

Sizewell C and National Planning Policy EN6 under revision.

I have been involved with the revised EN6 National planning policy for Nuclear since government announced a review as the current policy is out of time as no deployment is possible by 2025 .

As a member of the Government BEIS/NGO forum, details and minutes of which can be found at <https://www.gov.uk/government/groups/non-governmental-organisation-forum> I have taken an active part in discussions on the revised policy. In addition BEIS agreed that the new criteria on EN6 should take account of IAEA siting standards which have been understood as [https://www-pub.iaea.org/MTCD/Publications/PDF/P1565\\_web.pdf](https://www-pub.iaea.org/MTCD/Publications/PDF/P1565_web.pdf)

These include additional criteria for siting particularly availability of town water and constructability. Town water availability in East Anglia is already critical, the driest region in the UK. Previous 1993 Sizewell consultations considered desalination. Yet despite many requests no definitive information has been disclosed by EDF. Clearly water consumption for workers, construction and damping down will be a major requirement. Operational requirements are also unknown. I note from your notes of a meeting with EDF EN010012 page 2 that town water is considered non-statutory.

Additionally no detail has been supplied regarding the amount of construction materials. 31 hectares of borrow pits are proposed within the redline boundary and the AONB. However the Suffolk County Council as Minerals and Waste Authority do not have any information on volumes of the extracted aggregates material and its suitability for Nuclear construction. In view of the amounts of material required (maybe around 5 Million cubic metres of sand /gravel) this lack of data cannot inform the Highway Authority of alternative transport needs or sources of materials, should the borrow pit NOT have sufficient material or inadequate capacity. If the pits are not extracted there will not be sufficient capacity for spoil disposal and consequently a major knock on effect to transport and landfill costs.

However none of these revisions to update EN6 have been carried forward and no public consultation or parliamentary debate has taken place on the revised EN6 2025-35. Our MP has confirmed she had seen a draft of a revised EN6 last year from then Minister Richard Harrington, but none of the extra work to inform a new EN6 has taken place and no regulators (Particularly the EA and the Office of Nuclear regulation) have been involved. Substantial regulatory involvement across all sites will be required to thoroughly inform the new EN6.

As we are approaching a possible application from EDF for a Sizewell C it appears appropriate to ask PINS what siting criteria and policy are they likely to be assessing Sizewell C against. If it is to be assessed against the original EN6 there will have to be assessments made of need and alternatives neither of which appear to be possible without an Energy Review which has been promised since Summer 2019. BEIS also have promised that criteria will be updated as regards climate change to the latest predictions which I assume are UKcp18 ?.

I note from your meeting records with EDF that you and the DEFRA regulators may have concerns about the project but am acutely conscious that need may not be addressed as a planning issue.

Please can you confirm how these other issues will be addressed. Will PINS be receptive to listen to additional issues like these as part of its Pre-Examination process and or at the preliminary meeting?

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TASC member BEIS/NGO forum

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