

## Response for ISH 9 Plan and Policy 26<sup>th</sup> August 2021 – Bill Parker Interested Party Number 20026713

Dear Planning Inspectorate

Outlined below are my comments on Issue Specific Hearing 8 and confirmation of my observations from the day. These can be highlighted under the following headings:

- Creation of a flawed argument
- A Policy reason to reject the application
- The need

### **The Applicants creation of a flawed argument for Sizewell C:**

On listening throughout this ISH it became clear to me that the Applicant wished to use this opportunity to create an impression that the DCO for Sizewell C must be approved on the basis of policy and need. The argument outlined by the applicant can be summarised as follows:

- The Government through both EN1<sup>1</sup> and EN-6<sup>2</sup> and the more recent Energy White Paper identifies the need for another large nuclear plant to be approved by the end of this parliament
- In 2009 Sizewell was identified as a potential site for a new nuclear power station in EN-6
- Therefore, as none of the other potential locations are currently under active consideration for a large nuclear plant therefore Sizewell C should be approved by default through the DCO process.

This is false logic and the Examining Authority is required to examine the potential of the site in question (in this case Sizewell C) it is **not** responsible for the delivery of the Government's objective of finding a large nuclear plant site. This is clearly stated in EN-6<sup>3</sup>

*2.5.5 Therefore, subject to any contrary legal requirements, the IPC should judge an application on a listed site on its own merits and a comparison with any other listed site is unlikely to be important to its decision*

**Therefore, the application cannot be accepted on the premise that it is Government policy to build Sizewell C because there is no other active option available currently.**

### **Specific Policy reason to reject the application**

The Examining Authority should look beyond the headlines of energy policy at the more detailed policies contained within them. Whilst there are many issues that need to be examined, I wish to focus on just one fundamental area and that is of the vulnerable coastal location.

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<sup>1</sup> Overarching National Policy Statement for Energy (EN-1) July 2011

<sup>2</sup> National Policy Statement for Nuclear Power Generation (EN-6) – Volume I of II July 2011

<sup>3</sup> National Policy Statement for Nuclear Power Generation (EN-6) – Volume I of II July 2011 Page 11

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It clearly states in EN-6<sup>4</sup> para 2.10.2 states:

*“Nuclear power stations need access to cooling water.... Without appropriate mitigation measures the potential effects of climate change could mean these sites become at greater risk of flooding ... Coastal erosion and increased likelihood of storm surge and rising sea levels.”<sup>5</sup>*

Therefore, Government policy clearly recognises both the need for coastal location but also highlights the risks and vulnerability to the effects of climate change.

In EN-1, particular reference should be drawn to section 5.5 Coastal change.

*“The Policy states in section 5.5.1<sup>6</sup>*

*prevent new development from being put at risk from coastal change by  
(i) avoiding inappropriate development in areas that are vulnerable to coastal change or any development that adds to the impacts of physical changes to the coast, and  
(ii) directing development away from areas vulnerable to coastal change;”*

Paragraph 5.5.10 of EN-1 states that

*“the decision maker should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the project’s operational life and any decommissioning period.”*

Further in sections on Flood Risk Mitigation para 3.6.15 in particular these three key points:

*“..... the IPC should be satisfied that the applicant is able to demonstrate suitable flood risk mitigation measures.*

*These mitigation measures should take account of the potential effects of the credible **maximum** scenario in the **most recent** marine and coastal flood projections.*

*Applicants should demonstrate that future adaptation/flood mitigation would be achievable at the site, after any power station is built, to allow for any future credible predictions that might arise during the life of the station and the interim spent fuel stores”*

EN-6 National Policy Statement for Nuclear Power Generation also states:

*Para 3.8.4 “Take account of the effects of climate change over the lifetime of the project (including any decommissioning period), the IPC should be satisfied that the application will include measures where necessary to mitigate the effects of, and on, coastal change.”<sup>8</sup>*

It is clear that in more than 4 months of a 6-month DCO process the Applicant cannot demonstrate credible mitigation of coastal change and flooding. It is worth re-iterating the policy clearly states that “ *credible **maximum** scenario in the **most recent** marine and coastal flood projections” must be satisfied. The latest IPCC report Sixth Assessment Report (ipcc.ch) page 28 in its summary for policy makers states:*

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<sup>4</sup> National Policy Statement for Nuclear Power Generation (EN-6) – Volume I of II July 2011 Page 25

<sup>5</sup> EN-6 – Volume I of II page 14

<sup>6</sup> Overarching National Policy Statement for Energy (EN-1) July 2011 Page 79

<sup>7</sup> EN-6 – Volume I of II page 22

<sup>8</sup> EN-6 – Volume I of II page 25

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*B.5.3 It is virtually certain that global mean sea level will continue to rise over the 21st century. Relative to 1995-2014, ...the likely global mean sea level rise by 2100 is .....approaching 2 m by 2100 and 5 m by 2150 under a very high GHG emissions scenario (SSP5-8.5) (low confidence) – cannot be ruled out due to deep uncertainty in ice sheet processes.*

Each re-assessment of the combined impacts of climate change indicates that future impacts are becoming increasingly challenging. The vulnerability of this site is acknowledged by all and the evidence presented to-date has many questions still to be answered.

It would therefore be unwise to make the assume that the work undertaken by the Applicant is suitably precautionary in view of the need to maintain sea defences on site for 160 years after construction and therefore comprehensively fails the test identified in EN-2 para 3.6.15.

**Therefore, this application should be rejected.**

#### **The Need**

It is welcomed that the ExA is asking this question and I would like to identify the following:

There is an active and wide-ranging debate about whether nuclear power is part of the solution to climate change and if it is whether large-scale nuclear in particular is required.

Applicant re-enforced their flawed argument claiming that nuclear power and in particular the EDF EPR design was critical to meeting the challenges faced by climate change. Within the current policy framework nuclear has been identified as part of the solution to climate change as identified by the current UK government. However, the EN-1 and EN-6 policies and Energy White Paper do not state that; a) the EPR design is the solution nor that b) that a large nuclear reactor should be built on the Suffolk coast.

In the Governments more recent 10 Point Plan for a Green Industrial Revolution (Nov 2020) contains an important nuance as follows:

*Point 3: Delivering New and Advanced Nuclear Power it does make one small reference to 'Large-scale nuclear projects and they are subject to value-for-money', however it is noted that a) the majority of this section focusses on discussing SMPs and AMR and b) there is no inclusion of Sizewell in the Target Milestones, an admission that Sizewell is no longer a priority for Government."*

**In summary this application should be rejected as it has not been demonstrated to adequately meet the policy thresholds set by government and there is a significant question about and ongoing debate on need.**

Thank you

Bill Parker  
3/9/21