

Submission for deadline 8 - Water supply for Sizewell C - Frances Crowe (IP 20026749)

I write to express my extreme concern and outrage that an issue as critical as water supply for the construction and operation of Sizewell C is being introduced to the planning process at such a late stage. This issue should have been dealt with literally years ago: it was raised by so many people at multiple consultations but ignored by EDF. It is inexcusable that this was not resolved earlier.

The applicant's ineptitude and lack of planning on this issue reinforces the comments I made in my written representation about EDF's failings in the consultation process (REP2-275b, Pt 7) and further undermines any remaining confidence in the applicant's ability to manage an infrastructure project of this scale, complexity and risk.

My comments submitted to the recent consultation are given below as evidence for your consideration of water supply issues for Sizewell C. I also totally endorse the comments made by TASC and Stop Sizewell C in their joint letter to the Planning Inspectorate, dated 8th August, 2021.

Additionally, I really want to bring to your attention again the intolerable burden that the applicant's continued incompetence is placing on interested persons, especially those unfamiliar with this type of process. I am personally finding engaging with the planning process almost impossibly difficult. I am attempting to persist simply because i believe it is of such huge importance for our voices to be heard despite the difficulties.

Consultation on Construction Water Supply Strategy - Sizewell C
Response from Frances Crowe, (Interested person ref: 20026749), submitted 24/8/21

1. Lack of planning

I want to express my extreme dismay that the question of water supply is being introduced as a separate consultation when the DCO process is already so well-advanced. The problem of water supply in drought-stricken East Anglia, ignored by EDF in earlier consultations, was raised by myself in response to consultations 2, 3 and 4. Moreover, I understand that many other interested parties raised the issue a decade ago.

I specifically draw your attention to the comments I made on this subject in my Stage 3 Consultation response (27/9/19):

“Fresh water usage:

Why are no figures given in the consultation? I understand that SZC construction will use huge quantities of fresh water. Given that Suffolk is an area of very low rainfall, where will this additional water come from and how will the supply and quality of water for local people, tourism and agriculture be protected? This appears to be yet another area where the work has still not been completed by EDF.”

I also expressed my concern at EDF's failure (once more) to listen and respond to responses given in earlier consultations, despite their claims to the contrary, in my response to the Stage 4 Consultation:

“My concerns outlined in my response to the Stage 3 consultation have been neither acknowledged nor addressed in the Stage 4 consultation. These still represent my

views on the proposed development and I wish them to be taken into account in the Stage 4 consultation as EDF has to date failed to address them.”

This included a lack of response on fresh water supply.

It is inexcusable that we are being burdened with yet another consultation at this time (coinciding once again with summer holidays when many people will be away) and, moreover, that EDF have allowed only 3 weeks for response. This is especially galling as this could have been avoided by proper planning much earlier in the process and by responding responsibly and effectively to all the concerns that were raised at earlier consultations.

If the application for these new power stations is as urgent as EDF claim, how is it that the proper preparatory work was not carried out in the previous decade so that the measures for water provision could be properly integrated into the initial DCO application?

I have found it almost impossibly difficult to deal with on top of all the covid crisis and all my normal responsibilities. Statutory bodies and interested parties are already struggling to deal with the immensity and complexity of this case. This is not helped at all by the inadequate and ineffective planning of the applicant. I am very concerned that given the tight timescales of the planning process, this ineptitude will serve to benefit the applicant and would urge the Planning Inspectorate to guard against this.

2. Implications on air quality.

- I am particularly concerned about the major air quality impacts of diesel generators running 24 hours/day for an unspecified number of years. It is very frustrating that the applicant's tardiness in considering the water supply issue adequately means that this issue cannot (presumably) be considered as part of the forthcoming Issue specific hearing on air and noise pollution on 25th August - handy for EDF, very inconvenient for everyone else. The particulate pollution from diesel generation is significant and the WHO have stated that there is no safe level for this type of pollution.
- How long do EDF expect the diesel generators to be necessary? What is the worst case scenario on this?
- I find it very surprising that EDF considers it to be 'highly unlikely' that the additional temporary generators would give rise to any significant effect. It is stated that further assessment will be undertaken to confirm the preliminary view that there would be no new or materially different significant effects as a result of Proposed Change 19, and will include a qualitative assessment of the additional temporary generators. What has informed this preliminary view and why has this work not already been done? It is surely not that difficult to assess.

