

Dear Sir / Madam

Thank you for the opportunity to be able to comment on the response by the Applicant (EDF) to the questions from the Secretary of State as part of the DCO process for the proposed development at Sizewell C.

I have lived 11km from the proposed Sizewell C site for 20 years and know the area well. I was until 2019 Head of Coastal Management at East Suffolk Council and have worked on the Suffolk coast for over 15 years and so have a detailed understanding of the issues that affect this coastline.

My brief comments to the Secretary of State (SoS) cover the following areas:

- Water supply and desalination plant
- Traffic and Project urgency
- Coastal Issues
- Spent Fuel and Radioactive Waste
- Questions from Austria
- Accident Analysis
- Value for Money

Overall, I am concerned that despite 10 plus years of consultation EDF have still to complete and share publicly all their reports and analysis for independent examination. Despite the huge volume of documentation produced so far there are still too many contradictions and gaps in knowledge to enable a comprehensive, cohesive and rounded decision to be made. EDF appear to be pressing the Secretary of State to make a decision based on selective data and unrealistic assumptions. If this project is approved and goes ahead and if subsequent evidence and experience highlights fundamental concerns, there is a danger that through the momentum generated by construction and financial investment the project may become unstoppable and the catastrophic consequences of this development will therefore have impacts both locally and nationally and for many generations to come.

Fundamentally the approach taken by EDF is flawed. It is clear that whilst the understanding of the impact of climate change is developing rapidly and the consequences of a warming planet (such as sea level rise) are accelerating, EDF have limited their approach to certain time horizons, current standards and predictions. They have failed to recognise that these are likely to be revised and become increasingly stringent and therefore to take a sufficiently precautionary approach. It also appears that the Governments Arms Lengths Bodies (e.g. Environment Agency and ONR) are also insufficiently sceptical of the claims and predictions from EDF in their responses.

The areas of specific concern are as follows:

Water supply and desalination plant

- The issue of lack of potable water supply became clear towards the very end of the DCO process despite it being highlighted to EDF at an early stage in

the extended consultation process. Whilst there are clearly discussions ongoing with Northumberland Water Ltd, it is such a fundamental issue that the SoS must question the claims of urgency that EDF are highlighting when they have this and other issues yet to be resolved. There are worries within the existing local community and businesses that EDF will cause adverse impacts on water supply with any solution proposed. In an area that is already regarded by the Environment Agency as an area prone to drought the imposition of such a significant additional demand, when climate change predications identify this will become more acute, must be seen as a folly.

- The last-minute proposed solution of desalination plant contradicts earlier EDF statements that desalination was not an appropriate solution.
- Whilst EDF state in para 2.2.1 of their response to the SoS questions, "There is no *'in principle'* difficulty with the supply of water from desalination", this masks a multitude of concerns that the bland reassurance does not adequately reflect. These include an array of impacts on the environment including: concentrated salt solution discharge into the sea, air and noise pollution from the generators and specifically the issue of where would any plant be located. Whilst EDF casually dismiss the consequences of these additional impacts as insignificant (see para 2.28 of their response), the in-combination impacts of this entire development are inadequately examined. EDF states in para 2.2.8 with regard to the marine environment, *that in SZC Co.'s opinion,..unlikely to generate any materially new or materially different significant* but admit that there needs to be *'detailed assessment'* on environmental effects. Such a dismissive approach cannot be acceptable.

Para 2.2.10 states *'Impacts on the terrestrial environment, including landscape and visual would require detailed assessment but, in SZC Co.'s opinion, placement of the plant in either of these locations would be unlikely to generate any materially new or materially different significant environmental effects.'* It should not be EDF's opinion that matters and this should be independently assessed.

- Whilst the initial proposal for the desalination plant, during the construction phase, is to locate the facility on the platform site and the temporary construction site, it is now suggested as a long-term solution for a permanent desalination facility to bury the plant. This long-term solution has not been subject to any form of rigorous analysis, impact assessment or permitting and therefore to assume this is deliverable and therefore granting permission to the DCO prior to this assessment would clearly be a mistake. It is clear that without a fully thought through and agreed solution this project is unviable.
- The proposal by EDF in para 2.2.9 *'placement of the desalination plant, powered by electricity, on land within the Sizewell A complex that is currently assumed as developable for the Sizewell B Relocated Facilities proposals. This would require the Sizewell B outage car park to be developed on Pillbox Field'* highlights the chaotic and poorly thought through approach by EDF to both the site layout and mitigation for this project as this location has already been designated and planted for mitigation. This will require planning

commitments made for the Sizewell B Relocation project to be dropped and place outage car parking on Pillbox Field, currently planted as mitigation for the felling of Coronation Wood. This must raise questions for the SoS as to the competence of the Applicant and therefore whether they should have permission to build such a large and complex development.

