Sizewell C Non material change application

Personal response from Michael Taylor

18th June 2026

Background . This reactor site is adjacent to operating Sizewell B now owned by EDF France and close to Sizewell A owned by UK NDA. Sizewell B was constructed following the Layfield Inquiry and conditions and undertakings were laid down many of which should have been upheld as part of Sizewell C Planning. Sizewell C was given consent by a former Secretary of State despite there being many permits outstanding and there was a reliance on Rochdale Envelope because detailed plans were not available. A guaranteed water supply does not appear to be available. A consultation into NPS Policy EN6 had been started in 2018 and then appears to have been abandoned despite particularly SZC and other sites being in higher risk flood zones, only included for essential need for deployment by 2025. Those sites are still in EN6. BEIS officers coincidentally had declared they were going to build Sizewell C.

This is the first opportunity to raise concerns about this project with the Secretary of State and a question must be why the project has been allowed to get to this stage and spend millions on infrastructure roads and rail which was not deemed essential for construction of Sizewell B .

The Non Material Change Application

Planning Inspectorate website The Sizewell C Project - Project information Click documents.

Guidance Planning Act 2008: changes to Development Consent Orders - GOV.UK.

The summary of the main elements of the application should describe the changes sought to the project in a clear, accessible, and non-technical language. Documents, plans and maps that are made available for inspection should also provide clarity on the change being sought. If the change is technical in nature, applicants should consider providing a non-technical summary of any documents to be made available for inspection.

This next statement refers to NON material changes but is using a Rochdale envelope an acceptable plan when others are claiming Sizewell C is a **REPLICA** OF Hinkley C implying that drawings should be available?

28. Regulation 4 sets out the details of what must be included in an application made to the Secretary of State. This includes any documents or plans considered necessary to support the application. Despite a multitude of documents there appear to be few if any actual plans

- **Inadequate information. Nearly 4 years after consent by the SoS.**

This NMC application is made concurrent with a threat to limit Judicial Review. TASC Previous JR were due to inadequate information on essential aspects of this project. Although these cases were lost some of the major aspects of the project are missing

including a fully understood water supply for construction and operation. The change of design of curtain wall to plastic allied to apparent ignoring of conditions and undertakings laid down at the Layfield Inquiry related to planning lines on the easternmost boundary (now known as green and blue planning lines) continue to cause concern in the absence of a full plan for the development site. The ONR have been asked to respond to some questions on Changes 1 and 3. Email 2nd June 2026

- In addition the Governance of SZC Community forum rules have excluded the ability of the public and NGOs to ask direct questions of the developer in open forum. Recently the Lord Vallance has been requested to investigate why this is.

This application was posted after release of the NAO report into Sizewell C risk, that report confirms the current status of design drawings for SZC claimed as an above ground replica of Hinkley Point C . 📣 New NAO report on Sizewell C

- **Where are the detailed construction drawings essential to prove all facilities and services fit on the Main Development site ?? During consultation and planning inquiry there was no clarity and some misinformation regarding the size of actual construction site required and incorrect claims that SZC would be a replica of HPC when the foundation and size of the overall available construction site is clearly different. These comments are Filed on PINS SZC website as document by Mike Taylor.**

EDF in their response to the Public Accounts committee continue to claim SZC is a replica of Hinkley C Written evidence - SZC0010

East Suffolk council. Background to Change 1 and 2.

The council website planning portal continues to host DRR requirements for the site on ACA/LEEIE related to noise and vibration yet exclude the proposed development.

Reference. DC/26/1974/DRR28

A Response from ESC *includes "The Marine Tunnelling Segment Storage Yard which was included in the details submitted for approval under application DC/25/4267/DRR42 does not form part of SZC's non-material change application as it falls within the scope of Construction Parameter Zone C14 as approved under the DCO, as the explanation of this parameter zone in Table 4.4 of the Construction Method Statement that was certified under the DCO (REP10-025-Book-10.3-Construction-Method-Statement.pdf) includes 'laydown/stockpile areas'. Therefore, SZC already has consent under the DCO for the Marine Tunnelling Segment Storage Yard on this part of the Ancillary Construction Area."*

Clearly It does not have consent for the proposed very Large building and yard replacing a caravan park.

