



# Together Against Sizewell C

**TASC IP # (deadline 3 submission): 20026424**

**To Dr. Therese Coffey MP**

**cc PINS SZC**

Referring to your tweet 2nd June 2021, you state that,

“EDF is proposing to build a new nuclear power station at Sizewell. I am working hard to make sure that Suffolk Coastal reaps the benefits this opportunity will bring in terms of new high skilled jobs, education opportunities and infrastructure investment.

“I sit on the Joint Local Authority Group (JLAG) and the Sizewell Stakeholders Group (SSG). **These are designed to make sure that local people's voices are taken into account when considering the construction phase of the project and the legacy it will bring.**”

## **TASC Response.**

We would like to point out:

Para 1.

As an MP you appear to be more concerned with the purported economic benefits any Sizewell C may bring without due care and attention to many unresolved concerns and disbenefits expressed by many of your constituents, many of whom may have experienced the lack of long term economic gains that were promised to the local area by the development of Sizewell B. Indeed, the failure of promises made to the area are evidenced the SZC Local Impact Report submitted to PINS by East Suffolk Council (ESC) and Suffolk County Council (SCC) which states in paragraph 2.14:

‘Alongside the strengths, there are several weaknesses in the local economy:

- i. Major economic differences between the north of the district, especially Lowestoft, and the south. These differences are particularly seen in level of social mobility and skills profile, lower wage levels and the need for economic and physical regeneration.
- ii. In the immediate vicinity, the development of Leiston has significant socioeconomic problems such as low life expectancy, poor educational outcomes, low wages and a high level of worklessness.
- iii. Skills and labour shortages in some sectors.

iv. Housing affordability is challenging for people who rely on local jobs, particularly for the more poorly paid and young people. This is exacerbated in some areas by high levels of second home ownership.'

We believe it is important to bear in mind that EDF will not be the developer of Sizewell C which should be a cause for concern as regards liabilities, insurance and fully funded decommissioning and waste management. Page 72 EDF report to shareholders 2020 [EDF / 2020 Universal Registration Document \(cld.bz\)](#)

## Para 2

1. **JLAG** is a group set up by the Suffolk Coastal District Council (now ESC) and Suffolk County Council and MPs and others which meets in camera, to discuss SZC and windfarms and only includes selected councillors. There are no opposition observers, no public, and notes not minutes are presented and available to the public only at the subsequent meeting of JLAG. This arrangement was subject of a complaint by Friends of the Earth to the Local Government Ombudsman. The properly constituted Sizewell C task group which was open to the public was dismantled on the 27<sup>th</sup> April 2018. We note that JLAG appears to be more concerned about the "benefits" of a SZC project. Can you point to where any concerns and issues were discussed in a public forum? In August 2018, JLAG notes indicate at item 4 that Bill Parker highlighted issues to do with coastal process and lack of information and timescales. Some of this information has still not been made available. Can you explain how councillors can represent their constituents if they are not allowed to attend these meetings and if relevant information continues to be withheld?

2. **Sizewell SSG**. By right, you as MP, have always had a place on the Site Stakeholder Group (SSG) since your election. You have not attended an SSG for a number of years and you have sent no substitute representative. The Sizewell Site Stakeholder group is solely for the scrutiny of issues relating to Sizewell A Magnox and Sizewell B EDF and does not discuss Sizewell C, except for matters which impact on Sizewell B or A. We do recall however an acrimonious debate about the previous emergency plan.

## **Thérèse Written Submission to the Sizewell C DCO – Deadline 2**

### **Re your Initial comments as below:-**

"Tackling climate change and ensuring we have enough electricity as we phase out fossil fuels is vital to the success and sustainability of this country as we head towards net zero by 2050. The increasing electrification of much of our infrastructure and resources will need to be catered for. Nuclear power as a zero-carbon energy source is a key part of the energy mix we need today and in the near future given there is not sufficient technology yet to establish a baseload of electricity supply for the country's needs. Domestic energy provision is also important for our domestic security. Sizewell is an important nuclear cluster, generating electricity before the area was designated an AONB in 1970. Sizewell was included as a suitable site in the National Policy Statement EN-6 and which was supported by Parliament in a formal vote. Since then, there has been a consultation on updating the NPS (December 2017) and it was responded to by the Government in July 2018. While the new draft NPS has not yet been published, **there was**

**nothing in the consultation or response that indicated that Sizewell would be removed from the list of suitable sites** though all mitigations would need to be included in the DCO. It will be for the Planning Inspectorate and ultimately the Secretary of State for BEIS to decide the merits of the DCO within this framework.”

