

From: [REDACTED]
To: [SizewellC](#)
Subject: Sizewell C DCO response to BEIS request to further information
Date: 23 May 2022 22:36:23

Dear Gareth Leigh,
IP No 20026173

While I appreciate the opportunity to respond to recent information submitted by the Applicant I feel extremely let down by the DCO planning process. Having to allow the Applicant so many attempts in order to try and tick the right boxes for the Sizewell C project, should make alarm bells ring in BEIS and with central Government regarding the Applicant's competency. In fact, I sent the email below dated 17th October 2021 to The Chancellor Rishi Sunak and SoS for BEIS Kwasi Kwarteng stating my concerns regarding EDF's flawed EPR design and a list of outstanding DCO issues. It is extremely disappointing that to date I have received no reply from either department regarding my email. However, it is extremely telling and worrying that all the issues I pointed out in my email of 17th October have not been resolved. Indeed, problems arising from many of the issues are now an even greater cause for concern i.e. the Taishan 1 China EPR reactor is still offline, Olkiluoto Finland was connected to the grid in March 2022 but has been plagued with issues and is still not able to operate at full capacity, I understand work on Flamanville France has ceased until this issues at Taishan, China are resolved and the cost estimate for Hinkley Point C has risen by £3 billion and a further year's delay.

Turning to the Sizewell C DCO issues, despite assurances by the Applicant at the end of the DCO planning process that the desalination plant would definitely not be required for the 60 year operation period and indeed would be detrimental to the environment, the Applicant is now proposing that a permanent desalination plant could be installed underground in the AONB near Sizewell Marshes SSSI and other designated sites. Yet, despite all of these issues, Kwasi Kwarteng, who is supposed to be making an impartial decision on the project, and is refusing to speak to locals because of this, goes to EDF and hands them a cheque for £100 million of U.K. taxpayers money, because the French Government owned company is broke and has no desire and presumably no confidence in its own project to get it to a final investment decision. I find the government's blind support for the Sizewell C project unbelievable and potentially dangerous to the public purse and the environment. We are in a situation where interested parties have a far better grasp of the Sizewell C project issues than the government and I fear local knowledge and opinion is still not being listened to.

In respect to the specific matters raised by BEIS:-

Potable Water.

The fact that the Applicant is now contradicting its previous statement that a desalination plant is too environmentally damaging, to stating a desalination plant can be used for construction and the 60 year period of operation, is quite frankly astounding. I feel the whole water supply debacle demonstrates that the Applicant has no grasp of the impacts of climate change. Even when consultation began over 10 years ago it was a well known fact that climate change would cause severe drought, so it begs the question why, when East Anglia is the driest region in the country, was an alternative site not considered. Both sites now proposed for the permanent desalination plant mean further encroachment into the AONB, so are therefore unacceptable. An underground plant close to Sizewell Marshes SSSI and other designated sites risks the contamination of ground water and siting on Sizewell A land means a car park on pillbox field which has been planted as mitigation for the unnecessary destruction of Coronation Wood. Potable water will also be needed for decommissioning yet the Applicant seems to make little reference to this. Planning permission must not be granted without full knowledge of the environmental impacts and

length of time a desalination plant is required for. The burden of the cost of the desalination plant will also no doubt be passed on to the UK bill and taxpayers and I am not aware that the Applicant has given any indication of what these costs will be.

Coastal Defences.

The fact that the UK government is considering allowing the Applicant to build a new nuclear power station knowing that it will require a programme of managed adaptation by future generations surely means the Sizewell site should not be considered a potentially suitable site. Despite over a decade of planning, the Applicant is still unclear on the design and siting of the Hard Coastal Defence Feature. The suggestion is that final plans for the HCDF will now be resolved after the SoS's decision between the Applicant and East Suffolk Council. This calls into question the Applicant's and Cefas' competence as they have been unable to produce an appropriate design to protect the site without further detrimental impacts on the Heritage Coast. What guarantee is there that this is achievable. As for the Soft Coastal Defence Feature, I think great weight should be given to the RSPB and Suffolk Wildlife Trust observations at para 1.16 in their joint response to BEIS where it states "It is our view currently the only known method for maintaining dynamic shingle features of high conservation value is non-intervention and the ability for the features to move as required in relation to coastal process.". After watching the issue specific hearings I have lost faith in Cefas and feel there needs to be more transparency between them and their relationship with the Applicant, being paid by the Applicant and also funded by the taxpayer. I believe there is a conflict of interest here and warrants government requesting that the Applicant funds an independent opinion of the HCDF and the SCDF as this is a very important matter, particularly as there is the possibility that spent fuel could remain on site indefinitely as there is currently no GDF.

The Applicant's flood risk assessment does not cover the full lifetime of the Sizewell C site and this is clearly evidenced in Together Against Sizewell C's submission at Rep8-285a.

New roads/rail.