For Some of the planning history leading up to change 1 refer to **DC/25/4267/DRR42** in the search box. Simple Search This "plan" originally dated 3rd November 2025 was withdrawn in December 2025. No explanation is given. No further explanation of potential changes by SZC Co appears to have been given at any community forums.

Mike Taylor and Joan Girling made comments on 4267, but because plans under the DRR process are not advertised, there are no other public comments but I did ask Leiston Town Council clerk for the Leiston cum Sizewell Town Council to respond on behalf of many residents who would have been affected particularly by train noise, amenity and noise from the operation. No response was made.The basis of those plans was a building **340 metres long by 65 metres wide (no elevation confirmed)** adjacent to the National Landscape AONB, sited on the so called LEEIE, otherwise known as ACA. It simply stretches the bounds of credibility for a caravan park to be similar to an enormous building with a span roof as regards its potential impacts. Also included was use of land for storing the cooling water concrete tubes which are prefabricated off site and delivered by train? and the potential storing of aggregates.

Steelwork is conventionally supplied as sheets of mesh and delivered by rail, size to suit the rail loading gauge, similar, presumably, to that delivered to Sizewell B construction. This is a 24/7 operation and the mesh must be to nuclear standards and formed as required. Sometimes it has to be kept dry.

- Is this temporary until the site is up to base level when further facilities will be required on site??
- Is it expected to be under ONR control and site licence conditions ? ie has this site got to be included in the Nuclear site licence and operated under strict security conditions. Question already asked of ONR 2nd June 2026 copied to PINS.

At Hinkley this operation is carried out close to the construction site (within the Site licenced area ?) and can involve the use of the massive crane Big Carl . **Clearly sufficient space must be on the site to allow construction. There does not appear to be sufficient space for the steel bar fabrication building even on the SZC Construction site, never mind the main development site.** A copy of the HPC press release is available Attached to this submission . The Hinkley site declared in EN6 is 203 ha and the useable construction site is around 53 ha. Clearly HPC site has more land available for construction, even so building two reactors together has, it is understood, recently caused some Health and Safety issues related to craning of large components. The declared Sizewell C site in EN6 is 117ha including a highly constrained declared 31 ha site as shown in the original British Energy studies into SZC, now presumed larger by bridging the Leiston river and replacing the lost SSSI.

POLICY EN6. Annexe Volume2

C.8.89 The size of the site and the potential impact this could have on the AONB remained of concern in some responses. To reduce the likelihood of further land being needed, and

increase the usability of their site, nominators were encouraged to ensure that the area nominated included within it all ***likely actual site*** *plans and* ***all reasonable variations to those plans.*** *It is therefore possible that the nominated area is in fact larger than the actual site plan that will be put forward, in due course, for development consent.* ***Nominators have indicated that in their view the size of site required for the operation of a permanent site of a single nuclear power unit allowing for operation, maintenance, storage of spent fuel and intermediate level waste would be between 30 to 50 hectares.*** *The Office for Nuclear Regulation concur with this estimate. In addition, considerations of the space needed to provide for security defence-in-depth show that there should be enough land available at this site.*

- Where are the proper Main site plans in this application for Non Material Changes ? An example of the site plan was shown in EN010012-001801-SZC_Bk6_ES_V2_Ch2_Description_of_Permanent_Development_Fig2.1_2.13.pdf
- But those drawings are marked NOT TO SCALE

Change 1

- Claim made that steel bar would be prefabricated off site ie distant and that less HGVs are now needed. But extra HGVs and maybe even AIL are needed on Lovers Lane to the main site . Size of formwork is according to design requirements and may be exceptionally large ? At what point can the formwork be made on site ? OR is there insufficient space on site per se.?
- . The Frank Brazil building at Canvey Island studied for noise appears to be 3 times smaller than that declared for SZC and therefore could be flawed. Lighting of operational building laydown area. Close to the National landscape /AONB. Residential impact noise and dust and fumes. Traffic increase. Flood risk from large building roof and surrounds.