## **TASC response**

TASC have already refuted the CO2 claim.

Sizewell was identified as a “potential” site not a “suitable” site in the 2011 NPS. You claim that Sizewell C was still a “suitable” site and should be retained in the draft NPS. Your attempt to re-word the NPS by changing “potential” into “suitable” in reference to the site is disingenuous and underhand. Where is the evidence for this statement?

TASC members along with other NGOs have been involved in BEIS led discussions on a revised EN6 since December 2017, and have evidence to show that there was no regulatory involvement in the draft NPS. BEIS confirmed that regulators views would be published alongside developer nominations. TASC had already raised the issue of the important need for alignment between the DCO process and site licencing and permitting in the PINS process. BEIS further confirmed that the public would have the opportunity to comment on the issue of “need” in the consultation on the new draft NPS for nuclear. BEIS acknowledged that flood risk, climate change, and issues related to the AONB were of major concern. Town water and constructability risks were all noted as was a commitment to work to IAEA siting standards. In addition, BEIS have repeatedly acknowledged that the town of Leiston should be included in a 3-4 kms Detailed Emergency Planning Zone in accord with IAEA standards. This implies that EDF’s current emergency plans for Sizewell B are in conflict with Government advice and do not conform to REPP19.

There has been no public consultation on new EN6 despite a BEIS commitment that “sites judged to be potentially suitable with regards to all siting criteria will be set out in the draft NPS for public consultation and Parliamentary scrutiny”

We note further in your representation that you say Sizewell C is extremely important so we must question why EDF and CGN do not want to finance this project. We must assume the 2016 Government agreement is no longer valid. Nuclear has indeed been a long standing sector in East Suffolk and there will be continuing employment in Sizewell B and decommissioning of Sizewell A and ultimately B. The fact that large scale nuclear is seen as uneconomic and does not work in conjunction with renewables you seem to ignore. The reactor type EPR is not running in Finland and France. As the time of writing the other EPR in Taishan1 is causing great international concern because of an “imminent radiological threat” notified by Framatome the French company and builder of HPC and any SZC. EDF France are working on a “cheaper simpler” design which has not yet been approved. Your claim that people are opposed because of safety concerns may be because they have taken note of accidents particularly at Chernobyl and Fukushima which resulted in catastrophic financial losses and harm to health. In 2019 TASC facilitated a public meeting with Japanese organisation committed to improving children’s welfare and heard about the full impacts of the event and the difficulties of managing vast volumes of radioactive liquid and solid waste. We note also that

neighbouring governments response to SZC under ESPOO, including Eire, are concerned about risk to food supply following accidents and the ability of the Office of Nuclear regulation (ONR) to take over the role of Euratom following Brexit.

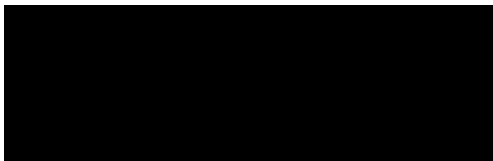
You make further comment about the independence of the ONR but they are obliged to work to the regulators code and we are not confident that ONR have been sufficiently robust in their response to PINS. The Generic Design Assessment (GDA), which you refer to, has many outstanding assessment findings, including one of special concern relating to whether high burn up spent fuel can be managed safely. Failure to resolve this issue has grave implications for the future of this area. We have seen no plan for resolution of these assessment findings.

We also note you have accepted the transport changes but would point out that continuous changes to the plans during the DCO process make a mockery of peoples' comments and significantly add to regulator's and statutory consultees workload. Indeed we were advised by Planning Aid that plans should be fixed before acceptance by PINS. The fact that there are still many unresolved matters to date including flood risk, coastal processes, town water supply, SSSI crossing design and marine ecology should be of grave concern.

You also claim confidence in the work of CEFAS on marine impacts but this is being disputed in written representations to the Sizewell C inquiry and in an ongoing planning inquiry into permits at Hinkley C.

We would appreciate an answer to our concerns and questions.

Yours sincerely,

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Chairman

Together Against Sizewell C

June 21<sup>st</sup> 2021

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