

Dear Planning Inspectorate

I am writing to respond to the current proposals by EDF for a 'Temporary Desalination Plant' at Sizewell C. I wish to object to this proposal for the following reasons:

At this late stage of the DCO process it is inexplicable that EDF is now introducing a major change in the supporting infrastructure to the Sizewell C proposal. The issue of potable water supply has been well known since the start of the consultation programme and the proposal to build a new pipeline has to my knowledge been under discussion for at least 3 years. Therefore, why is this only just been introduced into the planning process. This is either that the planning and development process within EDF is poor (which raises many concerns about the entire proposal) or it is a deliberate and despicable strategy to introduce new and potentially controversial elements at the last minute.

In addition, the 'consultation' has been introduced for a mere 3 weeks in the middle of the holiday period after 18 months of covid lockdowns. This fails to meet best practice guidelines for public consultations and pays lip-service to EDF's claim on page 3 of the August 2021 Community Newsletter 'we continue to listen to feedback from local communities and stakeholders'.

In examining the limited information, EDF have provided in the very short time made available it is clear that this is a poorly thought through proposal for the following reasons:

The need for potable water:

It is of course recognised that any development will need potable water. However, EDF claim to have reduced the need for potable water by; recycling water through the construction process inc: *the recycling the slurry returned from the Tunnel Boring Machines, adopting a similar process for the cut-off wall and with the concrete batching process*. This should all have been included in the standard construction procedures to reduce environmental impact, therefore the claims that this will create additional savings can best be described as spurious.

The proposed pipeline:

- Why is the proposal for a new pipeline not in the DCO process? It would not be required except for the needs of the Sizewell C development, therefore with no Sizewell C there is no need for this pipeline. Therefore, it and all the relevant environmental assessments should be included in the DCO process.
- The comments made by EDF representatives at the ISH11 that it will benefit the local community is post option rationalisation, there is a) no proven need for improved supply, b) if there was a need then no options assessment has been undertaken to see if this is the best option c) the extraction of upto 4m litres / day from the Waveney valley will compromise future water supply to the Lowestoft area. This appears to be poorly thought through.
- It appears that this is little more than a paper exercise without both the pipeline design and engagement with the relevant land owners who would be impacted, therefore there is low confidence that this is deliverable.

- The lack of information on the route of the pipeline makes it not possible to consider the impact that this pipeline would have on fragile habitats, people's homes and businesses. The statement that the pipeline length is 28km is not verifiable, this appears to be the direct distance between the potential water source and the Sizewell C site and therefore the actual length is potentially significantly more after taking into account the practical implementation considerations but this is unverifiable with the information provided.
- There are no environmental impact assessments or mitigation plan to provide confidence that this has been fully thought through.
- There is no mention of the cost of this pipeline and who pays for it. It would be unacceptable for local water users to pay for this in their water bills. It must be included as part of the overall cost of Sizewell C and wholly funded by the Sizewell C financing programme.
- There is no risk assessment included if this pipeline is delayed or abandoned for any reason. If this was to happen then is the de-salination plant the only alternative? The plans as outlined to-date indicate that there is no room on site for a permanent de-salination plant therefore approach must be considered high risk and not appropriate for this development. In addition recent comments indicate that even more of the AONB is at threat of industrialisation by the potential re-siting of the desalination plant.
- The environmental cost (including carbon emissions) must be included in the overall Sizewell C project and fully accounted for and mitigated in the overall Sizewell C proposal to PINS.

#### Desalination Proposal

- I note that previously EDF have dismissed the idea of a desalination plant. I refer to document [AS-202](#) Water Supply Strategy Update. EDF clearly state; *"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)"*

Whilst EDF have now indicated that it will not be included in the CDO the discharge will however still be into the sea and will have a similar impact as highlighted in EDF's own documentation. No explanation has been offered for the change in approach

- There is no environmental impact assessment for the proposed desalination plant in particular with concerns about the increased pollution. The plant proposals appear to operate 24/7 using diesel generators. This will contribute to significant CO<sub>2</sub>, Nitrogen Oxides, and PM 10s and 2.5s emissions. Atmospheric Ozone will also increase as a result of the combination of NO<sub>x</sub> and volatile organics which have health impacts. Recent tightening of WHO airborne pollutant limits have not been taken into account in any of the analysis.

- The water discharged (according to the EDF documentation) will be 1.6 times more concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. Impacts on marine life from this and the water intakes are unclear, however there is clear scientific evidence that this concentration of brine will create conditions that will be likely to generate algal blooms impacting on beach and sea users, marine wildlife and others affected by these pollutants. This must be aggregated with all the other pollutants proposed to be discharged into the sea in the EIA and HRA.
- In EDF's documentation it states blandly 'The addition of the desalination plant will not alter baseline conditions'. The baseline assessment has considered the potential presence of contamination in the two areas proposed to be used as a desalination plant with reference to existing desk study and ground investigation reports; this has identified no unacceptable contamination.' EDF admit there will be contamination but do not detail what are the contaminants and the quantities over what period of time. EDF assurances are not credible and the data is not transparent. This is unacceptable. I note in ISH11 Mr John Rhodes for the Applicant arrogantly stated that any pollutants would be within permitted limits – any form of pollutant discharge must be challenged as the North Sea is not a 'dustbin' that pollutants can be dumped in without long term consequences. The objective must be no pollution not adding to it.

#### Initial fresh water delivery

- According to EDF documentation the desalination plant will apparently take 6 months to build and therefore potable water will need to be brought in by road, I note that EDF state that drinkable water will need to be brought in by tanker for the first 9 -12 months of construction, up to 40 tankers /day (is this 80 truck movements / day?). EDF does not clarify how this will contribute to the cap of HGV movements. What mechanisms will there be to count the number of HGV movements and what sanctions there will be if EDF exceed set limits. There is little robust substance in EDF claims of no increase in HGV movements.

#### Non-Potable water

- Whilst the consultation documentation barely mentions non-potable water. In AS-202 EDF suggested potential sources that are largely a wish list but have little in the way of robust plans. In view of the possible impacts on ground water levels when will there be clarity for review and an opportunity to comment on EDF proposals for non-potable water supply.

In reading the consultation document at this late stage, which EDF have yet to be submit to PINS, it is evident that the key issue of water is poorly thought through and it is increasingly evident that EDF does not have a robust, environmentally appropriate and costed solution to this fundamental issue. It highlights the folly of pursuing this particular proposal to construct Sizewell C.

Deadline 8 - Comments on EDF proposal for a desalination plant within the Water Supply Strategy  
Bill Parker Interested Party No 20022617

I support the submissions from Stop Sizewell C, TASC and those of the Town and Parish Councils.

Yours faithfully

Bill Parker  
23/9/21