- The issue of the desalination plant highlights two fundamental issues; 1) the site is too small for the proposed EPR design (it is 40% smaller than Hinkley Point C) and 2) the scale of the environmental impact in this highly sensitive location will be catastrophic. This will be in direct breach of the objectives of the Environment Act 2021.
- Para 2.3.3 states '*At this stage, there is insufficient detail on the different permanent water supply solutions to enable SZC Co. to undertake any meaningful assessment of the various water supply solutions.*' If at this stage EDF are so unclear on such a fundamental issue as to how to solve the water supply solution, then clearly this application should be rejected as being incomplete.
- In addition, if in future the desalination plant is proposed to be powered by SZC itself, it is unclear as to how the power demand of desalination plant will be provided in outages (planned or otherwise).
- Whilst Question 3.6 is for MMO, EA and EA, the SoS must also consider the impact of the desalination plant discharge, with the likely that changes in the offshore banks, that over time have the potential to radically alter the rate and direction of tidal flows. Questions need to be answered as to whether modelling has taken this into account. It would not be acceptable to make an assumption that the offshore banks will remain as current for the next 100+ years. Evidence from both the MMO and EDF already indicate that these unconsolidated offshore features are highly mobile.

Traffic and Project Urgency

Even the most casual of examination into the road network to the Sizewell C site highlights how inadequate it is to deal with the predicted level of additional traffic in the area. This can easily be demonstrated by the tailbacks caused by the additional traffic generated by the annual Latitude Festival which gridlocks the area for a few days a year. However, this experience differs from future construction traffic as it is a) predominately cars and not HGVs and other goods vehicles b) not commuter traffic at the end of shift changes c) Festival traffic is travelling north / south on the A12 not across country through small villages. It is clear that one of the 'Achilles Heels' of this project is the capacity of the road infrastructure.

- The statement contained in para 3.1.4 on Construction Method Statement indicates that EDF wish to proceed before any relief road and bypass is constructed as this would delay the project by 3 years. It is noted that up till now EDF appear to have lack any sense of urgency, but they now expect the local communities to incur the inconvenience, pollution and disruption of not

having an adequate road network to handle the EDF traffic. It should also be noted that the road network will be further stressed with traffic from an array of windfarm and European Interconnector construction projects also underway in the same area at the same time. The lack of an improved road network and the in-combination impacts of both heavy and light goods vehicles is a major failing of the planning process. The consequences will be suffered by the local community but will also increase costs for every business and project in the area through additional delay times.

- The statement by EDF in para 3.1.18 “*The urgency and importance of new nuclear is emphasised in the strongest terms in the Energy and Nuclear NPSs, and NPS EN-6 confirms (at paragraph 2.2.3) that delay in deployment would increase the risk of the UK being locked into a higher carbon energy mix for a longer period than is consistent with the Government’s ambitions to decarbonise electricity supply*”, fails to acknowledge the additional and significant carbon load generated by the construction of Sizewell C at a time when by the governments own targets require a significant reduction in carbon. These two points are irreconcilable.
- EDF have failed to provide an accurate breakdown of what carbon will be generated and when for examination, it should also be noted there will be a significant and very long-term additional carbon load with the decommissioning and removal of Sizewell C. Full disclosure would demonstrate that this project is not low carbon and that any claims on this should be treated as spurious.
- Whilst EDF will of course promote and highlight the need for nuclear (para 3.1.18) and in Net Zero: Building Back Better (para 3.1.23) they highlight that “*The 2020s is a critical decade in determining whether the Paris temperature goals can be kept within reach.*” Yet delivery even with the most optimistic projections will not be until mid / 2030’s – too late to meet national objectives.
- *For the Sizewell Link Road EDF claim it is a key factor is sustainability (3.1.29).* However, this depends on your definition of sustainability. No comparative analysis has been undertaken. The proposed SLR that will have no long term legacy, cause significant additional mileage (including fuel usage and pollution) from each delivery vehicle, permanently scar the landscape but may save some vehicle movements (always assuming this would be transported by HGVs and not sea) against an alternative route (such as route W) that will have long term benefits and significantly reduce; the overall mileage, fuel consumption, impact on the environment and provide a lasting legacy for Leiston whose economic prosperity has always been inhibited by poor access. If nuclear power is such a beneficial economic driver the why after two power stations is Leiston economy relatively weak? Perhaps improved road access would be a more sustainable solution.
- The reality of the argument made by EDF about the impact of delay (para 3.1.37) as SZC is a twin and follow-on project from Hinkley Point C, with contractors and skills moving over from one project to the second needs to be examined in light of