Licenced site ONR security Question asked of ONR 2nd June 2026?

Hinkley site info indicates that Prefabrication is ON site (Route to Unit 2 on file).

Conclusion . We believe there is Insufficient space on SZC main development site versus HPC. Material change in conjunction with change 3 or scrap plans for two reactors?

Change 2

8 sidings on Main Green Rail site Only 3 on LEEIE , Residential impact 24/7 from noise of rail operation. Use of railway and crossing alarms close to the National Landscape /AONB. Dust problem. Substantial residential and traffic impacts from use of the rail line to LEEIE. Not clear how many trains per day and for how long. Additional load on Valley Road rail bridge.

Conclusion Substantial risk from a major construction operation off site close to residential properties and existing industry. Major material change

Change 3

Question asked of ONR email 2nd June 2026

Major question related to size of site to construct two reactors on very constrained site subject to long standing planning constraints and immediately adjacent to Sizewell B operational power station.

Intermediate level waste store do they mean ILW or Interim dry fuel store (DFS) as there could be major implications for siting a DFS at this location due to elevation and foundations and bulk of the building and security . The storage of the high burn up fuel/ MOX specified by SZC Co is not proven hence the size and scale of building is not proven. The dry fuel store has to be built on seismic qualified foundations capable of taking the weight of many dry casks and be accessible by a multi-wheeled flask transporter. The DFS plans for Sizewell B should still be on ESC website. The SZB DFS building is at least 10 metres AOD on Sizewell A land. Sizewell B DFS is roughly half the size of HPCs DFS proposed 229 metres by 73metres DFS.

- Are all site changes on a drawing somewhere for use as a master including the underpass, plastic curtain wall and final site lines particularly those on the seaward side affected by Layfield constraints planning lines.?

Why no drawings of all buildings on a site which is declared to be a replica above ground of HPC.

Extract from NAO report

" This is because SZC could benefit from HPC having already completed much of the work. The Company told us that, at the time SZC was approved, HPC had completed over 99% of detailed (execution) design for its civil works and 85% of detailed design for its mechanical work. By contrast, in 2016, when EDF reached FID on HPC, EDF had completed the outline design but only about 10% of the detailed design work necessary to complete the project. Designs in Finland and France were similarly immature when their respective sponsors made investment decisions.

While Hinkley Point and Sizewell require bespoke groundworks, the Company told us that about 85% of the above-ground design from HPC could be directly replicated for SZC, so it could use those detailed designs."

So Why are detailed designs not available now 4 years after DCO approval ?

Change 4

A consultation on RoW essential each parish must be consulted. Reference SCC Definitive ROW

Definitive Map and Statement of public rights of way - Suffolk County Council Numbers issue and lack of detail evident .

CONCLUSION

To Assist matters to CONCLUDE and give full understanding of Changes 1-3 a full material breakdown for Construction of Sizewell C would appear to be possible now based on evidence to the NAO and in light of advanced construction of Hinkley C reactor 1. This appears essential to gain understanding of the Material changes related to lack of space for Change 1 building not being on the main construction site and also relate to an essential assessment of the whole site including all previous planning constraints.

Also evidence of final site clearance including any off site materials and landscaping is essential.

Yours sincerely

Michael Taylor

[redacted]

Under embargo until 00:01 on Monday 1 June 2020

Hinkley Point C nuclear power project achieves latest major milestone on schedule

- **Completion of second 49,000 tonne reactor base helped by productivity gains from replication strategy**
- **Sets new UK record for a single, continuous pour**
- **New Coronavirus safety measures have enabled work to continue**
- **New pictures and video shows progress on site as all project goals continue to be met**
- **Hinkley Point C has beaten targets for delivering benefits to South-West region**

Workers building the Hinkley Point C nuclear power station have completed the 49,000-tonne base for the station's second reactor on schedule - meeting a target date set more than four years ago.

