

Dear Planning Inspectorate

Now that we have reached the conclusion of this part of the DCO process I wish to sum up my main concerns and observations that are unresolved with regard to coastal geomorphology and coast defence issues. I have major concerns about; logistics, the environmental impact, pollution, the impact on local communities, water supply and a range of other issues, however I will leave it to others to articulate.

For everyone, it has been a challenge to engage with the DCO's 3,500+ documents and the 15 Issue Specific Hearings, especially with the continual evolving nature of the proposal from the Applicant. The attitude and behaviour of the Applicant and its consultancies can in my view, best be described as high handed and obstructive, falling well short of the expected standards. This together with the late delivery and variable quality of key documents has made engaging with this process difficult.

However, it is clear that there are many issues regarding coastal geomorphology and defence. Those of most concern, are outlined below with references for more detail to submitted papers. They are not in a priority order as they all call into question the viability and sustainability of this proposal as submitted by EDF. They are as follows:

- 1) **The DCO process** was designed to be front loaded to enable all interested parties to be able to analyse and resolve the differences of opinion. However, with Sizewell C, we have had a continually moving proposal, this has either been planned to frustrate a genuine critique or a sign that the design and science it is based on is being developed on the hoof. This cannot be acceptable.
- 2) **Policy background** - The Applicant has stressed that National Policy EN-1 and EN-6 and subsequent government policy / white paper documents are justification for this development. Careful reading of the policies indicate that this is not the case. Each site needs to be reviewed on its merit and on the proposal being submitted. If the proposal is not appropriate (as is the case for Sizewell C) then it should be rejected and the ExA should not be pressured into accepting an inappropriate application. For more detail see [REP7-174]
- 3) **Time scales** – EDF in their proposals continually mislead the enquiry with regard to timescales. They highlight 2140 as the end of the project. This is incorrect as it assumes that build will be completed by 2030 (highly unlikely and unevidenced given other EPR builds), 60 years of production to 2190 and then 50 years for decommissioning which is only an estimate as it has never been done before. This ignores that spent fuel storage will need to be on site significantly longer than when Sizewell C is (due to be) decommissioned. Whilst the date for this is in reality uncertain and the requirement from the EA / ONR Coastal Management [REP5-191] for the site to be defended for 160 years after construction is definitive. This takes it to 2190 at the earliest. Therefore, the continual focus by EDF on 2140 is

disingenuous and can only be assumed to be a device to limit a focus on the long-term risks and difficult questions with regard to the impacts of climate change and coastal change. For more detail see [REP9-198]

- 4) **The scale of Sizewell C.** The plan to build a copy of Hinkley Point C (partly to achieve 30% cost reduction as demanded by Government) at Sizewell does not take into account the size and vulnerability of the Sizewell location. Sandwiched between the sea in the east and Sizewell Marsh SSSI in the west. The sites eastern boundary is too close to the sea which is against EDF's own risk assessment / mitigation plan. In short, the proposal is either too big for the site or the site is too small. For more detail see [REP2-230]
- 5) **Sizewell and Dunwich bank.** The shifting position of Cefas as to the importance in protecting the Sizewell shoreline is extraordinary. Having described it in the BEEMS technical documents (TR311) as critical for the protection of Sizewell, Cefas now say it would be beneficial to lose the banks as they will increase erosion upstream to provide sediment to Sizewell. Nick Scarr has interrogated this issue in detail and the Cefas position is untenable and goes against the accepted science of coastal geomorphology. The issue of these banks and the vulnerability of this coastline is very real. The current coastline must always be regarded as in transition and its history demonstrates it is very easily erodible. This is not a safe location for Sizewell C. For more information see papers [REP2-393] [REP3-119] [REP7-218] and Nick Scarr's Deadline 10 final submission.
- 6) **The impact of Sizewell B** – Outlined in his Deadline 10 paper Paul Collins has identified the critical function of an operational Sizewell B on the current stability of the coastline. This plant will close shortly after Sizewell C (if ever built) becomes operational. It appears that EDF / Cefas don't have a clear understanding of the impact of this change. This is worrying and is likely to place Sizewell C defences under significant stress almost as soon as it is operational. This risk cannot be ignored. For more information see Paul Collin's Deadline 10 submission.
- 7) **Hard and soft coast defence feature.** The design of this feature has continued to change throughout the DCO process which makes its critique difficult through the DCO process. Examiners will recall how close to the beach the HCDF is on their site visit. Even the latest re-revised Deadline 8 Sizewell C Coastal Defence Design Report [REP8-096] document places the revised location of the defence close to the existing beach. The document has many errors and inconsistencies that does not inspire confidence in its development. To leave the finalisation of this critical feature till after the DCO process to complete is not appropriate as it is so fundamental to both the safety and security of the site and the adjoining coastline and communities. If this application is approved then there will be a reliance for upto 160 years of climate change on this feature. For more information on the critique of the coast

defence proposals see Bill Parker Deadline 10 submission.

