

## WRITTEN REPRESENTATION RE SIZEWELL C (SZC) DCO APPLICATION

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### Summary

After nine years and five consultations (one in panic during the DCO process when Suffolk County Council said they would not support the project in its current form) the Applicants DCO has exposed that the proposed Sizewell C project is still little more than a concept. I have set out some of the reasons why I have come to this conclusion below.

Some of the problems with the project are:-

Appalling maps with little or no grid lines and impossible to read keys

Repetitive and misleading information

Lack of information and detail in all the main areas of concern including:-

The design of the hard coastal sea defence and the impact this will have on neighbouring properties/residents

How the site can be protected until all spent fuel is removed. Climate change resilience only covers period of construction and operation up to 2099

Failure to identify the actual source of potable water

The fact that the Applicant admits they will not and cannot fund the project installs little faith in EDF's EPR design and with just cause as French Public auditors Cour des Comptes describe Flamanville (same EPR proposed for Sizewell) as a failure with huge financial consequences and implications for the French nuclear industry and beyond. It is no wonder EDF want the UK taxpayers and electricity bill payer to pay upfront and take the risk for the Applicant's proposed Sizewell C project but the question is why does the UK government want to subsidise 83% French government owned EDF?

The Applicants attempts to exploit the Rochdale Envelope so their plans or lack of them escape public scrutiny.

I believe that the Applicant has demonstrated a cavalier attitude to the climate crisis (which is as much about biodiversity loss as sea level rise) and the unique landscape the proposed Sizewell C project is sited in for the following reasons:-

#### 1. Lack of consideration to alternatives

Sizewell B Relocation Facilities, despite many residents, NGO's, and I believe statutory bodies suggesting that there were alternative locations and advantages of siting the Visitors centre, Training centre and carparks elsewhere in order to stop the unnecessary destruction of Coronation Wood, EDF chose to disregard all suggestions and carry on with their plans

regardless. After a lengthy court case they then chose to fell the wood during the hibernation period and without the necessary bat mitigation license. I phoned Natural England and was told to report this incident to the police as Natural England advised me that this woeful destruction, without the necessary paperwork, was a wildlife crime. Sadly like myself, many reported the crime but to little avail and EDF continued their destruction regardless. There would have been many advantages to the siting of the Visitor and Training centres in Leiston such as bringing much needed revenue into the Town which is still in recovery from the boom and bust created by Sizewell A and B.

The planting of twigs in Pillbox Field which is acidic grassland meaning little chance of survival and the erection of a few bat boxes caused EDF to claim there would be biodiversity net gain for the destruction of Coronation Wood which was over 100 years old .

The Sizewell access road through Sizewell Marshes SSSI shows EDF's total disregard for UK's legally designated sites. Throughout the nine years and five consultations EDF have never proposed an alternative to the SSSI crossing and instead of avoidance have gone straight to compensation which should only be used as a last resort. Compensation is in the form of Aldhurst farm which could never replace what has taken hundreds of years to evolve on the SSSI site. It is disingenuous of EDF to claim what has been an arable area, I believe used for growing onions with all the pesticides and fertilizers required for that process, could in any shape or form compensate for the loss of 10ha of Sizewell Marsh SSSI. The access road and the 7.3 metre high crossing with 3 metre high barriers will be a permanent scar on the Suffolk AONB cutting it in two and will be a visual intrusion on the landscape. If proposed Sizewell C becomes operational with its nine hundred permanent staff and additional one thousand two hundred outage workers arriving every 18 month per reactor, it will be the road to ruin for the Sizewell Marshes SSSI and the flora and fauna that have made their home here, with traffic fumes and particulates, dust, microplastics from the tyres, noise and light from the constant daily traffic movements, permanent road lighting and an assortment of pollutions draining into the designated sites degrading this pristine location. I endorse the ecological concerns raised by Suffolk Coastal Friends of the Earth, Suffolk Wildlife Trust and RSPB Minsmere.

Is the Sizewell access road suitable for the lifetime of the Sizewell project?

APP-093 5.2 Main Development Site FRA Page 4 "The SSSI crossing is safe for use up to a 1 in 1,000 year coastal event at the end of the operation phase, after which there would be a high risk of coastal overtopping that would make crossing dangerous during storm conditions. Prior to this, the adaptive flood defences on the SSSI crossing would be constructed to reduce this risk through the remaining lifetime of the proposed site"

APP-093 5.2 Main Development Site FRA para 5.3.2 "The 2D-TUFLOW inundation model results for the 1 in 200 year and 1 in 1,000-year events with climate change up to 2030 (Figure 20) show the SSSI crossing area is at risk of flooding from both events with maximum water level 1.11m AOD and 1.49m AOD respectively."

APP-093 5.2 Main Development Site FRA para 8.1.1. "In the future with sea level rise, the SSSI crossing could be at risk from still water levels and/or wave action once the existing

shingle defences are inundated and sea waters propagates further inland. The proposed crossing is set back from the coast by approximately 250m”

There are many other statements in the DCO regarding flood risk to the access road and SSSI crossing. I have also found that the 1953 floods have not been included in one of the applicant’s surveys in DCO document ‘6.12, pages 68-86 Reports Referenced in the Environment Statement’ [AS-020] re Kenneth Pye BEEMS report TR322 conclusion on page 12, in which there is an assessment of extreme flood risk, and I quote part of the conclusion:-

“For the period extending beyond 2100 to 2185 a level of protection equivalent to a platform level of 7.5 m would be required to safeguard residual and more localised hazards such as those that might be associated with a spent fuel store. The additional effect of waves also needs to be considered in the specification of the sea defences. It should be noted that these statistical assessments are based only on data for the period 1964 – 2014 and do not include the high magnitude 1953 event. Modelling has shown that the inclusion of this and other high magnitude events earlier in the 20th century leads to even higher estimates for the 1 in 10,000 year water level.”

