



The Sizewell C Project

5.1 Ch Consultation Report Fourth Addendum Annexes A - B - Consultation Responses

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September 2021

Planning Act 2008
Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009



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Annex A: Copies of all Proposed Change 19 consultation responses



Consultation on construction Water Supply Strategy

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The deadline for responses to this consultation is **Friday 27 August 2021**.

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Name

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If so, which?

Organisation name

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Proposed Change 19: construction Water Supply Strategy

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Please provide comments on this proposed change

The water company's discovered inability to deliver 4 million litres of potable water to the proposed build of Sizewell C is yet another example of just how much of a wrong site this is. Hundreds of extra tankers hauling in water for the first 12 months of the proposed build adds extensively to the traffic nightmare. Nothing stacks up to justify this development, I sincerely hope the whole application will fail,

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Desalination and Nuclear Power plants - Alonso... 2020 - warns of the safety implications. 1)the barrier to nuclear containment - problems associated with linking the heat source to the Desal plant to avoid nuclear contamination to the water - need to test water supply produced. 2) transients produced in the desalination plant/water leading to more severe transients in the nuclear pathway. 3. excessive noise associated with desal plants - steam turbines and high pressure pumps. 4) excessive quantities of brine by product - essential to dissipate brine in sea water destination to avoid marine ecology disturbance. Like all EDF solutions - one assumes some competent body is monitoring the effects of this idea - desalination sounds a simple solution at first sight, but the scientific experience is that there are potential problems - learned from other plants around the world

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Don't want Sizewell C! Not welcome!

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These are not changes, they are tweaks on a proposal which is really not fit for purpose. The site is highly vulnerable to climate change however many barriers are erected, and much of it sits on an essential carbon sink in the form of heath and acid grassland. To disturb this spot more by adding a desalination plant is a step too far. Your original proposal was too much and every time you add to it you are damaging a deeply fragile and desperately important ecosystem even more.

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I wish to object to your plan to install a temporary desalination plant at the proposed Sizewell C site. This proposal will require the constant running of diesel generators for at least 12 months until an electric power supply is provided which will inevitably add to the already enormous carbon footprint of this scheme. Even with the addition of the desalination plant you calculate you will need additional HGV deliveries of fresh water on a daily basis for quite long periods and if you stick within the maximum daily allowance of HGV journeys this must impact negatively on any previously planned schedules.....thus increasing the construction time overall. I am also concerned about the damaging effects on the marine life in the vicinity of the brine discharge pipe which other studies have measured in similar projects around the world. To introduce this proposal at such a late stage in the planning process gives me very little faith in the overall strategy of your project.....surely you must have known that you needed this volume of water supply at a much earlier stage in your planning and should have made provision for it to be included in your initial application.

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I wholeheartedly support Proposed Change 19 (Desalination plant) but would prefer if the construction could be of a permanent nature thereby enhancing Community Water Supplies post construction of the Power Station. This would bolster Suffolk strategic infrastructure at a time when many cost cutting processes are disregarding increased demand for drinking quality water due to new home-building projects. This could increase the support for the Sizewell C development giving sustainability for our Children and grandchildren.

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The construction of Sizewell C would involve massive and unacceptable energy expenditure, carbon emissions and resource extraction long after the time such negative ecological effects are expected to drive climate change beyond critical levels, and without producing a single watt of useful energy. This proposed change only exacerbates this. Desalination inevitably involves intensive energy use, whereas we all need to use less energy to mitigate climate change. Seeking a new fresh water source, such as desalination, misunderstands the global problem facing us. Fresh water, wherever it comes from, must be prioritised for essential purposes, and Sizewell C would not be one of those.

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I understand that a Desalination Plant will put increased pressure on the local ecology. EDF should have foreseen this situation years ago and have been warned of the problem for many years by local people. At [REDACTED] we have seen exactly the same incompetent project planning and management or possibly deliberate manipulation of the Local Planning Authority by leaving problem issues until it is too late and twisting the arm of the Planning Inspectorate and Secretary of State. This is exactly what they have done with the Acoustic Fish Deterrents on the cooling water intake heads at Hinkley C. If you would like to have more information on this please contact me.

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We propose to build several 500m3 modules of solar thermal desalination system to satisfy the Sizewell C water requirements.

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• Treatments to anti-foul will have localised impacts. Discharge (brine) is hyper saline which can cause fish blinding. Dead fish at the outfall could be an attraction of food eg red throated divers, fish or other divers and potential impact to them. Dead fish may also wash up onto the beach. Outfall will be nearer to beach than other pipes associated with plant operation. • The depth that pipes are to be buried below bed should be clarified. • Confirmation that directional drilling will be to substrate rather than through sand is required. • Directional drilling will cause vibration to bed that might disturb cetaceans (has this been assessed in combination?) • The intake and outfall structures could cause some interaction with waves locally. Maybe most importantly around lower tidal levels but needs assessing. This could lead to alteration to the bar crest locally and that interrupt the bar processes. The localised impact to the whole LSD process is probably minimal but a change to the bar form could be more significant - particularly in combination with other impacts/changes arising either from works or nature. This should not be considered in isolation but in combination with other 'associated infrastructure' all working together eg temporary BLF and permanent BLF and HCDF and ship movements etc. • The land structure will be made of containers which will add further visual clutter. Plans and updated visuals of the site should be provided and the visual impact should be assessed. These should also be screened to provide noise mitigation as diesel generators will be required. The screening should address noise propagation from both locations identified (fig 2.3 and 2.4). Due to its elevated position, National Trust's land at Dunwich Heath should be considered as a receptor. The type of noise screening or noise suppression measures should be provided. • There is the potential for diesel fumes to waft on a breeze from the southeast to RSPB and NT land. Full measures for scrubbing of exhausts to avoid such odour and pollution should be provided. • There will be localised dredging for installation of seaward end of both intake and outfall but there is no indication of where this is disposed or the need for repeat dredging should there be a change in bed forms that start to encroach on either intake or outfall. Once installed the pipe could not be simply extended and so what will happen in this eventuality? • The installation of the outfall head is between the inner and outer bar. There could be change in the configuration/location of bars even in this short (relatively to long term) window of operation. What happens then? • Abstraction will occur for up to 24 hours per day. Therefore this will create additional noise on a coast with little barriers to deaden noise. Screening to address this noise may need to be tall and will potentially be visible for years. This should be assessed. • The addition of a 'duck bill' to the outfall pipe will help to reduce intrusion of sediment but this will not preclude it if the bed level alters. There is no indication of the height above bed these will sit as such but potentially they could be buried by a bar movement. • The discharge is in shallow water to try and disperse discharge but how will this look on a calm day? • It should be confirmed what additional lighting is required in connection with this proposal. • Details and plans showing the size, elevations, cross sections of the plant should be provided. The exact location of the containers and plant on the main platform in relation to other infrastructure should be shown. • The Coastal Processes Monitoring and Mitigation Plan (CPMMP) should be updated to reflect this change and be submitted with the change request. • The consultation document states that much of the proposal falls within the window of existing assessments but have the impacts been considered in combination with other impacts? • Closure of the desalination plant (including removal of end of pipe infrastructure and sealing of the pipes) once the Sizewell transfer main is operational should be secured within the DCO and reflected in the submission of an updated draft DCO.

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Desalination plants cause environmental damage to wildlife and plants and the fact that so much water is required for this project is a further indication of the inappropriateness of the Sizewell C development. The desalination plant is a large project and will cause further damage to this area and of course, involves additional embodied carbon. The Sizewell project will already cause vast amounts of carbon emissions including embodied carbon through transport, concrete usage and steel.

Processing your data

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NON-FITTING

Is Key Stakeholder?

YES

Stakeholder Type:

Enter stakeholder type

Unique Identifier:

Unique Identifier



Consultation on construction Water Supply Strategy

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The deadline for responses to this consultation is **Friday 27 August 2021**.

Your Details

Name

Email

Address

Are you responding on behalf of an organisation?

If so, which?

Job title

Interested Party Reference Number (if applicable)

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Please provide comments on this proposed change

I have already written strongly opposed to this very late introduction to the proposed Sizewell C project, but I have since learnt just what a problem the water salination plant will be. The several months of a vast increase in lorry movements tanking in water until the desalination plant is installed. The emissions of gaseous pollutants to air from the operating desalination plant and the risks associated with the discharge of highly concentrated brine. This is indeed a desperate and last minute attempt to solve the serious problem of insufficient potable water being available for the plant --- a problem which those against the whole Sizewell project drew attention to many years ago. As time goes back the problems with this ill-conceived project just continue to increase and the responses to them become more desperate.

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The plant is not viable and would create harm to the local environment. There would also need to be accountability as to when it was removed.

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Please provide comments on this proposed change

This is crazy. Desalination is a carbon producing process. Furthermore it uses chemicals which are highly polluting and I don't believe that you can reduce the risk of this sufficiently. It is stated that the desalination is to be temporary but a great deal of cooling water will be needed once the nuclear plant is operational. I don't believe you can rule out the need for continuing desalination. This area is in the driest part of the country and there are already plans for building many thousands of houses which will all need enormous quantities of water. You cannot solve one problem by creating others.

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As the desalination plant will produce enormous amounts of greenhouse gases this is not in line with our current needs to reduce CO2 emissions. I do not believe the low carbon energy that will be generated in the future will compensate for that created by water solutions. There will continue to need cooling all along the process unless it is practical to use sea water. I oppose this scheme.

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Please provide comments on this proposed change

I strongly object to this proposal. It is a very substantial change to the EDF plans and local residents should be given more time to understand the long term consequences of building a 'temporary' desalination plant on the Suffolk Coast.

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Please provide comments on this proposed change

We do not agree with the desalination plant, as we feel that Desalinisation plants are very energy intensive and the resulting waste slurry can have a dramatic environmental impact, as it usually contains anti-scaling agents and chlorine-removing chemicals in addition to the very high salt levels that can kill wildlife and vegetation it comes into contact with. The desalinisation plant is a big project in and of itself and we do not feel we can accept it being pushed through in this manner. And TASC have been informing us on social media of how happy residents are there about the project overall...we hope that this will not go ahead as it does not suite our future environment. Thanks.

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YES ☐

Stakeholder Type:

Enter stakeholder type ▼

Unique Identifier:

Unique Identifier ⌵

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SIZEWELL C: CONSULTATION ON TEMPORARY DESALINATION PLANT (Change 19) Response from [REDACTED]

[REDACTED]. The project itself should not be built, for reasons which I and many others have previously explained, some of the main ones being – huge amounts of nuclear waste (for which there is no long-term disposal plan) dangerous site on exposed eroding coastline, both for for operation and decommissioning unacceptable and irreversible impacts on protected wildlife habitats and landscape damage to the local economy appalling impact on local people from construction traffic and works vast cost On top of this, the extreme lateness to propose a plan for this key element of the proposed construction, plus the failure to give the recommended 28 days period for Consultation, shows the Applicant's incompetent approach to planning this huge infrastructure project. The issue of water supply has been pointed out as a problem for many years, yet the Applicant finally brings forward a half-formed plan with no detail available, a few weeks before the end of the plan inspection. The examining authority, government, financiers, contractors, electricity industry, and nation cannot have confidence in the Applicant to construct and operate a huge nuclear power station. The Applicant has attempted to deceive local people into believing that there will be no additional HGV movements, by such phraseology as "This would not increase the overall number of HGVs predicted for the project during the early years of construction" which is in the community newsletter. This is an untrue statement (see 4 below) and devalues the consultation process. Water tanker lorries - As a [REDACTED], I object to the additional HGV traffic that would be generated by having to bring in water by tanker. The Applicant has not stated where this water would come from, and so I must assume that it would be from reservoirs in East Anglia or beyond, so that the HGVs would be routed around Ipswich and onto the A12 past Woodbridge. There would be up to 40 additional 44-ton HGVs in each direction each day (80 HGV movements per day) – and that might be exceeded if the desalination plant doesn't become operational on the timescale the Applicant hopes. This would add to the congestion, noise, vibration and emissions affecting Woodbridge, which have already been mentioned in previous responses. These additional movements should not be allowed; in the undesirable event of the project going ahead, it should wait until it can be provided with potable water without the adverse impacts of additional HGVs. Discharges from desalination process – there are problems associated with discharges from reverse osmosis desalination – not just of minerals which were already present in the sea-water, but of cleaning and maintenance chemicals. See Wikipedia description of Reverse Osmosis desalination and the references cited there. This says "The reverse osmosis process is not maintenance free. Various factors interfere with efficiency: ionic contamination (calcium, magnesium etc.); dissolved organic carbon (DOC); bacteria; viruses; colloids and insoluble particulates; biofouling and scaling. In extreme cases, the RO membranes are destroyed. To mitigate damage, various pretreatment stages are introduced. Anti-scaling inhibitors include acids and other agents such as the organic polymers polyacrylamide and polymaleic acid, phosphonates and polyphosphates. Inhibitors for fouling are biocides (as oxidants against bacteria and viruses), such as chlorine, ozone, sodium or calcium hypochlorite. At regular intervals, depending on the membrane contamination; fluctuating seawater conditions; or when prompted by monitoring processes, the membranes need to be cleaned, known as emergency or shock-flushing. Flushing is done with inhibitors in a fresh water solution and the system must go offline. This procedure is environmentally risky, since contaminated water is diverted into the ocean without treatment. Sensitive marine habitats can be irreversibly damaged." The Applicant has made no mention of these discharges nor how they are to be avoided, minimised, mitigated or licensed. The consultation document mentions only phosphorus as an additional contaminant (2.4.16). Full assessment of the discharges is essential before desalination can be planned. Because it appears that discharges from desalination may pollute the sea locally to the station, it would be better to postpone the construction until potable water can be supplied by pipeline. Better still, cancel this ill-conceived and poorly planned project. Effect of desalination on local marine ecosystem- though it seems the proposed filter system may prevent small fish fry from being taken into the desalination plant, it would not exclude microscopic organisms, which would then be left in super-concentrated brine for some time, before being discharged back into the sea and carried to the sea-bed in the dense effluent. Many of these organisms would not survive this experience and would be lost from the food-web, with complex knock-on effects and imbalances taking place to larger creatures. This is undesirable; it should be assessed properly, rather than dismissed as it has been in the consultation document. Energy requirement of desalination – will be considerable, at 3 to 3.5 kWh per m3 of water produced. The document mentions diesel generators at first; it doesn't say how long before these are replaced by a regular electricity supply. At the peak of water demand, many thousands of litres of diesel fuel would be required every day – the consultation document makes no mention of the transport and storage for this fuel, nor of the associated risks of spills and leaks. Moving the desalination plant – should this be necessary, the proposed site is alongside the haul road and much closer to the Minsmere SSSI. It appears to involve intake and outflow pipes of approximately 2.5km length alongside the haul road. So the proposal would be to pipe seawater across the sensitive Sizewell Marshes SSSI for this distance, then to take desalinated water and super-concentrated brine/slurry back across the marshes to the outfall and the construction platform. This raises a number of problems- Risk of pollution to the Sizewell Marshes SSSI by accidental leaks from the pipes Impact of diesel generators (noise, NOx and particulates) being much closer to Minsmere SSSI Disruption to construction project caused by installing pipes alongside or under haul road Temporary non-availability of desalinated water during plant movement Energy requirement to pump liquids/slurry that distance. Points c and d would appear to extend the construction period, and thus the misery for local people. For these further reasons, it would be better to avoid desalination and wait for mains supply of potable water before commencing the build – or better yet, cancel the project. Storage of potable water – the consultation document makes no mention of storing water. Yet presumably a prudent developer would want some reserve in case of desalination outage (planned or unplanned). How many days' storage is intended? Will it involve a water-tower? If so, there would be visual impact, and it should be mentioned. For the above reasons, I object to the outline plan proposed by the Applicant in the consultation document. While it may have been possible to allay some of the smaller concerns if the Applicant had started work on its strategy for potable water some years ago, it is now too late to provide a satisfactory plan in time for the end of the planning inspection. The benefits of the Sizewell C nuclear power station are already outweighed by the costs and disadvantages; by the time the problem of water supply could have a satisfactory solution, this will be even more the case.

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Yet another half-thought-out issue resulting in further degradation of the environment, industrial intrusion, blatant pollution issues, a blight on the tourist industry and massive inconvenience to the local and regional infrastructure.

