

Alison Downes, IP number 20026485

Dear Secretary of State,

Thank you for the opportunity to comment on new information made available in the course of the questions issued to the Applicant in this period between the submission of the Planning Inspectorate's recommendation and your decision. I wish to make the following observations about roads and water supply, plus some further observations about the process.

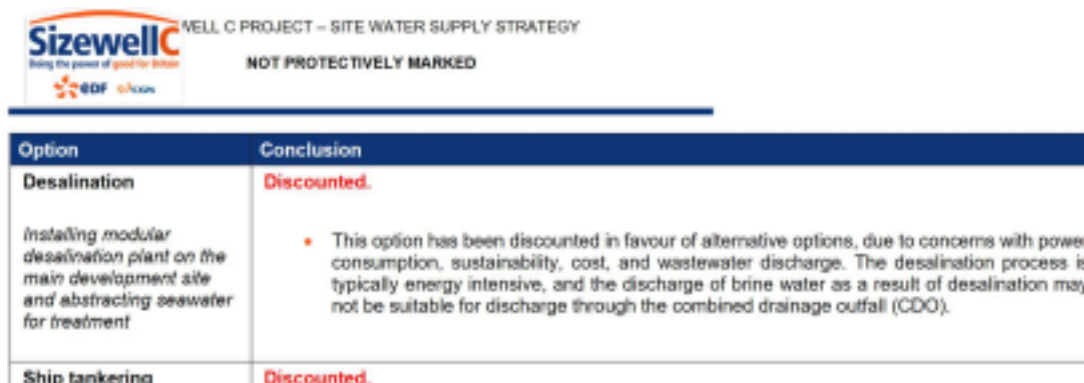
### 1. Roads

I am disgusted by the response of the Applicant to your question about delivery of roads ahead of work commencing on the main site. My understanding is that the Applicant is obliged to consider all alternatives, but clearly did not assess this possibility. If mitigation is “the action of reducing the severity, seriousness, or painfulness of something”, then there is no question that mitigating infrastructure *should* be delivered in advance.

As an Interested Party who has followed the planning process closely, I can state that the Applicant has never adequately justified its choice of route for the Sizewell Link Road. I can also state that the apparent reasons - as a source of material for the main site - were never communicated to residents and communities during consultation, and were only revealed by accident (or that is how it appeared), when the route was suddenly described as a “haul road” during the Examination.

### 2. Desalination

It must be remembered that the Applicant rejected desalination in January 2021.



Option	Conclusion
Desalination <i>installing modular desalination plant on the main development site and abstracting seawater for treatment</i>	<b>Discounted.</b> <ul style="list-style-type: none"><li>This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).</li></ul>
Ship tankering	<b>Discounted.</b>

A little over a year later, desalination is not only being proposed for the construction of the project, but considered as a long term provider for its operation. I fail to see how the objections raised by the Applicant above have suddenly become acceptable?

### 3. Overall cost of the project:

It's been over two years since the estimated cost of the project was published as £20billion. Since then the Applicant has made 22 changes to its planning application, including a new jetty and a water desalination plant. Given that estimates of materials increased 20% during the course of the Examination, and - according to BEIS statistics - significant increases in the cost of building materials and fuel as well as inflation, it would be very surprising if that £20 billion had not increased, so I urge you to publish a current cost estimate.

**4. Timing of a Decision:** Given the volume of material contained within the proposals and the number of issues that would appear to be unresolved, I would consider it extraordinary if you did not need to take more time to make a decision. Indeed other applications of a similar scale - or even a lesser scale - have been pushed back multiple times.

But it is also true that the recent delay to the decision exposes the hypocrisy of the frankly scolding tones of your official's reply to the Planning Inspectorate's request earlier this year for an additional six weeks to submit their recommendation (citing the need for developer confidence in planning timelines). It is worthy of notice that the overwhelming majority of delays in this project can be laid at the door of the Applicant. The years of the Applicant's obfuscation and delay - including after the DCO application was submitted - should be considered in light of the Applicant's exhortation for urgency. The expression "your failure to plan is not my emergency" springs to mind.

Is it right that communities should suffer as a result of poor planning, eg the Applicant's refusal to consider delivering road mitigation ahead of work on the main site, when the reality is it failed to assess this possibility, despite taking nearly ten years to get to this point? No.

**5. Comments about the project:**

Despite correspondence with BEIS I remain deeply unhappy about the comments being made about Sizewell C by yourself and the Prime Minister. We are told that Sizewell C is subject to planning consent, licences and permits and value for money, but you do not make any qualifying comment when you express support for Sizewell C, leaving the listener to conclude that your support is unconditional. The guidance your department is supposed to follow states "*Ministers will...avoid expressing views on the merits of a proposed scheme which is the subject of an application, in a way that might be, or might be perceived to be, prejudicial to the eventual determination of such an application.*" There is nothing in this guidance defining the "**merits of a proposed scheme**" as being limited to its planning application. You have made a number of statements about the "merits" of Sizewell C, such as calling it a "fantastic economic opportunity" in media interviews in January

Your department is in ongoing negotiations with EDF over Sizewell C. I fail to understand how expressing such overt support for Sizewell C is a good negotiating position and recall Minister Hands telling the Public Bill Committee "*I know from long experience of Government that often the best way of securing taxpayers' money in a negotiation is not to reveal too much about what approach the Government might be taking*"

I am also concerned at the signal it sends for the sudden change of Minister, at a rather late stage in the process, from Minister Rowley to Minister Scully, and remain deeply sceptical that either would turn down a planning application that their boss, and their boss's boss, so clearly support.

None of the replies by the Applicant have changed my view that this project is too slow, expensive and damaging and should not be consented. Last year you said the onus was on the developer to take the community with them. EDF has not.

Alison Downes  
23 May 2022