ISH 15 Desalinisation Plant – Change 19

from Regan Scott, S.A.G.E.

8.10.21

Comments on the ISH 15 Hearing & associated ExA Questions on Deadline 8 Submissions – *and IMG attachment*

1 Notwithstanding EDF's account of the history of the water supply problem, we wish to place on record that during a group visit/conducted tour to the proposed construction site for SZC by one of our group (RS) on September 25th, 2019, he asked senior company representatives about water supplies and was told they didn't know anything about it. A colleague recorded in his Notes "Water not yet clear".*

The concern was triggered because we had been researching Anglian Water's corporate development plan previously, finding no reference to SZC in the context of recognition of major water shortage problems in the East Anglia Region.

Anglian Water have two major pipeline projects in hand in the region under their Strategic Pipeline Alliance programme, and a flagship Future Fenland project. AW chief Mr Peter Simpson (EADT 17.7.20) told a Waterwise Conference that climate change could mean "Water could run out in ten years". South of Cambridge there is a huge new undergound reservoir recently publicised. Though NWL are the Sizewell suppliers, we simply cannot see how EDF have not been aware of the challenges, and able to design a reliable, life-long solution to this structural challenge from early days.

2 We attach *(IMG below)* a current EADT news story (7.10.20) telling a version of the water challenge which may also be of interest. To be noted are NWL projects for a desalinisation plant at Great Yarmouth and at Lowerstoft a water treatment plant, indicating that they have a

strategic capability, further raising the question of why SZC could not have been factored in much earlier.

NWL as Essex and Suffolk Water published its 2015-2020 WRMP in 2013/4 forecasting a declining demand level for Heavy Industry and Utilities and an overall decline for the 2011/2-2039/40 period. No mention of SZC.

Their response to a Government water consultation called Water 2020 (Regulatory Framework & 2019 Price Review), February 2016, is similarly innocent of SZC as a contingency despite SZC public consultations being well established.

3 Re the Rule 17 letter of October 6th, Annex B, Requirement 8(3), this ExA drafting does provide certainty for the project, and also other business and residential clients of NWL, including some of our associates. Water charges from NWL are, incidentally, administered throughout the area by Anglian Water, so many residents may not be aware that uncertainty about future supplies for SZC might affect them.

4 We further note that in respect of EIA/HRA monitoring EDF have aready committed themselves to a 3 year impact overspill for the Main Site. We trust the same will apply to all likely environment impacts from the desalinisation operations.

5 We wonder how the provisions of NPS EN1 and 6 relate to this structural issue, now being 10 years old. Setting aside water shortage changes and experience since then – disproportionate housing development being a major factor, East Anglian drought has to be recognised as having been a dominating structural narrative for a long time. Anglian Water's strategic projects were initiated at the time of NPS ENI and 6.

6 Noting the Government's NPS EN1-5 review process of September 6, 2021, it has been brought to our attention that the new Draft Overarching National Policy Statement (EN-1) - Water Quality and Resources – places a strong assessment duty on the applicant in four

bullet points (5.16.5). We suggest EDF's ES is revisited to ensure that it meets this "overarching" standard, likely to be enacted by the time the SoS receives a recommendation and certainly a material consideration at Government level for IROPI reasoning purposes.

**The visit Note also records EDF representatives accepting that 20 metre water bore holes were in mind, a new sewage plant might be needed, the diaphragm wall of 2.5 metre thickness woud go to 30 metre depth, tat the water table was high, that Field 1 lower at back north end is liable to flooding, that site dewatering would likely involve EA licencing, that the two reactor and buildings configuration would need 50 hectares and recognition of sea wall heights being different to Sizewell B.*

ends

[redacted]

A gathering of protestors against Sizewell C

Picture: CHARLOTTE BOND

Serious questions over water supply strategy for Sizewell C

A regional water supplier is scrambling to work out how to provide enough water if Sizewell C is approved, after the Environment Agency proposed a large cut to the amount it can take from the River Waveney.

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EDF, the company behind plans for the new £20billion nuclear plant, insisted yesterday it had a "clear and deliverable" strategy for its water supply.

The proposed nuclear plant will need up to 2.8 million litres of water a day when operating, mainly for cooling, a figure which has increased since plans were first drawn up.

Essex and Suffolk Water (ESW) has long said there is not enough water in the area with the nearest river, the Blyth, being too small.

Instead it planned to pump water from the River Waveney at Barsham to Sizewell to make up for the shortfall.

But those plans have been put into doubt.

The Environment Agency (EA) told ESW in August that it is likely to have to reduce the amount of water it lets it take from the Waveney, because of pressure on the river.

Modelling shows the cut could be up to 60pc, which would mean Sizewell C cannot be supplied from the Waveney.

Simon Barlow, the EA's project manager for Sizewell, said the exact reduction would not become clear until more modelling has been done.

But ESW's solicitor warned: "The water supply position in the East of England is not favourable with the EA categorising it as being a seriously water stressed area and if the ability to abstract water from the River Waveney were to be capped, there are very few other sources of water available."

To meet future demand, regardless of Sizewell C, ESW is already exploring a desalination plant at Great Yarmouth, which turns seawater into fresh water.

[redacted]

Together Against Sizewell C (TASC) chairman Pete Wilkinson

Other ideas include a sewage effluent reuse plant in Lowestoft, which treats wastewater and puts it back into the system or a new reservoir along the Waveney.

ESW objected to Sizewell C last month and warned there was a "significant risk" it could not meet the plant's water demands.

But it later dropped its objection after agreeing with EDF that it would not supply it during construction, which would last almost a decade if approved.

To cope with the shortfall during construction, EDF plans to build a temporary desalination plant. That would need to be in place throughout the construction period, but campaigners say it would harm marine life and the beach.

ESW now has until 2039 to work out how to supply Sizewell. EDF said that was ample time, but it is not clear where that water will come from.

An EDF spokesman said the water supply was secure because even if the amount ESW can take from the Waveney is reduced, it would identify "new resources".

They added: "There will be no impact on the supply of water to local communities from any stage of the Sizewell C project."

But Pete Wilkinson, chairman of campaign group Together Against Sizewell C (TASC) said EDF was in a "desperate" situation. "They have known about this requirement to provide huge amounts of water to the site for a decade but they still have not got a strategy.

"They have left it to the last minute to come up with a cobbled together plan."

At the end of September ESW and EDF signed a "statement of common ground" in which ESW said it would drop its objection to the new plant as long as it could not be sued for failing to supply water to Sizewell C during construction. In return it agreed to supply water by 2030.

So what happens now?

It falls to a national body called the Planning Inspectorate to decide whether or not to give Sizewell C permission. That decision is expected next year, but even if approved funding issues could cause further delays. EDF owns 80% of the project and Chinese state-controlled nuclear power company CGN owns the remaining 20%.

If built, the two new reactors at Sizewell C can generate enough electricity for six million homes. Supporters say it is much cleaner than burning fossil fuels and will create hundreds of local jobs. But campaigners have raised fears about the impact on wildlife, tourism, and years of disruption to communities during the building phase.