From:
To: SizewellC

**Subject:** Comments on EDF"s response to the Secretary of State"s information requests concerning Sizewell C

**Date:** 23 May 2022 10:49:32

Dear Sir,

I have various points to make in response to the Secretary of State's request for comments on EDF's answers to a range of questions put to the company by the Secretary of State in relation to Sizewell C.

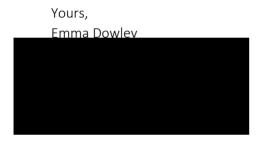
- 1. First it should be noted that I have no fundamental objection to nuclear power *per se*, but have been deeply disturbed by EDF's behaviour over the past 10 years in relation to their proposal to build two new reactors at Sizewell, otherwise known as Sizewell C or SZC
- 2. All the way through the process EDF has failed to listen to or show much sign that it might accommodate the well-argued and constructive suggestions as to the mitigation measures that might be adopted in order to minimise the disruption to the lives and livelihoods of communities in the Sizewell area. It is as if the people worst affected by the SZC proposals were nothing other than a complete nuisance. I can understand that the supply of energy for the nation is a serious matter to which solutions need to be found, not least because of recent events in Ukraine, but EDF has utterly failed in its obligation to minimise the effects of the project as currently envisaged will have the local economy, population and environment.
- 3. Most shockingly, EDF has been the entire way through the planning inspection process without the company actually having established definitively that the site is suitable or safe for such a project to go ahead and it beggars belief that this was not done YEARS ago. Many people with expert knowledge have made the point that Sizewell is a fragile site situated on an eroding coastline for a long time now, yet EDF went ahead with putting in a DCO application without knowing if the site can take it. Only in January this year did EDF seek to obtain permission to build a 'cut-off' wall 60m deep around the proposed site for the main platform with ground anchors attached to underlying crag to secure the 'cut-off' wall so that it can't fall into the void. At the same time EDF was also seeking permission for works to ensure that the ground beneath the proposed Hard Coastal Defences is suitable for the latter in fact to do their job. That failure of the Hard Coastal Defences could be catastrophic for the project (as well as risking the lives of construction workers) and/or cause irreparable harm through salt water and toxic waste contamination to the surrounding marsh land and possibly irreversible flooding to the village of Eastbridge would suggest that EDF has been utterly negligent. Or worse, this was a cynical manoeuvre designed deliberately to avoid establishing critical facts which might make it necessary to admit to a more realistic forecast for the total cost of the project. (Recall that well after construction at Hinckley Point C had started, the ground was found to be so hard that it was going to add several £billion to the cost of that project, albeit that at Sizewell the ground is likely to be too unstable)
- 4. Also of great moment is the fact the EDF got most of the way through the planning inspection process before it admitted that there was not enough potable water available for the project to go ahead and had to engage in a late stage consultation round to canvas

the possibility of a desalination plant for both the construction and operational phases of the SZC project. In fact, no solution has yet been identified for the supply of potable water for the latter and how the output of salt water might be effectively removed/disposed of without damaging the marine environment round Sizewell. Meanwhile Northumbrian Water Ltd, the owner of the local water company, suggested a pipeline might need to be constructed to bring water from as far away as north Norfolk and what would either solution add to the cost of the project? Again, is this negligence or a deliberate ploy to sidestep publishing a realistic total cost of SZC as well as to avoid the problem that the site at Sizewell not being big enough.

- 5. That EDF has not yet done the correct due diligence work with respect to these two matters above is a shocking indictment of its planning programme and destroys the limited faith one had that the company can build SZC successfully on time and to budget, especially given its track record of cost overruns and years of delays at Flamanville (France), Olkilouto (Finland) and Hinckley Point.
- 6. The proposal for a link road round Theberton, called the SLR, was another late stage proposal from EDF. The company signally failed to canvas opinion on the preferred option of Suffolk County Council as well as many local people and known as Route W (formerly D2). The late and unsuitable choice of the SLR would appear to have been made primarily because the route can be mined for aggregates/spoil needed for the SZC project, in order to meet 'mass balance' requirements. Moreover, there has been inadequate planning to mitigate the effects of extra traffic on the B1122 in advance of starting work on the main site. Those living nearby will have to endure massive issues of danger, noise, vibration, congestion, disruption and pollution until the SLR is built. Even once built, proposals to change access on certain roads (eg preventing traffic joining the B1122 from Potters Street) will force extra traffic onto wholly unsuitable narrow lanes. Route W would have a legacy value to the local area, whereas the SLR has none, and be of benefit in the construction of both SZC and the Friston substation project nearby. Even Therese Coffey MP, a keen supporter of the project, has stated that the SLR should be removed once SZC has been built, but EDF do not want to do this, presumably because of the cost.
- 7. When it comes to the cost of SZC, the current £20billion is already some way out of date given that only on 21<sup>st</sup> May 2022 was it announced that the cost of Hinckley Point C had gone up again by £3billion from £22-23billion to £25-26billion, the fourth increase from the original estimate of £18billion since 2016, in other words a 44% increase in 6 years. The cost of SZC is also bound to escalate at an alarming rate, but the difference with SZC is that the consumer will have to pick up the bill for cost overruns and time delays.
- 8. With regard to the environment, only 2 days ago (21<sup>st</sup> May 2022) the RSPB brought to the attention of government the 'catastrophic' (the RSPB's word, not mine) effect that SZC will have on Minsmere bird sanctuary, by staging a 'once in a generation' event outside parliament. Suffice it to say the RSPB stated that 'Minsmere has every [environmental] protection under the sun, and if Minsmere can be put a risk, nowhere is safe'. Importantly, the proposed works on Sizewell Marsh SSSI do not meet the government's recently enacted legislation, in particular, the Environment Act 2021
- 9. EDF' s estimate of when all spent nuclear fuel will be removed from the site at Sizewell is

2140, whereas the statutory authorities and EN-6 legislation point to dates closer to or beyond 2190 – a massive discrepancy for which an explanation is needed. At the same time the government is concerned for the UK to have energy security, yet more than half the world's supply of nuclear fuel comes from countries within the Russian sphere of influence, this at a time when Russia has become a pariah state following its invasion of Ukraine and may well choose to withhold supplies as a form of blackmail.

10. Lastly, though not of great import nationally, I would like to mention EDF's shabby treatment of local people. In our case, for over the last 10 years we have attempted to engage constructively with EDF about the devastating effects SZC will have on our family home and farming business, but have met with obfuscation, delay and failure to address the very real concerns we have for our employees as well as our enterprise. In particular, they have failed to pay our costs as promised, resorted to threatening and bullying tactics and told blatant untruths in the Planning Inspectorate's hearings and their submissions to the Inspectors.



Interested Parties refs - SIZE-AFP123, SIZE-AFP119, SIZE-AFP124 and SIZE-AAFP120