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East Suffolk Water Abstractors Ltd. support the proposal to install a desalination facility and feel that it should be a permanent solution to the water supply situation for the long term, relieving the pressures which will be put on local water resources should the site rely on the local public water supply (PWS) for construction and its long term potable water requirements. The use of potable water from the local PWS will result in further pressure on a local resource which is already recognised as being over licensed and likely to suffer from over abstraction. The supply to the Sizewell site is currently the responsibility of Northumbrian Water Ltd. (NWL) who own Essex and Suffolk Water. Their entire local supply is based on groundwater sourcing and any increases they may seek to cover supplies for SWC development will be challenged by current licence holders as well as the regulator due to the potential damage to the environment through reduced river flows. The recently updated Abstraction Licencing Strategy (ALS) issued by the Environment Agency (EA) advises that any application for new abstraction from the ground water source are unlikely to be accepted. As part of the solution to water supplies during the construction stage, those land owners with abstraction licences which may not be fully utilised due to the impact of the development of SWC on their farming activities could be approached to "trade" some of their licenced abstraction volumes on a temporary basis. This could be dealt with through NWL. If there should come a time when the potable water needs on the site can be covered by the PWS supplier and therefore reduce or eliminate the need for the desalination system it should be used to supplement the local industry and agricultural needs or indeed to support new developments close by. Linked with the proposed reservoir construction then a long-term legacy benefit for the local economy would go some way to compensating the local population for the disruption and disturbance they are going to have to bear should permission be granted for SWC to go ahead.

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Yes

If so, which?

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Please provide comments on this proposed change

Given the uncertain future of water in south east of england, it would be wise to keep the desalination plant as a back up. Or to use temporary treatment that can be brought back in in the future such as containerised solution. Water supply is critical to the future operation of Sizewell C and a backup to the mains supply should be included in the plans. Given the risks of collecting seawater thorough offshore pipes such as wildlife, biofouling, storm affects, pollution, that would all affect the supply and treatment of water, it might be sensible to explore borehole drilling. Though its likely a borehole would yield saline water due to proximity to the coast, the other risks would be mitigated and water quality could be easier to guarantee through desalination. Water reuse. Construction will create an effluent flow, which will require treatment to avoid environmental pollution. Similar filtration technologies used for deslination could also clean up this effluent allowing it to be reused. Reuse of wastewater is often cost competitive with mains water in my experience so it would undoubtebly be economically better than seawater desalination. In addition by reusing water, the abstraction of seawater would be reduced and have an environmental benefit as well. Since temporary power on site is likely to be at a premium, reuse of water would be less power hungry than further desalination. I would suggest splitting potable and non-potable water uses. unless there is another reason that construction requires potable water, the temporary solution should be arranged to produce water at an adequate quality for construction. Potable supplies should be reserved for site welfare and be brought in by road tanker or bowser to ensure quality and safety, while keeping the desalination costs down.

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YES

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Please provide comments on this proposed change

Firstly, it is utterly ludicrous that this issue has appeared only now. If edf wasn't aware that there was an issue with the provision of potable water, then it raises serious questions about their competence in managing a project of this scale. As a result of this omission from the original consultation document the public is now asked to make another response – it seems clear that the intention is to exhaust opponents with multiple consultations that leave insufficient time for proper scrutiny. I understand that to meet the requirements of Sizewell C's construction, water is to be abstracted from the River Waveney. This gives me great cause for concern as I cannot see how such volumes of water can be removed without serious environmental impact. I am a birdwatcher and enjoy visiting the river and its environs; and I would hate to see any deterioration in the river's condition. I note that Paragraph 2.2.4 refers to an ongoing sustainability study but note that to date there has been no agreement with the Environment Agency or Natural England. Paragraphs 2.2.9/10 draw attention to various water recycling arrangements but also propose the use of non-potable water for certain processes. I would like to know the source of this non-potable water and would like an assurance that there is no intention to use seawater on the site as this would kill any vegetation exposed to it. Regarding the installation of the desalination plant itself, I have already objected to disturbance of the seabed in previous consultations – this latest proposal makes things even worse: more dredging, more fish and other organisms killed at the intake head. In addition more lorries will be required for the construction of the desalination plant and yet, curiously, the HGV limits for the project will remain unchanged (2.3.5). How does that work? What HGV deliveries that were originally planned will be cancelled in order to accommodate those required for the desalination construction? Nor do I like the idea of diesel generators on the site (2.3.12) with the associated risks of spillage and contamination. I am also greatly concerned at what is to be discharged into the sea at the end of the desalination process – not just the continuous outpouring of concentrated brine but also various chemicals used for cleaning, such as chlorine (2.3.22). A proper environmental assessment of this needs to be completed and details provided. edf seem to think that the sea is a dustbin where they can dump whatever they like. Enough is enough. Suffolk has had to put up with a nuclear power station for years, Another one is NOT needed. Pull the plug on this proposal now.

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The supply of water is an important issue and the consideration of supply has come very late to the planning. Suffolk is one of the driest counties and is also growing its population rapidly and as the water you need has to be potable this site is not a good choice. Water reduction plans should be part of any building project and this is very much an afterthought. Using 40 tankers daily to bring in water at the beginning of the build will seriously affect the number of lorries on the road network each day. Noise and congestion will be much greater and there will be a big impact on the time it will take the project to go Carbon neutral. Daily lorry numbers are already too great. More congestion, noise and dust. As well as lorries, the diesel generators for the plant will push carbon neutral targets further away. No mention of where the 'cake' from the desalination plant will be disposed of. What precautions are being taken to ensure that chlorine is not allowed into the sea? Returning brine to the sea is not as simple as it sounds. It is important that the saltiness should not get too high around the outfall, and the chemical make up of the sea is not compromised by the cleaning chemicals. The water supply strategy is flawed adding much more the road traffic and the desalination has too many 'fingers crossed' proposals.

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We would like the opportunity to supply pumps to the desalination plant as we are a [redacted] who supplies pumps to [redacted] and desalination works around the world.

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This underlines the total lack of infrastructure available and needed for this project, poor connectivity, poor road network, lack of accomondation and now the lack of a adequate water supply from Essex and Suffolk Water Requiring Desalination Plant, creating more noise and pollution

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This late realisation that there's not enough water available to Build Sizewell C just shows how unprofessional EDF has been in this whole project. We are now faced with further blight and environmental damage to our Area of Outstanding Natural Beauty and Nature Reserves with the late introduction of the desalination plant(s) into the mix . EDF should have sorted out the water situation years ago and there will be insufficient time before the end of the Examination (14 Oct) for the Water Strategy to be properly scrutinised. There is supposed to be a minimum of 28 days for a Change Consultation, but EDF has only given 24, with the document lacking essential details and further information seemingly only forthcoming after the end of the consultation when the official request for the Change to the SZC Application goes in to PINS. What pressure would be put on the River Waveney due to such a large extraction per EDF's plans, and what would the environmental impacts be with all the Nature Reserves along this river which also forms part of the Norfolk & Suffolk Broads National Park . I have carried out ██████████ work for Suffolk Wildlife Trust all along the Waveney Valley and had many good days hiking along this wild water way, so I'd hate to see it ruined by the over extraction of water (which almost happened at the Redgrave and Lopham SWT reserve a few years ago due to a water company's over extraction in the area - luckily action was taken to close this down. What will EDF do if such a large extraction is deemed to be unsustainable? The consultation states the use of 'non-potable water' to suppress dust but where from and what sort of water? Using saline water would be a disaster for the designated sites, as it would kill the vegetation. With regards to the desalination plant build and process itself, there'd be more dredging necessary to install the intake and outflow heads, and yet more fish and other organisms killed at the intake head (in addition to the millions killed by the cooling water system). Where does the tankered water come from for the build the plant and, with yet more lorries journeys needed for the build, why do EDF makes out that these wouldn't affect the overall predicted number? Noise, fumes and smell from generators, also particulates, CO2 and NOx emissions, in very close proximity to Sizewell Marshes Site of Special Scientific Interest (immediately to the west of the platform) and Minsmere-Walberswick Special Area of Conservation (directly to the north – can affect rare plant communities due to increase in nutrients. Then there's the Greenhouse gas emissions and risk of diesel spillage and contamination. More information is needed about the water treatment and storage as the environmental impacts are not assessed, but just dismissed as being within the overall effects of the cooling system. A dead zone likely to be created around the outflow heads with the build-up of brine and increasing lack of oxygen (trapped between inner and outer bars) and naturally occurring minerals and chemicals being returned to the sea in a more concentrated form can cause poisoning. What anti-fouling chemicals will end up in the sea in addition to chlorine and the by-product of phosphorus? If the mains water from Barsham isn't forthcoming for peak construction, it seems another desalination plant would have to be installed. Water tanker movements would presumably be necessary again for any second desalination plant, and while the existing plant is being moved. There'd be extra lorries to bring diesel and take away the salt blocks, and, with two plants, the doubling of all the environmental impacts. Also, how would the plant and pipes etc be relocated to the Goose Hill construction site without causing any further damage to Sizewell Marshes SSSI? Wouldn't the construction programme be held up, i) by the building of the desalination plant in the first place (up to 6 months) and ii) by its later relocation? What delays are likely to result? I strongly object to these proposals.

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Please provide comments on this proposed change

Desalination uses a great deal of energy and therefore adds to the unacceptable carbon profile of the project. The construction uses vast amounts of concrete which again has a very high carbon producing impact. Since the world is facing a climate crisis there should not be such a large contribution to global heating by contemplating desalination. There are now many other technologies that are far more efficient and produce electricity at a much lower price. This project should be abandoned as it no longer makes economic sense.

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This surely identifies the compete lack of planning to introduce this at such a late stage. What else is pending. Please stop this madness and allow this area to return to normal life without the worry of Sizewell C

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The whole project is too much disruption and a huge impact on the local environment and wildlife and shouldn't be allowed to proceed enough is enough with A&B on this lovely coastline and cant be destroyed further by EDF.

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This is a late proposal with inadequate information and time to comment, relating to a very damaging operation. This is a strong objection on environmental grounds.

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Consultation on construction Water Supply Strategy

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If so, which?

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Please provide comments on this proposed change

I am against nuclear power - much better to spend the money on renewable energy supplies

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YES

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As one of the driest parts of the UK , East Anglia suffers tremendously with summer droughts, and water shortages as it is. and with climate change it's about to get worse. As it is landowners are having to spend thousands of pounds on creating reservoirs on their land to obtain sufficient water supplies for agricultural use. In this modern age of technology and science, I'm really surprised that given the cost of the proposed project , you are not looking at desalination technology. The site is immediately beside the North Sea and with sea levels apparently rising, should provide a plentiful supply of water without affecting the local communities and damaging our very fragile ecological infrastructure, possibly even providing a long term legacy to assist local communities and land owners with quality water for years to come. The inclusion of a desalination plant would be beneficial all round and another win win situation which you badly need! I realise that use of sea water in construction is not permitted due to salt levels but desalinated water is free from contamination. Thank you [REDACTED]

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Please provide comments on this proposed change

It is inconceivable that this shambolic and unnecessary proposal go any further. I don't agree with any plans, nor to the devastation and heinous outrageous plans of destruction of wildlife and the local community. In this current world of catastrophic climate change FIND ANOTHER WAY!

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At this stage to decide you need more water is bad planning The various movement that the plant will cause what studies have een done on the effect it will have on the coast line? 9 large tankers will not be a pretty sight. The claim of this will not lead to more lorries is NOT believeable. The disbursement of sea birds should be great.

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At this late stage EDF discover that water is a problem and hastily decide to ask permission for a desalination plant, another large industrial project with attendant tankers, use of diesel, disturbance of mineral balance (discharge of concentrated minerals and salt back to the sea) affecting fish and other marine life, noise and fumes. I object very strongly to this, as I do to the whole of this project, with its continual 'add ons' beng required. Because, dear EDF, this is the wrong Nuclear Reactor for this site. There are too many problems!

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Please provide comments on this proposed change

██████████ is surprised and concerned that EDF have again amended its application for an order granting development consent for Sizewell C. We are surprised because it seems odd that EDF have realised at this late stage in the process that supply of water, clearly crucial to the construction, as was not fully considered and resolved much earlier in the preparation of the plans; and we are concerned because this failure to address this crucial consideration in a timely manner undermines the credibility and reliability of the whole application which, if approved, will anyway present significant environmental, social and economic impacts to the East Suffolk area (see previous ██████████ submissions). ██████████ does not have the knowledge to understand fully the environmental impacts of the construction and operation of a desalination plant at the site but a simple Google search found numerous articles detailing the environmental implications of desalination plants elsewhere – none of which make comfortable reading – an inexhaustive list is provided in the footnote*. Further to these criticisms and concerns, statements made in this consultation document simply raise further questions: 2.3.4 The desalination plant will be required before the Sizewell transfer main is fully available. This is potentially for approximately the first four years of construction, i.e. to 2026 as set out in Paragraph 2.2.4 above. However, it should be assumed for the purposes of consultation that the desalination plant may need to be retained for longer – potentially throughout the majority of the construction period – in the unlikely event of a delay to delivery of the transfer main by Essex and Suffolk Water that is beyond their control. The desalination plant would be decommissioned once the transfer main is fully available. ██████████ comment: the impacts of the proposed change to the application are presumably not accurate given that as stated in this paragraph, the plant may well have to be used for much longer – even for the majority of the construction period – than is foreseen and presented in this consultation by EDF. 2.3.5 Construction of the desalination plant would take approximately 4-6 months and can only commence once the Main Platform is suitably prepared. It is assumed that for the first 9-12 months of construction, potable water will need to be imported by road via water tanker truck. The number of tanker deliveries is likely to rise gradually during this period to approximately 40 deliveries per day. The capped HGV limits already established for the Project would remain unchanged. ██████████ comment: if the capped HGV limits remain unchanged, what happens to the 40 trucks per day which they will be replace? Can we assume that their replacement by trucks transporting water to the site means that other work will be further delayed due to the slower delivery of materials? 2.3.6 The modular desalination plant would initially be capable of producing up to approximately 2,500m3 of potable water per day. In the event that the water transfer main is not complete by the 4th year of construction, an additional module would be added to the plant to create the ability to produce up to approximately 4,000m3 of potable water per day. ██████████ comment: i.e. the plant will have to be enlarged – the construction would presumably require more HGV movements and also further delay the construction of the site. 2.3.9 Plant would be delivered by road and is unlikely to comprise any Abnormal Indivisible Loads (AIL). The additional HGV movements would be within the already proposed HGV daily limit established for the Project during the early years. ██████████ comment: as above, this suggests that trucks for the construction will be replaced by trucks for the construction of the desalination plant – with the possibility that some traffic will be AIL. This would aggravate congestion and also cause further delays to the construction of the power station itself. 2.3.22 The intake screen and pipework will be maintained by periodic cleaning using a compressed air cleaning system. Periodic shock chlorination within the headworks would be applied to prevent biofouling. Chlorine dosing would be flow controlled and angled inwards to minimise chlorine emissions to the environment. Abstracted water would be dechlorinated prior to the Sea Water Reverse Osmosis membranes. ██████████ comment: we note this says that chlorine emissions will be “minimised rather than “prevented”. Why? 2.4.13 ...Potential impacts associated with the physical presence of the infrastructure and associated scour protections include loss or change in habitat type and the potential for the spread of non-indigenous invasive species. Each of these potential impacts will be fully assessed. ██████████ comment: surely “potential impacts” should have been “fully assessed” for the purpose of this amendment to the application? 2.4.16 Approximately 60% of the abstracted seawater would be discharged back into the sea. The discharge would consist of concentrated saline water, increased concentrations of naturally occurring metals as well as added phosphorus and a preliminary H1 screening assessment of the proposed discharges indicates that the small volume discharge may exceed screening thresholds for zinc and chromium as noted above. A full assessment will consider the magnitude of saline, trace metal and nutrient discharges in relation to the sensitivity of marine ecology receptors... ██████████ comment: as above, surely a “full assessment” should have been completed for the purpose of this amendment to the application? 2.4.20 Further assessment will be undertaken to confirm the impacts and any further mitigation which may be required to minimise the risk to marine users. ██████████ comment: as above, surely the “assessment” should have been completed for the purpose of this amendment to the application? 2.4.24 Further assessment may be required following a review of any updated or additional coastal and geomorphology assessment. ██████████ comment: as above, surely the “assessment and review” should have been completed for the purpose of this amendment to the application? All of these points only heighten ██████████ concerns about the credibility of the application overall and the impacts of the construction and operation of the site. * Environmental Issues of Desalination (siu.edu) 2.3 From Desalination to Destruction – Environmental ScienceBites (pressbooks.pub) The Disadvantages of Desalination (sciencing.com) Too much salt: water desalination plants harm environment: U.N. | Reuters Case studies on environmental impact of seawater desalination - ScienceDirect Desalination plants produce more waste brine than thought (nationalgeographic.com)

