

EN010012 – The Sizewell C Project

Response to Secretary of State's Request for Information, 25th April 2022

Interested Party ref: 20026566

23 May 2022

To: sizewellc@planninginspectorate.gov.uk

Dear Sirs

I have followed and participated in the Examination process in a personal capacity as an interested and concerned local resident.

I am not opposed to nuclear energy in principle. My objection to Sizewell C is not because it's in my backyard. I am opposed because the Sizewell site is inherently and demonstrably unsuitable for a new twin reactor EPR nuclear power station and its associated waste.

I assume that this submission, following the Secretary of State's invitation to comment on recent information provided by the Applicants, will be my last before a decision on the DCO application is announced. The fact that the date for that announcement has been delayed (again) comes as no great surprise, given the Applicants' repeated failure to perform efficiently and credibly, and given the gaps and unresolved elements in their proposals, which have characterised the entire process.

Notwithstanding the Secretary of State's invitation to respond, all his recent comments make it clear that his mind is already made up. The Inspectorate must not allow his partial approach to the DCO process, to influence its recommendation. It should be abundantly clear to the Examination team that the Applicants have failed to make the case for their fundamentally flawed and potentially catastrophic proposals. Their incompetent performance has demonstrated repeatedly that they are unfit to be entrusted with the delivery of the project.

It should also be clear to the Examination team, that the Applicants have failed to meet the challenge set them by the SoS when he took up his post, that they should bring the local community with them. Local opposition from residents and from the local business community remains at a high level. If anything it has hardened. The failure of the Applicants to engage honestly and transparently with the local

community, their errors and omissions, their refusal to listen to valid objections and to make adjustments taking those objections into account, all point to one conclusion: that the Sizewell C project should be abandoned before it does more damage.

On the specific issues raised in the SoS's questions and the Applicants' answers, I have the following observations:

1 Water Supply and desalination

If there is one issue which demonstrates EDF's failure to produce a convincing case for their proposals, this is it. After 11 years and as the Examination was drawing to a close, the Applicants were forced to confront the fact that they had neglected to secure the most basic level of service provision for their project.

Barely believably, given the immensity of their proposals, they had no supply of potable water for a new twin reactor power station. A Nationally Significant Infrastructure Project, the subject of a major public planning examination in progress at the time, consuming vast amounts of public money, and yet the Applicants had no water supply - even to build the thing. As a recently retired architect I know that an error of that type would have been enough to have me kicked off a job for a single private house.

In their original submission the Applicants ruled out the use of desalination on the grounds that it would be inappropriate.

They were forced to concede that the water company could not meet their requirements for a mains supply.

Northumbrian Water appear to accept that a mains supply may be possible at a later stage but, of this, there can be no guarantee. Even if capacity is found, supplying the site would still be subject to a separate regulatory regime over which no guarantees can be offered.

Given the increasing demands for water caused by climate change, population growth and changing patterns of behaviour, the Applicants have to concede that desalination may become the only long term solution.

So, at the eleventh hour, the Applicants performed a humiliating 180 degree swivel and told us that desalination is, after all, the answer. The solution that even as the Examination commenced, they argued was inappropriate had, in the space of a few weeks, become the only answer.

The Sizewell site is already too small. Now the Applicants need to find space for a large piece of extra plant and additional intrusive, potentially damaging, connections to and from the delicate marine environment - intake and saline discharge.

The Applicants cannot tell us precisely where the plant will be located. They cannot tell us with any degree of certainty whether the requirement will be temporary or permanent, although we know that if desalination is still the only answer for the operational phase, the temporary plant for the construction phase will need to be replaced with a permanent facility.

The Applicants' Biodiversity Net Gain assessment already admits to devastating levels of damage. The addition of desalination, either temporary or permanent, above ground or underground, threatens further major environmental degradation - additional permanent losses of biodiversity in one of the most important wildlife sites in the UK.

2 Traffic and transport

Once again EDF has demonstrated that it has failed to listen to the local community and their representatives.

The Sizewell Link Road route has been selected in spite of opposition from our local highway authority (Suffolk County Council) and local parish councils whose preference, in the event that approval is granted, was for Route W.

The SLR offers no legacy benefits and major practical and environmental disbenefits. It has only been selected, again at the last minute, to serve the Applicants' own interests. It demonstrates a cavalier disregard for the rigorous process of assessment and consultation which should have been followed and which would normally be insisted upon by an attentive planning authority. Consideration for what would be best for those living in the area has given way to their own disjointed and inadequate stop-start project planning.

However quickly the Secretary of State wants the project to proceed, the democratic planning process will have been subverted to the long term disadvantage of all those living in the area, if the wrong options for traffic and transport are selected.

If the project is to go ahead, the Applicants should be required to go back to the drawing board over this issue.

3 Coastal considerations

I will not engage with the detail of the Applicants' proposals because I am not qualified to do so. On this subject I will simply address the Inspectorate from the heart.

I've lived in this place for 67 years. We know that we are living in a time of climate crisis, a crisis which threatens the capacity of the planet to continue to support the human species. We know that sea levels are rising. We know that the regularity of extreme weather events is increasing and that those events will become more severe as the planet warms. We know from history, right here in this very location, that extreme weather events occasionally coincide with high spring tides. We know that coastal erosion will continue to the north (yes - the Minsmere site will eventually be inundated) and to the south (it has been happening at Thorpeness even as the Examination process has been underway).

But we do not know how high global temperatures will rise in the future. The COP26 goal of limiting global heating to 1.5 degrees is already unattainable. 2 degrees is almost inevitable. Beyond that, positive feedback effects are highly likely to take over.

The Applicant has provided reams of technical information compiled by their paid experts. At best though, their assessments are simply educated guesses based on a series of assumptions and projections (covered by caveats acknowledging the uncertainty for periods of more than the next decade or two).

As you consider their application, please ask yourself this question: when COP26 was underway last November, how many people knew that Russia would invade Ukraine four months later, threatening global order, food security and the very real danger of an escalation towards world war - even nuclear war? We didn't know then and would have been laughed at for suggesting it. But that's where we are right now.

If the Sizewell C project is allowed to proceed, it will have to be defended for centuries. It will become a headland projecting beyond the coast to north and south. In time it will become an island. But it will still need to be defended, long after any power generation has ceased because of its toxic legacy of nuclear waste.

Throughout the planning process the Applicants have provided ample evidence of their unfitness to be entrusted with this project. But over and above their manifest incompetence, lies the fundamental point at issue:

To seek to address the climate crisis by building a new twin reactor nuclear power station on, of all places, the Suffolk coast would be folly ... reckless folly. The Secretary of State may have closed his mind to the dangers associated with a

decision to proceed. Future generations will not forgive him, or us for our complicity, if we allow Sizewell C to be built.

I respectfully implore the Examiners to reject the application for DCO consent.

Yours faithfully
Neil Poole RIBA

