



28. 09.2020

The Planning Inspectorate,
[Application for Sizewell C],
Temple Quay House
Bristol
BS1 6PN

Sir/Madam,

Sizewell C Stage 3 Planning Application

I have read the Consultation Documents and attended the exhibitions at Woodbridge. In addition I have studied recent press articles related to Sizewell C and Hinkley Point C. These studies have convinced me that a full review of the need for Sizewell C is urgently required.

My case in calling for such a review is based on the following factors:

1. The success and impact of renewables, in particular the output and economics of local off-shore wind-farms has been very encouraging and bodes well for their major role in supplying future UK power needs. The efficiency of future wind-farms and those under construction will further improve their viability.
2. Recent reductions in UK's power demands have already reduced the role of nuclear power in meeting these demands. Note the announcement that one of Sizewell B's reactors has already been closed due to lack of demand for its power.
3. It has become evident that the introduction of electric vehicles will create a sizeable national battery which will be supplied with off-peak power which in turn will reduce the peaks in the power supply demands.
4. The provision of Sizewell C would be highly dependant upon the UK's reliance on our relationship with both France and China. The contractual relationships between UK, French and Chinese organisations are over-complex and will inevitably be the cause of disputes between the three national parties.
 - a. EDF is owned by the French Government, the performance of EDF's nuclear plants is already giving cause for concern, it is known that EDF falsified records of its Creusot nuclear forge; the Hinkley Point plant is over budget and running late. Furthermore the UK's exit from the EU will put a strain on working relationships between the two countries.
 - b. The unknown performance of Chinese contractors and their role as financial providers gives further cause for concern; their involvement introduces contractual complications; coupled with the UK's recent dismissal of Huawei as an important partner in the design of

next mobile phone network provide further grounds of concern for smooth working relationships.

5. The sheer size of the Sizewell C project is enormous and threatens the East Suffolk coastal environment and would devastate Suffolk's coastal AONB. The recent decision to incorporate marine access arrangements has not been explained and questions the whole basis of road, rail and sea predictions of traffic and loadings of materials and equipment.

6. In 2019 the BBC's Today Programme reported that the EDF nuclear plant at Hunterston B, which had been out of action for over a year, will continue producing electricity until 2023. Owners EDF expects that all of its 14 UK reactors installed at its advanced gas cooled reactors to be decommissioned earlier than planned. It is known that cracks in the Hunterston B gas cooled reactor were growing faster than expected so that on average they are now 2mm wide. The extent of these cracks is extending the offline time whilst repair or replacement works are considered. This plant is one of seven such plants in UK

7. The RSPB is concerned with the threat posed by construction and operational works to their prime UK bird reserve at Minsmere. As a member of RSPB and frequent visitor to Minsmere I endorse their concerns to act to help "keep Minsmere safe".

8. I endorse the objections of the campaign group TASC [Together Against Sizewell C], which bases its objections to the proposal on the vulnerability of the site, the effect of traffic and accommodation blocks to house a workforce of 6,000; presumably this figure will be boosted by partners and families who wish to live as a family over this 10-12 year period. Such population figures will swamp the schooling, health and infrastructure facilities in the area.

9. Flamanville Nuclear Plant – A major article printed in The Guardian, 27 July 2016 states that not a single EPR reactor operates anywhere in the world and criticises the delays at Flamanville where the first concrete was poured in 2007. Since then costs have more than tripled to €10.5bn, while the project is six years behind schedule. In Finland, the location of another EPR, the picture is even worse: the Olkiluoto reactor is nearly a decade behind and three times over budget, with the added headache of legal battles over who is to blame. In 2015 France's Nuclear Safety Authority (ASN) said it had found "very serious anomalies". As the regulator deepened its investigation, it warned that the problems could affect other reactors in operation in France. In its latest annual report, the ASN said it had "significant concerns" for the future as financial pressures build on France's nuclear industry.

10. The 2011 Fukushima disaster turned some countries off nuclear power; however France has made a dash for big, costly projects, just as electricity production is moving to a smaller, more dispersed model with the arrival of successful renewables. Meanwhile, demand for power has been falling in continental Europe as a result of factory efficiency drives. This conclusion has been endorsed by recent events in UK.

11. Martin Young, an analyst at RBC Capital Markets, questions whether anyone needs to be building nuclear power stations on the scale of Flamanville or Hinkley Point C. "We should probably think about smaller, easier-to-build, more-flexible nuclear power stations," he says.

Instead, the EPR prestige project has forced Areva to the brink of bankruptcy. The reactor builder is cutting 1,000 jobs and has been forced into a shotgun merger with EDF at the behest of the French government. This affects Hinkley Point C, whose two reactors are intended to supply 7% of British electricity by 2025; this project, co-funded with China, has

become another enormous headache for EDF. In March 2018, EDF's finance director, Thomas Piquemal, resigned because he felt his warnings that Hinkley Point C could bankrupt the company were being ignored.

Emmanuel Macron, argued that Hinkley Point C was vital to secure EDF's position in the UK, but also to promote "our expertise in this major technology around the world". In May 2018, he told Le Journal du Dimanche that if Hinkley Point C did not go ahead, "we would give up our place to our American, Chinese or Russian competitors". He also questioned where France would find the skills to renew its own ageing nuclear power stations.

12. Mycle Schneider, a Paris-based nuclear policy analyst, accused the French industry of overestimating its capacity to build highly complex reactors, while underestimating skills gaps. "It is clear that the skills issue is part of the problem. Areva hasn't built reactors [in France] for a very long time," he says. Schneider is worried that relentless cost-cutting pressures could compromise safety, as Areva bid to save €1bn by 2017, through job cuts. "To me, it is very obvious that you will cut into safety and security and that is what makes me most nervous," he says. "The financial and economic pressure on all the stakeholders is completely unparalleled."

RBC suggested that EDF wanted a decision on Hinkley Point C while the UK has a functioning government and before possible Brexit aftershocks, including the recommendation that the UK leave Euratom, complicate the picture. "If you are EDF, why would you want to wait and run the risk of a snap election being called?" he says. A future government could change its mind on the project, Whitehall's official spending watchdog has said, warning of a "tidal wave" of pressures from an impending Brexit. These arguments were applied to Hinkley Point C but are equally applicable to the decisions surrounding Sizewell C.

Conclusions on the philosophy of Sizewell C.

* The proposed Sizewell C plant is too complex, too large and too expensive and would have a devastating effect on the Suffolk's delicate and vulnerable coastline. Delays and cost over-runs are already being flagged up for Hinkley Point C and accordingly, the two projects should be contractually divorced from each other.

* Suffolk County Council, East Suffolk District Council and the joint Local Authorities Group have again rejected proposals for Sizewell C on the basis that the EDF plans are not good enough to support the proposals. Their concerns relate to the effects of a 10-12 year construction period on roads, tourism and the AONB; the proposed plant would result in a permanent scar and devastation of our precious coastline and rural hinterland.

* I appreciate that these comments go wider than the construction proposals in EDF's consultation report, but the wider issues of reviewing the decision to install this type and size of plant are of fundamental importance.

On the basis of the foregoing I call for the planning application for Sizewell C to be refused.

Yours faithfully

Colin Palmer