It needs to be acknowledged by both the Applicant and government that this new infrastructure is in fact more environmental damage and should be avoided at all costs. There does not appear to have been put forward by the Applicant any alternatives that could avoid the considerable environmental damage that will be inflicted on the East Suffolk environment by the new infrastructure that is required in order to deliver the Sizewell C project. Indeed, the Applicant is intent on replicating the Hinkley point C design on the site rather than designing a reactor to fit the Sizewell C site which has many constraints, meaning it is not suitable for two EPR reactors. Not only has the Applicant ignored avoiding significant adverse impacts, they plan to start construction on the main development site the same time as the so called mitigation is being constructed. The reason stated by the Applicant as to why mitigation cannot be in place first is quite frankly laughable 'the urgent need for new nuclear'. The government has been supporting the new nuclear renaissance since 2006, but it has not generated any electricity. The electricity generation system is expected to be carbon free by 2035 and the only possible contribution to this from new nuclear is from Hinkley Point C (if it ever works) so the Applicant's Sizewell C project which at the earliest can only come on line by 2035 will in fact be a huge carbon debt.

The Applicant's responses to the Austrian Government.

Highlights the uncertainty around a geological disposal facility ever being available in the UK for the spent fuel generated by the Applicant's Sizewell C project. I feel it is an imperative that the Applicant proposes an alternative arrangement for the spent fuel generated by their Sizewell C proposals. Without a sound alternative for disposal of the spent fuel there is a great possibility it will remain on site indefinitely. So if an alternative is not put forward by the Applicant, I think before a decision is made on the Applicant's Sizewell C project, there should be community engagement and a public consultation in East Suffolk to decide if the community wishes to host the Applicant's spent fuel

indefinitely.

There are clearly still many unresolved issues with the Applicant's Sizewell C project and a sensible conclusion is planning permission must not be granted. Indeed, if the SoS grants permission for Sizewell C, they will be doing that in the knowledge that the project:-
Cannot demonstrate the site can be kept safe from flooding for its full lifetime.

Has no proven source of potable water.

Is EDF's unproven EPR technology, which is still currently offline in Taishan with little explanation as to why. Also has issues in Olkiluoto and is not yet fully connected to the grid. Is delayed at Hinkley Point C where EDF recently advised of another year of construction and with an extra cost of three billion pounds.

Has no funds.

Will not have all its permits and licenses.

Will permanently damage Sizewell Marshes SSSI and impact many other national and international designated sites.

Will burden future generations who have derived no benefit from the project with the responsibility of protecting the site from the impacts of climate change.

Will kill millions of fish annually and other marine biota over its sixty year operational period.

Will be ignoring the concerns of the RSPB and Suffolk Wildlife Trust.

Will add to consumer bills (when people are already struggling) and place risks on to taxpayers for cost overruns.

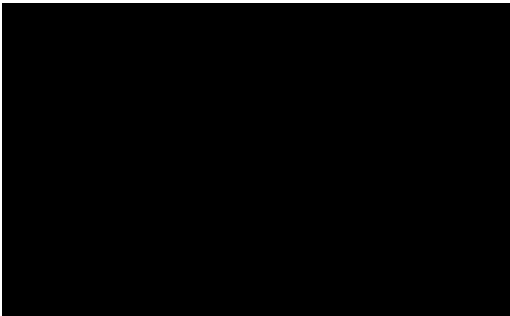
Will not help with energy security as is reliant on foreign sourced uranium, foreign state owned developers, foreign reactor design, potentially foreign investment.

Will divert funds away from quicker to deploy alternatives such as renewables which would help with energy security and in reaching carbon targets sooner.

Will potentially make the Sizewell C site a de facto geological disposal facility without any community engagement or public consultation.

Yours faithfully

Jennifer Wilson



Begin forwarded message:



Date: 17 October 2021 at 23:13:14 BST

To: enquiries@beis.gov.uk

Subject: **FAO Rt Hon Kwasi Kwarteng Secretary of State BEIS**

Dear Secretary of State,

Please find below a copy of my email requesting the Chancellor to confirm he will not be investing UK tax payers' funds into EDF's environmentally damaging proposals to build Sizewell C.

Yours faithfully

Jennifer Wilson

Sent from my iPad

Begin forwarded message:

From: Jen Wilson [REDACTED]

Date: 17 October 2021 at 22:51:52 BST

To: public.enquiries@hmtreasury.gov.uk

Subject: **FAO Rt Hon Rishi Sunak, Chancellor of the Exchequer, HM Treasury**

Dear Chancellor,

[UK government's investment in EDFs proposed Sizewell C nuclear reactors](#)

I first refer to my below submission to the Planning Inspectorate [AS-026] 16th November 2020 in respect of the Sizewell C DCO examination:-

“You are no doubt aware that there has been a big splash in the media that Boris Johnson is about to give the “Green Light” for Sizewell C. I am concerned that this, coupled with heavy lobbying from the nuclear industry, and misleading statements and adverts from EDF will undermine the DCO planning process, as EDF Sizewell C is being presented as a done deal. This comes at a time when residents are struggling during Covid restrictions to negotiate their way around the 56,000 pages of DCO documents and the newly announced EDF 5th consultation putting even more strain and mental anxiety on residents.

