

Application by NNB Generation Company (SZC) Ltd for an Order Granting Development Consent for The Sizewell C Project EN010012

I have followed the Examination process, including most of the Issue Specific Hearings via the livestream, with interest. I have submitted representations at various stages. I'd like to make one final written representation to the Examination team.

We can all agree that we need to find additional capacity within our energy infrastructure.

We can all agree that in order to address the climate crisis which exists right now, we need urgently to stop exploiting fossil fuels.

We can probably agree that alongside the rapid development of genuinely renewable sources of energy generation, some form of nuclear generation may be needed - at least in the short to medium term.

At Sizewell, the two key issues that the Examination team have to consider therefore, are:

1 Is a project of the type under consideration appropriate?

I suggest to the Examiners that the case for a twin reactor mega project of the type proposed by the Applicant, has not been made:

- that it is not a green solution because of the legacy of dangerous waste material that it would leave behind and because uranium is itself a depleting resource;
- because the project would be too slow, far too costly and too vulnerable to geo-political issues;
- and, in this case because the Applicant has shown repeatedly, before the Examination started, but also during the Examination itself, that it lacks the necessary levels of basic competence to be entrusted with the delivery of a project this huge and this complex. Their admission, at the end of the Examination, that they have no secure supply of potable water for the construction phase is just the latest demonstration of their patent unfitness to be permitted to proceed with the project.

and:

2 Is the proposed Sizewell C site an appropriate location?

Even if ... the Examiners are inclined to overlook the objections at 1 above, I urge you to focus your decision on the issue of location:

- You will be aware, from visiting the area around the application site and from contributions to the Open Floor and Issue Specific Hearings, that there is almost unanimous opposition to the project from the local community.
- You will be aware that the Applicant has failed to rise to the challenge set it by the Business Secretary:

"The onus is on the company developing the project to bring as many people as possible with them. ... if you can get a big majority and can show that you are benefitting the local community, that you're sensitive to their environmental concerns. I think that's a challenge they can deliver on."

- You will have noted that there has been a surprisingly muted response from the local business community - indeed major local businesses are opposed.

Even if ... the Examiners are prepared to accept all the issues around access to the site; the inadequate size of the site (considerably smaller than that of the directly comparable Hinkley C project); the inevitable and unavoidable damage to adjacent priceless nature reserves at RSPB Minsmere and SWT Sizewell Belts; the inevitable damage to local businesses and tourism ... the Examiners are still left with the single issue which outweighs all of those:

- The fragile nature of the entire East Anglian coast, particularly in relation to the climate emergency facing our species.
- For all the thousands of pages of 'expert' analysis and for all the hours of testimony during the Examination, from the Applicants' paid consultants, nobody is able to give you a clear and reliable prediction of the impacts of climate change on this delicately balanced coastal strip of land. I urge you to read and reflect on the September 2021 Research Paper from Chatham House (Royal Institute of International Affairs), *Climate Change Risk Assessment 2021* (Subtitle: *The risks are compounding, and without immediate action the impacts will be devastating*).

[2021-09-14-climate-change-risk-assessment-quiggin-et-al
\(chathamhouse.org\)](https://www.chathamhouse.org/2021/09/14-climate-change-risk-assessment-quiggin-et-al)

Please note that funding for the research that informed this report, came from the UK Government's Foreign, Commonwealth and Development Office through its prosperity programming.

Some relevant extracts:

- P32 *The impacts of coastal flooding are likely to occur over a longer time horizon than many other climate risks. The long-term central estimate of committed sea level rise is around 12 metres, if temperatures are held at 2°C.*
- P33 *Given current understanding, the central estimate suggests that by 2100 nearly 200 million people worldwide will be living below the 100-year flood level. However, if the rate of Antarctic ice melt continues at the accelerated rate of recent years, this is likely to be an underestimate (the rate of ice loss from Antarctica has tripled since 2012, relative to the previous two decades).*
- P40 *Physical risk events from heatwaves, wildfires, floods and droughts are of particular concern because of their potential to impact food security, energy and water infrastructure, as well as lead to business defaults on a scale that the insurance industry would be unable to cope with.*

Defending the site against climate change

To conclude, I would like to remind the Examination team of the powerful contribution from Professor Andrew Blowers OBE to Issue Specific Hearing 6, in which he pointed out:

"Proposals for defending the site against climate change and its effects will be at best short term. In the longer run, and especially during the indefinite period of decommissioning and clean-up, it is impossible to provide unequivocal technical assurance of safety and security in the management of radioactive waste, including spent fuel. There is the possibility of calamitous risks being passed on to generations in the far future. This may be acceptable to the developer and government, in which case they should say so. It is not acceptable to those who oppose the development. I believe it is technically improbable and ethically indefensible for the present generation, who enjoy the debatable benefits and consign the cost to the future which have no voice and no interest in the present proposals."

I suggest to the Examiners that the risks associated with a project of this type, in this location, are simply too great.

Many of the Applicant's technical submissions suggest that a precautionary approach has been taken in their preparation. The only ethically defensible way in

which to apply a genuinely precautionary approach to the Sizewell C project, is to refuse the DCO application.

For the sake of all of us now, and for the sake of future generations, I urge you to refuse the application.

Yours faithfully
Neil Poole RIBA

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My Interested Party Ref: 20026566