

## Stop Sizewell C Written copy of Oral Submission, 21 May 2021

Good morning, I am Alison Downes Executive Director of Stop Sizewell C. I observe that in the agenda I am listed as speaking for Sizewell C. I am sure you will appreciate that the temptation to announce the project is cancelled and to apologise to everyone for the inconvenience is irresistible, however, I thank you for this opportunity to share the views of Stop Sizewell C.

I will start by briefly outlining our journey to becoming Stop Sizewell C.

More than eight years ago, when EDF published its first consultation documents, the community of Theberton and Eastbridge where I live, was - frankly - shocked to realise the scale of the impacts on our Parish; not only that it was effectively two new power stations, but with hundreds of HGVs passing through on the B1122 and a campus for thousands of workers just a few hundred metres from Eastbridge. So, the Theberton & Eastbridge Action Group on Sizewell (or TEAGS as we became known) was born to give this community a voice. For many years we didn't oppose Sizewell C outright - instead we tried to show how the impacts could be significantly reduced and over successive consultations we sought to engage EDF and suggest how the proposals could be improved - for example with sustainable housing in local urban areas instead of a huge single campus, and a relief road that would be a genuine legacy for the area. To no avail. When Stage 3 consultations were unveiled and a relief road was proposed, the chosen route was a complete shock, severing our community. There were tears at EDF's exhibition here in Theberton's village hall (at Stage 4 they didn't even bother to come to this most affected community). Meanwhile, as we read more and more about the proposed role of nuclear energy in the UK, and the history of the EPR reactor globally, we realised this issue was as detrimental nationally as locally. Early last year we concluded that there was no option but to become Stop Sizewell C. We have the support of thousands of people.

Business Secretary Kwasi Kwarteng recently said about the UK's nuclear plans *"....there are a number of other considerations I would be interested in being focused on. **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."*<sup>1</sup>

We are here to say emphatically this has not happened.

- You may think that 4 stages of pre DCO consultation was more than many projects get, but we have had quantity rather than quality. Our recently resigned District Councillor TJ Haworth Culf said *"The devil is in the detail, but the detail isn't there"* - a common theme throughout these Open Floor Hearings, along with a lack of a clear evidence basis for EDF's proposals; for example when publishing the route of the Sizewell Link Road, EDF did not evidence their choice, and the report they eventually

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<sup>1</sup> <https://world-nuclear-news.org/Articles/Nuclear-stands-out-as-clean-dispatchable-firm-powe>

commissioned was superficial in the extreme and robustly criticised by the County Council among others.<sup>2</sup> The County Councils' choice of relief route was never consulted on. EDF have never adequately justified the campus arrangements. When we asked - perfectly reasonably - for the split campuses of Hinkley Point to be replicated here (with a few hundred workers on site and the remainder in nearby urban settings with the potential for legacy) we were told "the contractors don't like it". That well paid contractors take precedence over local people, and that we should be told so in such blunt terms, frankly took our breath away.

- **EDF never provided a Community Impact** report before submitting its DCO. Stage 3 documents stated *"Once the formal environmental assessments have been undertaken, following Stage 3, we will draw together the impacts of each element of the project on individual communities and proposed mitigation measures into a Community Impact Report. This will include but not be limited to Leiston, Theberton and Eastbridge."*<sup>3</sup> Yet when the DCO was published we found that our tiny, frontline community was lumped with the lovely but very different town of Saxmundham with its population of 5,000 people.
- With no Community Impact Assessment, through 4 stages of consultation we were forced to wade through documents from four stages of consultation to try and piece together the community impact ourselves. This was particularly critical for Theberton and Eastbridge which has the cumulative impacts of all the early years traffic, new roads, the workers' campus and borrow pits on our doorstep.
- **In terms of wider public engagement**, the last Sizewell C Community Forum, which our group despite its broad support was never permitted to join, took place in December 2019. Such events were an important opportunity for Town and Parish Councillors especially to get together. A meeting planned for March 2020 was cancelled because of covid but there was no attempt to reconvene online before the DCO was submitted. EDF made it clear it considered the life of the Community Forum to be over, despite the publicly available purpose being "to provide a mechanism for discussion during the planning and construction process between EDF Energy, representatives of the local community and other key stakeholders",<sup>4</sup> and despite the existence of a Community Forum at Hinkley Point. Traditionally Community Forums were convened prior to consultation stages, but there was no attempt to convene such an event when EDF decided to change their proposals last autumn.
- Incidentally, a question about Coronation Wood posed by Cllr Roy Dowding at the last Community Forum was forcefully shut down by EDF personnel as being outside the Sizewell C Community Forum's remit. For some years EDF lied to us all, claiming the felling of Coronation Wood had absolutely nothing to do with making space for Sizewell C and was purely about the operation of Sizewell B. We now know this is untrue. The independent chair later overruled EDF and said Cllr Dowding could ask his question at the next meeting - but there never was a next meeting.