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Please provide comments on this proposed change

I think this is a good idea, only if it helps to speed up the process of getting this much needed and safe power-generating station under construction and operational as soon as possible, and overcomes any local objectors

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Response from ██████████ To Sizewell Consultation re Water Supplies August 2021 The site when operational will require vast quantities of fresh water. It is still unclear what long term solution EDF intend to use, nor how it is going to be implemented. Therefore we cannot yet judge whether this will cause detriment to the environment or our ratepayers. Construction and use of a desalination plant is an expensive and energy inefficient approach which surely should and could have been avoided by better long term planning. Using water tankers for several months until the desalination plant is operative is inevitably putting traffic on the roads that would not otherwise need to be there, even if done within the overall HGV limits. ██████████

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██ was set up in 1996 to represent the water-related interests of the agri-food sector in North-East Norfolk and to promote best-practice irrigation methods. The group currently has over 170 members, who are licenced to abstract approximately 15,000,000 m3 per annum (equivalent to 41,000 m3/d or 41 MI/d). This water is used to produce high value crops such potatoes, carrots, fruit and salads. ██████████ abstractors operate in the driest part of the UK. Access to water during the irrigation season is constrained by reduced river flows, vulnerability to drought and the requirement to meet water-related environmental needs. Climate change threatens to exacerbate these challenges. In response, ██████████ ██████████ are interested in alternative water supply options, particularly where these are drought & climate change resilient and sustainable in the long-term. In respect of the proposed temporary desalination plant for Sizewell C, ██████████ encourage SZC Co. to work with local agri-food abstractors to assess the feasibility of using desalination to meet agri-food needs in coastal or near-coastal locations. This includes using the water which is produced by the process in the generation of hydrogen, so that this can be used by farmers and food-processors as a low-carbon energy source. ██████████ would welcome the opportunity to meet with SZC Co. to discuss the potential for a related innovation project. Using data and learning from the proposed scheme and working with a suitable academic partner, this would identify how applicable desalination is for agri-food abstractors, and where modifications of the Sizewell C system might make it a feasible and cost-effective alternative to traditional sources of supply. If successful, the project would deliver significant long-term economic and environmental benefit for communities and businesses in the vicinity of the proposed new development.

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The early assessment in the consultation document indicates that there should be no undue impact on coastal geomorphology but the new plan appears not yet to have been fully evaluated. There is some indication that there may need to be localised dredging . [REDACTED] therefore wishes to reserve its position as the apparent assessment appears a preliminary view not a detailed assessment.

Processing your data

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NON-FITTING

Is Key Stakeholder?

YES ☐

Stakeholder Type:

Enter stakeholder type ▼

Unique Identifier:

Unique Identifier ↗



Consultation on construction Water Supply Strategy

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I refer to EDF environmental statement January 2021 concerning the rejection of a desalination plant "This option has been discounted in favour of alternative options due to concerns with power consumption sustainability, cost and wast water discharge. The desalination process is typically energy intensive and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (DCO)." I suggest this statement is indisputable. Further brine + levels of phosphorous zinc chromium and possible nuclear radioactive particles at high discharge rates will inevitably cause toxic algae blooms toxic to fish, humans and animals. Exacerbated by enclosed sea water between the large sandbank and the close inshore sandbank. EDF and the EA have known for 10 years that a great quantity of potable water will be needed to construct and run SZC & SZD and supply SZB and increased requirement with outages. EA have repeatedly been fobbed of with EDF,s statement " that a suitable and ACCEPTABLE supply of potable water is available" without saying how until the third of August 2021. Allowing not even 28 days for consultation but 21. This is not a potable water strategy whatever this may mean but a desparate attempt to justify the build in the driest part of the country. There is no doubt that the desalination plant will be running for several years to come with electricity supplied from a massive polluting diesel farm. From the tone of the submission there is a strong possibility that the plant will be operational for the extent of the lifetime of SZC & D. The proposed 28 km water pipeline from the Waveney/ Beccles to the build with the predicted global warming restricted rainfall will possibly denude the area to the extent that C & D and possibly B dependant on a much larger permanent desalination plant. This area should not accommodate any more nuclear power stations for reasons of potable water scarcity, rising sea level flooding, eroding coastline and pollution from build and running. [REDACTED].

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YES

Stakeholder Type:

Enter stakeholder type

Unique Identifier:

Unique Identifier



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Please provide comments on this proposed change

Please can it be explicitly confirmed, that the requirements for the Construction phase of Sizewell C, will not have any material impact on the availability of Water, both surface and Underground for Agricultural use, in particular, that used for Spray Irrigation, either directly or via Winter Storage Reservoirs. Otherwise there is a danger in surrounding Catchments, that this will impact on the Farming and Food Economy. I appreciate that Desalination is likely to be via Sea or Tidal supply, but the impact on Fresh Water for Agriculture, should be treated the same as is stated as the case for local drinking Water.

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Please provide comments on this proposed change

I find this change significant and worrying.The issue of potable water has been raised since the Stage 1 consultation so why is this plan only now being put forward? Sufficient time needs to be given for proper scrutiny of the resulting issues. It is disingenuous to claim that it will make no difference to the overall number of HGV movements. Although they may still be within agreed limits, they will still exceed the number required if there were no need to transport water. The effect of the discharge of brine on the marine environment needs to be carefully evaluated not subsumed into the other issues the project raises for marine life. How effective are diffusers? What studies have been done on this topic? There will be further adverse effects on air quality from the diesel generator in the early stages and the extra HGV movements. There may be problems with the water supply if the desalination plant breaks down or needs maintenance and this may have a knock on effect on Leiston's water supply. There are other potential problems with this major change to the plans, for example concerns about supply in the event of a fire, further reduction of local access to the beach. If the water supply is insufficient or cannot be safely guaranteed, then Sizewell C should not be built.

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First comment: a three week public consultation in August when a significant proportion of people are on holiday and many organisations are running on skeleton staff is not acceptable and shows disrespect to genuine consultation required in our democracy. 1. This late consultation gives little confidence that all basic provisions for this major project have been fully thought through. Given the time that has already passed in preparations prior to the DCO submission it is unnerving that, only at this late stage, has sufficient contact been made with the water provider to begin to get any indication of what water supply may be available. Perhaps it was the reminder from Environment Agency (REP2-135) that prompted this when EA said there was not sufficient detail to provide assurance that a sustainable water supply that would not cause ecological harm and that it was concerned that the issue had not been resolved by this stage. 2. This consultation is rushed so the assessment of impact is very by and large. There needs to be a more detailed assessment of the impact of intensely salinated with other mineral contents water going back into the sea. For example, it is stated that this densely salinated water will diffuse at t a low level within the water, but more work is to be done in relation to chromium and zinc levels. It needs to be clear whether people swimming not the benthic / bottom living flora and fauna would be adversely affected. 3. What surety is that the water provider will be able to install a Sizewell transfer main in adequate time? What if the temporary plant has to be in place for as many as ten not five years? Also, how might its prolonged presence affect the operation of the site in which it is to be temporarily sited. 4. The consultation document shows that the highest use of potable water will be in months 46 to 82 but this period starts just at the time the temporary desalination plant would need to be moved from its first site to one slightly further south. What guarantee is there that the daily 40 HGV water loads (80 journeys in the area) will not need to be doubled to meet the known increased water requirement. 5. The provision of water by road is said to be within the HGV cap, will it be? Given the essential need for water, is it certain that the cap will not need to be exceeded when several essential different sets of supplies needed for the many aspects of the construction happen to be delayed and coincide because of unrelated circumstances? 5. What will the impact of the HGV s carrying water, which is a very heavy load, be on the inadequate road foundations on the local roads to be used east of the A12. Comment on this consultation format - first the system for saving and mailing links for part completed submissions does not work and has therefore caused me more work as I had to re do it from scratch. The window for typing in comments is wholly inadequate in size as it is not possible to see more than two lines at a time

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I think the changes you are proposing will have dangerous consequences to the Marine environment in a 3mile radius of the proposed site. The extra pipes will disturb the ever moving shingle and the brine which will be returned to the sea will further disturb fish and other marine creatures impacting on their health. If the two reactors are to be constructed water should be provided in other ways. Given that this part of the country faces the strong possibility of increasingly dry weather due to Climate Change during construction it would be better to get the carbon reduction required from a mix of retrofitting houses and the opportunity for Community Energy Projects to flourish. This is an environmentally damaging proposal so NO I don't think it should proceed.

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██████████ will not be impacted directly by the need for yet another consultation on the plans for Sizewell C but it does consider the need for the further consultation, at this late stage, to be yet another example of the inefficient way that EDF has prepared its plans to construct Sizewell C. ██████████ has already added its name to the list of signatories of the letter drafted by AEPAS (Anglian Energy Planning Alliance). This ██████████ has repeatedly pointed out problems that will arise if the construction goes ahead (such as rat runs from Sizewell traffic and increased diversion of non-Sizewell traffic) but measures for mitigation in this and many other areas has been very delayed or incomplete. We have noted Tom McGarry's attempt to justify the late plans and consultation in his letter to the East Anglian Daily Times this week, ("Assurance over water supplies.") but we remain unconvinced that this is a new problem that could not have been foreseen at a much earlier stage. (i.e the need to have a lot of water to make a lot of concrete.) The need for 40 HGV water tankers a day for up to 12 months may not exceed the stated traffic plan but it is still 40 more per day that will have to be tolerated by those living near the route. 40 tankers a day means 80 road trips along the access roads (1 every 7.5 minutes) with inefficient use of the empty tanker on the return trip with a large carbon footprint. ██████████ does not support the EDF plans to construct Sizewell C.

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Please provide comments on this proposed change

It is a well-known fact that this area of East Anglia is one of the driest in the Country. It has always been obvious that there would never be enough fresh water available from the immediate area to supply the needs of a huge accommodation site for the workforce and for the supply of fresh water to two new nuclear power installations. Surely in the planning process this fact should have been taken account of in the first instance rather than coming up with a last-minute plan for a de-salination plant. I object to this late-in-the day proposal which will cause even more environmental damage than already envisaged with the development of two unproven and untried nuclear power plants.

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Water Supply should have been thought about in the initial planning stages. This consultation is far too late and too short. A full environmental impact assessment needs to be done before before the desalination plant is agreed and before water is abstracted from the Waveney Valley area and the impact of tankers of water on small country roads also needs to be considered.

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You are not the planning inspectorate so my IP number is not relevant to you

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In January 2017 I raised concerns in my stage 2 consultation response that East Suffolk is a water stressed area. The fact that you had not worked out you needed such a large potable water supply which is not available in this area prior to submitting your DCO is a massive concern and raises more red flags about how poorly planned this project is. Desalination is an energy heavy process with impacts on water based biodiversity. This will exacerbate the significant damage to this unique coastal area which is already planned for the SZC project and further increase its carbon footprint. This area is not appropriate for you proposed development due to a variety of issues, this is just the latest. I continue to wholeheartedly object to this development.

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The reporting of this proposed desalination plant is constructed in such a way as to completely obscure the appalling damage that will be done to the marine ecosystem in the environs of Sizewell. To write that the system will be in operation for "up to 24 hours a day" is deliberately meaningless. If the aim is to generate up to 4,000 meter cubed of desalinated water a day, what is the actual amount of seawater projected that will need to be removed from this ecosystem on a daily basis? The fact that a filter will be put in place to prevent the entry to the desalination plant of eels and other fish, particularly of young age, is entirely irrelevant to the well-being of the fish and the marine creatures in the surrounding area. They will not survive the abstraction process, nor will they survive in the climate of increased salt concentrations. The Fish Recovery and Return will simply be a process for depositing thousands of tonnes of dead fish and aquatic creatures to their home environment. The diesel generator power supply will increase emissions in the area. The publicity states that nuclear is low-carbon in comparison with large-scale solar. This is palpably an untested assertion (no comparison of power, size, scale or long-term carbon generation is given). As ever, the public relations material from EDF is a gloss-over of the real environmental damage to the current habitat of non-human animals and the future habitat of human animals. The project is a disgrace and the publicity surrounding it nothing but a 'green' or indeed 'white'-wash.

Processing your data

Traverse, an independent research company, have been appointed to undertake processing and analysis of responses to this consultation. All personal data will be held in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and your personal data will not be transferred outside of the European Economic Area. Traverse’s full Data Protection Policy and Privacy Statement can be found at traverse.ltd or by contacting Traverse on 0207 239 7800 / info@traverse.ltd

NON-FITTING

Is Key Stakeholder?

YES

Stakeholder Type:

Enter stakeholder type

Unique Identifier:

Unique Identifier



Consultation on construction Water Supply Strategy

The development consent application for the Sizewell C Project was submitted on 27 May 2020 and is currently being examined by an Examining Authority that was appointed on 30 June 2020. On 21 April 2021, the Examining Authority accepted for examination 15 changes (the "Accepted Changes") to the Project proposals. A further three proposed changes (numbers 16, 17, and 18) were submitted on 23 July 2021.

We are now consulting on Proposed Change 19. This questionnaire has been designed to be answered once you have read about our proposed changes in the Consultation Document, which is available at www.sizewellc.co.uk.

To return a hard copy, or any other written response, please send it to FREEPOST SZC CONSULTATION (no stamp or further address required). Please note you can also provide your feedback by writing to us. You do not need to submit a completed questionnaire as your official response.

The deadline for responses to this consultation is **Friday 27 August 2021**.

Your Details

Name

Email

Address

Are you responding on behalf of an organisation?

If so, which?

Job title

Interested Party Reference Number (if applicable)

Privacy Notice

Privacy notice

Our privacy notice provides information on what personal data we will collect as part of this process, how we will collect it and what we will use it for. You can access our privacy notice at: <https://www.edfenergy.com/privacy/NNB> or you can request a paper copy by emailing: dpo@edfenergy.com

Proposed Change 19: construction Water Supply Strategy

To ensure a dependable supply of water is available for construction of Sizewell C, we are proposing a temporary desalination plant on the main construction site. The plant would not impact local drinking water supply and would be removed when no longer required.

