

Justin and Emma Dowley Written Submission to PINS for Deadline 10 on 12.10.21

Interested Parties refs - SIZE-AFP123, SIZE-AAFP119, SIZE-AFP124 and SIZE-AAFP120

This Submission supplements earlier Submissions made to PINS for previous deadlines. We stand by those earlier Submissions, but would like to add some final comments.

We remain very concerned about the Applicant's willingness to engage with us:

1. We still have no firm date for a farm impact assessment so that an independent body can see directly how devastating the building of SZC will be for our estate. This is something we were told by EDF's agents in July 2021 was a matter of urgency.
2. We finally received some idea of proposed planting by way of mitigation of the effects of the SLR, the entrance roundabout and the borrow pits on 6th October 2021. This has given us practically no time to consider the plans in much detail. Suffice it, and it is not an exaggeration, to say, that these proposals will make no difference because the plants will take years to grow and are highly unlikely to mitigate the effects of SZC during the construction phase which will be the most injurious to us and our neighbours. In addition, the planting is limited to very small areas and, for example, will not protect Theberton House, Potters Farm, Eastbridge Farm or the village of Eastbridge from the immensely damaging effects of noise and light pollution in any meaningful way. Please see Submissions for Deadline 10 from our agents Mike Horton of Savills and Paul Zanna of Create Consulting.
3. We sent to PINS on 6th October 2021 a copy of an email we sent to Jonathan Smith of EDF's agent Dalcour Maclaren which we would like to be considered a part of this Submission (see below for ease of access). Apologies for drawing to your attention what might seem a trivial matter, but it is typical of our dealings with the Applicant in that they send at a very late stage what they regard as answers to our questions, but in fact are no such thing. EDF have admitted that water levels on our marshes will rise, which will inevitably affect the quality of and time available for grazing for our cattle and hay making. This will be the case QUITE INDEPENDENTLY of any other factors. Consequently, sending us maps of the flooding arising through the construction of SZC that will be IN EXCESS of a 1 in 200 year flooding event does not provide any reassurance about the effects of the project on our land.
4. The Applicant has not made any proposal to us about how we might progress negotiations since we met with them on 3rd September 2021 and which meeting we outlined to you in our Deadline 8 Submission. To repeat briefly, they claimed in a communication between Ian Cunliffe (of EDF) and our local MP, Dr Therese Coffey, that "at this meeting (on 3rd September 2021) the basis of an alternative proposal was discussed in relation to acquisition of the land required to construct the project". We would reiterate that this statement is not true and that there has been no attempt by EDF to move forward since.

Summary for the close of the SZC DCO process

1. The construction of SZC will in all probability create unsurmountable difficulties for our estate and our farming, cattle, shooting and camp site businesses. As explained in previous Submissions, we run an integrated farm and the damage done to any one aspect of our operation will have consequences for all the others. As a result, it is highly likely that SZC will mean the end of a family business that started some 60 years ago and most sadly

redundancy for our staff, many of whom have been with us for many years and some live in houses on the estate.

2. The effects of the construction of SZC will be catastrophic because we will be surrounded by various components of the proposed development. In a continuous arc running from the northwest corner, round the southern side and on to the north east side of our land will be the SLR, the entrance roundabout, the lorry park, the workers campus and the borrow pits. And on the northern side our marshes are threatened by higher water levels arising from the construction of SZC and salt water ingress on our land which could destroy grazing land and potentially poison our irrigation bore hole, on which we are wholly dependent for successful cultivation of crops.
3. SZC will be one of the largest construction sites in Europe and will be situated on our border. It is not possible to avoid the conclusion that this project will destroy the rural environment of the area in general and the ambience, amenity value and monetary value of our estate in particular.
4. EDF has shown us no evidence that it is prepared to or even is able to mitigate effectively the catastrophic effects of the construction of SZC on our estate.
5. We understand that there is national need for energy, but EDF have behaved in an egregious manner towards us. We would only ask for fair treatment, but have been met with obfuscation and delaying tactics. EDF first came through our door some 9 years ago and have had ample time to answer our questions and come up with mitigation proposals and a possible deal to acquire land they might need. Instead we have been left in limbo not knowing whether to invest in our business and EDF have reneged on promises to reimburse us for costs involved. We are some tens of thousands of pounds out of pocket and, for example, have found ourselves paying for noise surveys which should have been done by EDF themselves. This is in part evidenced by that fact that EDF did at one point ask to do sound surveys within our garden as well as elsewhere on our estate and in the end decided against doing so, but also by the inadequacy of the surveys they have done (see Create Consulting's Submission). This seems to be in keeping with the general attitude of EDF to the project in that they have had to come up with late-stage un-costed plans for a desalination plant to address the major unsolved problem of the lack of drinking water for SZC, as well as what might be termed 'hiding behind the Rochdale Envelope' – in other words, not undertaking environmental studies or providing information because the details have not been resolved.
6. We have no fundamental objection to nuclear power, but SZC is simply the wrong project in the wrong place on an eroding coastline. EDF's proposals involve outdated technology that has not yet been proven to work and has a history of years of delays and billions of cost overruns. It will involve massive damage to the local environment, wildlife, the local community and an AONB and will not be operational in time to meet national climate change obligations. Even the French government stated a while ago that it will not build any more of EDF's Flamanville/SZC type reactors and only today, President Macron of France has announced "The number one objective is to have innovative small-scale nuclear reactors in France by 2030 along with better waste management" (Financial Times, 12th October 2021). Can SZC make any sense?

Justin and Emma Dowley



[REDACTED]

From: Justin Dowley [REDACTED]
Sent: 05 October 2021 16:36
To: Joshua Clarke-Davis [REDACTED]
[REDACTED]

Subject: Dowley/Theberton House and estate

Dear Josh

We have received your letter of 27 September 2021 asking us to confirm by 12 October that we “are content that the potential extent and increased flood depth is not a significant concern to you”.

This email is to inform you that we are NOT content.

As we have repeatedly and consistently informed you, in responses to the various consultation stages, in our submissions to the Examining Authority and direct to you and your colleagues, we are seriously concerned about the possible effects of what you describe as “the potential additional and marginally deeper flooding on land within your ownership.....”

We are so concerned because the management of the water levels on the land concerned is already a delicate exercise and any increase in the levels will threaten the marshes on which our herd of cattle grazes from May until October. The building of Sizewell C will in EDF’s admission be likely to result in a small rise in water levels quite independent of any other factors such as climate change. In addition, any surge will threaten saline incursion to the bore hole on which our farm irrigation depends. This would be catastrophic for us.

You have to date, despite our well rehearsed concerns, failed to present to us or our advisers any prevention or mitigation measures. At the Accompanied Site Visit on 8 June 2021 EDF personnel, in response to questioning by the Examining Authority Inspectors, acknowledged that EDF had not submitted any plans to stop the flooding of our marshes from the proposed EDF water holding areas to the south of those marshes.

You refer to a 1 in 200 year theoretical event. For the record, you may note that in North Norfolk, where our family owns property, the Environment Agency’s flood models also refer to 1 in 200 year assumptions. And yet 3 times in living memory – in 1953, 1978 and 2013 – the 1 in 200 year event (sea surges and resultant widespread flooding) has occurred.

As we let you know by email on 30 September, but you have not yet acknowledged, in the maps which you sent to us on 27 September you have inserted a neighbour’s address and post code rather than ours in the Location box.

Regards
Justin and Emma Dowley
[REDACTED]

