

From: [REDACTED]
To: [SizewellC](#)
Subject: Denise Johnson - Ref 20025555 - Response following Preliminary Meeting Part 1
Date: 04 April 2021 14:58:56
Attachments: [20025555 Prelim Mtg + Draft Examination Timetable response #2.docx](#)

Dear PINS staff

Please find attached my comments regarding virtual meetings, site visit suggestion, timetabling and other matters arising following the SZC DCO Preliminary Meeting Part 1 which took place on 23/24 March, to arrive before the deadline of 7th April

Many thanks as always for dealing with this

yours sincerely,
Denise Johnson

[REDACTED]
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[REDACTED]

Sizewell C Case Team
National Infrastructure Planning

04/04/21

Dear Sir or Madam

Re: EN010012 – The Sizewell C Project

My reference: 20025555

I should like to add some further comments, following the Preliminary Meeting on 23/24 March 2021, which I watched on livestream, regarding virtual communication issues, suggested site visit, and principle issues and public participation matters arising from the Preliminary Meeting.

These comments can be broadly grouped as follows:

1. Virtual communication issues: Technological and public participation issues observed during the Preliminary Meeting(s)

Firstly, I have attended many Zoom meetings, but I was not prepared for quite **how many** technological issues there would be during these meetings and how this would so hinder clear communication flows, and skew the proceedings in favour of those who were already familiar with each other and with the PINS planning process. My expectations were for a well-managed efficient meeting, giving all those involved an opportunity to speak and be heard. But it quickly became clear that a level playing field was not going to be created during Day 1 of this online meeting. In fact things got markedly worse on Day 2. I am obviously not blaming Inspectors for this who just tried to control factors which were outside of their control, but the virtual nature of this meeting could be seen to create a very unfair, and at times, it has to be said, inadequate process, for such a high profile nationally important infrastructure project. Here are some examples of what I am talking about (there were more instances I could have added):

Day 1 (23/3/21)

From the beginning of her introductions there were problems with the Lead Inspector's video and sound transmission. Alan Collett can be seen to have raised the point about an 'echo' sound problem and there were a lot of freeze frame issues which also occurred, and I found it hard to work out what she was trying to say from the outset because of the poor sound and interruptions.

After Greg Jones QC spoke (on funding for mitigation), it became clear the Inspector Mr Humphrey was unable to see all the 'Hands' that were going up to comment/ask a question, as some people had been waiting some time to do so, which meant he had to be replaced as 'host' by another Inspector whose system was more fully working. I don't know if all got chance to ask the question they had been trying to ask, or if some gave up due to persistence of the technical issues.

Mr Philpott, counsel for the applicant, was unable to connect at all at their first attempt.

A couple of Interested Parties reported Microsoft Teams compatibility problems on their ipads/iphones.

Day 2 (24/3/21)

I was not alone in observing that technological issues were becoming a serious obstacle to equality of participation, understanding of proceedings, and accurate representation. Mr Antony Ingram remarked he judged that the whole quality of the process was 'low' because of the online issues and felt 'face to face' would be better.

There were so many screen 'freezes' and intermittent interruptions, adjustments, loss of picture and sound throughout, (my own Internet connection was working fine, probably because I'm in Ipswich not rural Suffolk) that because of the repetition of these technological problems, I actually emailed PINS central office at one point to make my views known, because I felt all, including Inspectors, contributors, and particularly objectors, were just not able to have the opportunity to communicate clearly enough to make this a coherent, well-focussed, representative and worthwhile meeting.

Worse was to come, when, ten speakers in succession, including and after Mr Robert Hoggar, then had serious problems with their (dis)connections which made their contributions totally disjointed and hard to follow. Mr Hoggar also noted online methods were an 'unsatisfactory' way to conduct such a process, and subtitles are 'not a good record' of proceedings.

As noted then, and by many others since on social media, the transcript was frankly just a bad joke (as they usually are on many online meetings). I made my own notes, and though I have not compared every word, I would not be surprised if they depart significantly from the recorded transcript in many cases, which will I assume be relied upon as an 'accurate' record of proceedings.

Then Mr Philpott, counsel for EDF, spoke without any problems whatsoever with his particular connection. So he was able to continue freely and uninterrupted for some time, to speak about the proposed changes to the application.