The final concrete pour of 8,991m^3 set a new UK record for a single, continuous pour. It surpasses by 37m^3 the previous record during construction of the base for Hinkley Point C's first unit in June 2019.

The power station in Somerset will produce reliable low carbon electricity and – alongside renewable power - will help Britain move to a future without polluting fossil fuels.

This major milestone in nuclear construction was completed by teams who have had to adapt to new Coronavirus working conditions. Their achievement, known as "J-zero", comes less than a year after the completion of the first reactor's base in June 2019. It is the second major goal in 2020 and the successful completion of both follows the achievement of all the project goals in 2019. The date for achieving J-zero on Unit 2 was set more than four years, before the final investment decision was taken.

Completion of the second reactor base also benefited from experience gained on the first identical unit – which has led to significant increases in productivity through steps such as increased use of prefabrication. This will benefit the proposed follow-on project at Sizewell C in Suffolk.

Construction during the current Coronavirus crisis was able to continue after the project took a wide range of steps to ensure the safety of workers and the community. This included reducing numbers on site to enable social distancing and concentrating on the most critical areas of construction. Many health measures remain in force to prevent the spread of infection. Where social distancing is not possible, workers have been using extra protective equipment.

Work on the first reactor is also moving ahead and new pictures show the rapid progress made since its own "J-zero" 12 months ago.

The project has also been able to use its resources to support the local community and NHS during the crisis. Further information on the measures taken at Hinkley Pont C during the Coronavirus crisis can be found here. New figures issued last week also show that Hinkley Point C beat its ambition to spend £1.5bn with regional businesses five years ahead of target

Hinkley Point C Managing Director Stuart Crooks said: "I want to thank workers and our union partners for their extraordinary efforts to make safe working possible during the pandemic. They have adapted to major changes in everyday behaviours and working practices which would have been unimaginable

a few months ago. The commitment of our specialist suppliers across the UK and in Europe has also been instrumental in helping us safely achieve this major milestone. And we must never forget the duty of care we owe to our community; whose on-going support is vital to the success of our Project.

“Hinkley Point C has a strong culture of learning and innovation which is leading to improved productivity as we get ahead building our second identical reactor. This experience is a great basis for further identical reactor s at Sizewell C in Suffolk.”

- Ends -

NOTES TO EDITOR

1. EDF and CGN are leading the UK's nuclear renaissance with the construction of a new nuclear power station at Hinkley Point C. This will provide low carbon electricity to meet 7% of UK demand. In 2019 the project met all of its milestones and remains on schedule.

2. CGN is a leading global clean energy company. It has the largest nuclear generating capacity in China, the third largest worldwide, and is a leading developer of new nuclear power globally.

The company has more than 30 years’ experience of safely and effectively developing, constructing and operating nuclear plants. It has 24 units in operation in China, with a total installed generating capacity of 27.14GW, and a further 5 units (5.78GW) under construction.

CGN is also a major investor in renewable energy, and has over 30GW of installed capacity in 15 countries around the world. In the UK the company is investing in and bringing its industrial expertise to Hinkley Point C, Sizewell C and Bradwell B, as well as the project to secure regulatory approval for its HPR1000 reactor design. CGN also has 340MW of wind power in operation in England, Wales, Northern Ireland and Ireland.

3. Eleven months after achieving J0 on Unit 1, HPC has completed the same milestone on its second identical reactor, Unit 2.

EDF ENERGY HPC CGN

FACT SHEET

What is J0?

J0 stands for 'Jalon Zero' (J0) and is a French term meaning 'milestone zero'.
Achieving J0 on Unit 2 at HPC signifies the completion of the foundation, or 'Common Raft', for HPC's second reactor.

