



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference EN010012

Deadline 10: *12 October 2021*

Written Summary of Oral Case

Issue Specific Hearing 15 Temporary Desalination Plant (Change Request 19)

5 October 2021

20026200 East Suffolk Council

<p>Issue Specific Hearing 15 – Temporary Desalinisation Plant (Change Request 19) 5 October 2021</p>	
Agenda Item	East Suffolk Council Submissions
<p>1. Welcome, introductions and arrangements for the Hearing.</p>	<p>Speakers on behalf of East Suffolk Council:</p> <p>Andrew Tait QC FTB Chambers</p> <p>Paul Patterson, Senior Coastal Engineer, East Suffolk Council</p>
<p>2. Water Supply update: Following the discussion at ISH11, the parties to provide an update on the Water Supply Strategy with particular reference to:</p> <p>(a) Period prior to the temporary desalination plant being operational;</p> <p>(b) Period of operation of the temporary desalination plant, including the transfer of the temporary plant to the Temporary Construction Area; and</p> <p>(c) Period when Temporary Construction Area is being reinstated and operation of the Proposed Development.</p>	<p>(a) Period prior to the temporary desalination plant being operational; No comment.</p>
	<p>(b) Period of operation of the temporary desalination plant, including the transfer of the temporary plant to the Temporary Construction Area; and ESC welcomes the assurance provided by the Applicant at ISH14 that they would notify ESC of the proposed location and subsequent relocations. This should be secured through the CoCP. ESC would also wish to see provision for ensuring that the plant is brought into operation at the requisite time-see under Item 5 below.</p>
	<p>(c) Period when Temporary Construction Area is being reinstated and operation of the Proposed Development. ESC wishes to ensure that the plant is removed by the end of the construction period-see under item 5 below.</p>

