

## **Response to Secretary of State BEIS Request for Information Related to Sizewell C 25 April 2022**

**The following submission is made by Cllr Josie Bassinette on behalf of the Walberswick Parish Council. Interested Party Number: 20025708**

### **Introduction**

Walberswick is a coastal village, less than 10 miles north of the Sizewell C site, and has within its boundaries the Walberswick Marshes, SSSI, and AONB. Many of the questions posed by the SOS have long been raised by Walberswick Parish Council and by other local Councils and interested parties. These issues were also raised with the Planning Inspectorate and we are glad to have another opportunity to point out the very serious flaws in the proposed Sizewell C development. Because of these flaws, the Sizewell C development would not only have a devastating impact on the local environment and on our communities, but would also be a terrible mistake in public policy related to our current and future energy needs. In fact, the more Government wants nuclear power, the more it should be wary of Sizewell C. We therefore expect that the SoS will do the right thing and reject the Sizewell C DCO.

### **Water Supply, Desalination Plant and Drainage**

The absence of a sustainable water supply during operation should conclusively argue that this project is grossly inappropriate for its proposed site. We reject EDF's argument that the development can go forward without a guaranteed and sustainable water source and that it be left to be sorted out during the years of construction. It is clear from the statements of Northumbrian Water that there is no guarantee of piped water for the Sizewell development and for the other consumer and business-based needs of water scarce east Suffolk. EDF itself made very explicit at the Inspection Panel hearings that its proposed construction period water strategy based on tankers, diesel operated desalination and eventually electricity powered desalination was only appropriate as a temporary measure. Sizewell C, once constructed, could not even be tested if the "temporary desalination" was not first removed.

EDF's reply to SoS that their solution in the long-term could be to fall back on somehow finding another site for a permanent desal if necessary – including ones that would further encroach on and endanger Minsmere and the SSSI -- cannot be accepted. In this regard, I would like to draw to the attention of SoS that EDF's own argument in support of desalination during construction was precisely because the negative impacts would only be temporary and that permanent desalination would not be appropriate. For example, when the Applicant itself looked at the impact on air quality of its temporary desalination proposal, it conceded (see the document labelled Desalination Plant Air Impact, para 3.4.3 ) with regard to Ammonia, that the impact on Minsmere would go above the threshold of insignificance. It then went on to argue that this could be dismissed by rounding down their assessment (ie by lowering the standards required) and that even if the dangers were higher, they would not matter as impact would only be temporary! It would seem, therefore, illogical for SoS to consider approving Sizewell C development on the basis that desalination could become permanent.

Although the SoS did not query the 'water strategy' being proposed by EDF during construction, it should have done so as it highlights many of the absurdities and contradictions of this DCO. The Applicant's proposal for some 40 daily tanker movements for at least the first year of construction on an already inappropriate transport network and then a desalination plant run on diesel, raises huge cost and environmental concerns which have not been properly addressed. With the sky-rocketing cost of diesel and the UK's stated claim of decreasing its dependency on imported oil, this

diesel-based desalination strategy is even more absurd. Sizewell C's carbon intensive water strategy during construction (and possibly thereafter) undermines the argument of the Applicant of Sizewell C's contribution to a lower carbon future. In fact, Sizewell C will be a large net contributor for many years even after it becomes operational because of the processes used during its decade(s) long construction.

We would also note that since the early days of the consultation, local communities have repeatedly pointed out the lack of water as a reason that these EPR reactors should not be built at Sizewell. We note too that there is no effort being made to provide an analysis of the cost impact of the water strategy or who will be expected to pick up the cost especially under the proposed RAB financing model.

### **Traffic and Transport**

The question by SoS on the Applicant's failure to put in mitigation prior to construction is one that has been asked repeatedly by local communities since the beginning of the consultations and has been routinely rebuffed by the Applicant without proper explanation or analysis. Planning processes require the developer to consider and assess alternative methods to ensure mitigation is provided in advance. This has not occurred. Rather, EDF has fallen back on arguments that their development is so special and so essential that they should be allowed to trample planning rules, trample local communities and trample the environment. We whole-heartedly reject such an approach and SoS must do the same.

The Applicant in its response to SoS makes little attempt to address this situation but rather falls back on its old argument that it has used for a decade --- that it has no time to build mitigation. This is simply ridiculous. Even under the most optimistic scenarios, Sizewell C is not some quick fix to the country's energy emergency. The Sizewell construction will take some 12 years to construct even under best case assumptions. Given that EDF has never been able to build any reactor without running years (or a decade or more!) behind schedule, making such an argument is laughable and takes us all for fools. No one believes that Sizewell C, if allowed, will produce any power by 2035. This links in with the question above regarding the lack of a sustainable water strategy. In the 'early years', the Applicant proposes to add 40 tankers a day to the existing road network. One would think that this 'strategy' would need to depend on the road transport mitigation being in place, but the Applicant makes no attempt to link the two.

The Applicant's response to the SoS even attempts to argue that early mitigation would have a negative impact on the amenity of those along the SLR. This is clearly a ridiculous argument. The communities that will suffer from the SLR will be suffering from the impact of traffic on the B1122, will then be suffering from the building of the SLR, then from the operation of the SLR itself. They will also suffer because of the Applicant's refusal to remove the road after construction. Therefore, to say that keeping the awfulness on the B1122 longer will somehow lower the pain of the SLR cannot be taken seriously.

