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BY EMAIL ONLY

Dear Mr Leigh

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by NNB Generation Company (SZC) Limited (“the Applicant”) for an Order granting Development Consent for the proposed Sizewell C Nuclear Power Station (“the proposed Development”)

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 statutory response to the Secretary of State for Business, Energy, and Industrial Strategy’s request for information, dated 18th March 2022.

1. Natural England’s response

1.1. Secretary of State request: Paragraph 3.6 (under Water Supply, Desalination Plant and Drainage) – ‘The Secretary of State invites the *Marine Management Organisation*, the *EA*, and *Natural England* to provide their comments on the updated BEEMS Technical Report TR552 regarding the updated version of the Sizewell C Desalination Plant Construction Discharge Assessment H1 Type Assessment submitted by the Applicant at Deadline 10 [REP10-052].’

1.2. Natural England response – Natural England understands that a H1 type assessment is one of several documents used to specifically support an application for a Water Discharge Activity permit and inform the relevant environmental assessments, including a Habitats Regulations Assessment (HRA). For this reason,

we defer to the Environment Agency's expertise on this topic and have no further comment to provide ahead of us being consulted on these assessments in our role as a statutory consultee on the permit.

1.3. On this topic, Natural England wish to highlight paragraph 1.13-1.15 in our Deadline 8 submission to the examination (*Natural England's Comments on the Site Water Supply Strategy* [REP8-298c]), where the Applicant's assessments are referenced, outlining multiple reasons for discounting desalination in the original application as submitted in May 2020. Natural England advise that any previous advice we have provided following Change 19 relating to the desalination plant effects were explicitly made on the assumption that the desalination plant would only be temporarily in operation during the construction phase of the project (maximum period of three years). As such, any further change to the project to extend the operational lifespan of the desalination plant or to translocate the desalination plant to another location during the operating phase of Sizewell C lifespan would likely require a significant amount of additional assessment of impacts to statutorily protected sites, landscapes and species, including of additional cumulative and in combination impacts.

1.4. **Secretary of State request: Paragraph 7.3 (under Habitats Regulations Assessment, Biodiversity, and Ecology)** – '*Natural England is requested to provide views on the effects on site integrity from changes in air quality during the construction and operation of the proposed Development, for all features of the Sandlings SPA, Minsmere to Walberswick Heaths and Marshes SAC, Minsmere-Walberswick SPA and Minsmere-Walberswick Ramsar site, both alone and in combination. In particular, Natural England is requested to provide comments upon the impacts attributable to the temporary desalination plant generators, with specific reference to the Applicant's Deadline 10 Submission '9.117 Sizewell C Desalination Plant Air Quality Impact Assessment'.*

1.5. **Natural England response** – Natural England's remaining concerns in terms of potential air quality impacts to European sites relate to the increased deposition of nitrogen oxides (NOx) and atmospheric nitrogen arising from the project as proposed on Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC), Minsmere-Walberswick Special Protection Area (SPA) and Minsmere-Walberswick Ramsar site.

1.6. We are satisfied that air quality critical levels are not exceeded to a degree that this would constitute and adverse effect on site integrity when various construction and operation works/activities are considered in isolation, including the Desalination Plant to which the Applicant's Deadline 10 Submission '9.117 Sizewell C Desalination Plant Air Quality Impact Assessment' relates. However, emissions arising from the proposed Development as a whole must be assessed cumulatively across the various works/activities within project (i.e. to conclude the 'alone' assessment) and 'in combination' with other plans and projects in order to inform a robust conclusion with regards to adverse effect on site integrity. In particular, emissions from the diesel generators used during the construction of the Development and the diesel generators used to power the temporary desalination

plant should be assessed together and with other activities including Heavy Goods Vehicle (HGV) movements and other site works to ensure critical level thresholds are not exceeded to a degree that would constitute an adverse effect on site integrity when considered cumulatively

- 1.7. It is therefore Natural England's position that, without these assessments, it is not yet possible to conclude no adverse effects on the integrity of these sites from air quality impacts arising during the construction and operation of the proposed Development. We understand that the applicant plans to submit such a report in response to the Secretary of State's information request which we welcome.
- 1.8. We also wish to reiterate that any previous advice we have provided following Change 19 relating to the desalination plant effects were explicitly made on the assumption that the desalination plant would only be temporarily in operation during the construction phase of the project (maximum period of three years). As such, any further change to the project to extend the operational lifespan of the desalination plant or to translocate the desalination plant to another location during the operating phase of Sizewell C's lifespan would likely require additional environmental assessment of impacts in terms of air quality.

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 only, please contact Jack Haynes on

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Yours sincerely,

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Senior Adviser
Norfolk & Suffolk Area Team