the actual gap in timing between the two projects. It should be noted that the reliance on the importation of HPC staff will not support local jobs as is heavily promoted by the Applicant.

- The Applicant also highlights cost price inflation as a reason to press ahead however, no recent figures have been issued on the latest costs which in view of shortages of labour and increases in raw material costs must make this project unaffordable. Hinkley Point C is now expected to cost in excess of £26bn (an increase of over £8bn from initial predictions) and in view of the constraints of the site and prevailing economic conditions it would be unrealistic to expect the costs to be anything less than this recent figure.
- The scale of increased traffic is highlighted in para 3.1.41 "*Chapter 2 of the Fourth Environmental Statement (ES) Addendum [REP7-032] (electronic page 481) shows that in Stratford St Andrew (link 24) and Farnham (link 23) there is forecast to be an 8% increase in daily two-way total traffic and a 90% increase in daily two-way HDVs during the early years.* What this statement does not clarify is that with the 90% increase in HDVs plus all the LDV's (volume increase not noted) is that it will substantially impact on the operation of the roads and the ability of the individual to move from one place to another. The phasing during the day of the increase in traffic is not specified but will be exaggerated as shifts change on site.
- In para 3.4.12 it states 'agreed with the Councils that the risk of significant adverse air quality effects arising from the use of the proposed pedestrian crossings is likely to be minimal'... However, have the in-combination impacts of pollution (though fumes and increased brake and tyre wear) of the increased volume of traffic really be accurately assessed esp. for pedestrians. East Suffolk suffers from high Ozone pollution with the nearby Sibton Green monitoring often registering the highest levels in the country in any one day. The combination of Ozone with nitrogenous oxide, high PM2.5 and other toxic chemicals can only harm pedestrians and local residents. The spurious calculations contained in para 3.4.13 may not reflect the real impact from the traffic.

Coastal Issues

A feature of the entire DCO process has been the determination of EDF and their consultant CEFAS to only look as far forward as 2140 with regard to sea defences and flood risk. This is contrary to guidance given by EA / ONR in Principles for Flood and Coastal Erosion Risk Management July 2017 which clearly defines: Full lifetime of the station as:

the operational life, plus the time taken for the decommissioning and interim storage of spent fuel and waste, prior to disposal. Again, this should be specified and justified by the operator, but is generally understood to be 160 years.

Flood and erosion protection is therefore required from the start of operations (say realistically 2035) and therefore till 2195. This causes the Applicant major difficulties as they know the Sizewell C site is highly vulnerable to both flooding and erosion. This was identified in an internal Defra report in January 2012 and said to 'have a *'high risk' of flooding and erosion now: Sizewell in Suffolk, Hartlepool in County Durham and Dungeness in Kent.*' (Edwards, 2012). Uncertainty about the increasingly extreme consequences of climate change make both this site untenable as a new nuclear station but also the information presented by EDF / CEFAS increasingly irrelevant.

Note: CEFAS is a consultant to EDF. Whilst as an organisation it is largely UK taxpayer funded (~£50m p.a.) CEFAS has also received significant additional consultancy income from EDF. Whilst CEFAS has had an excellent academic reputation in the past, there is an inherent problem with a tax payer funded body playing both the role of an independent government adviser and commercial consultant.

This is highlighted in the Hinkley Point C public inquiry over the removal of an acoustic fish deterrent device. CEFAS' advice has been questioned by scientists acting for various other government agencies and local conservation groups. It appears there are; deep flaws present in CEFAS' methodology, a serious lack of engagement with these agencies, knowledgeable local actors and possible conflicts of interest.

The findings of the Hinkley Point C public inquiry (and thus the reliability of CEFAS' advice) have yet to be made public, but the fact this went to public inquiry at all demonstrates potential deep failings in the CEFAS / EDF approach.

