



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

**Natural England's Comments on Draft Sabellaria Reef Management and
Monitoring Plan**

Planning Inspectorate Reference: EN010012

24th September 2021

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Summary

Natural England welcomes the work the Applicant has undertaken to incorporate the advice that we have provided outside of the Examination, and the submission of the Sabellaria Management and Monitoring Plan (SMMP). Overall, we believe that the document addresses many of our concerns, but we provide further comment which would improve the quality of the plan and increase our confidence in the outcomes. These are provided in the detailed comments below.

Detailed Comments

1. Condition/requirement 45 - This does not take into account that a pre-construction survey must be undertaken no longer than 18 months prior to the works commencing. This is first mentioned in section 3.1 but could and should be brought forward and included in the condition
2. Page 13 - Further evidence should be presented to demonstrate the likelihood of recovery making the impacts temporary. This is something that all marine Nationally Significant Infrastructure Projects (NSIPs) are struggling to evidence, hence the need for monitoring. Nevertheless, we would welcome the Applicant considering it further.
3. Section 3.2 on minimising impacts is welcomed. However, we advise that monitoring may need to be greater than the 50 m construction zone given anchor spread and drag. Therefore, our position is that the use of anchors over jack up barges may not necessarily minimise the impacts.
4. Page 16. Section 3.2. - Operation and maintenance works over the life time of the project. We request clarity on whether or not the Applicant is going to consult the Marine Management Organisation (MMO) further. We would advise speaking with the MMO to see if, as with Aggregates, it would be appropriate to have a 5 yearly review to ensure that the proposals remain fit for purpose?
5. Section 3.3. - Natural England queries how the commitments made by the Applicant to provide enhancement will be secured i.e. will this document be a named plan in the Development Consent Order/Deemed Marine License (DCO/DML)?

6. Section 4 - In the introduction, it would be beneficial to highlight that a pre-construction survey will be undertaken no longer than 18 months prior to commencement to inform mitigation measures.
7. Section 4.1 - Natural England reiterate point 3 above, that the construction zone may need to be greater than 50 m if anchors are to be used.
8. Section 4.3 - The monitoring schedule is welcomed by Natural England.
9. Table 5 - Please be advised that we would expect Year 0 (baseline) monitoring to be immediately after the works/disturbance have completed rather than before.
10. Section 5 – Natural England reiterate point 5. above i.e. will this be a named plan on the DCO/DML?