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<sup>2</sup> The Joint Councils did not publish their response but showed a copy to Stop Sizewell C and we have no doubt they will share with PINS if requested. When asked by the East Anglian Daily Times to comment, the Councils said the review "does not fully answer concerns" that the route may not be the best option. It called on EDF to provide more evidence. See <https://www.eadt.co.uk/news/edf-energy-to-build-road-through-fordley-hall-farm-in-2640208>

<sup>3</sup> <https://edf.thirdlight.com/pf.tlx/FVFMA3FMgCGVZ>, page 69, para 4.4.58

<sup>4</sup> Community Forum Terms of Reference July 2019

[https://www.edfenergy.com/sites/default/files/szc\\_community\\_forum\\_-\\_terms\\_of\\_reference.pdf](https://www.edfenergy.com/sites/default/files/szc_community_forum_-_terms_of_reference.pdf)

- **Finally good Faith;** some speakers told during the Preliminary Meeting of trespassing incidents on their land, others of drones flown over properties without the courtesy of advance notice. Our village hall was booked under false pretences by someone on EDF's behalf. The Hall Committee only found out when EDF's exhibition schedule was published in the local paper and did not take kindly to being so badly misled. They wrote to EDF to express their general incredulity that EDF should further undermine the fragile confidence in its good faith and integrity. In Stage 1 consultations the first question posed in the response questionnaire was about the location of the visitor centre. Utterly irrelevant, utterly unempathetic. We know from anecdotal conversations local people have shared that EDF has admitted to being stretched for resources during this planning process, and one definitely gets the impression that this DCO is being carried out "on the cheap".
- I recall meeting Mr and Mrs Field of Fir Tree Farm, Kelsale for the first time on 8 January 2019 when they came into one of our mobile exhibitions in Yoxford, just across the road from EDF's Stage 3 exhibition. They were both literally shaking with emotion - and anger - having had what they described as an upsetting and insensitive encounter with EDF staff. They had only received notification of EDF's plans for a roundabout, road and construction compound adjacent to their house by courier on 7 January, three days after the consultation documents were published. Mr Field subsequently complained to EDF's Chief executive a number of times. Mr Field died suddenly last March at the age of only 48. EDF are well aware of his widow's circumstances, yet in recent months she has been forced to push for any limited contact with EDF or their agents. She told of seeing torchlight shining through her windows which she assumes was a bat survey, but you can imagine how unnerving that would be. No one had notified her.

So, in addition to our dissatisfaction with EDF our three main reasons for opposing Sizewell C are:

- **because of its destructive impacts on the area's economy, communities and the environment**
- **Because Sizewell C does not answer this government's policy imperatives;**
- **and the appalling track record of EDF and its EPR in cost overruns and delays.**

**Quite simply - and you will have heard this expression a few times already this week - Sizewell C is the wrong project at the wrong time in the wrong place.**

You have heard from many others about destructive impacts on the area's economy, communities and environment so I won't repeat them here. Our written representations will include expert critiques of EDF's Economic Statement, Transport Strategy and other proposals.

Suffice it to say, for a project as destructive as Sizewell C to be consented in such a fragile protected place, it would have to have 100% cast iron justification, so - relating to policy and need - I want to outline why it does **not**.

