

**WRITTEN SUBMISSION ON SIZEWELL C AT DEADLINE 5:**

**FRIDAY 23 JULY 2021:**

**JOHN SUTHERELL REGISTRATION NUMBER 20026479**

**KEY ISSUES ARISING FROM ISSUE SPECIFIC HEARINGS 1-7 HELD  
6-9 JULY AND 13-16 JULY 2021**

**INTRODUCTION**

Firstly, I would like to thank the Planning Inspectors for enabling me to register as an Interested Party and contribute to the hearings. Although I asked to speak at only 3 hearings (IST 2- written submission 3546; ISH 3 -written submission 3588; IST 6 -written submission 3591) I observed all days except one. The consistent courtesy and patience of the examiners, especially towards the 'amateurs' in this process like me, was much appreciated, as was the fairmindedness and penetrating questioning. Thank you.

For me the hearings were very informative, with a mass of detail to digest. While all those providing evidence are professionals doing their part to the best of their ability for their employer, in sum the answers and arguments provided by the applicant have confirmed the suspicions and concerns I expressed to you in my written submission at Deadline 2: 'Sizewell C: A Strategic Mistake: submission 2766. They have also sharpened my concerns about the overall integrity and competence of the applicant to carry out this huge project effectively and in the national interest.

**'GAMING THE SYSTEM'**

The applicant has a large team of people with a comprehensive knowledge of planning regulations seeking to drive this project forward. I referred to the twists, turns and cynical timing of the 6 year consultation process and DCO submission in the Open Floor Hearings (20 May: written submission 2782) but the last two weeks have produced more examples of where issues of all sorts raised consistently by local parishes and concerned individuals have been ignored to the last minute and the details of proposed solutions dragged out now in the hope of neutralizing opposition.

I lost count of the times when the applicant sought to rule out a question, an objection or an alternative by referring to government policies and planning guidelines. The same technique was used to try to minimize enforceable obligations, transparency and accountability to the local authorities who are meant to represent the community. They seek to maximise power and freedom to act while minimizing responsibility and accountability. The crucial

importance of the DCO became very clear but the scale, detail and arcane language of this document gives little comfort to the layman.

Government Policies and Plans. It is entirely understandable that the applicant will base his submission on the policies and plans that exist. The problem is that these policies and plans are now, given the dramatic changes in circumstances of the last 10 years, seriously out of date. It is understood that they are due to be updated before the end of this year. How much detailed attention was given 10 years ago to Sizewell's suitability to host a third power station, especially one with a double reactor, when it was seen as one option among a dozen sites? 10 years on, and with the full implications of cramming a double reactor onto a very confined site becoming more apparent, it seems not unreasonable for that decision to be reconsidered.

### **'TRIED AND TESTED SYSTEM'.**

The applicant made frequent reference to the system being tried and tested and lessons being learned from Hinckley Point C (HPC). The reactors are the same model as the single EPR reactors in China, Finland and Flamanville. Both of the latter have had problems and are not yet generating power. That in China now also has problems; today's FT headline states : 'EDF says it would shut Taishan reactor if it were in France'. Hinckley Point C is the first double reactor; it is in construction, not operating. This is hardly 'tried and tested technology' and construction. It is also understood that, after the Flamanville experience, the French government is reluctant to use this design EPR in their next generation of stations.

Arrangements and outcomes at HPC were also quoted in respect of governance, transport, socio economic and the coastline. Yet, as must be apparent, the environment, infrastructure and the community are all very different, and much more demanding in Suffolk. Because of ownership issues, using the same governance structures is also questionable.

### **'URGENCY'**

The 'urgency' of the 'unusually large and complex project' of 'vast' scale has also been frequently quoted as a reason for not examining alternatives (eg: the preferred triple span bridge across the SSSI would cause 6-12 months delay) or taking a more thoughtful and thorough approach to planning.

In ISH 7 Pt 1 it was even suggested this urgency ('the balance of timing') was in the 'national interest', not just that of the developer. This is humbug. An article in *Le Figaro* this week reports that "*EDF must wait until 2023 for a possible order for 6 EPR nuclear reactors from the French government. In the*

*mean time it is in the UK that the electricity company should be able to keep its hand in the matter. But it is asking the Johnson government to speed up the process to begin advanced discussions on the project for the two EPRs at Sizewell, Suffolk. The company needs the British Parliament to pass legislation specifying the financial package for the project which is estimated to cost around Euro 20 Billion”.*

It is also possible that EDF are driven by the dawning recognition that, notwithstanding the growing requirement for secure and reliable electricity, the need for another ‘vast’ double reactor nuclear plant is being called into question, not only by the rise of other renewables, and interconnectors, but also by developments in the nuclear industry. At a Royal United Services Institute (RUSI) on line seminar on ‘The Future of Energy Security and National Resilience’ on 12 July 2021 it was suggested that *“the day of large nuclear plants, which are expensive and high risk, and not attractive to investors, is over and the time has come to shift to small modular plants that can be factory built and bespoke placed”*. EDF are seeking to ‘bounce through’ this decision, which has formidable, wide ranging adverse effects, before the alternatives can be properly assessed.

## **‘OWNERSHIP’**

All these issues, especially those of governance, responsibility and accountability, are brought into even sharper focus because of the issue of ownership. Mark Goyter has addressed the implications of concerns about ownership in some detail in his written submission of 23 July entitled “Comment on the Draft DCO Tracked Change Version Revision 4 against Revision 3” and I commend his paper to you.

EDF clearly does not want to take responsibility for this project. Again: *Le Figaro* this week *“This –(parliamentary legislation)- is an essential prerequisite to move forward on the project” said Simone Rossi, CEO of EDF energy. EDF wants to keep only a minority stake in the capital of the future Sizewell plant.”*

If this is the case, who will be held accountable for safe delivery on time, with strict control of costs, minimum damage to the environment and community, and appropriate, sufficient and timely mitigation?

## **CONCLUSION**

I recognize that you, the Inspectorate are far better qualified and equipped to make the critical judgements in this case than the legion of committed volunteers in Suffolk who are engaged with this project (and have been in some cases since its inception). I also recognize that your powers as an Inspectorate

are not limitless. However I, with many others, very much hope that you may be able to buy time for serious consideration to be given to other options to provide the necessary nuclear power this country needs, and the strategic mistake represented by Sizewell C to be avoided.

John Sutherell

23 July 2021