



# The Sizewell C Project

SZC Co.'s Response to the Secretary of State's Request for Further Information dated 31 March 2022: Appendix 9 - Updated Shadow Habitat Regulations Assessment Addendum Appendix 9A: Southern North Sea Site Integrity Plan, submitted in response to Question 8.15

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## EXECUTIVE SUMMARY

Level 1 control documents will either be certified under the DCO at grant or annexed to the Deed of Obligation (DoO). All are secured and legally enforceable. Some Level 1 documents are compliance documents and must be complied with when certain activities are carried out. Other Level 1 documents are strategies or draft plans which set the boundaries for a subsequent Level 2 document which is required to be approved by a body or governance group. The obligations in the **draft DCO** (Doc Ref. 3.1(J)) and **DoO** (Doc Ref. 10.4) set out the status of each Level 1 document.

This **Draft Site Integrity Plan (SIP)** is a Level 1 document which concerns the construction of the Marine Bulk Import Facility (MBIF) and Beach Landing Facility (BLF) as part of the Sizewell C Project.

Under Condition 40(2)(c) of the Deemed Marine Licence in **Schedule 20** of the **draft DCO** (Doc Ref. 3.1(J)), prior to the commencement of impact piling associated with the BLFs, the final SIP must be submitted to and approved by the Marine Management Organisation (MMO) no later than six months prior to the commencement of impact piling activities and that the SIP must be approved by the MMO in writing before impact piling commences. This condition, therefore, aligns with Natural England's advice.

The final SIP must be in general accordance with this **Draft Site Integrity Plan**.

Where further documents or details require approval, this document states which body or governance group is responsible for the approval and/or must be consulted. Any approvals by East Suffolk Council, Suffolk County Council or the MMO will be carried out in accordance with the procedure in **Schedule 23** of the **dDCO** (Doc Ref. 3.1(J)). The **DoO** establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made. Any updates to these further documents or details must be approved by the same body or governance group and through the same consultation and procedure as the original document or details.

Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

For the purposes of this document the term 'SZC Co.' refers to NNB Nuclear Generation (SZC) Limited (or any other undertaker as defined by the DCO), its appointed representatives and the appointed construction contractors.

## 1 INTRODUCTION

### 1.1 Objective of the SIP

1.1.1 This **draft Site Integrity Plan (SIP)** for the Southern North Sea Special Area of Conservation (SNS SAC) has been produced to ensure there is no significant disturbance of harbour porpoise, *Phocoena phocoena*, as a result of underwater noise from the Sizewell C Project in-combination with other plans and projects, so that there is no potential for an Adverse Effect on Integrity (AEOI) of the SNS SAC in relation to the conservation objectives for harbour porpoise. A final updated SIP will be produced in general accordance with this **Draft SIP**, and will be submitted to the MMO for its approval at least six months prior to the commencement of impact piling associated with the Beach Landing Facility (BLF) or the temporary Marine Bulk Import Facility (MBIF) pursuant to Condition 40(2)(c) of the Deemed Marine Licence in **Schedule 20** of the **draft DCO** (Doc Ref. 3.1(J)).

1.1.2 This **draft SIP** sets out the approach for the Sizewell C Project to ensure the avoidance of AEOI for the SNS SAC in-combination with other measures. The final SIP will include any updated information on management measures, advice or guidance for the SNS SAC, final design of the project and the in-combination assessment will be revised based on the latest information and scheduling of works for other plans and projects.

1.1.3 This version of the **draft SIP** (Revision 5.0) updates the version (Revision 4.0) submitted at Deadline 10 [[REP10-022](#)]. Revision 5.0 (this document) addresses Natural England's Deadline 10 comments [[REP10-200](#)], which were made on Revision 3.0 of the SNS SAC SIP [[REP8-047](#)]. This revised draft SIP is provided in response to the Secretary of State's request for further information dated 31<sup>st</sup> March 2022.

1.1.4 This **draft SIP** is based on the latest Underwater Noise Report ([[REP5-124](#)]), which remains valid and is appropriate for the assessments in this **draft SIP**.

1.1.5 This **draft SIP** provides the following:

- An overview of the requirement for a SIP for the marine components of the Sizewell C Project in Section 1.2.
- An overview of the SNS SAC and Conservation Objectives for harbour porpoise in Section 1.3.

- A summary of the potential underwater noise effects of the Sizewell C Project alone and in-combination with other plans and projects that could disturb harbour porpoise in the SNS SAC in Section 2.
- Mitigation and management measures in Section 3.
- Draft SIP summary and conclusions in Section 4.

1.1.6 A separate Marine Mammal Mitigation Protocol (MMMP) will be prepared (in general accordance with the **draft MMMP** (Doc Ref. 10.8) (secured pursuant to Condition 40 of the DML)) to reduce the risk of auditory injury in marine mammals as a result of underwater noise during piling. In addition, if required, a European Protected Species (EPS) licence application will be submitted prior to construction of the offshore components in accordance with relevant legislation.

1.1.7 It is also important to note that the requirement for any unexploded ordnance (UXO) clearance underwater associated with marine works for the Sizewell C Project has not been included in the SIP because, on the advice of the MMO, UXO clearance for the Sizewell C Project has not been included in the DCO Application, but if required, will be included in separate Marine Licence application. This approach is appropriate because the need for (and therefore nature of) any UXO clearance that may be necessary is currently unknown. The separate Marine Licence application for any UXO clearance will assess the worst-case scenario of potential effects on the SNS SAC at the time of application for the Marine Licence, based on an understanding of the specific UXO clearance activity that is required. However, the potential for UXO clearance for other projects, such as that connected with development of offshore wind farms (OWF), has been included in the worst case in-combination scenarios in **Section 2.2**.