<p>3. The Environmental Assessment and the environmental implications of the proposed temporary desalination plant including matters relevant to the Habitats Regulations Assessment:</p> <p>(a) The additional environmental assessments and supporting documentation submitted in connection with the proposed temporary desalination plant.</p> <p>(b) Transport implications, including the Heavy Good Vehicle (HGV) deliveries and any Abnormal Invisible Loads (AILs) associated with the water tankers during the early stages of Sizewell C construction, and the construction and demolition of the temporary desalination plant.</p> <p>(c) Noise and vibration, including that associated with the additional</p>	<p>(a) The additional environmental assessments and supporting documentation submitted in connection with the proposed temporary desalination plant.</p> <p>ESC has reviewed the Fourth Environmental Assessment Addendum documents submitted at Deadline 7, [REP7-029, REP7-030, REP7-031, REP7-032, REP7-033], and agrees with the methodologies employed in the ES Addendum.</p> <p>(b) Transport implications, including the Heavy Good Vehicle (HGV) deliveries and any Abnormal Invisible Loads (AILs) associated with the water tankers during the early stages of Sizewell C construction, and the construction and demolition of the temporary desalination plant.</p> <p>ESC defers to SCC as highway authority.</p> <p>The Fourth Environmental Statement Addendum Volume 1 Chapter 3 [REP7-030], states that ‘The HGV movements are not anticipated to extend beyond those already assessed for the main development site.’ As the HGV movements associated with water tankers will be controlled by the proposed HGV cap, ESC is satisfied that the Applicant’s traffic and air quality assessments remain robust.</p> <p>(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.</p> <p>ESC accepts the outcomes of the Applicant’s noise and vibration assessment of the desalination plant [REP7-030] and notes that the desalination plant will be controlled through the MDS site noise controls in the NMMP and its construction and operation will require best practicable means for noise mitigation as with all other MDS site operations.</p>
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<p>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.</p> <p>(d) Air quality, including those associated with the introduction of additional on-site diesel generators within the main development site and any additional impacts upon relevant internationally and nationally designated sites.</p> <p>(e) Coastal Geomorphology, including any effects arising from the introduction of new infrastructure and construction activities within the marine environment, with particular regard to the effect of intake and outfall headworks on coastal processes and any additional impacts upon</p>	<p>(d) Air quality, including those associated with the introduction of additional on-site diesel generators within the main development site and any additional impacts upon relevant internationally and nationally designated sites.</p> <p>ESC understands that the additional temporary generators will be regulated by the EA and subject to the EA's permitting regime which itself will require environmental impact assessment. ESC notes that the EA is content that the assessments undertaken by the Applicant to date are adequate for the purposes of the DCO, without prejudice to the EA's separate permitting decision. ESC agrees that the assessment of air quality impacts is adequate. Subject to the controls in the Construction Method Statement [REP8-054] and the CoCP [REP8-082], ESC does not dispute the findings of the ES addendum [REP7-030] and the assessment of air quality impacts on designated habitats [REP9-026].</p> <p>In respect of HRA matters, ESC defers to Natural England.</p> <p>(e) Coastal Geomorphology, including any effects arising from the introduction of new infrastructure and construction activities within the marine environment, with particular regard to the effect of intake and outfall headworks on coastal processes and any additional impacts upon relevant internationally and nationally designated sites.</p> <p>ESC is satisfied that, subject to the use of HDD (rather than trenching), and in light of the Fourth Addendum to the Environmental Statement, the proposed desalination plant will not introduce any significant impacts on coastal geomorphology or coastal processes.</p> <p>ESC considers that the CPMMP should be amended to require the removal of the pipelines, once they are no longer required, in the event that they become exposed through future shoreline change. It is good practice for relic infrastructure to be removed.</p>
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<p>relevant internationally and nationally designated sites.</p> <p>(f) Landscape and visual implications, including the impact of equipment associated with the temporary desalination plant, with particular regard to any additional landscape impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) associated with the construction and siting of a containerised desalination module.</p> <p>(g) Marine historic environment implications, including the impact of horizontal directional drilling and dredging with particular regard to buried archaeological remains.</p> <p>(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</p>	<p>(f) Landscape and visual implications, including the impact of equipment associated with the temporary desalination plant, with particular regard to any additional landscape impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) associated with the construction and siting of a containerised desalination module.</p> <p>The temporary desalination plant is initially proposed to be located on the main construction and then on the temporary lay down area at Kenton/Goose Hill. ESC does not consider that the temporary desalination plant will give rise to any additional significant landscape impacts in those locations, beyond those of the other construction works which have already been assessed.</p>
	<p>(g) Marine historic environment implications, including the impact of horizontal directional drilling and dredging with particular regard to buried archaeological remains.</p> <p>ESC defers to Historic England as the responsible statutory body.</p>
	<p>(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.</p> <p>ESC defers to the Environment Agency and MMO as the responsible statutory bodies.</p> <p>In relation to HRA matters, ESC defers to Natural England.</p>

<p>environment, and impacts of use, abstraction, discharge and hypersaline water on relevant internationally and nationally designated sites.</p> <p>(i) Terrestrial ecology and ornithology, including any additional effects upon marine birds and mammals and upon relevant internationally and nationally designated sites.</p> <p>(j) Any other relevant environmental implications, including any additional in-combination or cumulative impacts.</p>	<p>(i) Terrestrial ecology and ornithology, including any additional effects upon marine birds and mammals and upon relevant internationally and nationally designated sites.</p> <p>ESC does not dispute the findings of the Fourth Environmental Statement Addendum [REP7-030] or the additional air quality assessment [REP9-026].</p> <p>In relation to HRA matters and marine birds and mammals, ESC defers to Natural England.</p>
<p>4. General Habitats Regulations Assessment matters not covered under item 3 above:</p> <p>(a) Physical interaction between species and project infrastructure -</p>	<p>(j) Any other relevant environmental implications, including any additional in-combination or cumulative impacts.</p> <p>ESC has no comment in respect of any other environmental implications of the desalination plant and notes that the use of the desalination plant will be restricted to the construction period.</p> <p>(a) Physical interaction between species and project infrastructure - effects on bird, marine mammal and fish qualifying features of relevant European sites.</p> <p>ESC defers to Natural England as the responsible statutory body.</p>

