

## Kelsale-cum-Carlton Parish Council Review of the SZC Co. Public Consultation (3rd to 27 August 2021)



### Introduction

Kelsale-cum-Carlton Parish Council [KcCPC] have participated fully in the Sizewell C Pre-Application Consultations and the dDCO Process since 2011, including the first 'Post dDCO Application Consultation' which marked the commencement of KcCPC's ninth year of responding to a plethora of; 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' that have subsequently largely been; qualified out, significantly modified, re-badged or still remain subject to 'continuing analysis'.

Nevertheless, KcCPC have once more committed hours of work to review the 24-page document, not only in the context of the previous Pre-Application Consultations, but also the huge volume of documents accompanying the ongoing dDCO Application and Examination.

As is now clear, having set 'hares running', SZC Co. have chosen to further exploit the intense pressure on limited community resource by bringing forward another proposal that yet again largely remains incomplete or lacking in; underpinning data, detailed analysis, necessary agreements, any appraisal of likely unforeseen consequences and their wider efficacy. KcCPC have flagged their concern about the issue of potable water supply on many occasions and it is disappointing that over half way through the examination we are now having to consider how to safeguard water supplies to a seriously 'water stressed' part of Great Britain and Northern Ireland.

Nevertheless, KcCPC recognise that it must continue to participate in the prescribed process in order to try to safeguard the community of Kelsale-cum-Carlton and Coastal Suffolk from the worst excesses of SZC Co.

The following pages summarise KcCPC's review of the SZC Co. Consultation Document.

In summary, we are committed to ensuring that residents have 'water in the tap' should the project be granted approval. We are also concerned about potential environmental impacts and the current seeming indifference of the Applicant to any new environmental impacts or consequential changes within the consultation document.

**Note:** The absence of a specific comment in this response does not imply, nor should it be interpreted as implying Kelsale-cum-Carlton Parish Council having no issues pertaining the paragraph where there are no views expressed.

## CHAPTER 1. INTRODUCTION

### 1.1.1 No comment

## CHAPTER 2. TEMPORARY DESALINATION PLANT (PROPOSED CHANGE 19)

### 2.1 Introduction - No comment

### 2.2. Water Supply Strategy

KcCPC attach **[at Appendix A]** some of its more recent communications with SZC which flag the issue of potable water.

Having received a follow up email to a meeting in March 2021 which supplied links to a number of SZC documents, some of the section relating to water strategy which was flagged has been extracted and is also included **[at Appendix A]** for contextual purposes.

It cannot be acceptable, either morally or legally, to denude the rest of the area of water to construct SZC, so an environmentally neutral (at worst) solution to this issue must be found, should SZC be granted development consent.

It is of concern that as of 23<sup>rd</sup> July 2021 it is stated by Walker Morris LLP on behalf of Northumbrian Water Limited (NWL) that *“the information provided to NWL by the Applicant regarding the peak water supply requirements for Sizewell C has recently been updated and materially increased and is still not fixed”*, Particularly as the document (referred to above) stated the water figures included in January were supposed to be upper requirements.

This combined with another issue in the same letter, where we saw confirmation of an issue raised by informed residents of KcC many times, that *“the Environment Agency considers all NWL abstractions in the Blyth Water Resource Zone to be over licensed and therefore NWL is not able to provide any additional water supplies by simply abstracting more water than it currently does”*

### 2.3. Description of Proposed Change 19

It is unclear apart from the Main Development Site, how the other proposed developments would be supplied with water. Would this be bought in from the Main Site desalination plant (should it be accepted) or/and tankers? Alternatively, would this further exacerbate an already over abstracted water supply? A water supply which coincidentally, MPs warned on 10<sup>th</sup> July 2020; “Some parts of England are at serious risk of running out of water within the next 20 years ...”.

### 2.4. Environmental impact of Proposed Change 19

KcCPC expect a thorough re-evaluation of the combined short, medium and long-term impacts on the marine environment, especially as desalination may become a longer term ‘fix’ to a fundamental issue.

Moreover, KcCPC stunned at reading SZC’s own reasons for discounting it in January 2021 (see screen-print below) from the document: The Sizewell C Project, January 2021, 6.14 Revision: 1.0 Applicable Regulation: Regulation 5(2)(a) PINS Reference Number: EN010012 Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 2 Main Development Site Appendices 2.2. A-D Update to the Description of Development.

Option	Conclusion
<b>Desalination</b>  <i>Installing modular desalination plant on the main development site and abstracting seawater for treatment</i>	<b>Discounted.</b> <ul style="list-style-type: none"> <li>This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).</li> </ul>
<b>Ship tankering</b>	<b>Discounted.</b>

If the Applicant had already discounted this option in January 2021 having presumably undertaken a thorough analysis, how can it be an acceptable solution now?