1.1.8 In summary, if underwater UXO clearance for the Sizewell C Project is required, further assessments will be conducted, based on the latest information, guidance and mitigation techniques, and submitted in support of a separate Marine Licence application. This will include potential effects on the SNS SAC and the requirements for any EPS licence as set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

1.1.9 It has been agreed with the MMO that a separate Marine Licence will be sought for any UXO clearance prior to any such clearance being carried out, as outlined in the SoCG agreed with the MMO [[REP10-107](#)] (see Ref MMO-47 on page 107).

## 1.2 Requirement for a SIP

- 1.2.1 The proposed Sizewell C nuclear power station will be located on land immediately to the north of Sizewell B nuclear power station, on the Suffolk coast approximately midway between Lowestoft to the north and Ipswich to the south.
- 1.2.2 The marine works associated with the Sizewell C Project are located wholly within the winter area of the SNS SAC.
- 1.2.3 The assessments in the **Shadow HRA Report** [[APP-145](#)] and the Shadow HRA Addenda [[AS-178](#)] [[REP2-032](#)] [[REP7-279](#)] indicate that there is no potential for adverse effect on the integrity of the SNS SAC from the Sizewell C Project alone.
- 1.2.4 Therefore, as outlined above, the SIP is drafted to ensure there is no AEOI on the SNS SAC as a result of underwater noise from the Sizewell C Project in-combination with other plans and projects.
- 1.2.5 The assessments in the **Shadow HRA Report** ( [[APP-145](#)]) and the Shadow HRA Addenda [[AS-178](#)] [[REP2-032](#)] [[REP7-279](#)] indicate that the highest levels of underwater noise is from the impact piling of the BLF and temporary MBIF . Therefore, underwater noise from this activity has been assessed, as a precautionary approach, in this **draft SIP** to assess the potential disturbance of harbour porpoise.
- a) **Impact Piling of BLF and MBIF**
- 1.2.6 The Sizewell C Project marine works will include an enhanced permanent BLF for use during construction, which will be retained for operational purposes and a temporary MBIF for use only during the construction phase.
- b) **Enhanced permanent BLF**
- 1.2.7 The enhanced permanent BLF design is for 24 piles, with 12 piles and 4 dolphin / fenders piled below mean high water spring tide (MHWS). The pile diameter will be 1m and approximately 2.5m for dolphin / fender piles. The maximum hammer energy will be 120kJ for the piles and up to 280kJ for the dolphins / fenders piles.
- 1.2.8 Up to 16 piles (including dolphins / fenders) will be installed for the enhanced permanent BLF below the level of MHWS tides. Up to two piles or two dolphins / fenders will be piled per day (see **Appendix B**).
- 1.2.9 It has been assumed on a precautionary basis that impact piling would be used and assessments in this draft SIP, as outlined in **Section 2**, are based

on the current Statutory Nature Conservation Bodies (SNCB) guidance for the Effective Deterrence Ranges (EDR) for pin-piles without mitigation. However, where practicable, a hydrohammer will be used to minimise the effects of underwater noise. A hydrohammer has two hydraulic plungers filled with water designed to dampen the impact and reduce the source noise of impact piling. Hydrohammers will reduce sound exposure levels (SEL) by between 3 and 6dB and sound peak pressure level (SPL) by 9 to 12 dB.

c) Temporary MBIF

1.2.10 The temporary MBIF will be approximately 505m in length and extend approximately 440m seaward of MHWS. The temporary MBIF will consist of a trestle pier and an enlarged unloading platform with a single berth. The trestle pier will require 68 piles below MHWS of approximately 1.2m in diameter. The unloading platform will consist of 30 piles of approximately 1.2m diameter. Four mooring dolphins with a diameter of approximately 2.5m will also be installed at the unloading platform. Piling of the temporary MBIF will be similar to the piling for the enhanced permanent BLF, with a maximum hammer energy of 120kJ for the piles and up to 280kJ for the dolphins / fenders piles.

1.2.11 In total, 102 piles (including dolphins / fenders) will be installed for the temporary MBIF below the level of MHWS tides. For the trestle pier, up to two piles or two dolphins / fenders will be piled per day. For the unloading platform, up to three piles will be installed per day (see **Appendix B**).

1.2.12 As a worst-case it has been assumed, as outlined above, that impact piling would be used and the assessments in **Section 2** are based on the current SNCB guidance for the EDR for pin-piles without mitigation. However, where practicable a hydrohammer will be used to minimise the effects of underwater noise.

d) Installation of permanent BLF and temporary MBIF

1.2.13 Installation of the enhanced permanent BLF will take approximately six months. Installation of the temporary MBIF will take approximately nine months.

1.2.14 No impact piling associated with construction of the permanent BLF or temporary MBIF will occur below MHWS in the months of May to August inclusive to avoid the potential for indirect effects on fish prey availability for foraging little terns..

1.2.15 Should piling for the enhanced permanent BLF and temporary MBIF occur simultaneously, a total of 48 days of piling will be required (see **Appendix**

**B).** If piling for the enhanced permanent BLF and temporary MBIF were non-simultaneous, a total of 54 days of piling will be required (see **Appendix B**).

## 1.3 The Southern North Sea SAC

### a) Site information

1.3.2 The SNS SAC, designated in 2019, has been recognised as an area with persistent high densities of harbour porpoise (Ref. 1.1).

1.3.3 The SAC covers both winter and summer habitats of importance to harbour porpoise, with 27,028km<sup>2</sup> of the site being important in the summer (April to September) and the 12,696km<sup>2</sup> of the site being important in the winter period (October to March) (Ref. 1.1).

