 to the Examination timetable.
- 2.2. We will assess our attendance at this ISH once a detailed agenda has been published, and will notify the Planning Inspectorate's case team to inform the Examining Authority (ExA) of our intention as soon as possible.
- 2.3. We continue to welcome ongoing engagement with the ExA through a written process. We will make best endeavours to provide comprehensive answers to any specific questions for Natural England by the following Examination deadline.

### 3. Desalination Assessments

- 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. 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.
- 3.3. However, we were 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 an increase of diesel generators which would be running for a greater duration annually would not change these scenarios and require no further detailed assessment.

3.4. Natural England advise that further justification and consideration is given to this issue and others where no further detailed assessment has been undertaken

This concludes Natural England's advice at this time, which we hope you will find helpful.

For any queries relating to the content of this letter <u>only</u>, please contact Jack Haynes on 020802 64857.

Yours sincerely,

Jack Haynes Senior Adviser Norfolk & Suffolk Area Team Ben Walker Lead Adviser Norfolk & Suffolk Area Team