Mr Graeme Murray requested PINS 'check the IT systems please'. There was some encouragement from Inspectors at this meeting for those daunted by the process and the IT 'hiccups', which was good to see as it cannot have been easy for them to manage either.

Mr Clive Lovelock stated he had wished to present an image of a map of the local rail network to support his point, but was not able to do so at this online meeting. He suggested there should be some way for participants to present their information online visually, or he felt the public are being 'disadvantaged'. This request for a visual, eg Powerpoint, facility for participants was reiterated by Councillor Saunders of Woodbridge.

Others, such as Alison Downes from Stop SZC, also expressed concern about the online difficulties, and occasional lack of clarity about order of agenda items. The worst moment came I felt when Nicola Pilkington spoke and asked for the return of face to face meetings, because she apparently suffers from screen photophobic attacks, which will mean she will have to withdraw from any further meetings held online. I felt quite upset by this, as this was an important moment to her as somebody affected by this proposed development and it felt like she had been disenfranchised of her right to participate in a manner where she was able to do so.

There were also comments made by EdF Counsel, relating to timetabling, which appeared to diminish the importance of oral submissions in the process ('not a priority'), by reason of PINS Examination being primarily a 'written process' and therefore statute setting the timetable. I found those comments rather made me question EdF's professed support for public engagement in the process. I don't have to reiterate that the public have a right to participate, as inconvenient as it may be to the professionals sometimes, especially if they don't fully understand the procedures.

There are obviously more people who wish to speak than have been heard so far, and in light of the fact so many parties at the Preliminary Meetings had their contributions marred/lost by sound and video difficulties, my recommendation would be to hold a future Open Floor Hearing face to face, at an early date after lockdown ends after June 21st 2021. Blended meetings will face the same technological hiccups that affected the preliminary meeting so negatively, so it seems pointless to invite complications by trying to 'blend' all methods of communication. Blended meetings will also affect inclusivity and produce the same 'skewed' result, by deterring participation by those in areas with a poor signal or who are just not comfortable with technology.

2. New comments on changes Principle issues following Preliminary Meeting presentations

The comments from Suffolk Police Deputy Chief Constable (Rachel Kearton) about the Police's **Community Safety** 'concerns' regarding the applicant's existing impact assessments and mitigation measures, around effects on current levels of police resources, law and order, transport, and emergency service responses were very worrying. As she said there is much more work needing to be done by the applicant on several specific issues she identified to ensure adequate protection of the local and wider Suffolk community.

The Rochdale Envelope (as explained by Counsel for EdF) seems to allow flexibility as to how much information an applicant has to provide in changing circumstances, but there must be a point where recognition needs to be made as to how long statutory agencies need to respond and make their determinations, and it is worrying that enough time to do that does not appear to exist in the proposed timetable. It is hard to understand why detailed **coastal defence** plans have not yet been made available to the Environment Agency (EA) for their inspection, when there is a theoretical possibility that the application could be approved as early as January 2022. EA have made it clear they will need months not weeks to make their determinations after any plans have been submitted, to examine issues like flood risk modelling, cooling water systems, and the impacts on water supply.

I agree with Suffolk County Council and East Suffolk Council who concurred that all the **AONB** designation issues cannot be 'shoehorned' into being just one item for consideration and need to be broken down into their constituent statutory and practical parts (eg. statutory responsibilities, landscape effects, design, visual impact etc) as so many issues are encompassed by 'AONB'.

3. Suggestion for Site Visit

I think it would be key for the **Inspectors to make an independent visit to Hinkley Point C** nuclear power station development, during the day and night time, to get a visceral sense of the scale of this project, as well as a more detailed view of its environmental impacts. I strongly feel it would be more useful for them to do it independently, without EdF staff involved in the planning process 'accompanying' them, as they immediately offered to do, when the matter was raised during the meeting. That sounds to me rather like visits one hears about in totalitarian states, where state officials shadow visitors wherever they go, to have control over what they can see and who they can speak to. Though obviously PINS will need to liaise with some EdF staff onsite, I feel they should also meet a range of people from the local Somerset authorities and community to get a fair unbiased picture of the impact (and any problems) caused by the project in that area, and there have been many major and minor problems, judging from presentations I have seen made by local residents, not least collapse of a (35 metre x 5000 tonnes) silo at a concrete batching plant in June 2020 (Pictures/report in somersetlive.co.uk)