1.3.4 The majority of the SAC is less than 40m in water depth, reaching up to 75m in the northern-most areas. The seabed is mainly sublittoral sand and sublittoral coarse sediment (Ref. 1.1). The site overlaps with a number of other European sites, including the Dogger Bank SAC, Margate and Long Sands SAC, Haisborough, Hammond and Winterton SAC and North Norfolk Sandbanks and Saturn Reef SAC, all of which have important sandbank and gravel beds.

1.3.5 As a wide-ranging species, harbour porpoise within the SAC cannot be considered isolated in relation to the rest of the population. Harbour porpoise within the SAC are part of the wider North Sea Management Unit (MU) population (Ref. 1.2). JNCC and Natural England (Ref. 1.2) consider that it is therefore not appropriate to use site population estimates in assessments, and the assessments need to take into consideration population estimates at the MU level to account for daily and seasonal movements of the animals. Currently the population estimate for the harbour porpoise North Sea MU is 346,601 (coefficient of variation = 0.09; 95% confidence interval = 289,489 – 419,967; Ref. 1.3).

1.3.6 The Sizewell C Project marine works area will be located wholly within the winter area of the SAC. The winter SNS SAC area is 12,696km<sup>2</sup> and the winter period is October to March, inclusive (Ref. 1.4).

1.3.7 The Sizewell C Project marine works area will be located 49.4km (at its closest point) from the summer area of the SNS SAC. Therefore, there is no potential for any effects on the summer area.



b) Conservation Objectives

1.3.8 The Conservation Objectives for the SNS SAC are designed to help ensure that the obligations of the Habitats Directive can be met. Article 6(2) of the Directive requires that there should be no deterioration or significant disturbance of the qualifying species or to the habitats upon which they rely.

1.3.9 The Conservation Objectives for the SAC are (Ref. 1.2):

*“To ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for Harbour Porpoise in UK waters.*

*In the context of natural change, this will be achieved by ensuring that:*

- 1. Harbour porpoise is a viable component of the site;*
- 2. There is no significant disturbance of the species; and*
- 3. The condition of supporting habitats and processes, and the availability of prey is maintained”.*

1.3.10 These Conservation Objectives are:

*“a set of specified objectives that must be met to ensure that the site contributes in the best possible way to achieving Favourable Conservation Status (FCS) of the designated site feature(s) at the national and biogeographic level” (Ref. 1.2).*

i. Conservation Objective 1: The species is a viable component of the site.

1.3.11 This Conservation Objective is designed to minimise the risk of injury and killing or other factors that could restrict the survivability and reproductive potential of harbour porpoise using the SAC. Specifically, this objective is primarily concerned with operations that would result in unacceptable levels of those impacts on harbour porpoise using the SAC. Unacceptable levels can be defined as those having an impact on the FCS of the populations of the species in their natural range.

1.3.12 Harbour porpoise are considered to be a *viable component* of the SAC if they are able to live successfully within it. The SNS SAC has been selected primarily based on the long-term, relatively higher densities of porpoise in contrast to other areas of the North Sea. The implication is that the SAC

provides relatively good foraging habitat and may also be used for breeding and calving. However, because the number of harbour porpoise using the SAC naturally varies, there is no exact value for the number of animals expected within the site (Ref. 1.2).

1.3.13 Harbour porpoise are listed as EPS under Annex IV of the Habitats Directive, and are therefore protected from the deliberate killing (or injury), capture and disturbance throughout their range. Within the UK, the Habitats Directive is enacted through The Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017. Under these Regulations, it is deemed an offence if harbour porpoise are deliberately disturbed in such a way as to:

- Impair their ability to survive, to breed or reproduce, or to rear or nurture their young; or
- To affect significantly the local distribution or abundance of that species.

1.3.14 The term deliberate is defined as any action that is shown to be “*by a person who knows, in the light of the relevant legislation that applies to the species involved, and the general information delivered to the public, that his action will most likely lead to an offence against a species, but intends this offence or, if not, consciously accepts the foreseeable results of his action*”.

1.3.15 In addition, Article 12(4) of the Habitats Directive is concerned with incidental capture and killing. It states that Member States “*shall establish a system to monitor the incidental capture and killing of the species listed on Annex IV (all cetaceans). In light of the information gathered, Member States shall take further research or conservation measures as required to ensure that incidental capture and killing does not have a significant negative impact on the species concerned*”.

- ii. **Conservation Objective 2: There is no significant disturbance of the species.**

1.3.16 The disturbance of harbour porpoise typically, but not exclusively, originates from operations that cause underwater noise, including activities such as seismic surveys, pile driving and sonar. Responses to noise can be physiological and/or behavioural. JNCC *et al.* have produced guidelines to minimise the risk of physical injury to cetaceans from various sources of loud, underwater noise (Ref. 1.4). However, disturbance is primarily a behavioural response to noise and may, for example, lead to harbour porpoises being displaced from the affected area.

- 1.3.17 As outlined above, JNCC and Natural England (Ref. 1.2) note that harbour porpoises in UK waters are considered part of a wider European population and that due to the mobile nature of this species the concept of a ‘site population’ may not be appropriate for this species. JNCC (Ref. 1.1) therefore advises that assessments of effects of plans or projects (i.e. HRA) need to take into consideration population estimates at the MU level, to account for daily and seasonal movements of the animals.
- 1.3.18 Disturbance of harbour porpoise may lead to displacement from an area, and the temporary loss of habitat. As such, JNCC and Natural England (Ref. 1.2) suggest that activities within the SNS SAC should be managed to ensure that the animals’ potential usage of the site is maintained and any disturbance should not lead to the exclusion of harbour porpoise from a significant portion of the site for a significant period of time.
- 1.3.19 The current SNCB advice and guidance (Ref. 1.4) for the assessment of significant noise disturbance on harbour porpoise in the SNS SAC is that:
- “Noise disturbance within an SAC from a plan/project, individually or in-combination, is considered to be significant if it excludes harbour porpoise from more than:*
- 1) 20% of the relevant area of the site in any given day,  
or
- 2) An average of 10% of the relevant area of the site over a season.”
- iii. **Conservation Objective 3: The condition of supporting habitats and processes, and the availability of their prey is maintained.**
- 1.3.20 Supporting habitats, in this context, means the characteristics of the seabed and water column. Supporting processes encompass the movements and physical properties of the habitat. The maintenance of these supporting habitats and processes contributes to ensuring prey is maintained within the SAC and is available to harbour porpoise using the site. Harbour porpoise are strongly reliant on the availability of prey species year round due to their high energy demands, and their distribution and condition may strongly reflect the availability and energy density of prey.
- 1.3.21 This Conservation Objective is designed to ensure that harbour porpoise are able to access food resources year round, and that activities occurring in the SNS SAC will not affect this.