Completing the Common Raft means that work can now start above ground on Unit 2's permanent reactor buildings. It is a hugely significant construction milestone - delivered despite the significant challenges of Covid-19.

Why is it so significant?

J0 on Unit 2 is significant for several reasons

- **Delivery despite challenges:** HPC has adapted, finding safe ways of working and focusing on critical areas during the Covid-19 crisis. The Project reduced the on-Site workforce by half to enable social distancing. Critical workers were retained - including those with the necessary skills to complete the large concrete pours to maintain Unit 2's critical path.

- **Continuous Learning:** A huge amount of knowledge was gained in delivering J0 on Unit 1, which has transferred directly to Unit 2. Improved steel reinforcement installation rates and the ability to pre-empt and solve problems more quickly has resulted in more efficient delivery.

- **Delivering to time:** Unit 2's J0 delivery date of mid-2020 was set in a Project schedule in 2016. The journey has been complex involving many smaller milestones, thousands of people and hundreds of companies. Achieving J0 on Unit 2 demonstrates that HPC is being delivered to schedule.

- **Start of permanent buildings:** Now the foundation is complete, work can begin on Unit 2's permanent buildings. The focus now shifts from below ground activity to construction above ground.

J0 U2 in numbers

Reinforcement **4,569 tonnes**

Total weight of the **COMMON RAFT** **49,000 TONNES**

Total concrete volume **20,693** m^3

Nuclear Island Unit 2 over time

What is the **COMMON RAFT**?

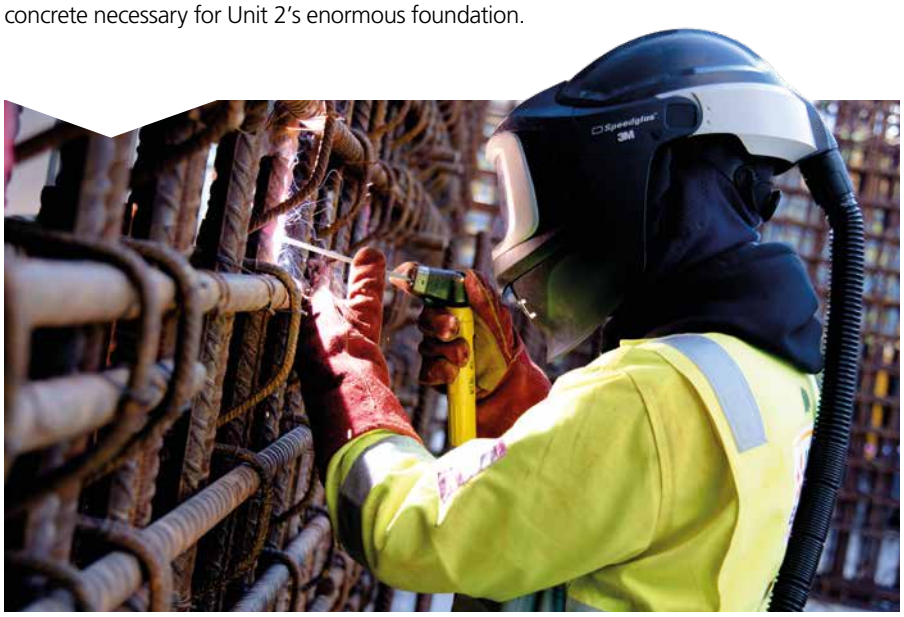
The Common Raft is a thick, reinforced concrete platform on which all of reactor's Nuclear Island buildings will sit. The buildings include the reactor itself, fuel building, and electrical and safeguard buildings.

The Common Raft ensures the nuclear significant systems passing between buildings are anchored to one stable platform, ensuring connections are maintained in the unlikely event of any ground movement.

