



9 October 2021

SZC DCO Application Examination

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Dear Sir,

Submission to Sizewell C DCO Application Examination Deadline 10

Planning Inspectorate Reference: EN010012

Interested Party: 20026846

As the Examination draws to a close, many Interested Parties have given great detail on specific issues. I want to highlight the very serious concerns which this proposal raises for me and my concern that the applicant has been unable to offer satisfactory solutions, mitigations or alternatives to enable this development to proceed without serious harm on several fronts.

Water supply:

One of the most fundamental requirements of both the construction itself and all humans who are involved on site is a secure water supply. The lack of a secured long-term water supply and the late stage at which this fundamental necessity was addressed are deeply concerning.

The potential use of a desalination plant to provide water raises grave concerns of impact on the marine environment, particularly through algal blooms which have been caused by similar installations elsewhere.

Climate change:

Throughout the construction period the project would have a massive carbon footprint during a period when every sector of society is under pressure to cut emissions. It would be 2040 before it paid off this carbon debt and began generating zero carbon electricity. Too little too late.

The timescale for which nuclear waste would remain on site way beyond the relatively brief working life of the two reactors is deeply concerning. This is especially so in the light of the report *Climate Change Risk Assessment 2021* published by Chatham House last month. This report highlights ‘cascading systemic risks’ as shifting weather patterns in turn have greater impacts on severity and frequency of extreme weather events. There is also the increasing uncertainty of the longer-term impacts of climate change on weather patterns and sea levels the further into the future they are projected. It is a high-risk strategy to place on a vulnerable coastline two more nuclear reactors whose waste will remain on site well into the next century.

Environmental impact:

If it were to go ahead, the project would have an enormous cost in environmental terms, beyond the carbon emissions generated by its construction. Its scale is inappropriate for such a sensitive setting within an AONB, next to the RSPB Minsmere reserve which is of international significance, and it will mean the sacrifice of part of the Sizewell Marshes SSSI not adequately mitigated by the applicant’s proposals. The RSPB has stated that the project could be catastrophic for wildlife. Suffolk Wildlife Trust has significant concerns too.

Transport & Traffic:

EDF has failed to produce any solution that does not cause enormous disruption for road users over a wide area during the many years of the construction phase. The resulting congestion and delays will cost those who live and work in the area dearly. The fact that work to implement the road schemes will not even begin until construction is underway, means the road works will compound the congestion of the project itself. The impact of SZC' construction in combination with the other major projects which could be under construction at the same time within the immediate locality.

Living close to Wickham Market, the impact of projected increased traffic movements of over 1,000 vehicles a day is of great concern to me. EDF has been extremely reluctant to engage meaningfully with the community and its proposals to address the problems its project would generate remain woefully inadequate, placing a huge burden on residents and locals. They have been so late in developing a first draft of a scheme that the consultation on it will close on October 25th, almost a fortnight after the examination phase of the DCO accepts last submissions, rendering findings inadmissible as I understand it.

Impact on Tourism:

In the immediate vicinity of Sizewell, the Heritage Coast of Suffolk with the Coast and Heaths AONB, the RSPB Minsmere Reserve, Snape Maltings Concert Hall, Sutton Hoo and the excellent quality of locally produced food and drink make the area a very attractive destination for tourists. Tourism is a very significant contributor to the economy. If SZC were to go ahead, there would be a huge impact on this vital sector through road traffic and congestion, a vast influx of workers, needing accommodation and changing the character of the area throughout the construction of SZC. The area would be much less attractive as a destination. Whilst EDF are keen to stress that the construction phase will bring jobs, these will be largely filled by people from beyond the area working directly on the construction whilst local businesses, in particular in the tourism sector, will be adversely affected for many years.

Technology:

The EPR design proposed for this site is based on nuclear fission, creating waste that will remain lethal to life for centuries. Aside from the continuing improvements in renewable technology that are increasing their cost-effectiveness, there are continuing advances in nuclear fusion as a source of energy. There are continuing advances also in energy storage, whether in batteries, hydrogen, hydropower or any other technology. Given the very long timescale of the construction phase for SZC, it is highly likely that the technology on which it relies will be out of date before it generates any power and almost certainly before it has generated enough electricity to offset the carbon emissions of the construction. The reliance on Chinese technology and the fact that the only EPR reactor in China has been shut down after problems with degraded fuel rod seals, as well as the fact that the EPR's under construction in France and Finland are well over budget, cast serious doubt over the viability of the project on technical and economic grounds.

The Applicant:

EDF's approach to every stage of their consultation has been characterised by superficial engagement with flimsy, last minute proposals – whether for traffic solutions in Wickham Market or a water source or coastal defence design.

Within weeks of submitting the DCO application in May 2020, EDF submitted proposals for changes to the DCO. These were consulted on in December 2020. Six months later there were further changes, some of which had been suggested by consultees over two years earlier. So, there had been ample time to consider them fully and integrate them into the original DCO application if EDF had engaged meaningfully back then. Most recently the options for

a water supply have been presented as if the water supply were a final minor add-on, rather than a fundamental issue on which the construction and all who work on it would depend.

Changes to the application submitted within weeks of submitting the DCO application were either a result of this approach or a deliberate attempt to muddy the water and make the process of examining the application even more complex than it already was – especially for the many local people with grave concerns about the project yet unfamiliar with the examination process by which such concerns can be scrutinised.

This lack of meaningful engagement early on and the subsequent ad hoc approach to the detailed proposals inspire very little confidence in EDF's capacity and suitability to construct two nuclear reactors and the associated works.

Yours faithfully,

Paul Clarke