c) Management measures

- 1.3.22 Specific management measures are yet to be developed for the SNS SAC; however, JNCC and Natural England (Ref. 1.2) advise that *“the maintenance of supporting habitats and processes contributes to ensuring that prey is maintained within the site and is available to harbour porpoises using the site.”*
- 1.3.23 JNCC and Natural England (Ref. 1.2) also state that *“management measures (e.g. the scale and type of mitigation) are the responsibility of the relevant regulatory or management bodies. These bodies will consider SNCB advice and hold discussions with the sector concerned, where appropriate.”*
- 1.3.24 In the absence of management measures for the SNS SAC at this time, a range of project-level commitments have been proposed through the development of this **draft SIP**, the **draft MMMP** (Doc Ref. 10.8) (secured pursuant to DML Condition 40) and any necessary EPS licencing requirements, to ensure that appropriate mitigation measures (where required) can be agreed to ensure that the Conservation Objectives are met.

d) Advice on activities

- 1.3.25 JNCC and Natural England (Ref. 1.2) have provided advice on activities that specifically occur within or near to the SNS SAC that could be expected to impact on the site’s integrity. The key activities that JNCC and Natural England consider to have the greatest impact on the population of UK harbour porpoise and, therefore, the SNS SAC are:
- Removal of non-target species by commercial fisheries with by-catch of harbour porpoise (predominantly static nets).
  - Increased contaminants from discharge / run-off from land fill, terrestrial and offshore industries.
  - Increased anthropogenic underwater noise from shipping, drilling, dredging and disposal, aggregate extraction, pile driving, acoustic surveys, underwater explosion, military activity, acoustic deterrent devices and recreational boating activity.
  - Death or injury by collision from shipping, recreational boating and tidal energy installations.
  - Reduction in prey resources by commercial fisheries.

- 1.3.26 The aim is that the advice should help identify the extent to which existing activities are, or can be made, consistent with the Conservation Objectives, and thereby focus the attention of relevant and competent authorities and monitoring programmes to areas that may need management measures (Ref. 1.2).

## 2 POTENTIAL EFFECTS: SOUTHERN NORTH SEA SAC

### 2.1 Potential for significant disturbance of harbour porpoise as a result of underwater noise from the Sizewell C Project (alone)

2.1.1 The assessments in the **Shadow HRA Report** [APP-145], concluded that there is no potential for adverse effect on the integrity of the SNS SAC in relation to the Conservation Objectives for harbour porpoise from the Sizewell C Project alone. However impact piling for the permanent BLF and temporary MBIF is identified as the activity that is likely to generate the highest levels of underwater noise that could therefore contribute, in combination with other plans and projects, to potential disturbance of harbour porpoise. Therefore, it has been assessed as the worst-case noise-generating scenario in this **draft SIP**.

2.1.2 Since the completion of the **Shadow HRA Report** [APP-145] in early 2020, there have been updates for the enhanced permanent BLF and the inclusion of the proposed design change for a temporary MBIF (as outlined in **Section 1.2a**). However, the subsequent assessments in the **Shadow HRA Addendum** [AS-178] for the enhanced permanent BLF and temporary MBIF concluded that there is no potential for adverse effect on the integrity of the SNS SAC from the Sizewell C Project alone.

#### a) Effective Deterrence Ranges (EDR)

2.1.3 Since completion of the **Shadow HRA Report** [APP-145]) JNCC *et al.* (Ref. 1.4) finalised guidance for assessing the significance of noise disturbance against Conservation Objectives of SACs with harbour porpoise as a qualifying interest feature. The guidance identifies noise generating activities that can potentially result in disturbance to harbour porpoise and provides recommended Effective Deterrence Ranges (EDR) for these activities. This includes a recommended 15km EDR for pin piles. The assessments in the **Shadow HRA Addendum** [AS-178] for the enhanced permanent BLF and temporary MBIF and the assessments in this draft SIP take into account this guidance and recommended EDR for pin piles.

2.1.4 The potential areas of disturbance for piling at the permanent BLF and temporary MBIF are based on the worst-case piling locations, taking into account overlap of the maximum potential area in the SNS SAC and proximity to land:

- For piling at the permanent BLF, the maximum area of disturbance in the SNS SAC winter area is 332.5km<sup>2</sup> (2.62% of the SNS SAC winter area).

- For piling at the temporary MBIF, the maximum area of disturbance in the SNS SAC winter area is 341.1km<sup>2</sup> (2.69% of the SNS SAC winter area).
- For non-simultaneous piling at permanent BLF and temporary MBIF, the maximum area of disturbance in the SNS SAC winter area is 341.1km<sup>2</sup> (2.69% of the SNS SAC winter area).
- For simultaneous piling at permanent BLF and temporary MBIF, the maximum area of disturbance in the SNS SAC winter area is 341.5km<sup>2</sup> (2.69% of the SNS SAC winter area).

