



**Summary of Oral Submissions at ISH15  
Desalination Plant**

**for the  
Royal Society for the Protection of Birds  
and Suffolk Wildlife Trust**

**Submitted for Deadline 10  
12 October 2021**

**Planning Act 2008 (as amended)**

**In the matter of:**

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

**Planning Inspectorate Ref: EN010012  
RSPB Registration Identification Ref: 20026628  
Suffolk Wildlife Trust Registration Identification Ref: 20026359**

## RSPB and SWT Summary of Oral Submissions at ISH 15 Desalination Plant

### 1. 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.*

#### 1.1. We commented that whatever the long term source may be, whether abstraction, desalination or something else, our concern, in support of NE's position as set out in its briefing note<sup>1</sup> on the detailed agenda for Issue Specific Hearing 15 on the Proposed Temporary Desalination Plant – 30.9.21 specifically para 2.1.

*"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)...."*

#### 1.2. Although we appreciate any new proposals will be assessed – it is the consideration of those potential effects within the HRA and ES for this project. Including ensuring proper consultation with interested parties such as RSPB and SWT

#### 1.3. As NE go on to state within paragraph 2.1 - Natural England would expect further information to be provided by the Applicant, identification of sources, the environmental implications of these (and any associated infrastructure) in order to assess potential impacts upon internationally and nationally protected sites – particularly in combination/cumulative consideration of potential effects arising out of the proposal as it currently stands.

*"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<sup>2</sup> which are not currently assessed within the Development Consent Order (DCO)...."*

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<sup>1</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-007827-EN010012\\_368644\\_SZC\\_Natural%20England%27s%20Briefing%20Note%20for%20ISH15.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-007827-EN010012_368644_SZC_Natural%20England%27s%20Briefing%20Note%20for%20ISH15.pdf)

<sup>2</sup> Water Resources Zone

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

*(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.*

2.1 We have one comment, specifically in relation to the assessment of the effects of noise on waterbirds and marine birds. In the Applicant's response to our queries about noise impacts in REP9-024, we note the Applicant asserts that additional effects (over and above those of the original assessment) are not predicted while the desalination plant is in its initial location in the main platform during Phases 1 and 2 of construction, however, the figures provided do not include combined noise levels for this initial location, only those arising from the desalination plant alone. Based on the figures which are provided (for other phases), we consider that it is necessary to assess the combined noise effects of the desalination plant and other sources of construction noise whilst the plant is in its initial location on the terrestrial and marine environment, including on birds of the Minsmere-Walberswick SPA and all features of the Outer Thames Estuary SPA.

2.2 For clarification, we wish to add that this is of particular concern at night-time, when other noise levels from other construction noise sources are lower, noting that noise from the desalination plant will remain constant during the day and night.

*(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.*

2.3 Firstly, we also wish to echo Mr Barlow's points that, whilst we understand this is not proposed at present, we would have significant concerns should the usage of the desalination plant extend into the commissioning or particularly the operational phases given the further potential for impacts of the desalination discharges combined with other operational effects on fish which are prey species for birds of the Outer Thames Estuary, Alde-ore Estuary and Minsmere-Walberswick SPAs.

2.4 I would also like to raise a point from our submissions on Change 19 around the total project effects with the inclusion of the desalination plant during the construction phase. The saline plume and the plumes for lead, zinc and chromium arising from the desalination discharge are not discussed in the change documentation in the context of indirect impacts on birds. Whilst we understand that the individual extent of each of these plumes is limited, we consider that the desalination plumes add further to the total marine impacts from the construction of the Application affecting Greater Sizewell Bay. We therefore query how the likely extent of the Bay subject to some degree of degradation in habitat quality, including its ability to provide prey, is valued, assessed and mitigated and the effect that such changes may have on birds (such as little terns of the Outer Thames Estuary and Minsmere-Walberswick SPAs) that forage within this area.