### CHAPTER 3. RESPONDING TO CONSULTATION

#### 3. No comment

Kelsale-cum-Carlton Parish Council’s review of SZC Co.’s Public Consultation (3rd to 27<sup>th</sup> August 2021) ends.

## APPENDIX A

KcCPC has been concerned about potable water issues for some while. Some of the more recent exchanges are given below:

1. Minutes from Sizewell C Community Forum EDF Energy 3 July 2019 at which Cllr Edwina Galloway attended on behalf of KcCPC:

*"Edwina Galloway queried how EDF would ensure drinking supplies, and farming and tourism activities would not be jeopardised in the driest part of the country during the construction operation and decommissioning of Sizewell C. Jim Crawford explained that EDF intended for there to be no impact on local communities"*

2. Notes from a meeting held with KcCPC & SZC C representatives – 16 March 2021

Present: Edwina Galloway – Vice Chair KcCPC, Marie Backhouse – Clerk to KcCPC, Tom McGarry – Head of Stake Holder Engagement for the Sizewell C project, Carly Vince – Chief Planning Officer for EDF Energy, Richard Bull – Associated Development and Transport Elements of Sizewell C & Steven Henry – Community Relations Officer for Sizewell C

**TMG** – *"Yes, you said the impact on the water supply, as we are in the driest part of the country, on national significant natural history, on habitat ....*

**RB** – *With regards to the supply of water, to Sizewell C, it's obviously an issue we have been working with for some time, with the Environment Agency, Essex and Suffolk Water, we understand the constrained nature of the Blyth management water zone which is the one where Sizewell sits, and generally the constrained situation on the supply of peoples water generally in Suffolk, being dry, so we have been working with Essex and Suffolk water, to come up with a scheme that they can deliver and through their own development rights to bring more water in, to the Blyth management area that will supply water from the start of the construction to Sizewell C and also provide, a benefit to the region on an ongoing basis by increasing the interconnectivity from the Blyth are to the wider water network; this is about bringing in water from the Waveney area further south down to Saxmundham into the Sizewell area so we are, as I say, working with Essex & Suffolk water and the environment agency to ensure that we have got a viable source of supply, and that work is progressing very well.*

**EG** – *How do you propose that will actually work because obviously last year we were finding in some parts of Suffolk, they were bringing in water in tankers from Essex; so, it is a huge concern.*

**RB** – *Absolutely, I think, as you would expect, the Environment Agency obviously are very aware of that and hence we are looking to bring water in from outside the area to support Sizewell not rely on the local water in the Blyth area, and, as I have said, when the construction period is over then we will utilize that supply for the operational period it will also provide a legacy benefit and more resilience for the water network in the area. When we are talking about topping up the Saxmundham water tower with road tankers, hopefully going forward, that would not need to be required, because of this additional resilience within the network.*

**EG** – *Ok, so where would the water actually derive from, because obviously a lot of East Anglia is dry.*

**RB** – *As I say, it would be coming from the Waveney catchment area, so from the north. We have been working very closely with Essex & Suffolk water to link into that supply, it will require an enhanced mains network to get it through but that will be for Essex & Suffolk water to deliver and we are working closely with them to ensure that they can.*

**EG** – *Is there any kind of timescale on that?*

**RB** – *We are confident that we can get that supply of water for the start of the construction period. The water demand curve, we have included, within the January submission which we should provide you with a link to that document as that is the water supply update, which will hopefully confirm what I am telling you. The peak of water demand is actually when we are starting to use the tunnel bore machines for the offshore tunnels that's when we need the highest amount of water, so that's a number of years into the construction period, by which time we will have the full supply of water from Essex & Suffolk water. The first one to two years of water demand can be covered again through their scheme so they will provide up to one and a half mega-litres per day, at the start of the construction period and that will increase up to three and a half during the tunnel bore machine use. We will send you the link to that update, it summarizes things quite nicely.*

**EG** – *That would be interesting because I know in Essex, Tiptree, the Queen's Jam makers, ran into trouble because local residents were finding their water supply dipped every time, they did something major. They had to actually adjust what they were doing, but putting further piping in. I would be interested to see in what you say because, with East Anglia as a whole, being dry and the kind of summers we have had over the last couple of years, we do seem to have gone through a phase where we are getting extremes of weather already.*

**CV** – *I am going to cover landscaping and the ecology system.....*

Following on from this meeting, an email was received dated 19<sup>th</sup> March, with links to relevant documents, the relevant paragraph being below:

*SZC to provide a link to the Water Supply Curve /latest information on water supply for SZC from the supplementary information provided to PINS in January 20201.*