2.1.5 As outlined in **Section 1.2.12d**), installation and piling for both the permanent BLF and temporary MBIF will start at the same time:

- If piling for the permanent BLF and temporary MBIF occurred simultaneously, a total of 48 days of piling will be required (see **Appendix B**).
- If piling for the piers for the permanent BLF and temporary MBIF occurred non-simultaneous a total of 54 days of piling will be required (see **Appendix B**).

2.1.6 As a precautionary approach, it is assumed all impact piling below the level of MHWS tides associated with construction of the permanent BLF or temporary MBIF will be in the winter period (October to March inclusive).

2.1.7 **Table 2.1** provides an assessment of the potential worst-case effects of piling for the Sizewell C Project (alone) for the permanent BLF and temporary MBIF.

2.1.8 The assessments indicate that the worst-case scenario is for non-simultaneous piling at the permanent BLF and temporary MBIF (up to 2.69% of SNS SAC winter area) with no temporal overlap in piling (seasonal average of 0.80% for 54 days). Therefore, piling for the permanent BLF and temporary MBIF will not exceed 20% of the winter area on any given day, or exceed an average of 10% of the winter area during the winter season. Therefore, there is no potential for adverse effect on the integrity of the SNS SAC from the Sizewell C Project alone.

2.1.9 It is important to note that, where practicable, a hydrohammer, will be used for the piling of the permanent BLF and temporary MBIF, which would reduce sound exposure levels (SEL) by 3 to 6dB and sound peak pressure level (SPL) by 9 to 12 dB.

2.1.10 In the **Underwater Noise Report** [REP5-124], assessments of fleeing behaviour assumed that marine mammals would flee from the source location at the onset of activity. The maximum potential range for harbour porpoise was less than 9km, based on fleeing response, 24 hour exposure and Temporary Threshold Shift (TTS) threshold. Therefore, the EDR of 15km used in the assessments represents the worst-case.

**Table 2.1: The potential worst-case effects of impact piling for the Sizewell C Project on the SNS SAC (alone)**

Potential Effect	Assessment Of Potential Effect On Harbour Porpoise (% of North Sea MU)*	Spatial Assessment In Relation To The SNS SAC Winter Area	Season Average Assessment In Relation To The SNS SAC Winter Area And Winter Season	Potential For Adverse Effect On The Integrity Of The SNC SAC
<b>Non-simultaneous impact piling at the permanent BLF and temporary MBIF</b>				
Worst-case	207 (0.06%)	2.69% (341.1km <sup>2</sup> )	0.80% (54 days)	<b>No</b>
<b>Simultaneous impact piling at the permanent BLF and temporary MBIF</b>				
Worst-case	207 (0.06%)	2.69% (341.5km <sup>2</sup> )	0.71% (48 days)	<b>No</b>

\* Density of harbour porpoise = 0.607/km<sup>2</sup>, based on SCANS-III (Ref. 2.1) and North Sea MU of 346,601 (Ref. 1.3)



## 2.2 Potential in-combination effects during piling for the Sizewell C Project

2.2.1 It is assumed, as a worst-case, all impact piling below MHWS for the permanent BLF and temporary MBIF will be non-simultaneous piling and in the winter period of October to March. Potential in-combination effects for activities that could occur in the winter area of the SNS SAC during this period have been determined.

2.2.2 However, as outlined in **Section 1**, the final SIP, which will be submitted prior to piling pursuant to DML Condition 40, will include any updated information on the in-combination effects, based on the latest scheduling of works for other plans and projects.

2.2.3 Since the completion of the **Shadow HRA Report** [[APP-145](#)] in early 2020, there have been some changes to the potential plans and projects that could result in in-combination underwater noise effects with the Sizewell C Project. This includes the Thanet Extension OWF being refused consent in June 2020 and the decision not being challenged<sup>1</sup>. Therefore, the in-combination assessment has been updated with the removal of the Thanet Extension OWF project.

2.2.4 In addition, East Anglia ONE North, East Anglia TWO and East Anglia THREE have been combined to form the East Anglia HUB and construction is due commence in 2023. Piling is most likely to start in 2024 or summer 2023, at the earliest. Therefore, piling or UXO clearance for an OWF has been considered in the worst-case in-combination scenarios.

2.2.5 As outlined in **Section 2.1**, since completion of the **Shadow HRA Report** [[APP-145](#)], JNCC *et al.* (Ref. 1.4) have finalised guidance for assessing the significance of noise disturbance against Conservation Objectives of SACs with harbour porpoise as a qualifying feature.

2.2.6 The JNCC *et al.* (Ref. 1.4) recommended EDRs are:

- 26km EDR for OWF piling of monopiles, an area of up to 2,124km<sup>2</sup> (up to 16.7% of SNS SAC winter area);
- 15km EDR for pin-pile piling, an area of up to 707km<sup>2</sup> (up to 5.6% of SNS SAC winter area);

<sup>1</sup> <https://group.vattenfall.com/uk/what-we-do/our-projects/vattenfall-in-kent/thanet-extension>

- 15km EDR for OWF piling of monopiles with noise abatement, an area of up to 707km<sup>2</sup> (up to 5.6% of SNS SAC winter area);
- 15km EDR for conductor piling of oil and gas wells, an area of up to 707km<sup>2</sup> (up to 5.6% of SNS SAC winter area);
- 12km EDR for seismic surveys, potential area of 452.4km<sup>2</sup> around the moving vessel (2.5% of SNS SAC winter area); however, JNCC *et al.* (Ref. 1.4) recommends the daily disturbance footprint should be calculated using the EDR as a ‘buffer’ around the predicted survey line(s) that can be completed on a single day. For example, a single 10km line in a single day results in 692.4km<sup>2</sup> of area (5.5% of SNS SAC winter area).
- 5km EDR for high resolution geophysical surveys with sub-bottom profilers, an area of 78.54km<sup>2</sup> around the moving vessel (0.6% of SNS SAC winter area); and
- 26km EDR for UXO clearance, an area of up to 2,124km<sup>2</sup> (up to 16.7% of SNS SAC winter area).