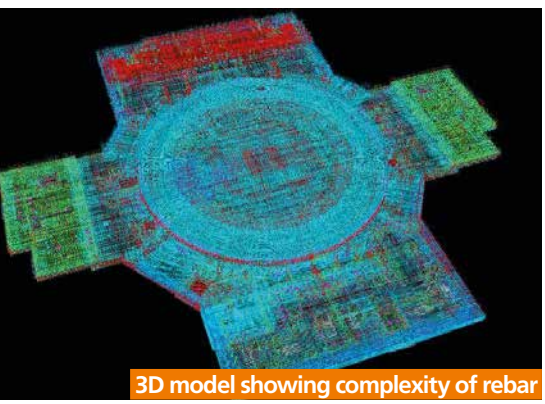
Concrete and rebar

The Common Raft is a cross-shaped structure (see 3D model below) and it will take a total of five concrete pours to attain J0. Pours have occurred in the four outer segments with the final, largest pour, in the centre of the raft. The first pour occurred in December 2019 with subsequent pours in April and May, with the final pour of 9,000m3 completed in late May 2020. HPC has its own concrete production plant, operated by our contract partner Bylor.

The large concrete pours have again demonstrated the necessity of having a production facility on site. Boom concrete pumps are used, which have a remote controlled articulating arm to place the concrete. Team members guide the last portion of the boom to accurately place the concrete between the rebar. Over the past year, teams on Site have placed and tied together over 4,500 tonnes of reinforced bar on the Common Raft. The concrete is then poured amongst the rebar creating the high strength, reinforced nuclear-grade concrete necessary for Unit 2's enormous foundation.



Concrete being poured into the rebar on site



3D model showing complexity of rebar

Maximising learning

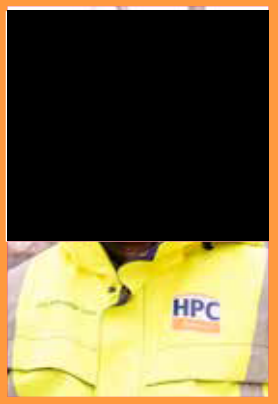
Learning is valuable in nuclear construction. Experience gained by teams working on J0 for Unit 1 has been directly mapped across to Unit 2. The results are impressive with rebar installation rates 25% faster.

When the Unit 2 works encountered a problem with the late delivery of sumps, teams were able to use the knowledge gained on Unit 1 to re-sequence works. The changes cut the time between arrival of the sumps and the concrete pour from 10 weeks to 10 days, and the works were completed on time. Not only was a problem solved, but this time saving can be taken forward to Sizewell C.

Building on experience

The route to Unit 2

EDF ENERGY HPC CGN



"Our belief that we can do things better drives innovation at Hinkley Point C. As we build the first UK European Pressurised Reactor (EPR) we are learning and improving all the time. This is leading to improved productivity as we build Hinkley Point C's second identical reactor. We will use that experience to underpin our plans for two more identical reactors at Sizewell C."

[redacted], Managing Director, Hinkley Point C

Cover image: Unit 2.

Building on experience

In 2019, Hinkley Point C completed the base under the first reactor's main buildings, a milestone we call 'J0'. It was the first time a European Pressurised Reactor (EPR) project had met this achievement on time.

Now, less than a year later and ahead of schedule, we have completed the same milestone on our second identical reactor, Unit 2. Our teams have used the knowledge gained on Unit 1 to increase efficiency and productivity. EDF, CGN and contractors have also used innovation based on experience from other EPR projects and from the UK construction industry. Techniques like large-scale prefabrication and digitalisation are increasing predictability and reducing the hours needed for Unit 2's construction. From Unit 1 to Unit 2, and for Units 3 and 4 at Sizewell C and beyond, we'll continue to see tangible gains as we use replication and experience to drive innovation...

4,667

tonnes of steel installed on Unit 2 vs 3,194 tonnes in the same time frame on Unit 1

Unit 1.

Replication… prefabricating steel reinforcement

Prefabrication is a key innovation at Hinkley Point C and is an increasing trend in global construction. It means large parts can be assembled and lifted into place complete, improving quality and reducing schedule risk. For example, long sections of giant cooling pipes, steel containment rings and even Campus bedrooms are assembled before being installed.

