

## Additional Written Representation at Deadline 6

### The Applicants communication of the 'Construction water supply consultation'

**Notes:** Scanned images of 'Sizewell C Community Newsletter' as posted to residents are embedded in this Representation

I do not intend to comment at this time on the substance of the proposals being brought forward in the Applicants Proposed Change 19 and will address any issues arising in later representations.

#### INTRODUCTION

My name is Ian Galloway and I am a resident of Kelsale-cum-Carlton and have been advised of the 'Construction water supply consultation' by an August 2021 edition of the 'Sizewell C Community Newsletter' [Fig. 1] delivered to my home address on 3<sup>rd</sup> August 2021.



Fig. 1

I am concerned that such a potentially significant, damaging and extraordinarily late change to the Applicants proposal is being sent to residents wrapped up in a 'sugar coated' Public Relations vehicle that is full of; spin, contradictory statements, misdirection's, misleading statistics and half-truths.

For example, **THE FRONT PAGE** claims "Tackling climate change and protecting the local environment" as its first headline.

I will not rehearse the many and complex arguments made at the OFH and ISH's over the previous months, suffice to say I cannot see how the wanton destruction planned over the construction period of Sizewell C could possibly be construed as 'protecting' the local environment.

Indeed, the almost total absence of 'avoidance', the level of mitigation and the incidence of compensation (albeit totally inadequate) bear witness to the prevalence of damage being inflicted on "the local environment".

On page 2, in the **INTRODUCTION** by Julia Pike, the construction period (at line 3) is described as “The build period will last for around a decade..”

However, in the article at the foot of the page [last 2 lines] it is quoted as “...construction will take between 10-12 years...” It seems incomprehensible to me that any corporate body (of integrity) could ever countenance a 20% adverse variance being described so glibly as “...around a decade...”.

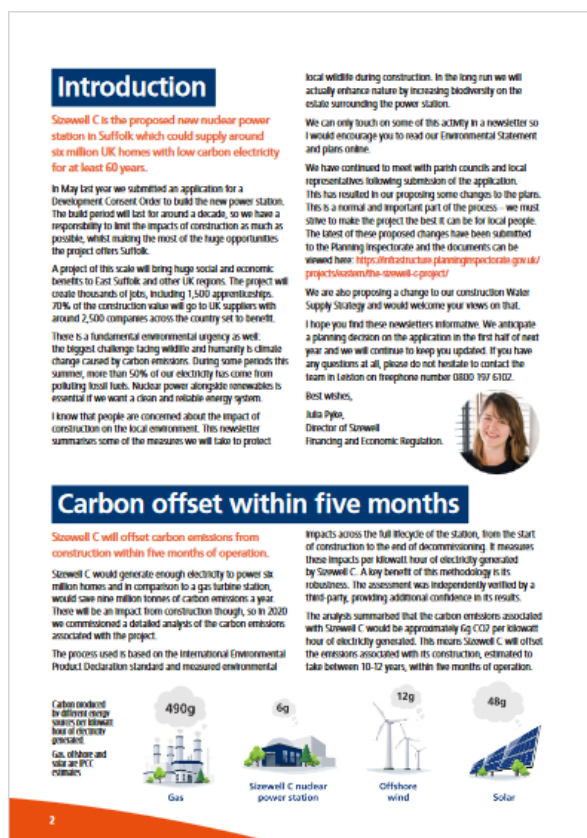


Fig. 2

It is acknowledged, albeit long after the Applicant has made widespread announcements about the local potential for Supply Chain opportunities, that they are now amending their long standing narrative on the Supply Chain and have aligned it more closely to the commentary in the Annual Report and Accounts to read “70% of construction value will go to UK suppliers with around 2,500 companies across the country set to benefit”. [Introduction 3<sup>rd</sup> Paragraph – last 2 lines].

It would seem that at last, the Applicant is curtailing the promulgation of false hopes to local businesses and coming clean about the wholesale ‘lift up and move’ of the developed Hinkley Point C supply Chain.

Indeed, in an interview with Nadine Buddoo of New Civil Engineer [2<sup>nd</sup> August 2021] Laing O’Rourke’s Civils Director Sarah Williamson hints at this potential change saying “Going from Hinkley to Sizewell, we’re not just copying the design, we’re replicating significant chunks of the supply chain because that supply chain has learned how to go to work in this environment.”

