

JOHN SUTHERELL: REGISTERED NUMBER 20026479 AND AS COUNCILLOR REPRESENTING YOXFORD PARISH COUNCIL REGISTERED NUMBER 20026527

HARD COPY OF ORAL CONTRIBUTION AND ADDITIONAL COMMENT TO ISSUE SPECIFIC HEARING (ISH) 11 ON TUESDAY 14 SEPTEMBER 2021

**Oral Submission.**

I am grateful to the Inspectorate for the opportunity to contribute to the discussion. I am speaking today as the Councillor representing Yoxford Parish Council, as well as a personal Interested Party.

My specific oral contribution was on Item 3 Flood Risk Assessment (FLA) on Main Development Site. I drew the attention of the Inspectorate to the report in the Times on Friday 10 September 21 (scan of article attached): a report by a volcanologist at University College, London at the British Science Festival in Chelmsford to the effect that significant recent ice melt in Greenland increased the risk of earthquakes triggering underwater landslides that would in turn produce a tsunami that would reach Britain similar to the 'Storegga tsunami' which led to a 20ft high wall of water reaching Scotland where it travelled 20 miles inland. This had an implication for the FLA for Sizewell C.

Comment. James Hanson, for the applicant, in answering this point suggested that seismic events and a tsunami had been 'part of the scoping of the design and that the design had considered it'. Bearing in mind that 'the science' in these matters is evolving rapidly with new knowledge and understanding, and that the consequences of earlier miscalculations are becoming increasingly apparent, I would ask that the Inspectorate double checks that the design calculations are taking account of the latest scientific analysis.

**Additional Comments on other aspects of ISC 11**

**Agenda Item 2: Water Supply.**

This is an issue of considerable local concern. I was grateful to witness the thoroughness of the Inspector's scrutiny but also concerned to see the inadequacy and arrogance of the applicant's responses. I attach below the submission by Yoxford Parish Council to EDF in response to their consultation on the De-Salination Plant. While I appreciate that the issue of the plant will be addressed

at ISC 15, several of the points we made are relevant to ISC11; I have highlighted these in the text below.

Dear Sir,

Timing of this Consultation

Before providing our feedback we would like to register that, once again, we are responding to a consultation at short notice, of short duration and during a period when many people are on holiday. This has happened too many times to be just an unfortunate coincidence. It appears to be a deliberate strategy and we are disappointed with the contempt with which you appear to hold us and the consultation process. It is additionally disappointing as Yoxford Parish Council has attempted to maintain constructive and friendly relations with EDF representatives recently despite our significant differences over Sizewell C.

General Points

After eight years of consultations and four months after the submission of firm plans for a Development Consent Order we expected the main parts of the Sizewell C plan to be clear in terms of strategy, approximate timescale and phasing, with the "in principle" agreement of significant third parties. Yoxford Parish Council was surprised by the size of the change in these proposals and the apparent gulf between EDF and Essex and Suffolk Water. **EDF has claimed that the construction of similar plants abroad and the experience of building Hinkley Point C will lead to a more repeatable construction and efficiency improvements. It is therefore worrying that there has been a material change in the requirement for potable water that has led to the need for 28Km of high pressure water mains to be built, a temporary (four years) desalination plant to be constructed and 40 tankers (80 movements) per day to bring in potable water prior to the desalination plant coming on stream. If this has always been a possibility, it should have been consulted on sooner and included in the DCO submission. If it really is a recent discovery, it raises serious concerns about the management of the project and engagement with third parties.** This is not the only example. The position with Network Rail regarding the number of freight trains that can use the East Suffolk line has been in discussion for years and is still not completely nailed down. We are concerned that more issues like this will come out before or during the development.

Specific Points

EDF has previously discounted the use of a desalination plant. In the DCO submission, document AS-202 says "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)." In light of your views, how do you propose to mitigate the power consumption and sustainability concerns? What is the cost impact of the desalination plant and water tankers? The wastewater discharge was a concern when EDF did not believe they needed a desalination plant. Now they do, there is no longer a concern. We are not reassured by this change in view and would like to see the original concerns explained and a full explanation of why those concerns are no longer held. With respect, EDF has a significant vested interest in no longer holding its previous concern. This is an area where the review of an independent third party would provide reassurance that EDF cannot provide.

**Water tankers. The consultation document attempts to reassure us that the additional 40 tankers per day will not require an increase to the early years daily limit of HGVs. We expect that the daily limit is likely to represent the busiest day with some contingency so there is no reason to doubt that 40 tankers can fit within that envelope in the first few months. What does concern us is that the 40 tankers use up some of the contingency which increases the chance that some other issue in the project creates a scenario where there is pressure on the local authority to allow a breach of daily HGV numbers. In the issue specific hearing on the DCO, it was clear that the applicant's approach would be to use project issues impacting timescales as justification for relaxation on project constraints. We absolutely reject this approach. The constraints, such as they end up being, are there**

*to protect the local communities from the worst impacts of this project and must not be breached no matter what issues with the project might be doing to timescales (or cost). As good neighbours, we expect EDF to willingly enter into binding commitments on HGV numbers, timely delivery of mitigations (i.e. before the impact begins) and so on. We remain disappointed that they do not want to and even appear to be anticipating scenarios where they might ask to breach them.*

*Paul Ashton*

*Deputy Chair Yoxford Parish Council on behalf of Yoxford Parish Council*

In addition, given the fact that East Suffolk is already identified as a 'seriously water stressed area' area the possibility and implications of EA restricting extraction from the Waveney area needs to be taken seriously. The legal quibbling by the Applicant (Philpott) with Northumbrian Water highlighted, yet again, the negative impact of the conflicting plans of different commercial organisations (already seen with Scottish Power and now Nautilus in our local area). Since this important issue does not appear to be resolvable within the time frame of the investigation, we support the recommendation of our MP, Dr Coffey, submitted by her representative Phil North that the in section should be extended until a comprehensive report can be received from the EA.

The fact that there *is* this issue of water supply highlights, yet again, that the applicant is trying to lever this massive construction project into a location that is fundamentally unsuitable for what they intend.

### **Agenda Item 5 : Outline Drainage Strategy.**

The extensive submissions and responses on this item, both main site and associated sites, with their many unresolved issues, highlighted the crucial importance of Suffolk County Council being the Discharging Authority for this issues and NOT East Suffolk Council (ESC). SCC demonstrated that the knowledge and the technical capability to manage surface water drainage lies with them, clearly linking in with their responsibility for roads. The passive contribution of ESC gives no comfort to those concerned with the proper scrutiny and enforcement of this project. The Applicant's (Philpott) argument that 'ESC is best placed to 'hold the ring' where there is a balance to be struck' reflects their 'comfortable' relationship with ESC, is cynically self interested and part of their continuing efforts to minimise any form of constraint on their deprivations. His comment that 'some of the (associated) sites are remote' demonstrates his lack of understanding of this area.

John Sutherell

Councillor, Yoxford Parish Council