3. Inaccuracy in the consultation document

EDF state that 'The desalination plant and associated generators would not be located at the construction site boundary, or near to any noise-sensitive receptors identified in the ES' and that 'Siting of the desalination plant within areas already identified as construction areas, away from the boundaries of the construction site and noise-sensitive receptors, as proposed, means there is no potential for new, or materially different environmental effects to arise of relevance to terrestrial European sites, their designated habitats or species, as already defined and assessed in the Shadow HRA Report'.

This is very misleading as the second location if needed (which seems likely) appears to be close to the northern boundary (Figure 2.4) and impacts on sensitive habitats and wildlife are likely to be considerably greater.

3. Lack of clarity of figures given

EDF talk about having to introduce a second generator if the pipeline cannot be introduced in time for peak demand. Yet it is very unclear whether the figures given relate to one generator or two. For example, will there be 6-9 containerised plant modules (pt 2.3.8) - or potentially 12-18? Likewise, are the discharges from the brine water outfall pipe of 6Ml of water per day for one desalination plant or could it be double this?

4. Transport impacts

I find it hard to understand how delivering 2500 m³/day of water (40 deliveries/day) for the first 9-12 months of the project can have no impact on HGV numbers. What reductions in HGVs are going to result from the water strategy? If there are none, then the strategy represents a significant actual increase in HGV transport on Suffolk roads (80 movements/day for tankers plus whatever is necessary for construction of the desalination plant and for movement of waste materials generated during its operation).

Additionally, EDF state that plant for the desalination plant would be delivered by road and is 'unlikely' to comprise any Abnormal Indivisible Loads (AILs). How is it that EDF does not yet know whether there will be any AILs?

What will be the road transport implications If a second plant is introduced at peak construction, especially as EDF cannot preclude that this might include AILs.

5. Non-potable water

It is stated that 'non-potable water' will be used where feasible (pt 2.2.9), eg for dust suppression. Please can you confirm what the source for this non-potable water is and what quantities will be required, phased across the course of the project.

6. Where will the water brought in by tanker be sourced from?

7. Seawater quality

I am really concerned about the impacts on sea water quality both for wildlife and for humans, with the possibility of irreversible damage to sensitive marine habitats. I am very concerned about:

- the impact on turbidity of water at Sizewell and Thorpeness (already high) due to the desalination construction and due to dredging. Additionally, clarification is requested of how often will dredging have to take place.
- increased levels in potentially toxic chemicals in water (for example, phosphorus, chlorine, zinc and chromium)
- the need for a bentonite recovery system to be used during drilling to minimise emissions (pt 2.3.28). Please describe what these emissions are and what the maximum level of these emissions will be.
- the potential for algal blooms caused by chemical inputs.
- increases in water temperature
- potential for the 6,000m³ per day of brine (1.6 x more salty than seawater) which will be discharged to collect on the seafloor between the sandbars.

The findings in this BBC report are particularly damning:

<https://www.bbc.co.uk/news/science-environment-46863146>.

8. Cumulative tipping points

The consultation document repeatedly states that impacts are likely to be similar to those previously assessed (for example, pts.2.4.8 [suspended sediments], 2.4.11 [zinc & chromium discharges], 2.4.38 [non-hazardous waste]). At what point do these additional pollutants constitute a tipping point into something that is no longer acceptable?

9. Water pipeline construction

It seems that this is likely to be constructed during the peak years of the construction. What impacts will this have on traffic and roadworks in Suffolk. Please can details be specified of what, where, when and for how long? This is critical given the already extreme pressure on transport infrastructure during construction.

What will be the impact of extraction on this huge scale on the Waveney valley? Is another precious and valued part of the Suffolk countryside to be harmed by this project?

I also understand that the planning for this pipeline and extraction will not be considered as part of the DCO. How is it that something which is an integral part of the Sizewell C project and which serves no other purpose is excluded from the DCO process?

Impact on carbon emissions

Finally, I note that EDF themselves stated in their document ([AS-202](#)) Water Supply Strategy Update in January 2021 that the option of a desalination plant had been been ‘discounted due to concerns with power consumption, sustainability, cost, and wastewater discharge’ and that it was also ‘typically energy intensive’.

A desalination plant is a wholly unacceptable solution.