In respect to the local environment Ms Pike previews the back page feature saying “In the long run we will actually enhance nature by increasing biodiversity on the estate surrounding the power station” [Introduction 5<sup>th</sup> Paragraph – last 2 lines] a statement that is yet to be extensively tested; and that conveniently only deals with the Sizewell Estate, thereby avoiding the damage to the environment being inflicted on at other locations (i.e. the SLR and Theberton Bypass, the Two Villages Bypass, Park and Ride sites, etc.)

It is with some irony that in the penultimate paragraph of the Introduction Ms Pike, more or less in passing says; “We are also proposing a change to our construction Water Supply Strategy and would welcome your views on that.”

It beggars belief that after nearly ten years of Pre-Application consultations and countless expressions of concern from Interested Parties about water issues in East Anglia, it is only now (more than halfway through the Examination) that the Applicant brings forward a potential major change in the dDCO with seemingly little research and evidence as to the full impacts and consequences of the proposed desalination approach.

At the foot of Page 2 the Applicant summarises a detailed analysis (commissioned in 2020) of carbon emissions in less than 20 lines and a four part graphic under the banner headline **CARBON OFFSET WITHIN FIVE MONTHS**.

Inevitably a summary of this nature asks more questions than it answers and readers should be able to access the evidence before deciding for themselves how accurate and truthful the article is in portraying the totality of the issues having a bearing on the proposed power stations credentials. For example; are the goalposts the same as used for EDF's previous 'circa 6 year assertion', is the basis of calculation aligned with the dDCO basis, is operational effectiveness assumed to be above 75% and is that realistic, is gas a real comparator for the mid 2030's, with or without Carbon Capture and/or storage, should the benchmark be against the basket of generator contributors projected to be active in the mid 2030's rather than now, etc.

It remains to be seen if the Applicant is totally transparent on such matters, and makes available all of the research at the earliest opportunity, along with the previous EDF assessment.

Page 3 is used to herald another inadequate consultation period lasting just 25 days (19 days excluding weekends).

**Construction water supply consultation**  
3 to 27 August 2021

We continue to listen to feedback from local communities and stakeholders.

This ongoing engagement, along with further design work in collaboration with Northumbrian Water Limited, has resulted in a proposed change to our construction Water Supply Strategy. We are seeking feedback on this proposed change, which is summarised here and explained in more detail in a full Consultation Document available at [www.stowell.co.uk](http://www.stowell.co.uk).

Described as Proposed Change 19, the numbering reflects the format of the Consultation Document and follows on from previous changes. These include 15 changes to the application that were accepted for examination by the Planning Inspectorate on 21 April 2021 and three further changes submitted on 21 July 2021.

**Water Supply Strategy**

**Proposed change 19**

Clean water from a dependable source would be required from the earliest stages of construction of Stowell C. While our planning application includes proposals to access water from a permanent water main, ongoing work has identified a need for more flexibility in construction water supply.

The construction and operation of Stowell C, including this proposed change to our construction Water Supply Strategy, will not impact the local supply of drinking water.

We are proposing a change to our planning application to include a temporary desalination plant on the main construction site, away from both Stowell Marshes SSSI and Stowell beach. Desalination is the process of removing salt and other minerals from sea water to create drinking-quality, or potable, water.

The proposed temporary desalination plant would provide a reliable, continuous source of water while the permanent water transfer main is completed. We expect this to be around four years after the start of construction, although the plant may be retained for longer – potentially throughout construction – in the unlikely event of a delay to the permanent main. The desalination plant would be removed at the earliest opportunity and once sufficient supply from the main has been established.

Operating continuously, the temporary plant could produce up to 4,000m<sup>3</sup> of potable water a day. Water production will be in response to construction demand and generally substantially less than this. Up to nine 40-foot shipping containers would house the desalination technology, while back-up equipment and tanks including storage of two days' supply of clean water, are also proposed.

A small pipe to bring sea water onshore would be buried under the beach and coastal path and extend out to sea. It would also include screens to prevent intake of fish and minimise intake of debris. Salty water remaining after the desalination process would be returned to the sea through an outfall pipe, which would also be buried onshore.

During the 4-6 months it would take to build the temporary desalination plant, clean water would be delivered to the site by water tanker trucks. This would not increase the overall number of HGVs predicted for the project during the early years of construction.