Please provide comments on this proposed change

Unique Reference: [REDACTED] 27 August 2021 Dear Sir or Madam Application EN010012 for The Sizewell C Project by NNB Generation Company (SZC) Limited ("SZC Co.") Proposed Change 19: Temporary desalination plant I refer to the PINS email, on behalf of the Examining Authority, dated 10 August 2021 which provides a link to their letter dated 5 August 2021 addressed to Carly Vince, SZC Co, which incorporates the following link: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-006498-Third%20Notification%20of%20Proposed%20Project%20Changes.pdf> This link takes the reader to a document headed: Sizewell C Project 9.61 Third Notification of Proposed Project Changes My initial thoughts on browsing through what I took to be a fully complete consultation document, produced by SZC Co, was that it could be upheld to be an exemplar of succinctness, if not lightness. Unfortunately, this lightness contributes heavily to the lack of detail needed to arrive at a decent assessment of this proposed change. It's not brevity which is needed but fuller information. Having drafted the bulk of my response I then ventured, more by accident than design, onto SZC Co's project website and came across a bulkier (or if preferred a fuller) consultation document headed 'Sizewell C Project Consultation on Temporary Desalinisation Plant'. I surmise that the consultation document accessed using the above hyperlink should be read as an abridged version of the bulkier consultation document. There are now so many documents flying hither and thither it's easy to lose the plot. For instance, SZC Co are now, apparently, on version 3 of the Updated Main Development Site Environmental Statement and Environmental Statement Addendum Figures. I would allege there has been a bit of a failure by SZC Co not to point out that the document headed 'Sizewell C Project 9.61 Third Notification of Proposed Project Changes' is more of an abridged version of the fuller document on their website. What follows next represents my comments on the fuller consultation version. Scene Setting It is a truth universally acknowledged that the proposed location of the Sizewell C nuclear power station lies within a water stress area. This much we know. Indeed, the Environment Agency's response to the SZC Co first public consultation over the period November 2012 to February 2013 highlighted this fact. Prima facie, the obvious need for water supply both for the nuclear power station construction and operational activities, as well as potable water for the work force, does not appear, allegedly, to have been the subject of full investigation by SZC Co from the time of the Environment Agency's initial submission, over nine years ago, to the time of the DCO application. This is despite the issue of water resources having been scoped into the Environmental Impact Assessment – see ID 4.11.12 under the Groundwater and Surface Water section in the adopted 2019 scoping report. This advised that the ES should state the source of the required water and assess adverse effects on water availability, including potable water where significant effects are likely. This requirement reflected comments given by the Environment Agency in its response to the 2019 scoping opinion, which reinforced their earlier position on assessing water resources in the 2014 scoping opinion. The expectation seems to be that, in fairness, SZC Co considered that water supply requirements would be met from Essex and Suffolk Water's mains water supply. However, we now know with certainty, following the DCO submission, that Essex and Suffolk have confirmed with SZC Co that they would be unable to provide a mains water supply to the Sizewell C site from their local Blyth Water Resource Zone within which the SZC site is located. As stated by Essex and Suffolk Water this is because, in their words, all raw water in the Blyth Water Resource Zone is sourced from the Chalk and Crag aquifers which are assessed by the Environment Agency to be over-licensed and potentially over abstracted. Comments on Proposed Temporary Desalinisation Plant The information in the consultation document about the location of the proposed temporary desalinisation plant appears to be a little confusing. Figure 2.3 shows the indicative location of the plant on the main nuclear power station platform. Figure 2.4, this being described as 'subsequent location' shows an indicative location of the plant, 'if required', to the north-west of the main platform site. There is nothing in the text in the main body of the consultation document that explains the subsequent movement of the plant to this second site. It appears that the reader is expected to make the assumption that as construction progresses on the main platform site, it will be necessary to move, at some stage, the modular plant to the second site, plus further piping would need to be installed. The paucity of certain information contained in the consultation document is such that we are not informed about the type of desalination process which SZC Co proposes to carry out in the desalination plant. It's noted in section 2.4.11 that more detailed modelling will be undertaken as part of a H1 type assessment to confirm effects of the brine discharge on marine water quality. There is an indication at section 2.4.16 that approximately 60% of the abstracted seawater would be returned to the sea following the desalination process. I have some concerns that we will have to wait, apparently, until later for the H1 type assessment and a full assessment that considers the magnitude of saline, trace metal and nutrient discharges in relation to the sensitivity of marine ecology receptors. Without these specific items of information it is difficult to exercise any judgement about the full effects of the desalination process. Although desalination plants are in operation around the world, it would be useful to learn what advice has been given about operating a modular desalination plant and who has given that advice. Are there examples of so-called desalination modular plants operating elsewhere around the world that could be referred to for illustration purposes. We have no information about the scale and likely appearance of the desalination modular building. With regard to visual impacts, I understand that the Suffolk Coast & Heaths AONB Unit has expressed concerns about the possibility of moving the desalination plant to a location away from the original proposed location to a position on higher ground in an area of less developed AONB which would introduce a new built element into the AONB for several years. I share the AONB Unit's view that this would not contribute to the purpose of the AONB designation, nor would it contribute to the purpose of the AONB at either the proposed location or the site it may be moved to. There is also the matter of whether or not this proposed change constitutes a material change for the purposes of Schedule 6 to the Planning Act 2008. Given the site location for the proposed nuclear power station is within a water stress area, there would clearly be potential for significant impacts on the existing water supply, in the absence of the desalinisation plant, or any other major source of water supply. For this reason, it appears to me that this change constitutes a material change. The construction by Essex and Suffolk Water of their proposed water supply transfer main will of course require planning permission entirely separately from any DCO granted to SZC Co. There is no guarantee that the water supply transfer main will be granted planning permission. Yours faithfully [REDACTED]

Processing your data

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NON-FITTING

Is Key Stakeholder?

YES

Stakeholder Type:

Enter stakeholder type

Unique Identifier:

Unique Identifier

[REDACTED]
Unique Reference: [REDACTED]

Saturday 7th August 2021

Dear EDF,

Response to latest Proposed Change 19: construction Water Supply Strategy

EDF have stated in this documentation (relating to the newly proposed temporary desalination plant) that there will be no increase in HGVs:

"This would not increase the overall number of HGVs predicted for the project during the early years of construction."

I simply do not believe there will be no increase in HGVs if this proposed change to transport potable water in and to build a desalination plant happens.

I am vehemently against any increase in HGVs in either those in the early years using the B1122 and A12 or those using a completed Sizewell Link Road. This opposition to the proposed quantity of HGVs is due to the noise and air pollution and vibration they will bring to my local area and how all traffic congestion associated with the construction would devastate our normal way of life for over a decade.

The Proposed Change 19 also raises many questions in my mind:


- Is desalinated water thoroughly tested for use in this type of construction? i.e. Does the risk of salt being present in the water jeopardise the strength of the concrete and potentially make the reactor even more unsafe to live near?
- Have all the previous reactors of this proposed type for SZC been constructed with desalinated or potable water?
- If Sizewell B has never used desalinated water but always depended on local potable water, why?
- Will the desalination plant remain in situ for the making good of the construction area at the end of construction and for the eventual decommissioning requirements of the twin reactors or will these phases of the SZC project revert back to requiring potable water?
- Will this 'transported in' potable water and desalinated water also be required for the areas of construction away from the main construction site - e.g. the park and ride sites, the two-village by-pass, the Yoxford roundabout, the Sizewell Link Road etc - or will they all be built relying on a mains supply of potable water still?

Yours Sincerely,

[REDACTED]

c.c.

[REDACTED]

From: [REDACTED] 
Subject: [REDACTED]
Date: 3 August 2021 at 17:26
To: [REDACTED]
[REDACTED]



Hi all

Should this be logged as a formal response ?

Thanks

I have created an enquiry

From: [REDACTED]
Sent: 03/08/2021
To: sizewell@edfconsultation.info
Subject: Re: Construction Water Supply: Consultation
[REDACTED]

Please forward the EDF e mail and my initial views below to all Councillors for info (or comment back to me if they feel necessary)

Initially this us yet again EDF are 'seeing the light' and being forced into more expense as people have been shouting about this for ages

Initial view from me is it's a good plan

Cheers

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Update: We continue to work remotely throughout the Covid pandemic, monitoring the situation and responding to changes appropriately in accordance to government guidelines.

[REDACTED]

August 2021

comment on Consultation on Temporary Desalination Plant for Sizewell C project

Commentary

The [REDACTED] makes the following comments on the consultation for a temporary (9-12 years) desalination plant, that may be moved between two sites within the nationally designated landscape.

The [REDACTED] are aware of concerns raised by several parties about the availability of a suitable water supply and is disappointed that a new element is being proposed at this stage. The [REDACTED] notes the short period for comment and a potential change process for the Development Consent Order.

The consultation indicates to the [REDACTED] that expert advice is not being given due weight by the applicant and that it further demonstrates that the scale of the proposals in this location is not suitable.

The proposals are likely to cause additional damage to the nationally designated [REDACTED]. The [REDACTED] considers that the lack of reference to the location of the proposals, in a nationally designated landscape, in the consultation document (August 2021) to be remiss.

This consultation response is made on behalf of the [REDACTED]. The [REDACTED] is made up of around 25 organisations which are committed to the purposes of the [REDACTED] designation, to conserve and enhance natural beauty. For the avoidance of any doubt, some individual members of the [REDACTED] are public bodies or statutory undertakers which have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other [REDACTED] members are likely to make their own representations reflecting their purposes.

The [REDACTED] main concerns are summarised below:

- 1) Time period of consultation
- 2) Impact on defined qualities of the [REDACTED]
- 3) Impact on the statutory purpose of the [REDACTED]
- 4) Consideration of the [REDACTED]
- 5) Other [REDACTED] issues

1) Time period of consultation

The [REDACTED] consider that both the length and timing of the consultation to be unsatisfactory. For membership organisations such as the [REDACTED], the ability to develop an informed response calling on the expertise of a wide range of partners, is compromised by the restriction on time made available (just 24 days) to respond to the

consultation, which if considered as a standalone proposal would be considered major development.

This is exaggerated by the timing of consultation, during the holiday period, and at a time when partners are required to respond to a second round of Examining Authority questions and developing Statements of Common Ground with the applicant on issues relating to the Sizewell C project.

Furthermore, many [redacted] organisations that would be expected to support the development of this consultation response, have their day to day duties to undertake and are not solely devoted to providing comment on Sizewell C matters. It is due to the potential impacts of the proposals that many partners have made time to develop this response at the expense of their core work.

2) Impact on the defined qualities of the [redacted]

The Suffolk Coast & Heaths [redacted] natural beauty is defined by a series of features as agreed between the applicant, [redacted] (now [redacted]), [redacted] and the [redacted]. These defined features are outlined in the *Natural Beauty and Special Qualities Indicators v1.8*¹

These defined features are based on Natural England's *Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England*² and include the following characteristics:

- Landscape quality
- Scenic quality
- Relative wildness
- Relative tranquillity
- Natural heritage features
- Cultural heritage

The [redacted] consider that the proposals:

- Do not conserve or enhance **landscape quality** as they do not contribute to the intactness of the visual function of the landscape, degrade the condition of natural landscape features and are an incongruous feature.
- Do not contribute to **scenic quality** by providing a distinctive sense of place, (as they introduce a built element into the [redacted] that does not contribute to the local vernacular.
- Do not contribute to **relative wildness** including a sense of remoteness, due the introduction of an industrial element during construction phase of up to 12 years.
- Do not contribute to **relative tranquillity** by the introduction of increased vehicle movements and noise of generators 24 hours a day for 7 days per week for up to 12 years.
- Do not contribute to the conservation or enhancement of **natural heritage features**

¹ [redacted]

² Guidance for assessing landscapes for designation as [redacted] or [redacted]

- Do not contribute to **cultural heritage** of the [REDACTED] due to the introduction of large building (10 m high)

3) Impact on statutory purpose of the [REDACTED]

The statutory purpose of an [REDACTED] is to conserve and enhance natural beauty. The [REDACTED] does not consider that this proposed development would contribute to the statutory purpose of the [REDACTED].

4) Consideration of the [REDACTED]

The [REDACTED] are disappointed to see no reference to the nationally designated [REDACTED] or an indication of an assessment of the impact on the [REDACTED] in the applicant's Consultation Document: Consultation on Temporary Desalination Plant³

5) Other [REDACTED] issues

The [REDACTED] considers that:

- The use of a desalination plant is not an efficient use of resources and that the use of diesel generators to power the plant is unsustainable. The proposals, if built, would have a negative impact on local air quality and the defined tranquillity of the [REDACTED]. The consultation document refers to the National Policy Statement EN-1 about the nuclear industries role to diversify and decarbonise sources of electricity, the use of diesel generators for a period of up to 12 years would not appear compatible with this.
- The possibility of moving the desalination plant to a location away from the original proposed location to a position on higher ground in what appears to be an area of less developed [REDACTED] would introduce a new built element into the [REDACTED] for several years. This would not contribute to the purpose of the [REDACTED] designation. The desalination plant will not contribute to the purpose of the [REDACTED] at either the proposed location or the site it may be moved to.
- The proposals will require an increase in HGV movements for the delivery of plant and for a water supply for 9-12 months while the desalination plant is constructed (up to 40 deliveries per day, requiring 80 movements per day). It is acknowledged that this would be within the capped HGV limits but these proposals, if implemented would lead to an increase in HGV movements in the [REDACTED], and therefore not contribute to its statutory purpose.
- If the applicant pursues an alternative strategy to bring in water supplies by sea, that will also impact the [REDACTED]. An assessment of relative impacts would be required to understand how any such alternative proposals would affect the nationally designated landscape.
- The introduction of diesel generators to power the proposed desalination plant would impact the defined qualities of tranquillity of the [REDACTED].

The [REDACTED] consider the defined qualities of the [REDACTED] would be negatively impacted by the proposals for a desalination plant. This re-enforces the view that the overall proposals for the Sizewell C project are too large for this location and would have a significant detrimental effect on the [REDACTED].

³ Consultation Document: Consultation on Temporary Desalination Plant

https://www.edfenergy.com/sites/default/files/sizewell_c_project_consultation_document_updated_v2-compressed.pdf



9th August 2021

By email only:

info@sizewell.co.uk

Dear Sir or Madam

The Sizewell C Project, Planning Inspectorate Reference: EN010012: Proposed Change 19: temporary desalination plant

With reference to your letter dated 2nd August regarding the above proposed change.

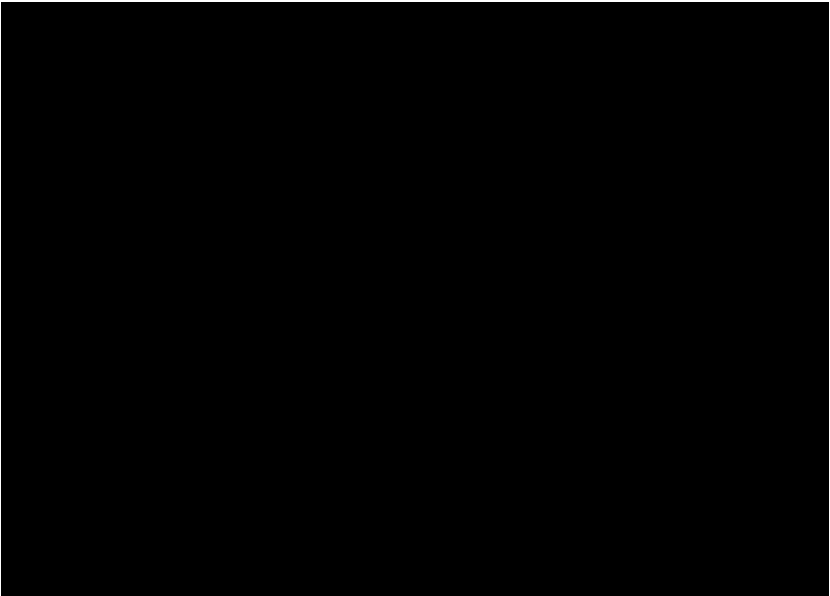
██ wish to confirm they have no comments to make in relation to this proposed change.

██ would like to take this opportunity to express their continued support of Health partners and blue light ██████████ across the ██████████ ██████████ for the requirement of adequate & robust health, wellbeing & emergency service mitigation to be included within the DCO Deed of Obligation process.

With the above in mind, we note that the ██████████ are focused on reaching agreement with the Applicant to seek to ensure that suitable health and well being provisions are included in the Project, before the Examination closes in October 2021.

Yours faithfully





9th August 2021

By email only:

info@sizewell.co.uk

Dear Sir or Madam

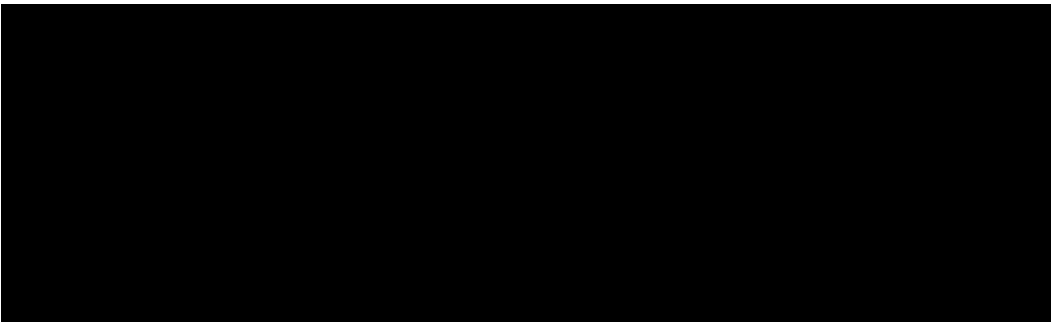
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██ would like to take this opportunity to express their continued support of Health partners and blue light ██████████ across the ██████████ ██████████ for the requirement of adequate & robust health, wellbeing & emergency service mitigation to be included within the DCO Deed of Obligation process.