However my biggest concern is despite the French public auditors, Cours des Comptes, saying “The newbuild plant (The Flamanville EPR same as proposed for Sizewell C) is a “failure” with “huge” financial consequences and implications for the French nuclear industry and beyond” as reported in Montel see full report

here [REDACTED] Boris Johnson, Rishi Sunak and Alok Sharma are reported to be coming to an arrangement with 83% French government owned EDF, which will commit the UK electricity consumer and taxpayer to pay for the construction of Sizewell C and pay again for the expensive electricity it may eventually produce. So effectively we the taxpayer will pay EDF to degrade Suffolk Coast and Heaths Area of Outstanding Natural Beauty and EDF will take profits back to France. Meaning the UK tax/bill payer is subsidising France's ailing nuclear industry.

I would like assurance from Pins that they will take into account that EDF's European EPR reactor is a failed technology and that EDF are in debt to the tune of 44 billion Euros and need billions of Euros to meet future liabilities for refurbishment costs and decommissioning. EDF have failed since Hinkley Point C, to sell their European EPR reactor to any other country in the world. There must be somebody in UK government with a conscience, common sense and the clout to stop the EDF Sizewell C madness."

EDFs DCO application closed on 14th October 2020 and we are again faced with media speculation that UK government plans are to force UK tax and bill payers to pay upfront using a RAB funding model to fund the build and take the risk of EDFs proposed Sizewell C. Ridiculously, this has been presented by the media as the government's solution to the current gas crisis and the need to achieve Net Zero. Since my November 2020 submission to PINS, both EPR projects Olkiluoto, Finland and Flamanville France with construction start dates of 2005 and 2007, are still not operational and to add to EDFs EPR woes, one of their Taishan reactors was closed down in July 2021 after only 3 years of operation due to fuel failure, it is still off line with little information available from the Chinese government, but obviously could have implications for Hinkley Point C. One would hope that this would make alarm bells ring at BEIS, particularly with the Secretary of State Kwasi Kwarteng as he will be responsible for the Sizewell C decision and at the ONR.

In my opinion, the DCO process for Sizewell C has exposed the incompetence of EDF and the fact that the site is not suitable for the proposed development. The examination has closed yet EDF:-

- still haven't evidenced that the Sizewell C site can be protected for its full lifetime, choosing to model up to the date of 2140 as opposed to the date of late 2190's which it would be following the advice of ONR/EA in their Flood

risk management report Appendix A page 10: full lifetime is “generally understood to be 160 years” <https://www.onr.org.uk/documents/2017/principles-for-flood-and-coastal-erosion-risk-management.pdf> Throughout the examination EDFs hard coastal sea defence position and parameters have gone up and down in and out and shown little detail. Relying on a programme of managed adaptation by future generations to keep the site safe, which I think is immoral.

- still haven't shown a sustainable transport route is deliverable, in fact have inflicted more environmental damage on the sites AONB setting in order to attempt to take HGV's off the road.
- still haven't a source of mains water for the 2.2 million litres required a day for the 60 year operation of Sizewell C despite locals informing EDF over 10 years ago during consultations that mains water was a cause of concern. Towards the end of the consultation, proposing a desalination plant in the Suffolk AONB for the up to 4 million litres a day of mains water required for construction which will also require up to 9 months of water being tankered in by HGV until the desalination plant is up and running, EDF are unable state source for tankered water. East Anglia is one of the driest counties in the UK, a competent developer would have factored water consumption into their site selection.
- Despite many changes during the DCO process EDF still choose not to give an update to the cost of the Sizewell C project even though they demand UK tax/bill payers pick up the tab.
- still choose to build on Sizewell Marshes SSSI impacting RSPB Minsmere and having a detrimental effect on many protected species
- still in denial about the hundreds of millions of fish that will be killed each year in their chosen cooling system, see report [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010012/EN010012-005261-DL2%20-%20TASC%20\(g\)%20Ecological%20Impacts.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010012/EN010012-005261-DL2%20-%20TASC%20(g)%20Ecological%20Impacts.pdf)

I could go on but would suggest those in government who are involved in the decision making of the Sizewell C project thoroughly exam Interested Party's comments and reports on the PINS website. The government's target is for the electricity grid to be carbon free by 2035, even if Sizewell C was

approved it is unlikely that with its 10/12 year construction period it could make any meaningful contribution to this aim.

The UK Labour nuclear renaissance started in 2006, it has produced no electricity and has detracted time and money from solutions that work and are quicker and easier to deploy, there are now many affordable energy models that do not include EDF Sizewell C- see Energy Systems Catapult Report for Good Energy as an example:

I would appreciate, Rishi Sunak, your confirmation that the Treasury has no intention of risking taxpayers' funds on the ill-conceived EDF Sizewell C project.

Yours faithfully
Jennifer Wilson