- 8) **Impact on adjacent coast lines.** There has been little examined of the context that the Sizewell C development will have on the adjacent coastlines, a fundamental facet of coastal management. EDF / Cefas has been admitted that there will be coastline retreat either side of the soft coastal defence feature and some of the work undertaken by the EGA alludes to this. However, at ISH 11 Tony Dolphin (Cefas) intimated it was too complex to model. The failure to examine in detail the collateral impacts of the Sizewell C development is unacceptable to the wider community along the Suffolk coast. Cefas maintain that this is a closed coastal sub-cell with no loss of material down drift. However, the Cefas arguments also relies on sediment material from updrift to replenish beaches. The arguments don't stand up to scrutiny. For more information see [REP5-191]
- 9) **Zone of Influence.** The EDF / Cefas insist that the Zone of Influence is only 3km long centred on the Sizewell C site. EDF / Cefas only want to know only if the development has a direct and measurable local impact on the coast caused by the HCDF and SCDF. They do not appear to be interested in a wider understanding of non-linear changes to the coastline potentially caused by SZC or the consequences that changes at other parts of the coast may have on the SZC site. The desire is to pass this responsibility to others such as East Anglian Monitoring Group. This approach also relies on Cefas's current understanding of how coastal processes work in the area. This avoidance of responsibility is deeply concerning. For more information see [REP7-175]
- 10) **Over reliance on modelling.** The Cefas approach is to assume that their models for future coastline change are reliable and accurate. All models are simplistic and rely on the quality of data used. In [APP-311] 6.3 Volume 2 Main Development Site Chapter 20 Coastal Geomorphology and Hydrodynamics, Cefas explicitly state:

20.4.72 However, there is no current computational modelling platform able to accurately integrate the numerous environmental processes that drive shoreline change, and there is no published evidence that shoreline change models can be reliably applied over the multi-decadal timescale that is required.

It is worth understanding the historical precedent taken over the long term that Sizewell has had some of the fastest eroding coastline in Europe (however not in the selected time period as promoted by Cefas) and this gives a good indication that this is a highly vulnerable area and with the anticipated impacts climate change is inappropriate for this development. Currently Thorpeness just 2 miles south of the Sizewell C site is believed to have in a very local area the fastest eroding coastline in Europe. There is no confidence that the same issue won't affect SZC in future. For more information see [REP5-191]

- 11) **Tsunami Risk** – There is increasing scientific evidence that the potential risk of a tsunami to impact this coastline will increase with climate change. Whilst the probability is low it is also measurable. EDF / Cefas persistence is refusing to discuss the situation in detail and their reliance on the ONR process is not acceptable. If flood risk assessment is part of the DCO process then tsunamis are a source of flooding, and therefore should be incorporated into this process. The response from the Applicant to ExA question on this issue is inadequate. This must be fully examined and mitigating actions identified. For more information see [REP2-228]

- 12) **CPMMP** – The desire by the Applicant to delegate the resolution of future issues to the CPMMP is a mistake. Once SZC is built and operational then there is little choice but to use the CPMMP to try to solve future issues. Not only the unforeseen but also those known about today but unresolved. There is an assumption that problems are a) technically solvable and b) fundable. Neither of these are safe assumptions. The most recent report from the IPCC – ‘Code red for humanity’ clearly indicates that climate change is a real and accelerating issue, with for instance sea level rise expected to be 1m by 2100 and possibly 5m by 2150. Each reassessment by IPCC has been increasingly pessimistic. The over reliance on the CPMMP to solve future issues is a high-risk strategy. In addition, there is a complete lack of local accountability which is unacceptable. For more information see [REP5-191]

Conclusion

Local people feel that through the entire process they have been poorly served by their elected representatives in particular the District Council and MP who have failed to articulate their concerns on many issues. It has been down to Interested Parties including local groups such as Stop Sizewell C, MSLG, Suffolk Coastal FOE and TASC as well as many individuals engage with this process and represent local views and national concerns as we have a legitimate and deep concern about the future of the Suffolk coastal area.

For coastal geomorphology and related defence issues, Nick Scarr, Paul Collins, Robin Sanders and myself do have the advantage of having both relevant expertise and experience to contribute to the DCO process as we are also not bounded by; process, protocol, politics or being funded by the applicant. I therefore urge the ExA to take particular note of these commentaries in particular. We wish to highlight that the EDF proposal is inappropriate and Sizewell is the wrong site.

We all have a collectively responsibility to future generations not to burden them with problems that are; avoidable, unaffordable and or technically unsolvable. Whilst climate change is undoubtedly our greatest challenge the solution proposed by EDF is not sustainable, affordable or a credible solution, it will become a disastrous white elephant.

I therefore urge you following your deliberation to refuse advise the Secretary of State do refuse this this DCO application. Thank you

Bill Parker
12/10/21