Yours faithfully



From: [REDACTED]

Sent: 17/08/2021

To: sizewell@edfconsultation.info

CC: [REDACTED]
[REDACTED]

Subject: Construction Water Supply: Consultation

Dear Sirs I write in response to your email seeking views on your proposals regarding the above matter. I would make four observations. 1. I am utterly astounded that at this stage of the planning process you are now introducing a change which goes to the heart of whether you can even build Sizewell C. This is totally unacceptable and shows further disrespect to those who are having to live with the uncertainties of this scheme. 2. The sudden realisation that the water provider cannot meet your expected demand demonstrates extremely poor project management as this should have been fully realised very early in the design process and therefore brings into question your ability to carry out this development. 3. The inclusion of a desalination plant is undoubtedly a material change to the DCO and should go through the full consultation process and not rushed through in the timescale you are proposing. I trust you will demonstrate the full effects of having to undertake these works in your public communications including the impact on CO2 emissions and traffic flows. 4. Once again your Community Newsletter is a misrepresentation of the reality - I find it hard to believe that 'ongoing work has identified a need for more flexibility in construction water supply' as you state. This statement just masks your failure to project manage the design phase correctly as the inadequacy of the current water supply could and should have been identified at a very much earlier stage of the process. It is becoming even more apparent that your company is unable to build Sizewell C in this location and this latest barrier to development is evidence of that. I trust you will now withdraw your DCO and save residents, shareholders and taxpayers further costs and uncertainty. Yours faithfully [REDACTED]

From: [REDACTED]

Sent: 16/08/2021

To: sizewell@edfconsultation.info

Subject: Consultation on Change Proposal 19, Desalination Plant(s)

I am writing to comment on the Consultation Document on Proposed Change 19 recently published, and would like the following comments taken into consideration:

- 1 It has been clear for ten years or more that there could be problems with sufficient water supply for the construction and management of Sizewell C, and it is very odd that this water strategy is only now being issued, with only two months of the Examination period left. This means that there will not be sufficient time for a proper scrutiny of the options put forward by EDFE, and indeed not even the **statutory** 28 day minimum for a change request consultation will be possible.
- 2 Similarly, modelling of some of the aspects of the proposed strategy, such as the extraction from the Waveney, are not yet available, which means that significant questions (for example, what will the environmental impact of the Waveney extraction be? What are EDFE's other options if Essex & Suffolk Water find the proposed extraction to be unsustainable?) cannot be answered within the consultation timetable. This is unacceptable.
- 3 The construction of the desalination plan will require significant extra fresh water, delivered to the site by up to 40 tankers each day, with further transport required for diesel and removal of the salt output. It is hard to understand how these additional journeys will not affect, as is claimed, the overall number of lorry journeys; nor is there anywhere a statement of where this tankered water will be drawn from.
- 4 The desalination plant (or plants, if mains water is unavailable from Barsham until 2026) will require yet more dredging, more death and destruction of marine life at the intake heads, and the discharge of brine and various other contaminants (in concentrated form) back to the sea. It's likely that a 'dead zone' will be created around the outflows with the building up of brine and lack of oxygen. The dismissal of all these problems as simply being within the overall effects of the cooling system is unconvincing, and I have highlighted, in the copy of para 2.4.10 following, some of the assumptive and very weak comments on how damage to marine ecology can be avoided:

2.4.10. The high salinity discharge would be denser than the seawater and would tend to sink to the seabed. This would be mitigated through use of a diffuser head (see Figure 2.6) that will would facilitate rapid mixing. [Will it? Or would it?] The discharge is also well within the surf zone that would favour mixing. Only very localised increases in salinity are expected. Although phosphorus is added to the discharge as noted above, this additional nutrient loading of the Sizewell Bay is expected to be comparable to previous assessments in the Environmental Statement. This will be evaluated as appropriate with additional nutrient modelling included in a H1 type assessment. [Will this be carried out in time for consultation, or after the consultation has closed?]

- 5 If the second plant is required, how would the relocation and operation affect tanker deliveries, environmental impact on the Minsmere/Walberswick SSSI, and the progress of the construction progress itself?

There are many more questions to be asked and I am sure others will have responded in more detail, but as a layman and Suffolk resident I feel that the most important point is that this bizarre delay in setting out a Water Strategy could almost have been, on the face of it, deliberately engineered to avoid giving the public and the Examining Authority a proper chance to evaluate the impacts of the demand for potable and non-potable water during the construction phase. I believe that the first recorded query on this issue was at a meeting of the Sizewell Stakeholder Group in 2010, so there has been some time to develop and publish the strategy.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 18/08/2021
To: sizewell@edfconsultation.info
Subject: The Sizewell C Project, Reference Number EN010012:
Consultation on proposed change 19

FAO Carly Vince

Chief Planning Officer – Sizewell C

SIZEWELL C

**PINS reference EN010012 - Consultation on proposed change 19– Historic
England comments**

Interested Party Number: [REDACTED]

This is just to confirm that we have read the consultation document (dated 2nd August 2021). I can confirm that we do not have any comments in relation to the documents provided and have noted the changes proposed.

Yours faithfully,

[REDACTED]

From: [REDACTED]
Sent: 19/08/2021
To: sizewell@edfconsultation.info
Subject: FW: Sizewell C

From: [REDACTED]
Sent: 19 August 2021 11:27
To: info@sizewell.co.uk
Subject: Sizewell C

Dear EDF/SZC Co.

The proposed construction of the Sizewell C nuclear power station raises many questions that need to be answered. A major problem here is the extreme lateness of the consultation period, something that should have taken place years ago. Not enough details have been provided which means that there is not sufficient time for proper scrutiny of the plans to take place.

One of the major problems (and there are quite a few) with the Sizewell C project is *WATER*. Water (especially potable water) is in short supply in this area, with hardly enough for local farmers, the local population and the tourist industry. In this environmentally sensitive area, what thought has been given to extraction and recycling, and especially the effects on potable water sources? As for using water-tankers, where would *their* water come from?

This whole extremely vulnerable area, with its Sizewell SSSI and the Minsmere/Walberswick SAC (Special Area of Conservation) is really threatened by the planned nuclear expansion at Sizewell.

Also a matter of great concern is the desalination plants proposals, and the fact that the whole Sizewell construction programme could be held up by firstly building the desalination plant, and then subsequently having to re-locate it. What delays are likely as a result of that?

And what exactly are the plans for the nuclear waste that would be generated at the new site?

I look forward to your reply.

Yours sincerely

A solid black horizontal bar used to redact a signature.

From: [REDACTED]

Sent: 17/08/2021

To: sizewell@edfconsultation.info

Subject: Consultation on Construction Water Supply

I've received the EDF Community Newsletter on the construction water supply matter and read the consultation document you kindly sent me on a USB stick


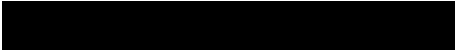
It appears that Northumbrian Water will not be able to provide enough potable water for the construction process, and that EDF intend to use a desalination plant to ensure an adequate supply.

While desalination is a very costly way of providing water suitable for construction et.c, I see no objection to it's use in this case, and would support the proposed change, as I do the overall Sizewell C project.

I tried doing an online response, but abandoned it when I found that Magpie Landing would be using my data for things I am not happy about; hence this e-mail.

Best Wishes,

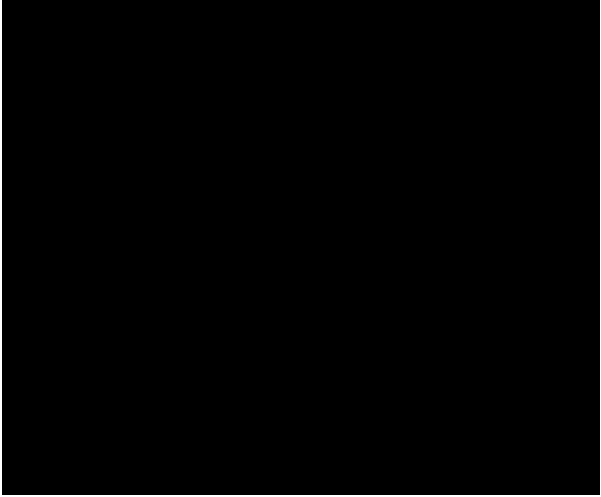
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Your ref:

EMAIL ONLY





info@sizewellc.co.uk





13th August 2021

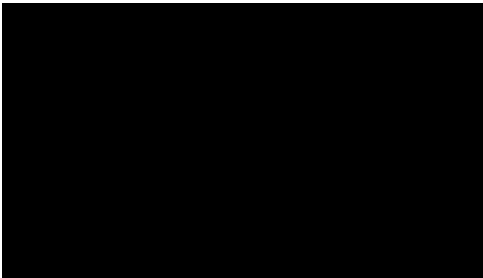
Dear Sir / Madam

**The Sizewell C Project, Planning Inspectorate Reference Number: EN010012
Proposed change 19 temporary desalination plant consultation**

Thank you for consulting  on the proposed change to the Sizewell C Project detailed above. The  and the 
 do not wish to make any representations in respect of this proposed change.

However, the  and  would like to confirm their support for the work of health and blue light organisations in Suffolk seeking to secure appropriate health, wellbeing and emergency services mitigation in relation to the Sizewell C project.

Yours faithfully



From: [REDACTED]
Sent: 18/08/2021
To: sizewell@edfconsultation.info
Subject: Desalination plant

Dear Sir/Madam,

I am writing with my concerns about the proposed desalination plant for Sizewell CD as detailed below and I would like to lodge my strong objection to the desalination proposal. I believe that Sizewell C/D cannot be built without vast amounts of potable water and this is just not available.

First of all, I feel compelled to point out that this consultation has been left to the very last minute and the issue of potable water should have been sorted out ages ago. It does not leave enough time for the water strategy to be properly scrutinised before the deadline of 14th October. Furthermore, the document lacks essential details and I understand these won't be available until after the end of the consultation period when the official request for the Change to the SZC goes into PINS.

I understand that the plan is to take water from the River Waveney, a relatively small local river. I would like to know what extra pressures are going to be put on this river from such a large extraction of water in an area which already has high demands from farming and a generally low rainfall. I live in the local area and am also very concerned about this as the Waveney Valley is noted for its wetlands which are rich in wildlife.

I note that the plan is to use non potable water for suppressing dust. Using saline water would be a disaster for these designated sites as it would kill the vegetation. Please could you let me know what your sustainable plan is for suppressing dust?

Another concern of mine is that to build the plant fresh water would have to be brought by tanker and this would need up to 40 tanks a day for 4-6 months on top of all the other disruption planned for the site. I would be very unhappy about this and know it would adversely affect the local area. I have further concerns about where the tankered water would come from - it doesn't say - please could you specify this? Also, I understand more dredging would be needed to install the intake and outflow heads which will mean even more fish will be killed at the intake system, in addition to the millions which will be killed by the cooling water system. I consider this to be unacceptable.

I understand that after the salt is removed, the remaining water will need further treatment and storage. Please could you clarify how this will be done? I am very concerned about the added environmental impacts which don't appear to have been calculated - please could you detail this for me? I am particularly concerned about the 'dead zone' which will be created around the outflow heads with the build up of brine and lack of oxygen between the inner and outer bars. I am also concerned about the concentration of naturally occurring chemicals and minerals being returned to the sea - arsenic for example and other chemicals which don't occur naturally in the sea which will now end up there. I swim in the sea near Sizewell regularly in the summer and am very worried about this. Please provide more details.

I also understand there is a need for a second desalination plant and for this there would be even more movement of tankers and also more lorries to take away the salt blocks and bring diesel. If the plan is to have two desalination plants then it would logically follow that the

environmental effects would be doubled. Please could you let me know? Also, how would the plant and pipes be relocated to the Goosehill construction site without creating more damage to the Sizewell Marshes SSSI?

I look forward to your response and further details.

Regards,



**The Sizewell C Project – Consultation on the Temporary Desalination Plant –
Representation from [REDACTED]**

Please see below my response to the SZC Co consultation on proposals for a temporary desalination plant, prior to a formal change being submitted to the examination authority as part of the Development Consent Order (DCO) process.

I have previously discussed the projected demand for water for this development (which is particularly acute during construction) with the Environment Agency and Essex & Suffolk Water (part of Northumbrian Water), mindful of the delicate and limited water resource in this part of the country particularly with regard to abstraction. It is clear that water cannot be balanced between the Northern/Central Water Resource Zone (WRZ) and the Blyth WRZ at those critical points without a net increase in abstraction. That would not be feasible locally which is why I understand that the proposal to transfer water from Barsham was put forward. The water supplier has now indicated it cannot guarantee this supply will be available until December 2024 at the earliest, with a risk that will come much later. That being the case, there is understandably a need for an alternative solution. That is why I am supportive of EDF's proposal for a desalination plant both in the initial and subsequent location (if needed).

Whilst it is concerning that during the first nine to twelve months of construction, as the Main Platform is being prepared and the temporary desalination plant is being built, that EDF will have to tanker in potable water amounting to 40 deliveries per day, I have been assured that the capped HGV limits for the project will remain unchanged.

Although it will be up to regulators such as the Environment Agency, Natural England and the Marine Management Organisation to judge these proposals from an environmental point of view, I note EDF's assurance that the temporary desalination plant would not result in any new or materially different likely significant effects on the environment from those already presented in the Environmental Statement. It also gives me confidence that the pipe would be installed under the beach and seabed using a trenchless construction method – and that that same pipe would be used for both the initial and subsequent locations avoiding the need for any further disturbance.

Whilst overall I am content with EDF's proposal, without prejudging the future, I do consider that it may be necessary for a permanent desalination plant to be considered in the future. That would need to be in a different location to what is proposed, however, I understand that due to their design, it is straightforward to deconstruct and reconstruct such plants. Also the footprint is rather small and in itself could have secondary benefits for local water users. In any event, that should not stop the temporary plant being approved at this stage for the facilitation of construction.

From: [REDACTED]
Sent: 20/08/2021
To: sizewell@edfconsultation.info
Subject: Sizewell C/D Potable water / desalination plant
Sizewell C/D Potable water / desalination plant

I wish to object very strongly about the construction of Sizewell C/D especially in respect to issues regarding the huge water needs to build and run the plant and the brine disposal.

I understand that there is no mains water currently available.

Extraction from the River Waveney, which is a beautiful but small river, unspoilt and with plenty of places for wildlife, which I visit and enjoy regularly. Extracting large amounts of water will obviously damage the river and destroy the habitats surrounding it. And even then will it be enough water? This is a very dry county.

The desalination process, where does the water come from? The construction of the plant will need water brought in by tankers, up to 40 a day for 4 to 6 months. The process is very energy intensive using diesel generators - fumes and noise - CO2 and NOx - close to local marshes which are SSSI sites.

And yet more dredging needed - more fish and other creatures killed by the cooling water system. And the discharge for the brine and other contaminants with the continuous discharge of salty water, so salty that organisms can't survive and the sensitive marine habitats will be destroyed.

Why is the consultation of the water use so late? This should have been raised much earlier.

This scheme will not only damage the climate and planet with the construction of the plant due to use of concrete and other processes, it will be added to by the overuse of water and the disposal of brine and other contaminants.

I very much oppose the building of Sizewell C/D and think the damage is not worth the construction of a nuclear power station.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



Unique Reference: [REDACTED]

Consultation – Temporary desalination plant

My comments on your consultation document:

1.2. Policy context

1.2.1. The Overarching National Policy Statement (“NPS”) for Energy (“NPS EN–1”) (Ref 1.1) and the NPS for Nuclear Power Generation (“NPS EN–6”) (Ref 1.2) were considered by Parliament and formally designated in July 2011. Together, NPS EN–1 and NPS EN–6 provide the framework for development consent decisions on applications for new nuclear power stations which are capable of deployment by the end of 2025.

1.2.2. The need for the Project is established in NPS EN–1 and NPS EN–6 which lists Sizewell as one of eight potentially suitable sites for the deployment of new nuclear power stations in England and Wales before the end of 2025. NPS EN–1 confirms that all applications for development consent

within the scope of the NPS should be assessed on the basis that the Government has demonstrated that there is a need for those types of infrastructure. NPS EN–1 confirms that

it is Government policy that new nuclear power forms an important element of the strategy for moving towards a decarbonised, diverse electricity sector by 2050, and that nuclear power should be able to contribute to the UK’s need for new capacity. The need for new nuclear power generation is described as “urgent”.

