

**WRITTEN SUBMISSION AT DEADLINE 10 FOLLOWING ISSUE
SPECIFIC HEARING (ISH) 15 ON 5 OCTOBER 2021**

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INTRODUCTION

Respecting the tight agenda for ISH 15, I did not make an oral contribution on 5 October, but I am grateful to the Inspectorate for having given me the opportunity to do so. I followed the proceedings carefully and was able to report back to colleagues last week. My Deputy Chairman Paul Ashton is making a final written submission on behalf of the Council

Before making my concluding written submission I would like to thank the Inspectorate for the care, courtesy and fairness with which they have conducted these hearings and, in particular, for enabling and encouraging individuals from a wide range of backgrounds to participate. I am also very grateful to the Inspectorate for the thoroughness of their examination of the complex and crucial issues involved in this project within the constraints of the inspection process, notwithstanding the continual efforts of the applicant to neutralize questions on important issues that did not suit their perspective.

The proceedings generally have been fascinating and highly instructive, not least concerning the characteristics of the applicant and their objectives; ISH 15 was no exception. Although the Inspection process *appears* to have persuaded the applicant to make certain changes to improve their plans and the mitigation being offered, the fundamental causes for concern I submitted orally on 20 May (submission 2782) and in writing on 2 June (submissions 2775/2766) remain extant. While I have found some individual members of the applicant's team apparently concerned, sincere and helpful within their strict limits, my confidence in the applicant's overall competence and integrity has not been enhanced.

WRITTEN SUBMISSION AT DEADLINE 10

SIZEWELL C: A HIGH RISK PROJECT RUSHING TO JUDGEMENT

High Risk.

Sizewell C is, by its nature, a high risk project. The record of EPR reactors built by EDF is not good. The proposed very large and complex construction, in itself

a major engineering and logistic challenge, is made much more complicated by the attempt to 'shoe-horn' the Hinckley Point C model (itself still very much a 'work in progress') into a much smaller space, in an environmentally sensitive and fragile location, within a more populated rural area which has a fragile road and rail network, limited water resources and sceptical local communities. All of these factors increase organizational 'friction'. In attempting to 'square this circle' the applicant has been obliged to add to the basic construction project a whole range of 'mitigation' measures: transport management facilities; two 'park and rides', the Sizewell Link Road, the two village bypass and numerous roundabouts, not to mention massive sea defences and a range of environmental mitigations. Most of these will add significant additional financial, carbon and organizational 'friction' costs and increase the chances of delays and cost over-runs in a type of project that is notorious for both.

Had the applicant a comprehensive, fully thought through plan, there might be an argument to proceed but, notwithstanding 6+ years of planning and 5 separate consultations, the evidence of the last 6 months is that, as the Inspectorate has identified inadequacies and uncertainties in the proposal, the applicant has changed the plan 'on the hoof' or attempted to deny that issues exist, and many appear to remain unresolved. The latest example has been the issue of water supply. None of this encourages confidence in the viability of the plan. Moreover a range of Agencies who need to authorize various aspects of the plan, such as the Environment Agency, require more time to produce a properly documented and analyzed judgement. I strongly support Dr Coffey's consistent request, made in three separate submissions, to extend the period of the Inspection to allow the evidence of these agencies to be taken into account. By reducing some of the uncertainty attached to this project, and allowing time for weaknesses identified to be addressed, it should also reduce some of the risk.

Rush to Judgement.

Notwithstanding these issues the Applicant has argued consistently for the 'urgency' of this project, often using this argument to dismiss the possibility of considering alternative options, and frequently quoting 'the National Interest' and quoting 'Government policy' as a reason for not considering issues and alternatives. It is curious, therefore, that Dr Coffey, who is a Secretary of State in this government as well as the local MP, has been making the case for a 3 month extension to allow for uncertainties to be pinned down.

The reality is that the Applicant is trying to 'bounce' this project through the planning and decision making process for narrow commercial motives. As explained in my submission ID 3813 in July, EDF have to wait until 2023 for an

order for 6 EPR reactors from the French government. **Today (12 October) President Macron was reported as deciding to invest in 'Small Modular Reactors' for the next French Nuclear sites, not EPRs.** There are reports that our own Secretary of State is considering the same option. The EPR is obsolescent and will soon be obsolete. While it is clearly necessary to complete Hinckley Point C (forecast at present for 2026), even if Sizewell C starts building in 2023 following a FID at the end of 2022, and there are no delays, it will not be generating power until 2034. Since the carbon cost of the project on EDF's own optimistic calculations will take 6 years to pay back, Sizewell C will not contribute to net zero until 2040. In the interval, other nuclear options and genuinely 'clean' energy technologies will be developing and contributing in a shorter time frame.

It is not, therefore, surprising that the Applicant is desperate to secure a DCO for Sizewell C as quickly as possible. But this is not a reason to rush an assessment of a flawed project which, if it is approved, seems likely to produce an obsolescent capability at very high financial cost and causing considerable environmental, economic and social damage in the process.

Conclusion.

Please do not recommend that a DCO is granted for Sizewell C until all the issues associated with this high risk and expensive project are properly resolved.

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12 October 2021