

## SZC – Change 19 – Provision of potable water and desalination plant

I am writing to express my grave concern at this latest change to EDF's application to build SZC.

In its consultation document it says:

*1.1.5. SZC Co. now wishes to make one further change to the application in response to recent engagement with Northumbrian Water Limited in relation to the supply of potable water.*

I am at a complete loss to understand why EDF has sought to engage with the water company on such a fundamental issue, so late in the day. The matter has been raised in consultations over the last ten years. This now the nineteenth change to the application. EDF is designing the project on the hoof.

In its response to Middleton Parish council (p326 doc 9.1 under REP1-013) EDF says "The EPR™ design is now successfully operating at Taishan 1 and 2 in China. *The French (Flamanville) and Finnish (Olkiluoto) Projects experienced delays as a result of an incomplete design.* (My italics.) Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. We have a very good understanding of Project risks and how to mitigate them. SZC Co. has been able to learn from the experiences of EPR™ construction and this has informed the proposals assessed within the ES." (I note that the two reactors at Taishan are now closed for "maintenance".)

It beggars belief that anyone would start any major construction project with incomplete plans – let alone a nuclear power station. The French and Finnish projects are more than ten years behind schedule and three times over budget. Hinkley is over budget and behind schedule. The two reactors at Taishan are now closed for "maintenance".

That said, whilst EDF may claim that it has bottomed the design of the power station per se, it is a long way from finalising infrastructure and the delivery of construction materials to the site. On this basis alone, the application should be refused on the grounds that the design is incomplete and the application is therefore premature.

Whilst it is not unreasonable for the Inspectorate to accept a few minor changes to an application during the course of an examination, I think that such changes should be looked at on a cumulative basis. One or two changes may be unfortunate, but nineteen smacks of ill-preparedness and/or carelessness and incompetence.

On this specific issue, Change 19, I note that EDF's previous objections to desalination seem to have disappeared. (In document AS-202 Water Supply Strategy Update, EDF states; *"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."*

What has changed?

The plant will still take 4 – 6 months to build and be brought in by road, but because it cannot be installed at the very beginning of construction, potable water will need to be brought in by tanker for the first 9 -12 months of construction – another 80 truck movements a day.

The plant will have to operate 24/7 using diesel generators until onsite power is available – not exactly an environmentally friendly development.

Water discharged will be 1.6 times more (brine) 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.

EDF tells us it has not had much feedback from its consultations on water provision. Small wonder! We are suffering from consultation fatigue and the company takes no notice of what we have to say. Like other objectors, with so many changes, so late in the day, and its contemptuous attitude to consultation responses, I am completely exasperated with EDF. If the application were to be approved, I'm sure we would see a string of applications to vary conditions. Enough is enough. The Inspectorate should not even be considering this application until EDF can tell us how it is going to build this development.

**Nigel Smith – MA FRICS**

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