- In question 5.1: The SoS asks the EA to confirm if the Preliminary Design and Maintenance Requirements for the Sizewell C Soft Coastal Defence Feature ("SCDF") (Version 4) TR544 [REP10-124] provided by the Applicant at Deadline 10 satisfies its remaining concerns in relation to modelling and further analysis for the SCDF, and consequently the Hard Coastal Defence Feature, including any implications for resilience and the cumulative impact assessment"

As a Statutory Consultee, the Environment Agency should comment on the Applicant's Flood Risk Assessment but it cannot validate it. For such a critical safety feature this should be undertaken by an entirely independent and suitably qualified organisation.

- Detailed Examination of TR544 highlights significant weaknesses in this paper. This has been examined in detail in a submission to this process by Nick Scarr but in summary:
 - EDF / CEFAS fail to take full account the likelihood of storms
 - EDF / CEFAS do not take into account in-combination events (storm and surge)
 - EDF / CEFAS fail to take into account the issues exacerbated by eroded coastlines
 - EDF / CEFAS analysis relies on a closed system of sediment movement, which is not universally scientifically agreed and its argument is empirically weak.

- The failure of EDF to provide details of flood defences other than to the east and lack of recognition that the land to the north and west could become inundated and therefore make the site vulnerable is inexcusable.
- Nick Scarr's conclusion that "Overall, the papers posit that Sizewell C, as presented in the DCO Hearing, will not be able to offer the sufficient and necessary flood resilience in the next century" is both correct but also in my view understated.
- The SoS in Question 5.2 asks the Applicant what effects the Sizewell B cessation of operation might have on the Coastal Processes Monitoring & Management Plan recharging mechanism for the SCDF. EDF's highlights its dependence on the CPMMP to respond to changes in the coast.

The Applicant is correct in its response but the question should perhaps should have been what plans EDF have if the CPMMP fails. Regarding the cessation of Sizewell B operation, the bland assurances from EDF / CEFAS (see para 4.2.2) are based on the assumption that the CPMMP will mitigate for changes in the shoreline. This may be an inaccurate assumption. It is worth noting how close the Hard Coastal Defence is to the shoreline, and the shallow construction of its foundations makes it especially vulnerable to the loss of the soft coastal defence. Should this development be delivered there is a high risk that future generations of coastal engineers and managers will be faced with major technical and financial challenges maintaining the integrity of the sea defences that have been installed.

The flaws in the location and design of the belated Hard Coastal Defence design are commented upon in my response to the DCO process (see REP10-228) and this, together with other fundamental questions on coastal issues, in my view have been inadequately addressed by EDF / CEFAS. These are briefly summarised in my letter to BEIS dated 5th February 2022 (see appendix 1). This highlights that this approach is flawed and this particular coastal location is unsuitable for such a long-lasting development. I have a detailed understanding of this coastline in this area and as a former head of Coastal Partnership East, I believe the proposals from EDF / CEFAS are disastrous.

Spent Fuel and Radioactive Waste

- In view of all the concerns highlighted in the previous section the proposal to store spent fuel and nuclear waste on site is of great concern. Should this happen then significantly greater safeguards need to be in place to prevent accidental / deliberate release of any nuclear material into the sea. Even if it was found to be acceptable for radioactive material to be release into the sea, due to the shape and tidal flows within the North Sea, the impact would be catastrophic and permanent for the Suffolk coast, the UK and Northern Europe as a whole. This risk must be avoided.

- With respect to question 8.1(a) and the Applicant's response 5.2, I fully support Mr. Nick Scarr's analysis, and highlighting of the vulnerability of the site to flooding especially with the long-term impact of climate change.

Questions from Austria

- The pertinent questions from Austria not only highlight that this development is being challenged locally but also is of significant concern to governments far away. The SoS has an onus responsibility to ensure that EDF not only meet the letter of current regulatory requirements but also protect future generations from ill-considered and potentially highly dangerous developments on the Suffolk coast.