**Sizewell C is not the solution for net zero.** By 2034, when Sizewell C *may* be completed, the UK's energy landscape will be profoundly different, favouring cheaper renewables and green hydrogen. You've heard how EDF's documents reveal it will take 6 years for Sizewell C to "pay back" the **now 6.2** million tonnes of CO2 generated in its construction compared to the expected energy mix,<sup>5</sup> so it cannot help the government's new target of 78% reduction in CO2 by 2035. Nuclear is too inflexible to fit well with renewables.<sup>6</sup> The National Infrastructure Commission<sup>7</sup> said the potential for other non-intermittent technologies to complement renewables "weakened the case for committing to a new fleet of nuclear power stations".<sup>8</sup> The Climate Change Committee's Chair Lord Deben describes it as a "transitional" energy source whose need reduces as grid-balancing improves<sup>9</sup> and three of the Committee's five energy scenarios published last December 2020 had only 5GW of nuclear capacity which is achievable by finishing Hinkley Point C and extending the life of Sizewell B.<sup>10</sup>

Far from being "always on" nuclear stations are regularly off for scheduled outages, and for unscheduled problems, such as with Sizewell B's current extended outage. I admit that the Secretary of State has said we need nuclear, but there is a legitimate question about whether that is the case, or how much, and - with Advanced nuclear progressing fast - in what form?

**Sizewell C is expensive:** last month Rothschilds, EDF's financial advisers, said they are looking for "*in excess of £20 billion*", *requiring the deepest pools of capital to be available* - and indeed as you picked up in your written questions it is hard to imagine the original estimate of cost has not gone up. There isn't an infinite amount of money available; so an investment in Sizewell C is at the expense of something else - likely cheaper, faster renewables, energy efficiency, storage, CCS, tidal and vital flexibility adaptations to the grid - even Small Modular Reactors. For the Prime Minister's increased target for offshore wind capacity<sup>11</sup> it has been estimated it would cost £50bn to get 30GW by 2030<sup>12</sup> - the equivalent of **nine** Sizewell Cs deploying some years soon. Bargain.

**Sizewell C's funding is a huge question mark. It is totally dependent on the controversial Regulated Asset Base<sup>13</sup> or "nuclear tax" which will require legislation.** RAB is widely criticised for pushing the risk of overruns and overspends onto consumers. As energy expert Professor Steve Thomas said to me the other day. "You can't magic risk away. All you can do is shift it, and that is what RAB does." A RAB-type model for a cancelled plant in the US is costing ratepayers \$2.3bn.<sup>14</sup> Stop Sizewell C has recently secured statements from three of the UK's biggest asset managers that they are not interested in Sizewell C and just yesterday Legal and General, the UK's biggest asset manager confirmed they would not invest in Sizewell C, despite

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<sup>5</sup> <https://stopsizewellc.org/sizewell-c-and-climate-change/>

<sup>6</sup> <https://www.thetimes.co.uk/article/big-is-not-so-beautiful-in-grid-talks-to-power-down-8w0qxbtg>

<sup>7</sup> <https://utilityweek.co.uk/treasury-still-unconvinced-rab-model-nuclear/>

<sup>8</sup> [https://www.thetimes.co.uk/article/advisers-raise-doubts-over-new-nuclear-plants-8hd85cr6d?fbclid=IwAR1lxogaZreJ4colG4tAlHKu3QstyAM2mt59U9Bx4q\\_dVOOQE8OP78H-15c](https://www.thetimes.co.uk/article/advisers-raise-doubts-over-new-nuclear-plants-8hd85cr6d?fbclid=IwAR1lxogaZreJ4colG4tAlHKu3QstyAM2mt59U9Bx4q_dVOOQE8OP78H-15c)

<sup>9</sup> <http://www.utilityweek.co.uk/lord-deben-politicians-finally-grasped-reality-climate-change/>

<sup>10</sup> <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

<sup>11</sup> <https://www.gov.uk/government/news/new-plans-to-make-uk-world-leader-in-green-energy>

<sup>12</sup> <https://www.theguardian.com/environment/2020/oct/06/powering-all-uk-homes-via-offshore-wind-by-2030-would-cost-50bn>

<sup>13</sup> <https://www.gov.uk/government/consultations/regulated-asset-base-rab-model-for-nuclear>

<sup>14</sup> <https://theintercept.com/2019/02/06/south-caroline-green-new-deal-south-carolina-nuclear-energy/>

being namechecked in January by the Chair of the Nuclear Industry Association.