From reading other DCO documents, it is my understanding that the platform height, and the SSSI crossing, will be 7.3 metres. With my limited knowledge, I question whether this will be high enough.

The spent fuel rods will remain on site until at least 2150 or maybe indefinitely as a GDF is still a government unicorn and bearing in mind that the CCR only covers construction and operation see APP-342 Para 26.5.2 states “The CCR assessment scenarios considers climate change impacts during the construction and operation of Sizewell C on the main development site and the associated developments through to 2099, the last year for which UKCP18 climate projections are provided.”

The plan of managed adaptation for the SSSI crossing to 10.3 metres does not fill one with confidence. It is impossible from the misleading info in the DCO about lengths, widths how the SSSI will eventually sit in the AONB landscape. I would hope the Exa will come to the conclusion that the Applicant’s choice of access road is not fit for purpose for the full lifetime of the Sizewell C project and would also be an environmental disaster.

The car park in Dunwich Forest on Goose Hill for 1370 vehicles

Total insult to the Suffolk Coast and Heaths AONB designation. As far as possible all traffic should be kept out of the AONB including staff and outage workers. Along with some of the Sizewell B relocation facilities it does not take much imagination to make this work. Car parks can easily be located in other areas with a minibus service in place, reducing pollution, noise and light disturbance in the AONB.

The Sizewell Link road

The fact the Suffolk County Council request that this is removed after construction says it all.

2 Village bypass

This is not mitigation, it is more environmental damage and, because the Applicant has no funds for the project, means you and I will have to pay for it. What is also often overlooked

is it pushes the problem onto somebody else's doorstep. The new (probably equally unworkable) transport strategy is supposed to reduce vehicle movements so there needs to be a new assessment to see if the 2-village bypass is still necessary.

#### The Need for Nuclear

EN6 and EN1 are out of date. The National Infrastructure Commission recommend the government should support no more than one more nuclear power station before 2025. The government push for new nuclear in 2006 for fear the lights would go out yet to date new nuclear has generated no electricity in the UK. The Applicant's claims that there is still an urgent need for new nuclear are disingenuous and in my opinion the continued time and funds wasted pursuing new nuclear are hindering us meeting the UK climate goals. There are clearly now many alternatives to produce 3.2GW of electricity quicker, cheaper and in a safer less environmentally damaging way than the Applicant's Sizewell C project. I hope the ExA will consider the need to decarbonise quickly and in the safest manner possible, for the sake of future generations and recommend refusal of the Applicants Sizewell C project.

#### 2. The Transport strategy

Nine years 4 consultations and at DCO a transport strategy that Suffolk County Council cannot support. A 5<sup>th</sup> consultation during the DCO process with options that are quite likely undeliverable and to the detriment of AONB, with a jetty that will likely impact coastal processes shows there is no sustainable route to the Sizewell site.

#### 3. The Sizewell site

Is on an eroding coast at risk from climate change sea level rise, storm surges and extreme weather. At 32ha it is too small for the proposed twin reactors (the Hinkley point C site is 125 football pitches). This means the sea defences have been placed outside the licensed nuclear site causing coastal squeeze. The Applicant wishes for the design of the hard coastal sea defences to be outside the DCO process. My concern here is that there are so many statutory bodies involved in this process ie ONR, EA, Cefas (who in this process appear to be a paid advisor rather than a regulatory body) and MMO, that no one body or person is responsible for the decision making process. Moving forward, if problems occur, somebody must be held responsible so on this basis, I request the ExA to recommend refusal of the Sizewell C project. If the Secretary of State for BEIS then decides to give approval, any consequences of the Sizewell C project will lay firmly on their shoulders.

I endorse the concerns of Together Against Sizewell C, Stop Sizewell C, MSLG, The AONB Partnership, The National Trust, Suffolk Preservation Society.

#### 4. Health and Wellbeing

The Applicant's Sizewell C project has put my life on hold and any plans I had for my life and property have seemed impossible decisions to make. To witness the destruction that the proposed Sizewell C project will inflict across East Suffolk, the Suffolk Coast and Heaths AONB, the Sizewell Marshes SSSI, the impact on RSPB Minsmere has resulted in the project being constantly on my mind. I am at a loss to understand how the UK government can be considering forcing UK Taxpayers and bill payers to subsidise French 83% state owned EDF

to build two unproven European EPR on an eroding coast in a landscape with many national and international designations. Making Sizewell a de facto radioactive waste dump without proper consultation with residents and passing the management of the waste onto future generations, who will gain no benefit from the project but all the responsibility for protecting the site from the unknowns that climate change will bring.

I hope that the ExA will reflect on all those who spoke at the open floor hearings and while many of them might not be classed as experts, they displayed a wealth of local knowledge and common-sense which, I believe, should make the ExA come to the conclusion that the Applicant's Sizewell C project will be an environmental and financial disaster for the UK and must never happen.