

Sizewell C Response to the Secretary of State's letters following up issues from the National Inspectorate's Planning Inquiry

The following are my comments on matters which I do not see addressed in relation to either of the Secretary of State's letters of 18 and 31 March 2022.

Letter of 18 March 2022: 5.1. The EA is asked 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. 5.2. The Applicant should advise as to what, if any, effects the Sizewell B cessation of operation might have on the Coastal Processes Monitoring & Management Plan recharging mechanism for the SCDF.

Letter of 30 March 2022: 7. Soil Management Plan 7.1. The Secretary of State invites the Applicant to provide a final Outline Soil Management Plan that reflects the areas identified for further amendment by Natural England [REP7-140 and REP7-144]

I would like to comment that the applicant's plans in relation to soil and ground management and coastal defence are unclear and have every chance of being unsound.

Initially the approach in the original Application appeared to be that the marshy ground on which the twin reactor would have to be placed would be dug out to a depth of over 30 metres and the material replaced by more stable soil from near Eastbridge: that firmer material would be installed to a similar depth to provide the necessary ground stability for the Twin reactors.

In February 2022, long after the Examination closed, the Applicant sought planning permission for a different approach acknowledging that the land is of 'highly compressible and very weak organic soil'. It sought planning permission from East Suffolk Council for trials to test the admixture of the marshy ground base with a substance to render it into a stiff clay and then to add greater stability by metal anchors going 15-20 metres or more down into the Coraline Crag which is below sea level at the site of the proposed twin reactors. This approach has yet to be trialled and all that is known about it, is that it is a very tricky process and not always successful.

In addition, all this will be within 10m of the SSSI site of Sizewell Marshes, no distance when it comes to potential impacts on the hydrology and the land in the marshes which is of the same peaty layer composition. The Applicant acknowledges that SZC with its Hard Core Defence Front will become a peninsula jutting out into the sea because the coastline is receding. The northern flank of the proposed area of stabilisation on which the twin reactors will stand, will in time also be more vulnerable to the impact of the receding coastline and it appears that may not be addressed by the Hard Core Defence Front which is proposed to deal with the aspect of the Twin Reactor site facing the sea.

All this shows, once again, that the plans for Sizewell C have not been thought through as there is no guarantee there will be a stable base on which the twin reactor can stand for the 150 years or more of its life. SZC is quite unlike Sizewell A and B which were built on Coraline Crag above sea level and so have a more stable base and will be little affected by the rising sea-level: in contrast, SZC will need a stable ground base, for which there is not yet an established method to achieve that fundamental prerequisite for any massive structure, and will rely too on a massive defensive Hard Core Defence Front as it will be at sea level, the plans for which still seem to be not fully formulated, and it is uncertain how it will perform as the coastline recedes.

Alison Andrews IP ref 20026470 23 May 2022