4. Civility

At certain times on both days, I did feel, to my surprise, there was a slight fall off in the expected high level of respectful civility standards that should exist during these sorts of proceedings. Whether that was exhaustion from all the online difficulties or overload of information is not clear, but I did feel Councillor Fellowes was definitely spoken over and even 'badgered' by PINS on Day 2. Also, I think an unfortunate phrase was used by Counsel for EdF when, also on Day 2, in his opening remarks on changes to the application, during which he made the error with the Fen Meadow hectareage, he said all the 'important' Interested Parties had been responded to. Many a slip betwixt cup and lip...

I also felt Mr Clive Lovelock's claims ([REDACTED]) regarding potential effects of additional rail operations on both the local points systems and passenger train frequencies were rather disrespectfully dismissed out of hand by Quad modelling (SCC legal counsel and Felixstowe Town Council having just before both expressed doubts about deliverability of the new transport proposals). I can understand such a plethora of information (much of their own making in EdF's case) overlaid by time/financial pressure could lead to a sense of frustration, but it surely should not lead to marginalisation of the less powerful to expedite progress on one's own behalf.

5. Suffolk Coastal FoE

It was reported Suffolk Coastal Friends of the Earth had suggested they might wish to align themselves with the RSPB and SWT as they support both their views (RSPB were there also representing SWT) and the RSPB representative Rosie Sutherland said she would be happy to discuss further with FoE. Mr Philpott then made an interjection to say as Suffolk Coastal FoE have a different 'angle' (sic) on the application, EdF would prefer to keep them separate from the other groups. I respectfully suggest this decision is not actually in EdF's hands, but is a matter for the organisations to explore, and perhaps EdF could then adapt their response accordingly, if necessary.

6. New Timetabling issues arising

A number of local Councillors once more expressed real concerns that due to the **local elections** on 06/05/21 there will not be the elected personnel available, in the weeks running up to May 6th, and possibly the week after, to deal with any SZC business adequately. Councillor Fellowes stated that effectively election restrictions make them unable to **consult with many outside organisations** such as Office of Nuclear Regulations, Magnox, Nuclear Development Agency, amongst others.

Alongside this, Councillor Saunders also described how the **legislation and guidance on holding of virtual meetings expires** on 7th May 2021, so after that councils will have to reorganise meetings and embark on recruiting and training 'emergency' clerks until June 21st, which will have significant time implications for them.

In terms of the proposed timetable, it just felt like there was pressure to keep moving forward at pace, disregarding the pandemic, local elections, effects of virtual communications. Whilst understanding the need to move forward, the reason for this haste still remains unclear, as so many wider aspects relating to this project's viability and deliverability remain unsettled. This applies not least to the fact that so many major changes have now been made to the original application and some statutory agencies have no idea what these might be but are still expected to respond within an unrealistic timetable. In EdF's own words this is an unusually large and complex application. It is unfair that statutory agencies do not have the time or indeed personnel to make a response or even to appoint their own consultants within such a short timetable. Far better surely to delay the start of the Examination process, if the examination timeline of 6 months is not extendable, to allow at least the crucial **environmental determinations** to be fully completed (which will no doubt involve practical site visits and sampling etc, etc as well as examination of the additional documentation). We in Suffolk think our beautiful coastal environment is worth that at least.

Councillor for Westleton requested postponement of consideration of changes to the application until due **consultation** had been carried out, as so far consultation by the applicant had been 'haphazard' and said Westleton had apparently been confused with Wenhaston by them at one stage. Landowners reported EdF staff/contractors being seen on their land without permission being asked first. Nigel Hiley from Saxmundham Town Council also reported that they and some of the local Parish Councils had **not received any joining instructions from PINS** for the meeting, despite their entitlement to attend. Public consultation and participation needs to be improved in so many areas in this process it seems.

The local Scottish Power Renewables DCO process has been extended by 3 months. It is difficult to see why an extension cannot also happen with this SZC DCO process, and why the oral hearings cannot be held face to face after lockdown now. This should happen not least to allow those people who might face significant loss and whose lives might be severely affected or blighted by this project for many years, if approved, for them to have a chance for their views to be properly recorded.

Thank you for registering my comments.

Yours sincerely