**Where to find the proposals and how to respond**

- View the Consultation Document and fill in the response form online: [www.stowell.co.uk](http://www.stowell.co.uk)
- View the Consultation Document by appointment at the Stowell C Information office\*\* or Leiston Town Council
- Request an electronic copy on a USB stick or a hard copy of the Consultation Document and response form by emailing [info@stowell.co.uk](mailto:info@stowell.co.uk) or calling 0800 191 6102\*

Responses can be made online, by email or in writing to FREEPOST SZC CONSULTATION.

Responses need to be received by midnight Friday 27 August 2021.

Fig. 3

Under the banner headline **CONSTRUCTION WATER SUPPLY CONSULTATION 3 to 27 August 2021** and subtitled “We continue to listen to feedback from local communities and stakeholders” the Applicant spends the following paragraphs trying to put a justifying context around this latest debacle to befall an ill prepared dDCO. They fail on all levels.

In short it seems that the Applicant elected to take a punt on water availability for the Sizewell C Project, indeed they didn't even provide for it in the dDCO, preferring to "work in collaboration" with Northumbrian Water Ltd [NWL] on a scheme to pipe millions of litres of water from a catchment somewhere close to the Suffolk border with Norfolk.

The result seems to be that unsurprisingly; the sourcing of the water, development of a suitable pipeline and all the concomitant issues therein is neither as easy as the Applicant had assumed nor as fast as they would have anticipated.

Further down the page under the banner **WATER SUPPLY CONSULTATION STRATEGY** the Applicant rehearses the need for "Clean water from a dependable source...from the earliest stages of construction...", they continue "ongoing work has identified a need for more flexibility in construction water supply."

The bottom line is that; the Applicants working off-piste (so to speak) approach has highlighted some immutable truths regarding water and East Anglia:

a) It really doesn't rain that much in Coastal Suffolk

b) Aquifers and abstraction are oversubscribed

c) Infrastructure and distribution are challenged (i.e. periodic flushing is required in places, etc.)

d) Hard choices by necessity have to be made periodically (i.e. Tiptree Preserves vs Domestic supply integrity)

Moreover, it has also surfaced issues among which is; just how difficult it is to tie the Applicant down [to what their demand might be]. Indeed in a recent letter to the Planning Inspectorate the sense of frustration at NWL is palpable when their legal representatives make it clear that "...information provided to NWL by the Applicant regarding the peak water supply requirements for Sizewell C has been recently updated and materially increased and is still not fixed."

This is in stark contrast to the Applicants statement at Appendix 8.4K Site Water Supply Strategy where at 1.4.44 they state:

SZC Co. is committed to reducing water demand during every stage of the project and is progressing all of these measures. Some, such as using water efficient fixtures and fittings, are straightforward to deliver, whereas others, such as rainwater harvesting and greywater re-use, would affect design and would be incorporated into detailed design decisions.

Moreover NWL's representatives make it clear that on a number of levels (including the potential requisition of a 'main' by the Applicant) there is inadequate water available to meet the Sizewell C requirements and maintain supply to existing customers without incurring a deficit.

The question is whether this is just shorthand for 'taps would run dry'. If so there are profound issues that do not have a short term solution and indeed may necessitate even more infrastructural work in the short to medium term, thereby extending the need for desalination at the Sizewell C site.

At Para 2 the Applicant notes that; "The construction and operation of Sizewell C, including this proposed change to our Construction Water Supply Strategy, will not impact the local supply of drinking water." Whilst it may be reassuring that the Applicant feels confident that local supply will not be impacted, it might hold more water (sic) if this was the jointly held view of the EA, NWL and the Applicant and was documented accordingly.

The article on the back page of the publication **SIZEWELL C AND THE LOCAL ENVIRONMENT** features a picture of a Marsh Harrier alongside the sub-heading "Nuclear Energy is vital to tackling climate change", presumably in a clumsy

attempt to suggest a direct dependency between the Marsh Harriers' survival, climate change and approval of the Sizewell C Project.



Fig. 4

In the first paragraph the article concatenates; the SZC space requirement compared to other technologies, “**...room for nature...**”, biodiversity growth and the applicants “**...growing estate...**” omitting to mention that; nature already had a significant stake in the area long before SZC was proposed, biodiversity in the area had prospered and was recognised as doing so with National and International designations and that a growing Sizewell estate will carry a heavy price for several hundred years and impact multiple generations of flora, fauna and human beings.