2.2.7 The in-combination assessments take this guidance and recommended EDRs for noise generating activities that could disturb harbour porpoise in the SNS SAC winter area into account. However, as previously outlined, where practicable, a hydrohammer will be used to reduce noise levels during impact piling below MHWS for the BLF and MBIF.

2.2.8 As outlined in **Section 2.1**, the worst-case scenario for piling of the permanent BLF and temporary MBIF is up to 2.69% (up to 341.5km<sup>2</sup>) of SNS SAC winter area and for non-simultaneous impact piling (54 days).

2.2.9 Potential in-combination scenarios have been assessed based on potential activities that could be undertaken during the winter period in the winter area of the SNS SAC (**Table 2.2**).

2.2.10 Not all these activities will occur at the same time in the SNS SAC winter area during the permanent BLF and temporary MBIF impact piling; these scenarios present the possible worst-case in-combination effects (**Table 2.2**), without having an adverse effect on the integrity of the SNS SAC.

2.2.11 The in-combination assessments during impact piling below MHWS for the permanent BLF and temporary MBIF indicate that the worst-case scenarios would not exceed 20% of the winter area on any given day, or exceed an average of 10% of the winter area during the winter season. Therefore, there is no potential for adverse effect on the integrity of the SNS SAC for

potential in-combination effects during impact piling below MHWS for the Sizewell C Project.

**Table 2.2: Potential worst- case in-combination scenarios during impact piling of the permanent BLF and temporary MBIF for the Sizewell C Project**

In-Combination Scenario For Permanent BLF and Temporary MBIF	Maximum Area Of Potential Disturbance In SNS SAC Winter Area	Percentage Of SNS SAC Winter Area	Seasonal Average* During Non-Simultaneous Impact Piling For The BLF and MBIF	Potential For Adverse Effect On Integrity Of The SNS SAC
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with OWF monopile piling (2,124km <sup>2</sup> )	2,465.5km <sup>2</sup>	19.4%	5.76% (54 days)	No
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with UXO clearance (2,124km <sup>2</sup> )	2,465.5km <sup>2</sup>	19.4%	5.76% (54 days)	No
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with pin-piles (707km <sup>2</sup> ) including conductor piling of oil and gas well	1.048.5km <sup>2</sup>	8.3%	2.45% (54 days)	No
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with OWF monopile piling with noise abatement (707km <sup>2</sup> )	1.048.5km <sup>2</sup>	8.3%	2.45% (54 days)	No
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with seismic survey	793.9km <sup>2</sup> (based on area (452.4km <sup>2</sup> ) around vessel)	6.3%	1.86% (54 days)	No
	1,033.9km <sup>2</sup> (based on	8.1%	2.42% (54 days)	No

**NOT PROTECTIVELY MARKED**

In-Combination Scenario For Permanent BLF and Temporary MBIF	Maximum Area Of Potential Disturbance In SNS SAC Winter Area	Percentage Of SNS SAC Winter Area	Seasonal Average* During Non-Simultaneous Impact Piling For The BLF and MBIF	Potential For Adverse Effect On Integrity Of The SNS SAC
	survey area (692.4km <sup>2</sup> ) in one day)			
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with geophysical survey (78.54km <sup>2</sup> )	420.04km <sup>2</sup>	3.3%	0.98% (54 days)	No
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with seismic survey (692.4km <sup>2</sup> ) and pin-piles or conductor piling of oil and gas well or monopile with noise abatement (707km <sup>2</sup> )	1,740.9km <sup>2</sup>	13.7%	4.07% (54 days)	No
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with seismic survey (692.4km <sup>2</sup> ) and geophysical survey (78.54km <sup>2</sup> ) and pin-piles or conductor piling of oil and gas well or monopile with noise abatement (707km <sup>2</sup> )	1,819.44km <sup>2</sup>	14.3%	4.25% (54 days)	No
Impact piling for the BLF and MBIF (up to 341.5km <sup>2</sup> ) with pin-piles	2,462.5km <sup>2</sup>	19.4%	5.75% (54 days)	No

**NOT PROTECTIVELY MARKED**

**NOT PROTECTIVELY MARKED**

In-Combination Scenario For Permanent BLF and Temporary MBIF	Maximum Area Of Potential Disturbance In SNS SAC Winter Area	Percentage Of SNS SAC Winter Area	Seasonal Average* During Non-Simultaneous Impact Piling For The BLF and MBIF	Potential For Adverse Effect On Integrity Of The SNS SAC
(707km <sup>2</sup> ) and conductor piling of oil and gas well (707km <sup>2</sup> ) and monopile with noise abatement (707km <sup>2</sup> )				

\*Based on maximum, not average, area of overlap with SNS SAC winter area (12,696km<sup>2</sup>) and winter period of 182 days from 1<sup>st</sup> October to 31<sup>st</sup> March.

### 3 SIP MITIGATION AND MANAGEMENT

- 3.1.1 As a worst-case it has been assumed in the assessments that impact piling, without any noise reduction, will be used. However, where practicable, a hydrohammer will be used to minimise the effects of underwater noise. Hydrohammers will reduce sound exposure levels (SEL) by between 3 and 6 dB and sound peak pressure level (SPL) by between 9 and 12 dB.
- 3.1.2 The in-combination scenarios assessed in **Section 2.2** indicate that, based on the worst-case scenarios for impact piling of the permanent BLF and temporary MBIF, there will be no adverse effect on the integrity of the SNS SAC. Therefore, no additional mitigation or management measures are required.