*The update to the Water Supply Strategy is available on the link below from page 134, see:*

<https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-003013-SZC Bk6 6.14 ESAdd V3 Ch2 Appx2.2.A D DoD.pdf>

The ExA's attention is drawn to the Water Supply strategy update in this document, which states:

*Construction of the Sizewell C Project would entail many activities that would require water supply, both potable and non-potable. SZC Co. has continued to develop its water supply strategy by engaging with stakeholders including the Environment Agency, Essex & Suffolk Water and Anglian Water to discuss and assess potential sources for this water supply.*

*The principal supply for the Sizewell C Project is unchanged from the original Site Water Supply Strategy (APP-601) and would come from mains water, provided by Essex and Suffolk Water. 1.1.2 In order to provide security of supply, and to ensure that all the water requirements of the Sizewell C Project can be met, SZC Co. has continued to work with stakeholders to assess the water supply options.*

*This document provides an update on those options by providing further detail on those that are retained as options and providing a justification for discounting others.*

1.1.3 Retained water supply options are reviewed in Chapter 2 of the ES Addendum to determine whether they have the potential to give rise to any additional significant adverse effects.

1.2 Estimated water demand 1.2.1 SZC Co. has updated its estimated water supply requirements during construction, based on a more detailed understanding of construction requirements and further findings from Hinkley Point C (HPC). 1.2.2

Plate 1.1 provides an illustration of the indicative demand profile for both potable and non-potable water throughout the construction period. During the 'early years' water demand continues to peak around 1.5Ml/d. This is related to the construction of the cut-off wall. During the main construction phase, potable water demand is predicted to peak at 3Ml/d during tunnelling works (4Ml/d including non-potable water), before returning to up to around 2Ml/d. This assumes no recycling of water by the tunnel boring machines, which would significantly reduce demand. After the completion of the tunnelling, forecast demand falls below 1Ml/d and then gradually decreases through the remainder of the construction period to around 0.5Ml/d. The demand during operation continues to be expected to be significantly lower than during construction.

1.2.3 SZC Co. considers that these estimates are reasonable and robust for the purposes of planning.

1.3.2 Tables 1.1 – 1.3 summarise all of the water supply options that SZC Co. has considered during the water strategy development process and concludes whether they are now being discounted or retained for further consideration, either as part of this project or separately. Each of the options considered falls into one of the three categories described above.

**Options are being taken forward in all categories.**

Essex & Suffolk Water transfer from nearby Water Resource Zone; Transfer of surplus potable water via a new pipeline from Barsham. **Retained.**

Essex & Suffolk Water transfer from Essex Water Resource Zone; Transfer of surplus potable water via a new pipeline from further afield. **Discounted.**

Anglian Water Strategic Pipeline; Transfer of surplus potable water via a new pipeline from North Lincolnshire **Discounted.**

National Framework; A long-term strategy to re-balance water resources across the country **Discounted**

Regional Strategy; A long-term strategy to improve water management across the East of England **Discounted.**

Non-potable water transfer from Benacre pumping station; Transferring surplus non-potable water via a new pipeline from Benacre. **Discounted.**

Non-potable water transfer from Minsmere Sluice; Transferring surplus non-potable water via a new pumping station and pipeline from Minsmere Sluice. **Discounted.**

Non-potable water transfer from Aldeburgh sewage treatment works; Transferring surplus non-potable water via a new pipeline from Thorpeness, or discharging into and then abstracting from the Hundred River. **Discounted.**

Ship tinkering; Filling large vessels with non-potable water outside the region and pumping water onto the site from offshore. **Discounted**

Compensation discharges; Seeking to facilitate various activities to help free up water from the environment that would allow increased local abstraction by Essex and Suffolk Water. **Discounted.**



Non-potable water transfer from Leiston sewage treatment works; Transferring surplus non-potable water via a new pipeline. **Discounted**

Programme works to avoid periods of high 'water stress'; Scheduling construction works to avoid high water demand activities during the summer months. **Discounted.**

What is retained is:

Use of water efficient practices on-site, use of water efficient fixtures and fittings, SZC construction site effluent reuse, Greywater reuse, Recycling tunnel boring machine water, Re-using concrete wash water, Rainwater harvesting and Re-use of dewatering water.

Water Resource Storage Area (WRSa); A means of capturing and storing excess water on-site for construction use. **Retained.**

Licence trading with local abstractors; Brokering licence trade(s) between abstractors and Essex and Suffolk Water to increase available abstraction volumes, or taking on nearby licences directly. **Retained.**

Sizewell B effluent reuse; Taking the unused output from the existing Sizewell B sewage treatment works and diverting it for use as a water resource. **Retained.**