<p>effects on bird, marine mammal and fish qualifying features of relevant European sites.</p> <p>(b) Direct habitat loss and direct/indirect habitat fragmentation effects on marine mammal qualifying features of relevant European sites.</p> <p>(c) The views of Natural England, the Environment Agency, MMO, RSPB and other IPs on the third addendum to the Shadow HRA report [REP7-279] and any relevant subsequent HRA material.</p>	<p>(b) Direct habitat loss and direct/indirect habitat fragmentation effects on marine mammal qualifying features of relevant European sites.</p> <p>ESC defers to Natural England and the MMO as the responsible statutory bodies.</p> <p>(c) The views of Natural England, the Environment Agency, MMO, RSPB and other IPs on the third addendum to the Shadow HRA report [REP7-279] and any relevant subsequent HRA material</p> <p>ESC defers to the Environment Agency, Natural England and the MMO as the responsible statutory bodies.</p>
<p>5. The DCO, DoO and other control documents:</p> <p>(a) Are any changes over and above those in Revision 9 of the DCO and versions current at Deadline 7 of the DoO and other control documents needed?</p> <p>(b) Practicalities of review and submission of any revisions.</p>	<p>(a) Are any changes over and above those in Revision 9 of the DCO and versions current at Deadline 7 of the DoO and other control documents needed?</p> <p>ESC requests an additional requirement in the CPMMP to secure that (once abandoned) the pipelines for the desalination plant are removed, if exposed by erosion.</p> <p>ESC welcomes the suggestion from the Applicant to amend Requirement 16 of the DCO to provide for the removal of the desalination plant. The Applicant indicated that the desalination plant would be removed prior to commissioning of the power station (i.e. prior to cold flush testing). ESC welcomes that commitment. ESC would have concerns about the use of a trigger point in Requirement 16 which only requires removal “following completion of the SZC construction works”, the exact point of which may not be clear. ESC’s concerns are not restricted to the in-combination impacts of operating the desalination plant together with the power station. For example, there may be landscape impacts of retaining the desalination plant beyond the commissioning of the power station, even if the plant is no longer operational. ESC wishes to see a requirement, either in the DCO or the CMS, which expressly requires removal of the desalination plant prior to commissioning of the power station.</p>

	<p>ESC also welcomes the proposed additional to Schedule 9 to the Deed of Obligation which will prevent the installation of the cut-off wall until such time as the desalination plant is operational.</p> <p>ESC also welcomes the proposed additional controls to be secured through the Construction Method Statement with respect to the desalination plant, including: a limitation on the number of diesel generators; a maximum period during which diesel generators may be used; controls on the depths of the pipelines in order to ensure that they avoid the crag deposits; controls on the intake and outfall over the SSSI; controls on non-potable water; a limitation on the total amount of water that can be abstracted by the desalination plant; and a requirement to notify ESC when the desalination plant is moved from the main platform to the temporary construction area.</p> <p>(b) Practicalities of review and submission of any revisions. No comment.</p>
<p>6. Any other matters relevant to the agenda.</p>	
<p>7. Close of hearing.</p>	

ExA Rule 17 Letter 7 October 2021

Decommissioning of the desalination plant, comments on the ExA's proposed Requirement 8(3)

Requirement 8(3) (i) The use of the temporary desalination plant and associated works (Work No. 1A (jj), (kk), (ll), Work No. 2M, Work No. 2N, Work No. 2O and Work No. 2P) must cease before either (a) commissioning testing begins or (b) the availability of the permanent water supply [to be defined], whichever event occurs first.

(ii) Within 3 months of either (a) commissioning testing beginning or (b) the availability of the permanent water supply, whichever event occurs first, the temporary desalination plant (Work No 1A(jjj)) must be removed and the intake head and shaft (Work No 2N) and outfall tunnel diffusers and shaft (Work No 2P) must be removed and decommissioned, and the outfall and intake pipelines (Works No.s 2M and 2O) must be grouted and capped.

ESC has no comments in relation to the wording of the requirement as proposed. However, should it be included in the draft DCO 'commission testing' would need to be defined.