

Wendy McKay

Our Ref: 20026727

Lead member of the Panel of Examining Inspectors
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN
sizewellc@planninginspectorate.gov.uk
cc. michele.gregory@planninginspectorate.gov.uk

Your Ref: EN010012

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By email only

Dear Ms McKay

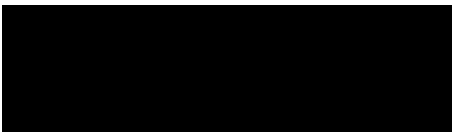
Planning Act 2008 – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 7: SZC Co. Comments at Deadline 6 on Submissions from Earlier Deadlines Appendices

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



For Deadline 7 (3rd September) the Examining Authority (ExA) have requested comments on additional reports submitted by NNBGenCo (SzC) Ltd at Deadline 6. We wish to provide feedback on the following reports contained within [REP6-024] 9.63 Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent Written Submissions to ISH1-ISH6 - Appendices - Revision 1.0
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- (pg 59) Appendix C: Sizewell Link Road Watercourse Crossings Mitigation Note
- (pg 90) Appendix F: Technical Note on EAV and stock size – In summary this technical note does not resolve our concerns regarding EAV methods used.

Yours sincerely



Simon Barlow
Project Manager
Sizewell C Nuclear New Build
Environment Agency

OFFICIAL

Appendix A: Environment Agency comments on Sizewell Link Road Watercourse Crossing Mitigation note (Appendix C)

The Environment Agency consider proposals put forward by the applicant in: 9.63 Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent Written Submissions to ISH1-ISH6 - Appendices - Revision 1.0, Appendix C Sizewell Link Road Watercourse Crossings Mitigation Note, are considered acceptable mitigation for impacts to watercourses as a result of the construction of the SLR.

We request this note is incorporated into the Sizewell Link Road Landscape and Ecology Management Plan.

Appendix B: Environment Agency comments on Technical Note on EAV and Stock Size (Appendix F)

Reference	Issue	Impact	Solution
Appendix F: Technical Note on EAV and stock size			
1.1.2	<p>'detailed evidence provided in support of the Hinkley Point C WDA Appeal Inquiry, including the main Proof of Evidence</p> <p>of Dr Jennings of Cefas (Centre for Environment Fisheries and Aquaculture Science) and the Rebuttal Proof of Evidence of Dr Simon Jennings on EAVs and the underlying principles of defining stock areas is analogous in the two developments.'</p>	<p>For completeness, the proof of evidence and rebuttal proof of Dr Jerome Masters of the Environment Agency should also be referred to.</p> <p>CD 6.7 Proof of Evidence of Jerome Masters (EAVs) https://ea.sharefile.com/share/view/sfb86ac1978a14420862086325f233f9f/fo0eb3c3-a748-4816-be7c-c98a687d4955</p> <p>CD 6.16 Rebuttal Proof of Evidence of Jerome Masters https://ea.sharefile.com/share/view/sfb86ac1978a14420862086325f233f9f/fo0eb3c3-a748-4816-be7c-c98a687d4955</p>	<p>The Environment Agency has provided a document to the Sizewell hearings which summarises the differences of opinion between the parties with regard to EAV, as expressed in the Hinkley documentation, and provides examples to aid understanding.</p> <p>If further detail is required then the Examining Authority may find it helpful to consult the proofs of evidence presented to the Hinkley inquiry by the Environment Agency as well as those presented by Cefas.</p>

	Hyperlinks are provided to Cefas' submissions to the Hinkley inquiry.		
1.2.31	<p>One precautionary assumption is that the EAV assumes no fisheries mortality of the juvenile stages. By assuming no fishing mortality before first maturity, the EAV assessment overestimates the chance of survival to maturity, particularly for species such as cod, whiting and sea bass.</p>	Fishing mortality is of less concern for species which are not targeted commercially, including twaite shad and smelt.	
1.2.32	<p>Furthermore, the EAV biomass is calculated by multiplying the EAV number by the mean adult fish weight from the spawning population. The individual weight at the age at first maturity will be lower than the individual weight of older and more fecund fish in the spawning population. Therefore, the EAV biomass</p>	The use of the mean adult fish weight will 'upweight' to some degree (which may vary from year to year as the mean adult fish weight also changes). However, the upweighting is not going to be equivalent to calculating the number of repeat spawners, as is would be done through the SPF extension.	

	<p>upweights apparent losses of spawner biomass due to entrapment</p> <p>and their potential contribution to the spawning population biomass.</p>		
1.2.35	<p>In accounting for repeat spawning, the assessment necessarily estimates</p> <p>a multiannual rate of losses and not an annual one</p>	<p>The Cefas method and the SPF extension both return annual rates.</p> <p>The ‘annual rate’ of the Cefas method is the number of first time spawners that would otherwise enter the population each year, had they not previously been impinged.</p> <p>The ‘annual rate’ of the SPF extension is the number of first time <u>and</u> repeat spawners that would have otherwise been present in the population in any given year, had they not previously been impinged.</p>	<p>Please refer to Example 2 of our explanatory note [REP5-150, pg 29]</p>
1.2.36	<p>A second important issue with the application of the SPF extension is the</p> <p>need to deal with fishing mortality.</p>	<p>Fishing mortality can be included into the SPF extension, just as it can into the Cefas method. However, there are considerable difficulties associated with selecting a value of fishing mortality that will be appropriate for the sixty year plus operational lifetime of SZC. Even if fishing mortality were included, the SPF extension would still return a higher EAV value than the Cefas method.</p>	
1.2.39	<p>However, to provide the highest level of</p> <p>confidence available in the assessment of no significant effects SZC Co.</p>	<p>Stock assessment for seabass will be based upon the ICES stock area, which extends from the North Sea, through the English Channel, Western Approaches and Celtic Sea, to the Irish Sea. However, many seabass off Sizewell will not migrate to spawning grounds to the western extremity of this range (e.g. Trevoise Head off the North Coast of Devon), and relatively few larvae produced in these western spawning grounds will settle in the North</p>	

	<p>has committed to completing a full ICES stock assessment for sea bass</p> <p>based on precautionary assumptions which will be provided at Deadline 8.</p>	<p>Sea. Consequently, while stock assessment will provide an estimate of impact on the fishery stock, it (alone) cannot answer questions about localised depletion around Sizewell. The Applicant may address localised depletion using different analytical approaches.</p>	
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