NPS1 & 6 date back to 2011 – 10 years ago – when the landscape for energy production was very different, when Nuclear Power might seem to be the only viable future power producer, and before Renewables had taken off, providing cleaner, greener and much cheaper options. It was a time before the scale of the Climate emergency was obvious. It was a time of optimism that nuclear could respond appropriately; before the technological and financial failures of European reactors like Flamanville, and the current over budget and delayed and technological problems of Hinkley C. The world in 2021 and any likely contribution of SZC in 2025 onwards, is very different.

1.2.3. Whilst SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station, it is no longer possible for deployment to take place by the end of 2025. In December 2017, the Government published a Written Statement on Energy Infrastructure (ref. HLWS316) (the “2017 Ministerial Statement”) which reiterated the continuing need for new nuclear and explained that the Government had begun the process of consulting on the preparation of a new NPS for nuclear power stations expected to be deployed after 2025. For projects yet to apply for development consent and due to deploy beyond 2025, which includes Sizewell C, the 2017 Ministerial Statement confirmed that ‘Government continues to give its strong in principle support to project proposals at those sites currently listed in EN–6’ (Ref 1.3). Chapter 1 – Introduction | 7

This statement is already 5 years old, and given the points made above about technological and environmental change. Five years ago, EDF appeared to be in a more viable financial condition, and Ministers could be forgiven for thinking that EDF had the solution to their energy problems.

1.2.4. In July 2018, the Government published its response to the consultation. The Government’s Response (Ref 1.4) reiterated the statements made in the 2017 Ministerial Statement and confirmed again the important role of nuclear in the UK’s energy future. These matters have now been confirmed most recently in the Energy White Paper – Powering our Net Zero Future, December 2020 (Ref 1.5).

Of course Nuclear has an important role, and will continue to do so with the current SZB, especially if extended. All the document does is to express the geo-political aims of a Government trying to look serious about considering energy (apart from the ludicrous statement about having a commercially viable fusion reactor by 2040). Some of these statements are old (in political terms) and the technology has moved on. Much of the paper reads like an election address – we will do this and do that...

- p8 – ‘continued contribution of nuclear’ – ie continue to use existing NPP
- p9 – we are ‘replacingfossil fuels’ actually mentions ‘with clean energy solutions such as renewables, before it also mentions nuclear,[but then nuclear is not really clean!]

- p11 – ‘we will generate new clean power with offshore wind, and then adds nuclear – we are already producing nuclear, and will continue to do so with SZB for another 30 years. This is not a justification for building new, nor building at SZ.
- p12 – ‘we are pursuing large scale nuclear ‘ but then goes onto predict that Offshore wind will quadruple in production. It casually mentions that nuclear is reliable, but in the 5 years I have lived nearby we have experienced long outages (of months) for ‘refuelling /maintenance, and several months of unforeseen technical faults – it’s not that good at being a reliable backup.
- p16 - ‘Aiming to bring at least one large scale nuclear project to the point of
- Final Investment Decision by the end of this Parliament, subject to clear value for money and all relevant approvals’ – undecided, until money and approvals sorted. Yes, a politicians rhetoric. As a sign of how quickly technology and climate worries move on, recent responses to the coming Climate Emergency mean that targets for Heat pumps have been increased.
- P38 – talks about ‘advanced’ nuclear. What’s that? According to the Glossary it’s not SZC.
- P41 – ending in 2030? already plans to extend its life by 30 years. This buys time for alternatives. And SZC couldn’t be constructed by then anyway.
- P43 – talks about need for reliability. SZC already on extended outage due to unforeseen maintenance and all other EU facilities plagued with design/construction and maintenance issues. How reliable is it?
- P48 – Nuclear plan – as p16 above – ‘clear value for money’ seems to be a problem. 10,000 jobs – they have been reading your literature!
- P49 – Nuclear sector deal 2018 – already out of date, as unpopularity of Nuclear makes potential investors investors opt out. ‘Clear value for money’ – reconsidering only way is to tax the public in advance of building.
- P51 – don’t put your faith in views expressed by these authors/government, that we will have a ‘commercially viable Fusion reactor by 2040’ ! Cloud cuckoo land! If EDF are building it, they ought to start now, as projects like SZ, Hinkley, Flamanville, Finland are usually decades late.

1.2.5. A more detailed explanation of the legislative and policy context of the Project can be found in **Chapter 3** of the **Planning Statement** [Examination Library Ref. **APP-590**] and the Planning Statement Update (Examination Library Ref. **REP2-043**).

1.3. Decarbonisation and the need for new nuclear capacity

1.3.1. Climate change is one of the greatest global challenges we face. To meet agreed global climate change targets, CO2 emissions from all sectors must be reduced to near zero levels (Ref 1.6).

- Agreed, but despite EDF claims, the process of building and generating Nuclear power and storing the waste, and mining the fuel, do little to address the issue of net-zero. EDF have already moved from claiming nuclear is carbon free [in advertising] to more correctly stating it is low carbon, due to advertising laws requiring the truth. However EDF’s claim for low carbon still ignores the fact that its fuel needs to be mined, processed and transported – all of which are carbon intensive. The 15 year construction of the plant and all the transport of materials to it, will also be carbon intensive. The Community newsletter (Aug 21) laughably calculates the carbon payback to be only 5 months. Where is the true analysis of what the carbon budget will be? The newly appeared project for desalination – pipeline, diesel generators – is not included in this budget.

1.3.2. Nuclear power is the largest source of low-carbon electricity in the developed world (Ref 1.6) and the UK Government recognises that new nuclear power stations will form an important part of the country’s transition to a low-carbon energy system that is resilient, diverse and value for money for end users (Ref 1.7). Nuclear generation has a lower carbon footprint than low-carbon alternatives, such as large-scale solar and carbon capture and storage, and a similar footprint to wind generation. It also has a significantly lower physical footprint, requiring around 1,000 times less land than solar and 1,500 times less land than onshore wind.

EDF always claim it is low carbon (and sometimes they even try claiming it is carbon free!) but the whole process is not and cannot be very low carbon. The mere building of SZC will produce lots of carbon. Your Community Newsletter August 21 has the claim that this will be offset in 5 months, but in reality this will be at least 5 years, from the start of operation/generation. With current construction practice of EDF the build will take up to 15 years, to the date when the government hope to have that commercially viable fusion reactor operating (huh!)– and fusion is a much better bet for a carbon and waste free future.

1.3.3. The Government recognises that new nuclear power stations are critical to the country's transition to a more resilient, affordable and diverse low-carbon energy system.

NPS EN-1 states:

"Nuclear power generation is a low-carbon, proven technology, which is anticipated to play an increasingly important role as we move to diversify and decarbonise our sources of electricity ... [i]t is Government policy that new nuclear power should be able to contribute as much as possible to the UK's need for new capacity." Well that's what they thought in 2011, but 10 years is a long time in technology.

'Proven technology'? - just a reminder that the current version of Hinkley and SZC reactors have never been put into operation anywhere, but are an adaptation of previous (old fashioned) reactors which work less efficiently. Hinkley and SZC are unknown entities. Even the Americans say they will never work!

.....

1. Why has this proposal taken so long to be produced. I can remember raising this problem – of lack of water – about 5 years ago, and TASC / Stop Sizewell C long before that. How is it that EDF's plans have overlooked this matter until after the Consultation has started?

2. I am concerned about the **air pollution generated** by this 'new' part of the project

- EDF's forecasts about transport movements did not take this into account, so those previous figures are understated/inaccurate.
- Transport movements – up to 40 water tankers daily from Barsham – a 28km trip (56km round trip) – will generate difficult traffic movements around Beccles, and generate diesel pollution and particulates (and tyre fragments and brake dust) all along the route – PM 10,2.5's and NO2.
- Construction of the pipeline – a 5 year project – will disrupt the countryside with pollution from plant and construction workers. Similarly construction at Barsham water treatment plant, and wherever the borehole is to be dug. [I am also concerned about the long term effects of draining the aquifer during the lifetime of the power station, given that climate change may make Suffolk even drier]. The machinery/plant need to build this pipeline will produce air pollution – unaccounted for in EDF consultation figures.
- Operation of the diesel generator to power up the desalination plant – to be run 24 hrs a day for the first year. The fumes – PM particulates etc– are going to be close to the coastal footpath, the unique flora there, and close to the scrapes at Minsmere where the particulates will settle, and the noise will be a disturbance. Again the pollution figure for this diesel are unaccounted for in initial EDF proposals.
- Carbon footprint and payback predictions therefore inaccurate in EDF proposals.
- Inappropriate site for such a large project if sufficient local potable water not available, and this is the only solution.

From: [REDACTED]
Sent: 22/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]
Subject: Desalination plant

To those who it should concern,

I have recently learnt about plans to build a desalination plant at Sizewell to provide fresh water for the possible construction of a new power station.

It leaves me almost speechless about the stupidity of whoever is organizing the Sizewell C project.

As the reality of the project slowly gets exposed it is quite clear the whole thing will be a disaster.

There are far far better ways to generate electricity and help this country achieve a green future.

As to the desalination plant:

1. It should not run on fossil fuel. Quite unnecessary and contrary to the whole objective.
2. It seems that the only way it can work is by dumping the salt which has been removed from the sea water back into the sea. This will cause horrendous pollution and kill fish and other marine life.
3. The process also involves using highly polluting chemicals that will end up in the sea. Yet more pollution.
4. Vast numbers of marine organisms and fish will be killed at the intake.

Do you not realize that this part of the North Sea is part of a Marine Protected Area and is also within the Outer Thames Protected Area.

I clearly get the feeling that this whole project is being driven by people in offices that are far away. They don't care about the mess they will make and they will never come and look at it.

All very sad

I just hope that, even at this last hour, someone with the power of decision will wake up and come to their senses.

Yours sincerely

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 25/08/2021
To: sizewell@edfconsultation.info
Subject: Sizewell
Still not acceptable changes

From: [REDACTED]
Sent: 23/08/2021
To: sizewell@edfconsultation.info
Subject: Re: Construction Water Supply Consultation

Dear Sir/Madam

Unique Reference: [REDACTED]

The following is the formal response to the Construction Water Supply Consultation from [REDACTED]

If the extensive delay to the provision of the required potable water has only just been brought to the attention of EDF by Essex and Suffolk Water (owned by Northumberland Water) then we must question the thoroughness of the EDF procurement and planning process, and the viability of the many other mitigation proposals that are not yet formally guaranteed and require the provision of infrastructure from other companies, such as the road improvements, rail improvements etc. There is a significant possibility that all of the proposed mitigation actions fail to materialise or face significant delays.

When [REDACTED] met with representatives of EDF on 15th April, 2021 we asked them directly if the massive demand for potable water was going to be an issue. We were told in no uncertain terms that it was not an issue, so imagine our surprise and disappointment when this latest consultation arrived, which contradicts what we were told just 4 months ago.

Alternatively, perhaps they knew of this all along and have tried to pass it off as an awkward footnote to the planning procedure hoping that the recent relaxation of COVID restrictions take people's minds off the significant impact this proposal will have on our community and environment.

An additional forty tankers a day along existing roads and the installation of a desalination plant with its own range of complications yet to be fully explored by the environmental experts cannot be passed off by EDF as a 'negligible' or 'insignificant' risk if this will add

to the previous assumptions used for the environmental impact studies.

How many more last minute surprises related to the other activities outside of EDF's direct control can we expect? The whole question of Network Rail's works are precarious to say the least. If these proposals fall through then the numbers of road movements through local villages would increase significantly from current expectations. There are a considerable number of 'ifs and buts' in this Consultation proposal, which has been submitted at short notice, without any independent advice being put before the Inspectorate, especially concerning any damage to the sea floor posed by the Desalination plant, which seems to have a very opened-ended lifespan.

A three week consultation period about a brand new proposal, without any externally validated impact analysis, is unacceptable. A proposal as significant as this should only be considered after a fully independent environmental impact assessment has been completed.

Which ever way you look at this, our confidence in EDF, which was frail at the best of times, erodes further.

Regards



From: [REDACTED]
Sent: 25/08/2021
To: sizewell@edfconsultation.info
Subject: Desalination Plant

Dear Sir/Madam

As so it goes on, the complete madness of the everlasting saga of Sizewell C. I am talking about the desalination plant. This project should not be happening; it is absolutely ludicrous to even think about this being built on an area of outstanding natural beauty let alone anywhere in East Suffolk. This will bring East Suffolk to a standstill and I mean a Stand still! And now we now have to contend with a desalination plant because EDF have only just realised, well they did realise but forgot to mention (hmm, convenient) this before. Why was this not in the DCO?!

There is no mention of costing either. So much secrecy surrounding this and for what reason? Are they trying to get things in by the back door?!

So, more HGV's carrying water adding to the hundreds that will already be on the road and just the normal everyday traffic and then to have a pipeline running from Beccles to Leiston...more digging up roads and more chaos. Just STOP, anyone with any brains will know that this will never work (nor will the power station, if others are to go by)!

The plant will take 4 – 6 months to build and be brought in by road, but because it cannot be installed at the very beginning of construction, drinkable water will need to be brought in by tanker for the first 9 -12 months of construction, up to 40 trucks/day (80 movements). EDF claims tankers and plant transport won't raise HGV "caps" but we are doubtful.

The plant would operate 24/7 using diesel generators until onsite power is available. This will contribute to significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics which have health impacts.

How much of the countryside, wildlife and marine life are they going to destroy?

Water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. Impacts on fish and other marine life from this and the water intakes are concerning.

As you can probably gather from my letter I am against this project and it is getting more and more absurd each week.

I object to the desalination plant and the digging up roads for the pipeline and I strongly object to more traffic on these already busy roads.

[REDACTED]

[REDACTED]

rom [REDACTED]
Sent:23/08/2021
To:sizewell@edfconsultation.info
Subject:desalination

From: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

To EDF:

Once again I write in dismay that you are even contemplating a desalination plant at Sizewell to provide drinking water.

Not content with spoiling an area of outstanding natural beauty and an SSSI you are now prepared to invade the ocean further.

To turn sea water to drinking water does not just require a filter but it needs chemicals which will cause real harm to the flora and fauna of the sea bed.

I have written before and will continue to do so, not just for myself but on behalf of the many who are concerned but feel voiceless.

What you are doing at Sizewell is nothing short of vandalism and I beg you to stop; you seem to be driving a tanker with no breaking system but there must be a way to turn round and develop more wind power and, as you have already begun, to continue research into energy storage.

Nuclear power is destructive, dangerous and ridiculously expensive and it will not address the climate crisis.

It really is time you cut your losses and left.

Very sincerely,

[REDACTED]

From: [REDACTED]
Sent: 24/08/2021
To: sizewellc@planninginspectorate.gov.uk
CC: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Potable water for Sizewell C

Dear Planning Inspector,

Sizewell C Co's drinking water debacle

I am sorry to find myself needing to write yet another letter to you with regard to the planning application for Sizewell C. This time in relation to the supply of potable water.

It was back in 2010 that the *East Anglian Daily Times* published a letter written, I am reminded, by one of [REDACTED] members, highlighting that securing enough potable water for such a mammoth project as Sizewell C in famously dry East Anglia would be a gargantuan undertaking and yet, we find ourselves eleven years later, at the eleventh hour, deep into the DCO process, with the Applicant only now seeking to find an answer to this huge problem and, in so doing, raising yet more questions...

I know that [REDACTED] and [REDACTED] have written to you at length about this and I would simply like to add my voice and express my agreement with all that they say. They are an intelligent, measured, thoughtful, objective bunch doing their level best to speak sense for us all in an increasingly machiavellian process and they are rightly angry - they are not alone. You may question the use of the word 'machiavellian' but please note that, for this response, stakeholders have been given only three weeks to respond in the heart of the holiday season and at a time when many people may be daring to take a break for the first time in nearly two years.

I too urge the ExA to 'accept the inevitable': on top of the many issues which have been raised since the inquiry opened which clearly show that this project represents 'the wrong development, in the wrong place at the wrong time,' without the prospect of a safe, environmentally sound and sustainable supply of potable water for the time it takes to be built and, indeed, for the sixty years or so that the plant is intended to be operational

(sea level rises notwithstanding...), the SZC proposal cannot go ahead. Evidence has convinced me that EdF is not a credible or trustworthy Applicant and that the planning application should be thrown out without further ado...

Yours sincerely

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Proposed Desalination plant

I am writing on the proposal of a desalination plant proposed by EDF in response to Essex and Suffolk authorities being unable to provide 28km of new water mains to provide 4 million tonnes daily of drinkable water to Sizewell C site.

