

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project EN010012

Interested Party ref: 20026566

My name is Neil Poole. I have spent most of my 66 years in Suffolk and retired last year from the practice of chartered architects that my business partner and I established here in 1985. I am writing in a personal capacity, on behalf of my family and of those I love.

I have made previous representations to the Examining Authority at:

- Pre-Examination: Deadline B, 7 April, and Preliminary Meetings Part 2
- Examination: Oral presentation to Open Floor Hearing 2: Tuesday 18 May 2021 (afternoon) Session 1/7 (edited written text version submitted and acknowledged 25 May 2021 for Deadline 2)

I would like to endorse the written representations of Stop Sizewell C, TASC, RSPB/Suffolk Wildlife Trust, Suffolk Coastal Friends of the Earth and all of the impassioned pleas from individuals within the Suffolk local community for the application to be refused.

I would like to make the following additional written representation:

My principle objection to the Applicant's proposals, as set out in my submissions to the ExA to date, is simple and straightforward: that this part of the east coast of the British mainland, with all that we know about its history, geography, geology, coastal geomorphology, and now, climate change, is simply not a sensible location for a project involving such high levels of embedded risk.

My objection is not to nuclear energy itself. But even if we were to agree that nuclear should, for the time being, form part of our future energy mix, I am convinced that this part of the east coast is a fundamentally unsuitable location for a huge new nuclear plant.

Climate change will inevitably result in rising sea levels and increases in the regularity and severity of extreme weather events. In spite of attempts by the Applicant's experts to predict the coastal impact which would result from the proposed development, there can be no certainty. As the panel will be aware, and in spite of the Applicant's mountain of technical reports attempting to prove otherwise, Cefas has admitted as much.

Where there is doubt as to possible future outcomes, the appropriate response - the response based on wisdom and on simple logic - should be the application of the precautionary principle (or approach). If the ExA applies the precautionary principle/approach¹ in its consideration of the proposal to site a huge new nuclear plant on a

rapidly eroding coast, a coast which will be subject to the increasing impact of climate change, they will be left with just one answer: that the application should be refused.

*“If we err in our decisions affecting the future of our children and our planet, let us err on the side of caution.”*² Gro Harlem Brundtland

I followed the Open Floor Hearings closely and I'd like to make some brief observations:

1 It was clear to me (and I suspect, to the panel), that whilst the case team and the panel tried hard to overcome the shortcomings of the virtual environment within which interested parties were forced to make their presentations, it would have been much better for all of us, if the hearings had been conducted in person. By the time the Examination started, we already had a fairly clear timetable towards the easing of lockdown restrictions. I regret that the ExA felt unable to accept the reasonable requests of interested parties, for a short delay, in order to enable in-person hearings - especially given the fact that the Applicant had made last-minute changes to its proposals. Those changes had already placed interested parties, who did not know whether the ExA would accept them for consideration, at a distinct disadvantage. I note now, with a heavy sigh, that the local MP, who has always been one of the few in-principle supporters of the project, asked in her own presentation for an extension to the Examination timetable because *“the Marine Management Organisation, the Environment Agency and Natural England – have not had sufficient time to consider all the impacts of the changes and new proposals”*.

2 The panel must have been struck during the hearings by the overwhelming level of opposition to the proposals. Perhaps they were also surprised at the almost complete absence of expressions of support from the local community. Where, for instance, were all the local business people telling them how much they welcomed the project? Where was the enthusiastic presentation from the local Chamber of Commerce? The truth is that there is hardly any significant local support.

3 I have no previous experience of DCO applications but I was astonished at the lack of any meaningful attempt by EDF to engage with the hearings. The panel will have noted the number of interested parties who criticised EDF for their lack of engagement over the last 8 years, for their often discourteous disregard for the genuine issues raised by local people. Surely the hearings offered them an opportunity to refute those criticisms, to apologise for any mistakes and to reach out to the local community. All that most of us see from EDF is an ever-growing mountain of virtual paper and reports from their consultants - reports which often appear simply to work backwards from the commissioning client's required conclusions. Yet at the end of each session, all we had was a brief promise to deal with comments in written responses. EDF's approach to the Open Floor Hearings must have confirmed to the panel, the overriding level of suspicion and mistrust with which the proposal is regarded locally.

4 I'd like to remind the panel that when he was appointed Secretary of State for Business, Energy and Industrial Strategy in January, Kwasi Kwarteng said:

"The way in which EDF engages with the local community, particularly in Sizewell C - if that's the one that gets the green light - is really important because in all of these issues there are always two sides. The onus is on the company developing the project to bring as many people as possible with them. You're not going to get 100% of people, and I'm realistic about that, but if you can get a big majority and can show that you are benefitting the local community, that you're sensitive to their environmental concerns. I think that's a challenge they can deliver on."

It was abundantly clear from the Open Floor Hearings that EDF (*"the onus is on the company"*) has failed - in fact, it appeared to me that EDF did not even attempt - to rise to Mr Kwarteng's challenge. *"... but if you can get a big majority"*? EDF hasn't even managed a small minority.

Finally, I'd like the panel members to ask themselves two simple questions:

Is this the best place to build a new mega nuclear plant?

The honest answer to that question has to be: No, it is not.

Are there more suitable places for such a project?

The honest answer to that question has to be: Yes, there are.

I urge the panel to refuse the application.

Neil Poole RIBA



Ref: 20026566

1 James Cameron & Juli Abouchar, *The Precautionary Principle: A Fundamental Principle of Law and Policy for the Protection of the Global Environment*, 14 B.C. Int'l & Comp. L. Rev. 1 (1991), <http://lawdigitalcommons.bc.edu/iclr/vol14/iss1/2>

"Briefly stated, the precautionary principle ensures that a substance or activity posing a threat to the environment is prevented from adversely affecting the environment, even if there is no conclusive scientific proof linking that particular substance or activity to environmental damage. The precautionary principle is a guiding principle. Its purpose is to encourage - perhaps even oblige - decision makers to consider the likely harmful effects of their activities on the environment before they pursue those activities."

2 Gro Harlem Brundtland, former Prime Minister of Norway and former Director-General of the World Health Organization. Keynote Speech, Opening Session, Conference on "Action for a Common Future," in Bergen, Norway (May 8, 1990).