

Interested Party: Colin Palmer : SIZE-003

Written Submission to Planning Inspectorate to meet Deadline B for Preliminary Meeting: Part 2

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1. **History of Sizewell C.** Sizewell C was one of nine possible locations for a major UK nuclear plant selected some eight years ago; it is understood that, with the exception of Sizewell C, the other eight major sites have been discounted.
2. **The Effect of the Wylfa Decision.** The Planning Inspectorate recommended that the Secretary of State withholds planning consent for the Wylfa plant; the report states that the planning application was withdrawn at a late stage of the inquiry due to the lack of an agreement on funding arrangements. The lack of an agreement was despite a Strike Price offered by the Government of £75 per MWhr, a very high figure. It is now evident that any funding agreement for Sizewell C would have to be agreed with the Government at an early stage as the Energy White Paper calls for the future electricity bills to be “affordable”; such calculations will be required to include decommissioning estimates and the Strike Price. Although the Wylfa report recognises that the proposed development failed, it commented that nuclear power was vital to meet low carbon targets but “acknowledged the risks associated with nuclear power”. The report concludes that **Need and Funding** are important matters and are relevant to the Inspectorate’s Inquiry and to the Secretary of State’s decision.
3. **Energy White Paper.** While the White Paper calls for one more large nuclear plant to supplement Hinkley C, its emphasis on a second nuclear plant does not appear to be stated as positively as when previously considered. It is clear that a new review of generation options is urgently necessary to take full account of the opportunities offered by renewables together with their significant reduction in unit power cost. Furthermore opportunities from Small Modular Nuclear Reactors are now evident and their development by Rolls Royce is proceeding at pace.
4. **EDF and Partners and Financial Plan.** Complex contractual and funding arrangements will be necessary to support the design, construction, operation and long term decommissioning requirements of Sizewell C. Coupled with different languages, translation issues and misunderstandings are not conducive to producing a smooth running long term contract, especially for such an essential link in the UK’s energy infrastructure. It is strongly suggested that such an arrangement should be adversely weighted against a contract with a single entity.
5. **China as a Partner and Part-Financier.** The proposal to include China in both construction and financing roles cannot be condoned, especially as we see their government currently dismissing criticisms of their horrifying human

rights violations. Today's UK media is full of criticism of China's violations and one eminent QC states that "there should be no let-up in shaming China for what is happening, and the UK should be clear and forceful. Human rights must come before trade". China is not a suitable partner for the Sizewell C project.

6. **Low Carbon.** It is understood that East Suffolk District Council is placing being in support of Sizewell C in their belief that the plant would be carbon free. Can you please ensure that consideration of the planning application carries out an independent review covering carbon emissions and control.
7. **Decommissioning.** It is now clear that any form of power generation whether associated with nuclear or renewables should include the capital and revenue costs of long term decommissioning and removal of all its hardware and contamination. EDF's proposals must be investigated and approved by the Inquiry before such plans are submitted to the Secretary of State.
8. **Opposition to Sizewell C.** The extent of opposition to the proposals are clear from the views expressed at the inquiry and which cover: breaching the terms of the SSSI; the adverse interaction with the RSPB reserve at Minsmere; objections from the Suffolk Wildlife Trust; the increased quantities of imported fill and its associated means of haulage to the site; freight haulage; and adverse effects of noise, light pollution, traffic, etc.
9. **Alternative generation strategy.** The Energy White Paper refers to the success of UK off-shore wind farms and envisaged a target generation from national wind farms of 40GW by 2030; it quotes that the wind generated price has fallen from £120/MWhr in 2015 to £40 in 2020. Furthermore the White Paper launched plans for a consortium to develop Small Modular Nuclear Reactors with funds of £385m. In February 2021 Rolls Royce, one of the members, announced that their SMR scheme was already well advanced with completion of the "feasibility and invest ability" phases. It is therefore appropriate for the Government to revise its Energy Strategy taking full advantage of renewables, Sir's and other opportunities thereby obviating the need for Sizewell C. The White Paper calls for future electricity arrangements and associated bills to be "affordable" for all users. Such a test should ideally be completed in conjunction with the work of the Planning Inspectorate and included in the Inspectorates report to the Secretary of State.

Colin Palmer

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