An on-site prefabrication yard and covered 'bunkers' replicate factory conditions, while tunnel segments are cast in a purpose-built factory at Avonmouth. Prefabrication reduces the need to work at height or in bad weather – an issue on other EPR projects. The work can be completed and checked in a controlled setting.

Hinkley Point C has the world's largest land-based crane to handle the vast amount of prefabrication. 'Big Carl' will lift more than 500 prefabricated steel and concrete elements weighing up to 1,600 tonnes.

Hinkley Point C is increasing the amount of prefabrication used in Unit 2 and across the project. This is increasing safety and productivity. For example, at the end of March, 4,667 tonnes of steel had been installed, compared to 3,194 tonnes at the same point in Unit 1. Thanks to learnings from Unit 1, 46% more steel was installed in the same time frame. Unit 2 is also benefitting from overall reinforcement rates that are more than 25% faster.

'Big Carl' lifts the liner cup into Unit 1.

"Over 500 tonnes of Unit 2's steel reinforcement for the common raft is being prefabricated and lifted into place, with minor adjustments made in situ. The approach improves safety, efficiency and productivity."

Jonathan Davies, Nuclear Island Unit 2 Senior Engineer, Bylor

Prefabrication drives improvement

In response to learnings from Flamanville 3 and Taishan, both reactors' containment liners are being built in five giant sections in a specially designed, weather-proof building before being lifted into place by 'Big Carl'. These cylinders contain the reactors and key equipment.

Liner cup floor
Construction time for the second liner cup floor is 30% quicker than Unit 1, 39 days vs 57, while quality during prefabrication has remained high.

Unit 2 Nuclear Island.

Experience...

preparing for concrete pours

The 49,000-tonne base or 'common raft' of each reactor is constructed in five main concrete pours.

Before the concrete is poured, steel reinforcement is installed along with embedded items, pipes and steel boxes called sumps, which form part of the drainage system.

As well as using prefabricated steel reinforcement, drainage system pipes were welded together in a controlled factory environment and delivered in sections up to 25 metres long.

Welding and testing in a controlled factory environment has reduced disruption on site and improved safety, quality and productivity.

Each step in the process is critical to the next. When the Unit 2 works met a problem with the late delivery of sumps, teams were able to use the knowledge gained in Unit 1 to adjust the sequence of works.

The changes cut the time from 10 weeks to 10 days between the arrival of the sumps and the concrete pour, and the works were completed on time. This time saving can be taken forward to Sizewell C.

Innovation… improving techniques

Hinkley Point C has learnt from leading construction projects across the world and been able to successfully utilise new techniques and innovations to build a legacy of skills and expertise.

The 'sump suction lines' for the power station's emergency cooling system, weighing up to 10 tonnes, were installed with zero defects and zero accidents. Contractor Darchem believes it can now cut installation time on Unit 2 by 50%, from 12 weeks to six.

With works on the nuclear drainage and vent system pipes and sumps, the number of pipe-to-pipe welds conducted on the raft was reduced by 12 to just three in Unit 2, improving quality and minimising the need for disruptive testing.

Robotic Mesh Factory

An exciting innovation on the project is the new Mesh Factory, which can produce up to 1,000m^2 of reinforcement mesh per day. The factory's tying gantry comprises five individual robots that have been programmed especially to perform tying within the factory, each fitted with a replaceable tying gun attachment to bind mesh together. As well as increasing productivity, this innovation will reduce the amount of manual handling for our Steel Fixers and the risk of associated injuries.

Unit 1 with liner cup and sump suction lines installed.

50%

reduction in installation time on Unit 2's cooling system components

Did you know?

'The Common raft' is the foundation that sits under the reactor building and the four buildings that surround it. There are five concrete pours to complete the common raft for each of Hinkley Point C's two reactors.