## 4 SUMMARY AND CONCLUSION

- 4.1.1 This **draft SIP** shows that the most likely in-combination scenarios, assuming on a precautionary basis use of impact piling, will not have an adverse effect on the integrity of the SNS SAC (**Section 2.2**). Notwithstanding, where practicable, a hydrohammer will be used to reduce noise levels during piling of the permanent BLF and temporary MBIF. No further mitigation measures will be required during impact piling of the permanent BLF and temporary MBIF based on this assessment.
- 4.1.2 A final SIP will be prepared based on this **draft SIP** and, prior to the commencement of impact piling associated with the permanent BLF and temporary MBIF, will be submitted to, and approved by, the MMO pursuant to the Deemed Marine Licence.
- 4.1.3 The final SIP will include any updated information on management measures, advice or guidance for the SNS SAC and will be based on the final design of the Sizewell C Project. The in-combination assessment will be revised based on the latest information and scheduling of works for other plans and projects.
- 4.1.4 The final SIP will be developed in consultation with the MMO and Natural England.

## REFERENCES

1. Ref. 1.1 JNCC. SAC Selection Assessment: Southern North Sea. January 2017. Joint Nature Conservation Committee, UK. Available from: <http://jncc.defra.gov.uk/page-7243>. 2017.
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3. Ref. 1.3 IAMMWG. Updated abundance estimates for cetacean Management Units in UK waters. JNCC Report No. 680, JNCC Peterborough, ISSN 0963-8091. 2021. Available from: <https://data.jncc.gov.uk/data/3a401204-aa46-43c8-85b8-5ae42cdd7ff3/JNCC-Report-680-FINAL-WEB.pdf>.
4. Ref. 1.4 JNCC, Department of Agriculture, Environment and Rural Affairs (DAERA) and Natural England. Guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs (England, Wales & Northern Ireland). June 2020.
5. Ref. 2.1 Hammond, P.S., Lacey, C., Gilles, A., Viquerat, S., Boerjesson, P., Herr, H., Macleod, K., Ridoux, V., Santos, M.B., Scheidat, M., Teilmann, J., Vingada, J. and Øien, N. Estimates of cetacean abundance in European Atlantic waters in summer 2016 from the SCANS-III aerial and shipboard surveys. June 2021. Available from: [https://synergy.st-andrews.ac.uk/scans3/files/2021/06/SCANS-III\\_design-based\\_estimates\\_final\\_report\\_revised\\_June\\_2021.pdf](https://synergy.st-andrews.ac.uk/scans3/files/2021/06/SCANS-III_design-based_estimates_final_report_revised_June_2021.pdf)



## APPENDIX A: FIGURE 1.1: SIZEWELL C IN RELATION TO THE SOUTHERN NORTH SEA SPECIAL AREA OF CONSERVATION



NOTES

KEY

- SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
- - - DEMARCATION LINE
- SOUTHERN NORTH SEA SPECIAL AREA OF CONSERVATION (SAC)
- SUMMER AREA
- WINTER AREA

