

Sizewell C – Assessment of Sustainability continues...

1. PURPOSE

1.1 This brief paper is to respectfully remind the Examining Authority of; the extent and of the role of the Assessment of Sustainability [AoS] undertaken for the Government by MWH UK Ltd with Enfusion Ltd, Nicholas Pearson Associates Ltd, Studsvik UK Ltd and Metoc plc and subsequently published in October 2010 by the Department of Energy and Climate Change [DECC].

1.2 Moreover, it is hoped that in so doing it will also remind the Applicant that the AoS (although very important) is only “...*part of an ongoing assessment process that started in March 2008...*” and does not in itself constitute confirmation of suitability, beyond a notional strategic fit with energy policy.

2. SYNOPSIS

2.1 In the preface to the AoS, the DECC advise “*The Appraisal of Sustainability (AoS), incorporating Strategic Environmental Assessment, of the revised draft Nuclear National Policy Statement (NPS) has been undertaken at a strategic level. It considers the effects of the proposed policy at a national level and the sites to be assessed for their suitability for the deployment of new nuclear power stations by 2025. These strategic appraisals are part of an ongoing assessment process that started in March 2008 and, following completion of this AoS, will continue with project level assessments when developers make applications for development consent in relation to specific projects. Applications for development consents to the Infrastructure Planning Commission will need to be accompanied by an Environmental Statement having been the subject of a detailed Environmental Impact Assessment.*”

2.2 It is notable that the DECC specifically recognise; “*These strategic appraisals are...part of an ongoing assessment process that...will continue with project level assessments when developers make applications for development consent...*”

2.3 Subsequently, it is my contention that the Applicant is being disingenuous (not to say disrespectful) and premature in claiming ‘the Sizewell Site’ has been confirmed as wholly suitable for the construction of the power station and associated works being brought forward.

2.4 This assertion is further supported by the AoS itself where it is stated [at S.2.7] that the Nuclear NPS; “*...lists the sites, nominated as part of the Strategic Siting Assessment (SSA), which have been assessed to be potentially suitable for the deployment...*”

2.5 At S.2.8 the AoS goes further and identifies “*New nuclear power stations may have negative and positive impacts on the environment and local communities. The significance of these impacts depends upon the characteristics of the local area and the detailed design of the nuclear power station.*”

2.6 Consequently it is also my contention that; a design largely the same as that being built at Hinkley Point cannot realistically be described as sensitive to the ‘characteristics of the Area of Outstanding Natural Beauty’ in which it is proposed to be sited.

3. CONCLUSIONS

3.1 It seems self-evident to me that the AoS (when published) may have envisioned the Sizewell Site being used for the deployment of a sensitively designed power station in keeping with its surroundings and of a scale relative to the forecast 5-6 year construction period, utilising just 4,000 construction workers.

3.2 However, what is before the Examining Authority now bears no similarity to that portrayed to the authors of the AoS and could never be considered as either of an appropriate scale, or design for its surroundings.

3.3 In that context I respectfully ask the Examining Authority to review the pre-publication procedures and processes of the AoS, with specific reference to what gave rise to them being persuaded that a sympathetically designed power station suitable for siting in a pre-eminent AONB could be constructed in no more than six years by no more than 4,000 construction workers.

4. QUESTIONS?

- 4.1** Can EDF confirm whether they (or their agents) were responsible for providing information to the AoS Report authors that portrayed the temporal and workforce numbers at 3.3 above?
- 4.2** If EDF (or their agents) did not discuss these dimensions with the AoS Report authors, do they know who did provide them to the authors?
- 4.3** Have EDF ever constructed a Nuclear Power station in less than 6 years and/or using less than 4,000 construction workers?
- 4.4** If EDF have constructed a Nuclear Power station similar to that described in 4.3 can they disclose the details?
- 4.5** Can EDF provide a conceptual design for a Nuclear power station that they consider would be fitting for the unique characteristics of the Suffolk Coast and Heaths AONB?
- 4.6** If they can, in the spirit of impact avoidance; what are the inhibiting factors (time, cost, quality, etc.) precluding a more sympathetic treatment of the Suffolk Coastal area?

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