With regard to other specific details, we align ourselves with the well-argued response provided by the Therberton and Eastbridge Parish Council. This includes their points related to the two Scottish Power windfarms, the locating of the site won material, and the route of the SLR which remains the most sub-optimal route in the opinion of everyone involved with the exception of the Applicant. If this project is allowed to go forward, then more appropriate alternatives including full mitigation prior to construction, the choice of Route W instead of the proposed SLR and an evaluation of cumulative impacts are essential prerequisites.

### Darsham Level Crossing Improvements Financing

We note the response of EDF that Sizewell C will pay for the improvements to the crossing should Network Rail lack sufficient financing. Given that the SoS is proposing a RAB financing model, it would appear that, if this project is approved, SoS is making the UK public responsible for this cost no matter what. Surely, it must be understood now by SoS that the inappropriateness of the site is going to drive time and cost overruns and it is us, the public, who will pay, not the Applicant. If Government is unwilling/unable to finance a safer level crossing through Network Rail, why would it possibly think it appropriate to finance the same through the tax-payer funded RAB via EDF?

We also note in the Applicant's response that it confirms that it will ensure that the improvements are in place prior to using Network Rail as part of its transport strategy. SoS needs to ask why it is appropriate to ensure mitigation is in place for this part of the transport strategy whilst considering allowing the project to proceed when the Road transport mitigation is not. Clearly, if this project is to proceed, ALL transport mitigation must be in place before construction begins.

### Coastal Considerations

The Walberswick Parish Council has no specific expertise in coastal processes but like all coastal communities we are acutely aware of how quickly our coast is deteriorating and therefore are alarmed at the proposals by the Applicant for sea defenses and for the safety of the spent fuel being left on site. Having read Nick Scarr's most recent submission, we find that very serious questions remain about the uncertainty and risk associated with the EPR reactors on Suffolk's eroding coast and whether the proposed SCDR and HCDF are appropriate. It is essential that this is determined to a much higher degree of certainty prior to any further consideration of this development.

### Habitats Regulations Assessment, Biodiversity and Ecology

EDF's proposals do not meet the requirements of the Environmental Act 2021. That, in itself, should stop further consideration of this development. We reject the arguments made by the Applicant in its answers to the SoS on the suitability of the wetland replacements and on the readiness of these replacements as suitable habitat including for the marsh harrier. As was made clear during the inspection process, the RSPB and the Suffolk Wildlife trust, supported by many other interested parties, dispute the claims made by the Applicant on the impact on biodiversity and the appropriateness and readiness of replacement sites chosen by them for the loss of AONB and SSSI. The answers by the Applicants make no meaningful improvements on their old claims. Walberswick Parish Council is particularly concerned about the impact on the Marsh Harriers which were saved from extinction in the UK by the work of the RSPB at Minsmere. These birds live in the Walberswick Marshes precisely because there is now protected habitat from the Sizewell to Walberswick Marshes. These arguments have not changed and the Applicant has provided no new evidence in its answers to the SoS but rather has repeated the same statements and actions that were conclusively challenged during the inspection process. There remains no new evidence of the Applicant's unsubstantiated claims of biodiversity gains, and much evidence provided by Interested Parties of the opposite. We draw to the attention of the SoS the Applicant's recent application to begin drilling test wells without the need for prior appropriate Environmental Impact Assessment. In fact, pairs of nesting Marsh Harriers have been found where the test drilling would have occurred and would have been disturbed or destroyed should EDF have gotten approval to proceed. As it stands, there is no where appropriate for the displaced wildlife to go.

Finally, we draw attention to the recent statement made by the RSPB Operations Director on 19 May: “Minsmere has every protection under the sun, and if Minsmere can be put at risk, nowhere is safe and sooner or later a line in the sand has to be drawn. This is our line in the sand.” We could not agree more.

Approval of the development of Sizewell C would be an act of unforgiveable environmental degradation and sabotage and there is nothing in the Applicant’s response to the SoS that changes this.

## **Conclusion**

In conclusion, it would be shocking and inexcusable for the SoS to approve a project (particularly one that the Government intends to be paid for by the public through direct Government financing and RAB financing) that:

- (i) *Lacks a fully sustainable, environmentally acceptable, costed and licensed water strategy.* At the Planning Inspectorate hearings, EDF itself made it clear that it would be physically unable to even test the completed reactors if the desalination plant was still in place and that desalination did not provide an appropriate solution to the lack of water at the site.
- (ii) *Lacks a plan to obey planning laws with mitigation fully in place prior to the start of construction.* Until and unless more appropriate alternatives including full mitigation prior to construction, the choice of Route W instead of the proposed SLR and an evaluation of cumulative impacts is completed, this project should not be approved.
- (iii) *Risks transferring to the UK public the limitless costs of a poorly planned transport strategy including those related to Rail transport.* The Applicant’s assurance that it will pay for the improvement in the Darsham level crossing if Network Rail cannot is meaningless if the SoS is committing to passing the construction costs to all consumers through the RAB as that means that the public, not the Applicant, will be paying.
- (iv) *Causes unacceptable biodiversity loss and catastrophic risks to the AONB, SSSI and the precious RSPB Minsmere including the population of Marsh Harriers.* The answers provided by the Applicant provide no new evidence but only repeat the same statements and actions that were conclusively challenged during the inspection process. There remains no new evidence of EDF’s unsubstantiated claims of biodiversity gains, and much evidence provided by Interested Parties of the opposite.