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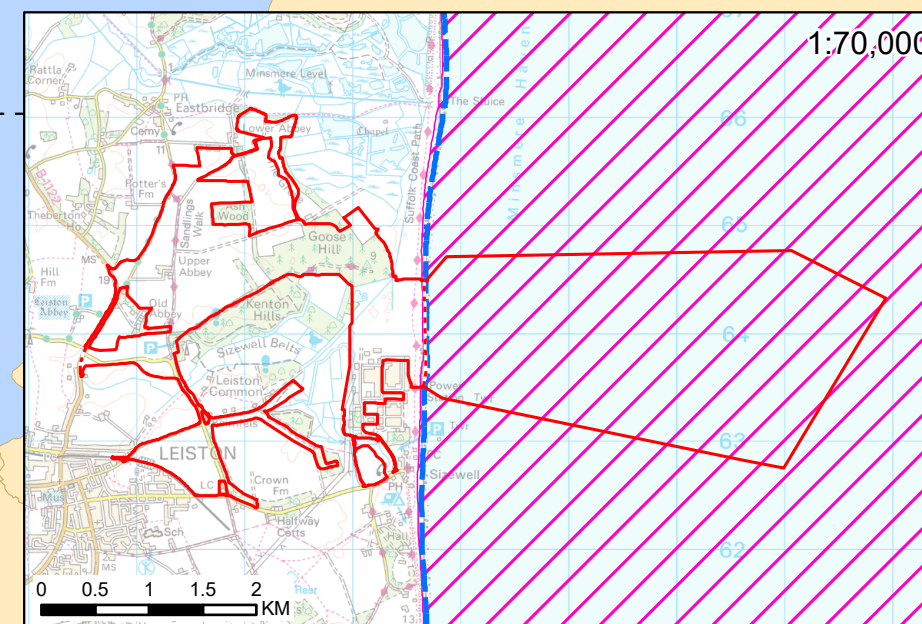
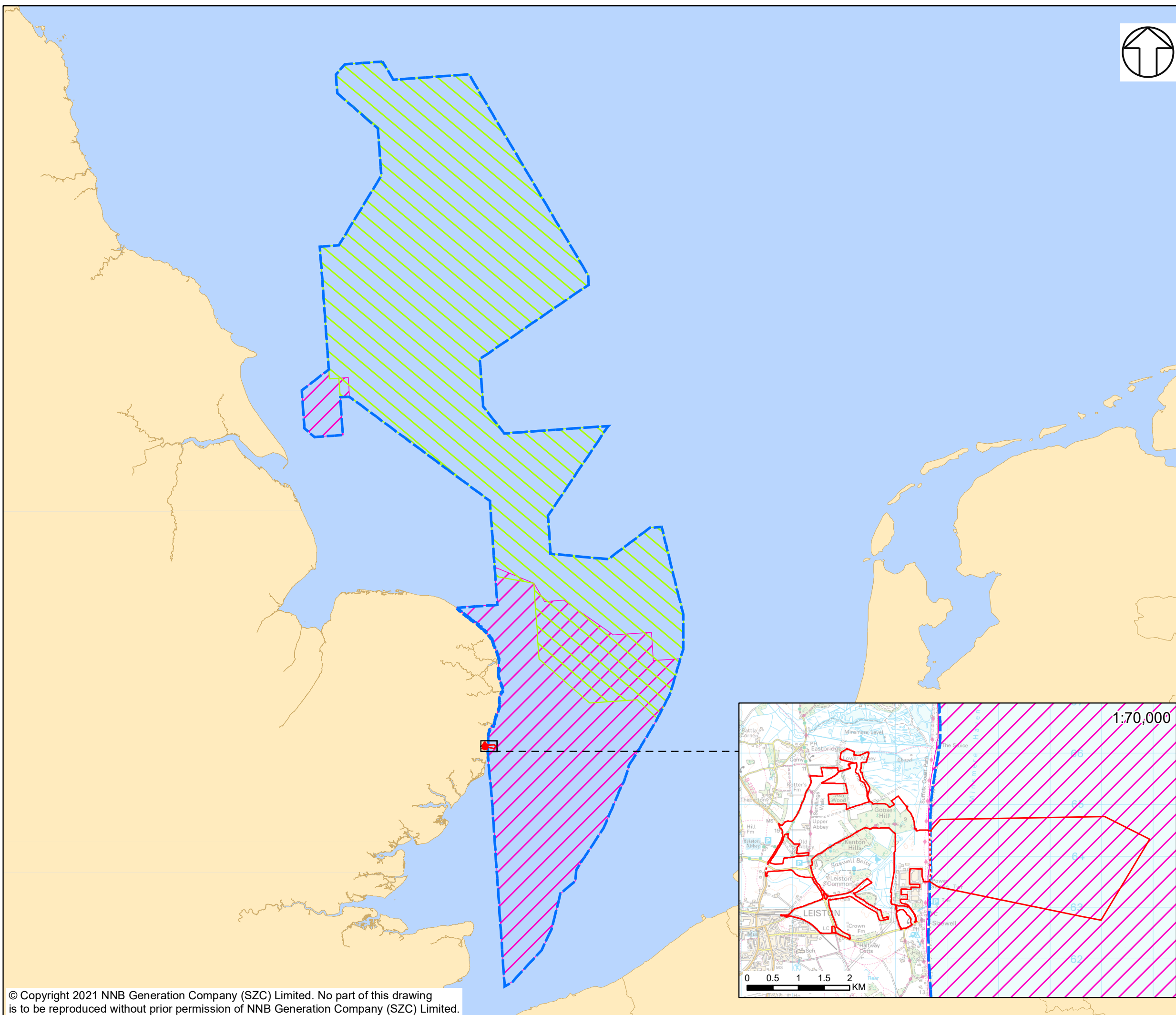
**DOCUMENT:**  
 SITE INTEGRITY PLAN FOR THE SOUTHERN NORTH SEA SPECIAL AREA OF CONSERVATION

**DRAWING TITLE:**  
 SIZEWELL C IN RELATION TO THE SOUTHERN NORTH SEA SAC WINTER AND SUMMER AREAS

**DRAWING NO:**  
 FIGURE 1.1

**DATE:** JAN 2021    **DRAWN:** J.T.    **SCALE:** 1:1,900,000 @A3    **REVISION:** 2.0

**SCALE BAR**  
 0 10 20 30 40 50 Kilometres



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## APPENDIX B: PILING SCENARIOS FOR THE BLF AND MBIF

**NON-SIMULTANEOUS**

Structure	Component	Piling rate	Pile number	Day
BLF	Piles	2 per day	2	1
			4	2
			6	3
			8	4
			10	5
			12	6
BLF	Dolphins	2 per day	2	7
			4	8
MBIF	Trestle piles	2 per day	2	9
			4	10
			6	11
			8	12
			10	13
			12	14
			14	15
			16	16
			18	17
			20	18
			22	19
			24	20
			26	21
			28	22
			30	23
			32	24
			34	25
			36	26
			38	27
			40	28
			42	29
			44	30
			46	31
			48	32
			50	33
			52	34
			54	35
			56	36
			58	37
			60	38
			62	39
			64	40
			66	41
			68	42
MBIF	Unloading platform	3 per day	3	43
			6	44
			9	45
			12	46
			15	47
			18	48
			21	49
			24	50
			27	51
			30	52
MBIF	Dolphins	2 per day	2	53
			4	54

**SIMULTANEOUS**

Structure	Component	Piling rate	Pile number	Day	Pile number	Piling rate	Component	Structure
BLF	Piles	2 per day	2	1	2	2 per day	Trestle piles	MBIF
			4	2	4			
			6	3	6			
			8	4	8			
			10	5	10			
			12	6	12			
BLF	Dolphins	2 per day	2	7	X		No simultaneous piling with dolphins	
			4	8	X			
				9	14			
				10	16			
				11	18			
				12	20			
				13	22			
				14	24			
				15	26			
				16	28			
				17	30			
				18	32			
				19	34			
				20	36			
				21	38			
				22	40			
				23	42			
				24	44			
				25	46			
				26	48			
				27	50			
				28	52			
				29	54			
				30	56			
				31	58			
				32	60			
				33	62			
				34	64			
				35	66			
				36	68			
				37	3	3 per day	Unloading platform	
				38	6			
				39	9			
				40	12			
				41	15			
				42	18			
				43	21			
				44	24			
				45	27			
				46	30			
				47	2	2 per day	Dolphins	
				48	4			