Our research, which we will share in written representations, is that EDF's estimates of a £40-£60 per MWhr price range for Sizewell C's electricity is frankly unrealistic, even with consumers paying up front on their energy bills, years before any electricity is generated.

And as for governance, we don't even know who will own Sizewell C, and there is increasing recognition it could be overseas owners. EDF's comments on the Relevant Representations states "The ownership of SZC Co. for the construction period is expected to be made up of third-party investors (**predominantly pension investment funds which may include foreign investment**) but has not yet been fixed. Foreign investment has been used to enable infrastructure development throughout the UK and external finance (equity and debt) is expected to be required to fund the construction of the Sizewell C Project.

Although EDF Energy and China General Nuclear (CGN) have funded the development phase of Sizewell C to date, this will change for construction and operation of Sizewell C.<sup>15</sup> So much for EDF's aim for the project to be majority UK owned.<sup>16</sup>

**Sizewell C will not help to "level up" the UK.** In its claim of IROPI we see no evidence that EDF has attempted to fully assess whether it could build twin reactors at its other sites of Hartlepool and Heysham, merely saying "all eight sites that made it through the NPS site selection appraisal are required".<sup>17</sup> Unfortunately for EDF it is an open secret that Ministers consider multiple gigawatt nuclear projects to be unrealistic.<sup>18</sup> According to a study we have commissioned and will also submit at Deadline 2, these other sites have much higher levelling up potential.<sup>19</sup>

**Finally, Nuclear energy is categorically NOT green. There is no solution in sight for nuclear waste:** The spent fuel from an EPR is exceptionally hot, so fuel from Sizewell C would have to stay on Suffolk's eroding coastal site for 100 years. The UK has made no progress on building a "permanent" waste facility.

I just want to finish by highlighting the appalling history of the EPR reactors, so well conveyed in the film "French Nuclear Trap" - overrun, over budget, with no working example in Europe and legitimate questions about the only two functioning reactors in China. Ironically EDF aims to have a new EPR design by very shortly, but Sizewell C would be of the old design.

Much has been made of the fact that the EPR reactors will be copies of those being built at Hinkley Point which is currently £2.9bn over budget and up to 15 months late.

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<sup>15</sup> Page 37

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-003958-Sizewell%20C%20Project%20-%20Comments%20on%20Relevant%20Representations%20\(RRs\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-003958-Sizewell%20C%20Project%20-%20Comments%20on%20Relevant%20Representations%20(RRs).pdf)

<sup>16</sup> <https://www.edfenergy.com/media-centre/news-releases/sizewell-c-dco>

<sup>17</sup> Page 49

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-001770-SZC\\_Bk5\\_5.10\\_V2\\_Shadow\\_HRA\\_Report.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-001770-SZC_Bk5_5.10_V2_Shadow_HRA_Report.pdf)

<sup>18</sup> According to information shared with Stop Sizewell C via multiple confidential sources close to government

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<https://stopsizewellc.org/core/wp-content/uploads/2020/06/Development-Economics-Nuclear-power-stations-potential-to-contribute-local-economic-benefits.pdf> This has been submitted as a Written Representation.

All I would say, is you can replicate the reactor, but you cannot replicate the location. And Location Location Location is critical to Sizewell C.

Thank you for listening. I would like to endorse the contributions of Together Against Sizewell C, RSPB and SWT, B1122 Action Group, Aldeburgh Society, Alde & Ore Association, Minsmere Levels Stakeholder Group, all the Town and Parish Councils and pretty much everyone who has spoken in the last few days.

Alison Downes

On behalf of Stop Sizewell C