Accident analysis

- It is worth noting that before each significant nuclear accident there is an assurance that the most rigorous standards have been applied. Yet after each accident (e.g. Fukushima 2011) the nuclear industry and governments updated the safety design standards. I understand the current version of the safety principles are from 2010. The nuclear industry and the regulators do not have a strong track record of predicting future accidents or potential threats and therefore, whilst accident analysis is important, it is weak in predicting future challenges. The EDF statement that *'Beyond design basis studies are performed for levels well beyond these levels and demonstrate the UK EPR design to be robust against beyond design basis hazards'* has to be regarded with some degree of scepticism.
- The SoS must also take into account the reliability of this design. The Taishan plant has been closed over 9 months and its only 3 years old. The EPR design has a fundamental design flaw that causes significant vibration within the reactor core which EDF have indicated is too difficult to fix in existing reactors and it is so complex that it is very difficult to build reliably. The SoS should take note that EDF will not build any more of this design in France and their nuclear regulator has asked for assurances the vibration issue will not appear in any future design submitted for approval. So, why then would the UK government want to have such an obsolete and unreliable design used for Sizewell C?

Value for Money

- All major projects will be subject to value for money considerations. The announcement today that Hinkley Point C will now cost in excess of £26bn (in 2015 pounds) and that decommissioning of 7 existing stations will also be in excess of £23bn (ref House of Commons report) must be taken into account when establishing the true VFM of this project. It is clear with rapid inflation, especially for major projects, that EDF must set realistic budgets and the

Government must undertake rigorous analysis to determine if the proposal at Sizewell C is financially viable.

- There are further concerns that the proposed funding mechanism (RAB) will not only increase fuel bills for householders already under severe financial pressure but also leave the liability for cost over-runs with the UK taxpayer. Therefore, this project should be rejected and an alternative solution found.

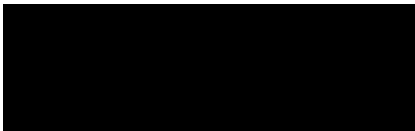
Conclusion:

In conclusion the applicant's proposal for Sizewell C still raises significant concerns. Whilst there is wide acceptance that urgent action is required to tackle climate change and support the governments objectives of achieving net zero, it is clear that the proposal for Sizewell C does not achieve any of these objectives.

Therefore the SoS should reject this application and look for more innovative, creative and reliable ways to invest in the UK energy supply.

I wish to fully support to following submissions: the combined response from Theberton & Eastbridge / Middleton cum Fordley Parish Councils / Stop Sizewell C / Minsmere Levels Stakeholder Group and B1122 Action Group, Nick Scarr, Suffolk Coastal Friends of the Earth, Together Against Sizewell C and Fran Crowe.

Yours Faithfully



Bill Parker B.E.M.

(Awarded for outstanding service in the management of the Norfolk and Suffolk coast)

Appendix 1:

Letter to BEIS February 2022 summarising outstanding coastal issues and Sizewell C.

Dear BEIS

Now that we have almost reached the conclusion of the Planning Inspectorate DCO process for Sizewell C, I wish to sum up my main concerns and observations that are unresolved with regard to coastal geomorphology and coast defence issues. I too share deep worries 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 3,500+ documents and the 15 Issue Specific Hearings in the DCO process, 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 outstanding issues regarding coastal geomorphology and defence. Those of most concern, are outlined below with the Planning Inspectorate document library references for more detail on the submitted papers. These issues 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** is intended 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 2090 and then 50 years for decommissioning which is only an estimate as it has never been done before. This

ignores the need for 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, there is a requirement from the EA / ONR Principles of Flood and Coastal Erosion Risk Management Policy [REP5-191] for the site to be defended for 160 years after construction is complete is however 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 agreed with the 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 identified in 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 offshore banks.** The shifting position of Cefas as to the importance in protecting the Sizewell shoreline is extraordinary. Having previously described them 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 [REP10-345].
- 6) **The impact of Sizewell B** – Outlined in [REP10-638] 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 or dismissed.
- 7) **Hard coast defence feature (HCDF) and soft coast defence feature (SCDF).** The design of these features has continued to change throughout the DCO process which makes its difficult to critique. The DCO Inspectors observed 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 up to 160 years of climate change on this feature. It is noted that for Hinkley point C all the sea defence features were detailed at the start of the DCO process. On a more challenging and vulnerable coastline such as at Sizewell this failure to have a clear and well thought through plan is extremely concerning. For more information on the critique of the coast defence proposals see Bill Parker submission [REP10-228].

- 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 good 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 appear to 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. Their 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 selected and 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 the currently 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) **Coast Processes Management Monitoring Plan (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. 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 extensive 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 BEIS 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.

Response to Secretary of State 's Request for Information, 25th April 2022 from Bill Parker IP20026713

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
5/2/22