It is appalling that such an important issue has been left to this stage when a desalination plant was previously rejected due to its cost, large energy consumption, diesel emissions, sustainability and problems of concentrated brine being discharged. Whether this is possible through the combined drainage outfall and the impacts this brine would have on fish as well as the environmental impacts from the intake water from the sea.

Also the environmental impacts of yet more tankers bringing in water until a plant would be set up.

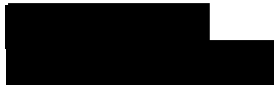
For such an important issue the consultation period is far too short while people are away over the summer and not able to address the issue fully.

██████████

██████████

██████████

██████████



Financing and Economic Regulation.
FREEPOST SZC CONSULTATION

2nd August 2021

Dear [REDACTED],

Thank you for sending me the August copy of the Sizewell C Community Newsletter, and requesting a response by 27th August this year.

Referring to your wording;

"Economic benefits, jobs and apprenticeships".

I think it unfair to imply that employment with the Sizewell C project will represent the only jobs available in the near future, when the wind power companies are, and will be, providing very similar employment figures to yours, in their own sector.

"Clean and reliable energy system".

I also think it unfair for you to claim that nuclear power is *clean* as it delivers the most dangerous and poisonous waste product ever known to man, endangering humanity for thousands of years to come.

"We must strive to make the project *the best* we can for local people".

Again this is rather disingenuous as, clearly, you *hope* (therefore cannot guarantee) to make the project *the least worst* for local people.

You welcome views on the construction Water Supply Strategy.

My opinion is, that it will require far more lorry transport through local roadways, and an even greater area of an AONB being detrimentally occupied.

You claim that your plan requires *less land* in comparison to other technologies.

(inferring renewables). This is incorrect- solar farms do not *lose* their land. Often sheep graze beneath the panels and, at any time, the land is easily recouped, never lost.

You (I hope not purposefully) ignore the huge *offshore* wind-farms, that take no land at all.

You claim that nuclear can produce more electricity per acre than solar or onshore wind.

Again it is disingenuous to avoid the mention of *offshore* wind farms, which are daily increasing their huge current output.

I hope that you do follow the progress of your competitors, but if not; Renewables generated 43 per cent of the UK's electricity, in 2020, with offshore and onshore wind accounting for 24.2 per cent of the renewable share: putting the country sixth on the global league table.

The RSPB has raised its concern about the level of land to be taken from Sizewell Marshes SSSI, and the lack of justification for this; saying "We do not have confidence that Sizewell C can be developed without significant impacts on the designated wildlife sites of the Suffolk Coast, and Minsmere in particular."
Even although you say you will not encroach by a single millimetre.

In allowing that your new site will occupy 6.52 ha of the SSI of Sizewell marshes you assert that you will create a replacement habitat of tenfold elsewhere. This would appear to be the land at Aldhurst Farm. However this land is currently a wildlife area anyway.

"To make sure that our whole estate *continues* to enhance the areas rich landscape."
I really don't think anyone can truthfully say that a nuclear power station can ever *enhance* a landscape!

In addition to the points raised in your Newsletter, may I add the following?

Sizewell C is posited as being designed on the Hinkley Point Model.
The original estimate (2012) for Hinkley Point was £4bn
Currently this stands at £21.5bn-£22.5bn.
Hinkley Point was scheduled to be completed in 2016.
Now the estimate is 2026. 10 years behind schedule.
The earthworks at Hinkley Point C required the excavation of 2.3 million m³ of material. Sizewell C is four times the size of Hinkley Point.

It is now considered to be politically unwise to partner with China General Nuclear Power, and EDF, (seeming dangerously close to bankruptcy), are also considering withdrawing their investment.

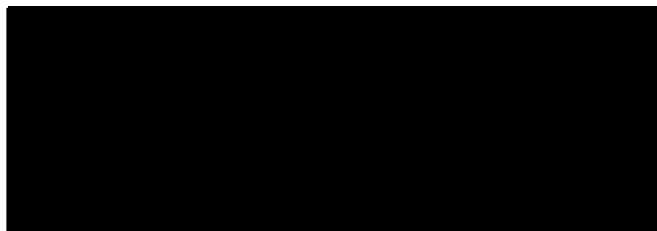
The UK Government are, therefore, contemplating investing directly in Sizewell C, that is, shifting risk and cost to the British taxpayer.

This is bad news twice, as the current government guaranteed, inflation linked, price of £92.50 per megawatt hour for Sizewell C's electricity, compares disastrously with the prices for UK renewables coming in at £39.65 per megawatt hour.

I know that it is your job to commend the plan for of Sizewell C to a far reaching community, but I do ask that, in future, you could be less misleading in the way you present your position.

Finally; costs, delays, land damage, traffic, present and future danger; I offer these as rational reasons for the abandonment of the scheme.

Yours faithfully,



SIZEWELL C: CONSULTATION ON TEMPORARY DESALINATION PLANT (Change 19)

Response from [REDACTED], resident of Woodbridge, unique ID [REDACTED].

1. **The project itself should not be built**, for reasons which I and many others have previously explained, some of the main ones being –
 - huge amounts of nuclear waste (for which there is no long-term disposal plan)
 - dangerous site on exposed eroding coastline, both for for operation and decommissioning
 - unacceptable and irreversible impacts on protected wildlife habitats and landscape
 - damage to the local economy
 - appalling impact on local people from construction traffic and works
 - vast cost
2. On top of this, the **extreme lateness to propose a plan** for this key element of the proposed construction, plus the failure to give the recommended 28 days period for Consultation, shows the Applicant's incompetent approach to planning this huge infrastructure project. The issue of water supply has been pointed out as a problem for many years, yet the Applicant finally brings forward a half-formed plan with no detail available, a few weeks before the end of the plan inspection. The examining authority, government, financiers, contractors, electricity industry, and nation cannot have confidence in the Applicant to construct and operate a huge nuclear power station.
3. The Applicant has **attempted to deceive** local people into believing that there will be no additional HGV movements, by such phraseology as "This would not increase the overall number of HGVs predicted for the project during the early years of construction" which is in the community newsletter. This is an untrue statement (see 4 below) and devalues the consultation process.
4. **Water tanker lorries** - As a resident of Woodbridge, **I object to the additional HGV traffic** that would be generated by having to bring in water by tanker. The Applicant has not stated where this water would come from, and so I must assume that it would be from reservoirs in East Anglia or beyond, so that the HGVs would be routed around Ipswich and onto the A12 past Woodbridge. There would be up to 40 additional 44-ton HGVs in each direction each day (80 HGV movements per day) – and that might be exceeded if the desalination plant doesn't become operational on the timescale the Applicant hopes. This would add to the **congestion, noise, vibration and emissions affecting Woodbridge**, which have already been mentioned in previous responses.
These additional movements should not be allowed; in the undesirable event of the project going ahead, it should **wait** until it can be provided with potable water without the adverse impacts of additional HGVs.

5. **Discharges from desalination process** – there are problems associated with discharges from reverse osmosis desalination – not just of minerals which were already present in the sea-water, but of cleaning and maintenance chemicals. See [Wikipedia description of Reverse Osmosis desalination](#) and the references cited there. This says *“The reverse osmosis process is not maintenance free. Various factors interfere with efficiency: ionic contamination (calcium, magnesium etc.); dissolved organic carbon (DOC); bacteria; viruses; colloids and insoluble particulates; biofouling and scaling. In extreme cases, the RO membranes are destroyed. To mitigate damage, various pretreatment stages are introduced. Anti-scaling inhibitors include acids and other agents such as the organic polymers polyacrylamide and polymaleic acid, phosphonates and polyphosphates. Inhibitors for fouling are biocides (as oxidants against bacteria and viruses), such as chlorine, ozone, sodium or calcium hypochlorite. At regular intervals, depending on the membrane contamination; fluctuating seawater conditions; or when prompted by monitoring processes, the membranes need to be cleaned, known as emergency or shock-flushing. Flushing is done with inhibitors in a fresh water solution and the system must go offline. This procedure is environmentally risky, since contaminated water is diverted into the ocean without treatment. Sensitive marine habitats can be irreversibly damaged.”*

The Applicant has made no mention of these discharges nor how they are to be avoided, minimised, mitigated or licensed. The consultation document mentions only phosphorus as an additional contaminant (2.4.16). **Full assessment** of the discharges is essential before desalination can be planned.

Because it appears that discharges from desalination may pollute the sea locally to the station, it would be better to **postpone the construction** until potable water can be supplied by pipeline. Better still, cancel this ill-conceived and poorly planned project.

6. **Effect of desalination on local marine ecosystem**- though it seems the proposed filter system may prevent small fish fry from being taken into the desalination plant, it would not exclude microscopic organisms, which would then be left in super-concentrated brine for some time, before being discharged back into the sea and carried to the sea-bed in the dense effluent. Many of these organisms would not survive this experience and would be lost from the food-web, with complex knock-on effects and imbalances taking place to larger creatures. This is undesirable; it should be assessed properly, rather than dismissed as it has been in the consultation document.
7. **Energy requirement of desalination** – will be considerable, at 3 to 3.5 kWh per m³ of water produced. The document mentions diesel generators at first; it doesn't say how long before these are replaced by a regular electricity supply. At the peak of water demand, many thousands of litres of diesel fuel would be required every day – the consultation document makes no mention of the transport and storage for this fuel, nor of the associated risks of spills and leaks.
8. **Moving the desalination plant** – should this be necessary, the proposed site is alongside the haul road and much closer to the Minsmere SSSI. It appears to involve intake and outflow pipes of approximately 2.5km length alongside the haul road. So the proposal would be to

pipe **seawater across the sensitive Sizewell Marshes SSSI** for this distance, then to take desalinated water and **super-concentrated brine/slurry back across the marshes** to the outfall and the construction platform. This raises a number of problems-

- a. Risk of pollution to the Sizewell Marshes SSSI by accidental leaks from the pipes
- b. Impact of diesel generators (noise, NOx and particulates) being much closer to Minsmere SSSI
- c. Disruption to construction project caused by installing pipes alongside or under haul road
- d. Temporary non-availability of desalinated water during plant movement
- e. Energy requirement to pump liquids/slurry that distance.

Points c and d would appear to extend the construction period, and thus the misery for local people.

For these further reasons, it would be better to avoid desalination and wait for mains supply of potable water before commencing the build – or better yet, cancel the project.

9. **Storage of potable water** – the consultation document makes no mention of storing water. Yet presumably a prudent developer would want some reserve in case of desalination outage (planned or unplanned). How many days' storage is intended? Will it involve a water-tower? If so, there would be visual impact, and it should be mentioned.

For the above reasons, **I object to the outline plan proposed by the Applicant in the consultation document.** While it may have been possible to allay some of the smaller concerns if the Applicant had started work on its strategy for potable water some years ago, it is now too late to provide a satisfactory plan in time for the end of the planning inspection.

The benefits of the Sizewell C nuclear power station are already outweighed by the costs and disadvantages; by the time the problem of water supply could have a satisfactory solution, this will be even more the case.

[REDACTED]

Interested Party ID: [REDACTED]

SIZEWELL C: CONSULTATION ON TEMPORARY DESALINATION PLANT (Change 19)

Our group response

[REDACTED]

[REDACTED]

1. The extreme lateness of this consultation

As local people, we are all very well aware of the shortage of water in this very dry region. We first raised this issue in relation to the possibility of another nuclear power station at a meeting of the Sizewell Stakeholder Group **in 2010** – eleven years ago! Since then, we have questioned the Environment Agency from time to time on this matter and have been told that they could do nothing until they received your water strategy. We understood, however, that no further licences for bore hole extraction were being granted.

We are now almost at the end of the Sizewell C examination, with only a few weeks remaining, and details of your strategy remain unresolved. We are not impressed.

2. The River Waveney

This river and surrounding valley are greatly valued by both local people and visitors for its beauty, the opportunities for quiet recreation and its very rich wildlife. The river is also relatively small. We cannot imagine that such an enormous extraction, at 3.5Ml per day, would be without harm. We need to see whether it would conform to the Water Framework Directive, yet the sustainability appraisal is still awaited.

3. The pipeline

You do not say which route the 28km pipe from Barsham would take. At what point would it enter the AONB? How can you get it to Sizewell without damaging the designated sites even further?

4. Water recycling

While we are in favour of methods of saving water and re-using it where possible, we wish to know what kind of non-potable water would be used for dust suppression, wheel washing etc. We need absolute confirmation that this would in no way have any saline content, as this would kill nearby vegetation and could be a disaster for the designated sites.

5. Lorry numbers

Our members, among many others, have already expressed grave concern about the numbers of lorries that would be using our quiet rural roads, as well as main transport links, and making people's lives a misery with all the attendant noise and pollution. As the mains water would not be available until at least 2024 – probably much later - we see from your document that tankers, at about 40 per day each way, would be used to supply water for the construction works and building of the desalination plant. What would be the source of this water? Where would it come from?

You claim that this would not increase your overall cap on lorry numbers, but you supply no evidence for this statement. We find this hard to believe. Where are the figures to demonstrate this?

6. The desalination process

██████████ are not in favour of this process due to the impacts on the marine environment – unless this is the only way that poor people can have access to fresh drinking water. It most certainly should not be used for the building of a nuclear power station – particularly one that is not necessary, bearing in mind that we now have the technology to produce electricity by other, more benign means.

Reverse osmosis is extremely energy-intensive due to the need to pump water through a fine membrane under high pressure in order to remove the salt and other minerals. Diesel generators would have to be brought to the main platform to supply this energy. Due to their proximity to Sizewell Marshes SSSI immediately to the west, and the Minsmere-Walberswick directly to the north, we will be asking the Environment Agency whether a permit for these would be forthcoming. Impacts of fumes and particulates on the interest features of the designated sites, together with ongoing noise from the plant, would have to be assessed. Here again, you supply no details. There would also be risks from diesel spillage and leaks.

In addition to all the marine works for the cooling water infrastructure, more dredging would be necessary to install the intake and outflow heads. Millions of fish and other organisms would be killed by the cooling system; yet more would suffer mortality at the desalination intake head. This is not acceptable.

7. Discharge of brine and various contaminants to the marine environment

You say that brine would be continuously discharged to the sea, at 1.6 times the ambient concentration, between the inner and outer sand bars. It would amount to about 6,000m³ per day. Despite disperser heads, it would nevertheless fall to the bottom, where, over time, a dead zone would form. Organisms that live on or close to the seabed would be unable to survive here due to the extra saline content and the resulting lack of dissolved oxygen.

The outfall would be situated within two designated sites, namely the Southern North Sea Special Area of Conservation (SAC) and the Outer Thames Estuary Special Protection Area (SPA). There would be a knock-on effect on the interest features here, such as Red Throated Diver, following the reduction in prey items. You supply no assessments of such likely effects.

Various chemicals would have to be used to keep the headworks and membrane ‘clean’, including anti-scaling acids and biocides, all of which would end up in the sea. ‘Shock chlorination’ and any emergency flushing with inhibitors are described in the literature as ‘environmentally risky’ and that ‘sensitive marine habitats can be irreversibly damaged’. (Rautenbach, 2007; Latteman & Hoppner, 2003.) You dismiss such damage as being within the overall effects of the cooling system. This clearly is not the case.

After separation of the salt, the resulting water would need further treatment – how, by what means, what further chemicals would be used and how would they be disposed of? Where would this be carried out? Where would the potable water be stored?

8. Need for a second desalination plant and relocation

If the mains water supply is not forthcoming prior to peak construction, which seems likely, then you say that a second desalination plant would have to be built. This would be extremely regrettable, as it would double the environmental impacts. Local people would once more suffer the impact of the water tankers on our roads. What are you doing to avoid such a situation?

When the station platform area is needed for other works, the plant(s) and generators would have to be moved north over the SSSI crossing (if already built) to the Goose Hill construction area. How would you get it all there without further damage to Sizewell Marshes SSSI? Would this not hold up the overall construction programme? These works would be unacceptably close to the Minsmere-Walberswick SSSI. Yet more energy would have to be supplied on account of the extra length of the intake and outflow pipes, as much as 2.5km each way according to your plans. Would this not lead to more diesel and probably more generators with all the attendant risks?

9. Conclusion

██████████ object to the proposed desalination plant(s) on environmental grounds. You have put in these proposals far too late for them to be properly assessed within the examination timetable. A detailed Environmental Impact Assessment is still awaited.