At paragraph two, the Applicant unjustifiably distorts the impact of the proposed SZC Project by:

- Using ‘finished state’ numbers instead of those pertaining to the projects construction
- restricting the impacts to “**the nuclear licensed area**” within the overall estate
- omitting Park and Rides (x2)
- omitting the Sizewell Link Road
- omitting the Freight Management Facility

Moreover, the Applicant then advances the notion that as “**the nuclear licensed area will amount to 69ha – that’s less than 0.2% of the...AONB.**”

This preposterous use of figures to substantiate a vacuous argument is at best deceitful, at worst a gross abuse of trust and respect for the people of Suffolk and should be fully considered by the ExA in respect to the probity of the Applicant and the lengths they are willing to descend to, in order to obtain Development Consent.

The ExA may also wish to consider to what extent the Applicant may have been selective in representing their position in; Pre-Application Consultations, the dDCO, throughout the Examination and indeed to other stakeholders.



In concluding the first paragraph, the Applicant uses a series of facile comparisons with other forms of energy production in a unseemly game of 'top trumps', somewhat akin to two schoolboys in the playground arguing as to who has the 'biggest brother'.

Paragraph three illustrates the degree of cynicism employed by the Applicant, wherein they close with "...in fact, the temporary construction site does not encroach into Minsmere by a single millimetre.", then immediately opening the following paragraph with "The Sizewell C station platform will require 6.52ha of the Sizewell Marshes SSSI".

As if to further compound injury the Applicant then continues "To compensate we will use ten times that amount of land (65ha) elsewhere to create replacement habitat."

One is left with an overriding feeling of helplessness when confronted by an Applicant that shows such disdain for the natural assets of this small island and a degree of corporate arrogance that blithely dismisses the loss (to someone 'elsewhere') of 65ha of land at the stroke of a pen. Perhaps this reflects a cultural divide between the parties comprising the Applicant, who unlike companies in Great Britain and Northern Ireland, are based in large countries where the rural assets cover a greater area and are more sparsely populated?

The Applicant continues the paragraph reflecting on their action in 2015 when Aldhurst Farm began development as "...a 67ha habitat creation area...".

I understand that there are mixed opinions in respect to the extent of success that some people have in regard to this initiative, nevertheless it does appear to host some avian, mammalian, invertebrate and amphibian species and therefore has a measure of success. It may of course be the case that achievement of a higher degree of success requires a longer time.

In this respect, one can only hope that Aldhurst Farm does not suffer the same fate as other mitigations, for example those provided by Sizewell B and now imminently threatened by development of Sizewell C!

The penultimate paragraph invites the reader to reflect on what is nothing other than a land grab which will see a pre-existing Sizewell Estate in excess of 600ha that will swell by a third (circa 30%+) to around 800ha after construction of the SZC Project, should it get Development Consent. Or as they so quaintly put it "almost 1,000 football pitches.", a thought to gladden all our hearts, I am sure.

In concluding the paragraph the Applicant alludes once again to their establishment of "...an independent Environment Trust to support rewilding and promote further biodiversity." One can only hope any such Trust is truly independent and not a cabal for yet more SZC representatives to laud over their domain, as intended with the proposed Transport Advisory Group that seems designed to be incapable of deciding anything that doesn't fit within the 'comfort zone' of the Applicant.

The final paragraph appears to demonstrate the SZC Project has ambitions beyond its own boundaries, announcing that "...measures we propose aim to protect Suffolk wildlife [what all of it, surely not?] during construction and enhance the local ecological landscape afterwards". It is noted that the term 'local' is once again used, but undefined. Could this be the 90 minute 'local', the regional 'local' or perhaps just a Leiston 'local'? Perhaps it is deliberately vague to appease everybody?

Moreover it concludes with "In the long run the plans detailed in our Application will lead to a net gain in biodiversity." It is noted that 'long term' is used but undefined in this context. Could this be because the Applicant cannot substantiate or evidence the claim, but is content to leave it hanging?

In conclusion, I do hope that the ExA will see beyond my cynicism (and distorted senses of irony and humour) and take a thorough look at the contents of the 'Sizewell C Community Newsletter' and my observations in regard to its approach to community engagement.

This example of the Applicants contemptuous manipulation of language and statistics is an affront to the intended purpose of Public Consultation and Examination and exploits the gulf between groups of people with a long term interest and commitment to Coastal Suffolk, and the single mindedness of heavy spending multinationals, intent on improving the bottom line at any cost; even if the only lasting legacy will be a collection of “mouldering nuclear waste with coastal views”.