Why did you not develop your water strategy years ago? We have known all along that there would be a serious problem with water supply in this very dry region, and with intense competition from the needs of agriculture, our tourist industry and the growing population. How is it that you did not anticipate this problem also?

References

Latteman, S. & Hoppner, T. (2003). *Seawater Desalination: Impacts of brine and chemical discharge on the marine environment*. Balaban.

Rautenbach, M. (2007). *Membranverfahren – Grundlagen der Modul und Anlagenauslegung*. Springer Verlag.

████████████████████

██████████

From: [REDACTED]
Sent: 24/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]
[REDACTED]

Subject: RE: GLI Sizewell Consultation Response

Dears Sir or Madam,

Please find below **in bold** our comments on the consultation.

Cheers,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 20 August 2021 05:30
To: [REDACTED]
[REDACTED]
Cc: [REDACTED]
Subject: [REDACTED] Sizewell Consultation Response
Importance: High

Hi both,

Excuse the timestamp, I'm up early finishing a couple of things off before I head off to Bath for the week. Below is the draft consultation response, covering what we

discussed at the meeting on Tuesday. **It needs to be sent to info@sizewellc.co.uk by august 26th.** Feel free to change however you like.

Thanks,

██████████

Subject: ██████████ response

Dear Sirs,

The ██████████ wishes to register its robust opposition to the new proposal for a temporary desalination plant at the site. The Sizewell transfer main is 'unlikely' to be available till 2026, and a lifespan of five years at the least means that this is not a 'temporary' structure.

We are unconvinced that the proposed mitigation measures will be sufficient. While the amount of marine life sucked in through the mesh may be 'negligible', the concentrated saline water released back into the sea can have harmful and far-reaching consequences for fish and other marine life. The consultation document predicts that "the effects of the dense saline discharges would be highly localised to the vicinity of the diffuser outfalls", but given that Sizewell C sits right in the middle of an AONB with delicate coastal ecosystems, these 'localised' impacts could well be catastrophic for the area.

Even after the transfer main has been completed, and the disruption a 28km pipe will cause to residents and the environment, the 3.5MI per day capacity will not be sufficient to supply the predicted 4MI a day demands of the site. This suggests that the desalination plant is intended to remain; not a temporary measure at all.

The document proposes that the transfer main will draw water from the river Waveney, which supports large bodies of wildlife greatly valued by local people. The fact that this proposal has been made before modelling of whether this would be sustainable shows a lack of foresight and an attempt to rush the process. If the Waveney is found to be unsuitable, the desalination plant will presumably remain permanent and possibly even expand, which would worsen the effects on the local area.

In short, we feel that this would be disastrous to the local wildlife and fragile wetland habitats, which our AONB and tourism are so dependent upon.

Water is suggested to be tankered in, which will produce a huge amount of noise pollution and fumes that locals will be forced to endure. The desalination plant will need energy from diesel generators in order to run, creating more noise pollution and fumes, as well as increasing the risk of contamination or even diesel spillage in the Minsmere-Walberswick Special Area of Conservation.

Throughout this process EDF have demonstrated a persistent lack of foresight, and this proposal is another example of that. The representation of the desalination plant as temporary is disingenuous, as the consultation document presents it as likely to be a permanent fixture. Finally, the consultation itself is 4 days shorter than the suggested minimum consultation length of 28 days.

The issue of water supply has been raised repeatedly by concerned residents since the very beginning of the process, and it is disappointing to see that at no point have those concerns been taken on board.

Yours sincerely

Consultation on Construction Water Supply Strategy - Sizewell C
Response from [REDACTED] (Interested person ref: [REDACTED])

1. Lack of planning

I want to express my extreme dismay that the question of water supply is being introduced as a separate consultation when the DCO process is already so well-advanced. The problem of water supply in drought-stricken East Anglia, ignored by EDF in earlier consultations, was raised by myself in response to consultations 2, 3 and 4. Moreover, I understand that many other interested parties raised the issue a decade ago.

I specifically draw your attention to the comments I made on this subject in my Stage 3 Consultation response (27/9/19):

“Fresh water usage:

Why are no figures given in the consultation? I understand that SZC construction will use huge quantities of fresh water. Given that Suffolk is an area of very low rainfall, where will this additional water come from and how will the supply and quality of water for local people, tourism and agriculture be protected? This appears to be yet another area where the work has still not been completed by EDF.”

I also expressed my concern at EDF's failure (once more) to listen and respond to responses given in earlier consultations, despite their claims to the contrary, in my response to the Stage 4 Consultation:

“My concerns outlined in my response to the Stage 3 consultation have been neither acknowledged nor addressed in the Stage 4 consultation. These still represent my views on the proposed development and I wish them to be taken into account in the Stage 4 consultation as EDF has to date failed to address them.”

This included a lack of response on fresh water supply.

It is inexcusable that we are being burdened with yet another consultation at this time (coinciding once again with summer holidays when many people will be away) and, moreover, that EDF have allowed only 3 weeks for response. This is especially galling as this could have been avoided by proper planning much earlier in the process and by responding responsibly and effectively to all the concerns that were raised at earlier consultations.

If the application for these new power stations is as urgent as EDF claim, how is it that the proper preparatory work was not carried out in the previous decade so that the measures for water provision could be properly integrated into the initial DCO application?

I have found it almost impossibly difficult to deal with on top of all the covid crisis and all my normal responsibilities. Statutory bodies and interested parties are already struggling to deal with the immensity and complexity of this case. This is not helped at all by the inadequate and ineffective planning of the applicant. I am very concerned that given the tight timescales of the planning process, this ineptitude will serve to benefit the applicant and would urge the Planning Inspectorate to guard against this.

2. Implications on air quality.

- I am particularly concerned about the major air quality impacts of diesel generators running 24 hours/day for an unspecified number of years. It is very frustrating that the applicant's tardiness in considering the water supply issue adequately means that this issue cannot (presumably) be considered as part of the forthcoming Issue specific hearing on air and noise pollution on 25th August - handy for EDF, very inconvenient for everyone else. The particulate pollution from diesel generation is

significant and the WHO have stated that there is no safe level for this type of pollution.

- How long do EDF expect the diesel generators to be necessary? What is the worst case scenario on this?
- I find it very surprising that EDF considers it to be 'highly unlikely' that the additional temporary generators would give rise to any significant effect. It is stated that further assessment will be undertaken to confirm the preliminary view that there would be no new or materially different significant effects as a result of Proposed Change 19, and will include a qualitative assessment of the additional temporary generators. What has informed this preliminary view and why has this work not already been done? It is surely not that difficult to assess.

3. Inaccuracy in the consultation document

EDF state that 'The desalination plant and associated generators would not be located at the construction site boundary, or near to any noise-sensitive receptors identified in the ES' and that 'Siting of the desalination plant within areas already identified as construction areas, away from the boundaries of the construction site and noise-sensitive receptors, as proposed, means there is no potential for new, or materially different environmental effects to arise of relevance to terrestrial European sites, their designated habitats or species, as already defined and assessed in the Shadow HRA Report'.

This is very misleading as the second location if needed (which seems likely) appears to be close to the northern boundary (Figure 2.4) and impacts on sensitive habitats and wildlife are likely to be considerably greater.

3. Lack of clarity of figures given

EDF talk about having to introduce a second generator if the pipeline cannot be introduced in time for peak demand. Yet it is very unclear whether the figures given relate to one generator or two. For example, will there be 6-9 containerised plant modules (pt 2.3.8) - or potentially 12-18? Likewise, are the discharges from the brine water outfall pipe of 6Ml of water per day for one desalination plant or could it be double this?

4. Transport impacts

I find it hard to understand how delivering 2500 m³/day of water (40 deliveries/day) for the first 9-12 months of the project can have no impact on HGV numbers. What reductions in HGVs are going to result from the water strategy? If there are none, then the strategy represents a significant actual increase in HGV transport on Suffolk roads (80 movements/day for tankers plus whatever is necessary for construction of the desalination plant and for movement of waste materials generated during its operation).

Additionally, EDF state that plant for the desalination plant would be delivered by road and is 'unlikely' to comprise any Abnormal Indivisible Loads (AILs). How is it that EDF does not yet know whether there will be any AILs?

What will be the road transport implications if a second plant is introduced at peak construction, especially as EDF cannot preclude that this might include AILs.

5. Non-potable water

It is stated that 'non-potable water' will be used where feasible (pt 2.2.9), eg for dust suppression. Please can you confirm what the source for this non-potable water is and what quantities will be required, phased across the course of the project.

6. Where will the water brought in by tanker be sourced from?

7. Seawater quality

I am really concerned about the impacts on sea water quality both for wildlife and for humans, with the possibility of irreversible damage to sensitive marine habitats. I am very concerned about:

- the impact on turbidity of water at Sizewell and Thorpeness (already high) due to the desalination construction and due to dredging. Additionally, clarification is requested of how often will dredging have to take place.
- increased levels in potentially toxic chemicals in water (for example, phosphorus, chlorine, zinc and chromium)
- the need for a bentonite recovery system to be used during drilling to minimise emissions (pt 2.3.28). Please describe what these emissions are and what the maximum level of these emissions will be.
- the potential for algal blooms caused by chemical inputs.
- increases in water temperature
- potential for the 6,000m³ per day of brine (1.6 x more salty than seawater) which will be discharged to collect on the seafloor between the sandbars.

The findings in this BBC report are particularly damning:

<https://www.bbc.co.uk/news/science-environment-46863146>.

8. Cumulative tipping points

The consultation document repeatedly states that impacts are likely to be similar to those previously assessed (for example, pts.2.4.8 [suspended sediments], 2.4.11 [zinc & chromium discharges], 2.4.38 [non-hazardous waste]). At what point do these additional pollutants constitute a tipping point into something that is no longer acceptable?

9. Water pipeline construction

It seems that this is likely to be constructed during the peak years of the construction. What impacts will this have on traffic and roadworks in Suffolk. Please can details be specified of what, where, when and for how long? This is critical given the already extreme pressure on transport infrastructure during construction.

What will be the impact of extraction on this huge scale on the Waveney valley? Is another precious and valued part of the Suffolk countryside to be harmed by this project?

I also understand that the planning for this pipeline and extraction will not be considered as part of the DCO. How is it that something which is an integral part of the Sizewell C project and which serves no other purpose is excluded from the DCO process?

Impact on carbon emissions

Finally, I note that EDF themselves stated in their document ([AS-202](#)) Water Supply Strategy Update in January 2021 that the option of a desalination plant had been been 'discounted due to concerns with power consumption, sustainability, cost, and wastewater discharge' and that it was also 'typically energy intensive'.

A desalination plant is a wholly unacceptable solution.

██████████
██████████

From: [REDACTED]

Sent: 25/08/2021

To: sizewell@edfconsultation.info

CC: [REDACTED]

Subject: Comments on the 19th EDF Sizewell C Change Consultation on the Desalination Plant and Pipeline, 25 Aug 2021, from [REDACTED]

[REDACTED]. Sent by e-mail

Dear Sirs

Ref 19th EDF Sizewell C Change Consultation on the Desalination Plant and Pipeline

I object to the proposal for the desalination plant for the following reasons:

1. The consultation has been submitted out of time. There is insufficient time for proper scrutiny, we are supposed to have 28 days for a Change Consultation, but EDF have only given 24. This is indicative of their general lack of preparation and planning. The provision of water is clearly a key consideration for Europe's largest construction site, particularly in one of the driest counties in the UK. The document is lean on detail and detail will only be provided AFTER the SZC application goes to PINS. This is unacceptable, or are EDF deliberately gaming the system to stifle our ability to scrutinise and comment?
2. The proposal suggests that the water will be extracted from the River Waveney, a relatively small water course which is a key natural asset of the area. Not content with destroying the habitat and AONB on the east Coast, EDF are now extending their contaminated reach to inland waterways. Is no where safe? We need a proper study on what the consequences would be on the surrounding area and habitat if that amount of water is extracted from the Waveney. What will EDF do if such extraction is not sustainable? What is their alternative plan?
3. There is an oblique reference to water being used for dust suppression and wheel washing etc – where will this be sourced?
4. The desalination plant sees yet more destruction of the local wildlife and sea bed; more fish and other marine organisms will be killed at the intake; yet more lorries for transport of water and diesel by lorries; more generators and diesel fumes and noise pollution; yet another development on the borders of Minsmere Sac and Sizewell SSSI.
5. I also object to the discharge of brine and chemicals (Chlorine and acids) into the sea, further increasing the desertification of the sea bed near and around Sizewell.
6. More dredging and disturbance to the sea bed, resulting no doubt in more CO2 being released into the sea and atmosphere;

7. We need more detail on the proposed discharge of chemicals into the sea.
8. I also note that if the proposed pipeline is not constructed then there will a second desalination plant, thereby doubling the above mentioned pollution and damage to local wildlife.

Yours faithfully

[REDACTED]

[REDACTED]

[REDACTED]

PLEASE NOTE OUR NEW ADDRESS

[REDACTED]

Tel: [REDACTED] | Mob: [REDACTED] | Email: [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 25/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]
Subject: Re EDF proposal for sourcing potable water for building Sizewell C

RE EDF proposal to build a desalination plant at Sizewell.

Copy to the Sizewell C Planning Inspectorate

I have already sent, via the Sizewell C website, two items of my concerns about this very late proposal to find potable water for the proposed construction of Sizewell C, through the introduction of a massive desalination plant.

However, the more we read about the impact of such a scheme the stronger the opposition of my wife [REDACTED] and I becomes. Many local people raised the question some years back about where the enormous amounts of potable water will be sourced for building Sizewell C. This was glossed over and we were told that water companies would be able to supply the potable water needed, now we learn that the water companies declare that they cannot supply the EDF needs. This situation arises so many years after the problem was pointed out. This is the driest county in England, and I understand that the Environment Agency are already considering the possible need to reduce the quantities of some water abstraction licences.

The discharge water from the treatment plant will have a significantly raised salinity, which means when returned to the sea it will sink to the lowest level. This itself can cause a problem, and if it is discharged between sandbanks it could result in an intense salinity build up. In the Middle East, where desalination plants have been introduced, the coastal areas are having a build-up of algae, because of the cleaning chemicals used in de-salination plants. This would prove to be a disaster for the holiday industry in coastal Suffolk.

Looking into the operation of desalination several problems are found:

- a. The plant would discharge gaseous pollutants in its operation, including sulphur dioxide, nitric oxide, nitrogen dioxide as well as carbon monoxide.
- b. If the power used to operate the plant is generated by diesels, then the emission problems will be increased as will the noise pollution level.

- c. A considerable amount of chemicals will have to be stored on site for desalination.
- d. The site is too small for the proposed nuclear build, so even more area will have to be found for this proposed water plant.
- e. Highly concentrated brine could contaminate ground water sources, which would then pose a health risk.

The plant would have to be built before any other construction could occur on site, and in the several months that would take, potable water would have to come in by tanker. There is no information to show what that would mean in terms of increased vehicle movement, indeed there are several areas where the information is limited. However, an already problematic and uncertain number of lorry movements would be further loaded.

There is no information about the source and quantity of non-potable water that will be needed on site for cleaning, washing vehicles tyres leaving the site etc, etc.

One final comment is that the three weeks consultation period for this massive scheme change, during the middle of the holiday period, cannot really be called a realistic opportunity for people and community organisations to comment.

The case against this entire Sizewell C project just continues to get bigger and bigger.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Construction Water Supply Sizewell C: Consultation on Temporary Desalination Plant (change 19)

Planning Sizewell: Unique Reference No: [REDACTED]

[REDACTED]

I am extremely surprised that plans have been submitted so late on in the planning of Sizewell C /D. This is a substantial change that is being pushed through at a very late date for a very basic need.

The need for additional potable water was voiced as a key need ten years ago and was clearly voiced by Peter Lux in the Ecologist 23rd January 2017, '*Sizewell C consultation 'forgets' to mention 600,000 M3 of mains water a year*'. Water that this region, a dry region does not have and now we have consultation plans submitted that are trying to overcome the lack of potable water for building the plant.

As I understand the present desalination proposals, the desalination plant will not be installed until 2024. This leaves so many questions not resolved and this is very unsatisfactory. Some of these are bullet pointed below:-

- Where will the desalination plant be located: as I understand it, the Sizewell C/D construction site is small and cannot accommodate more buildings. Where will this plant be located taking into account that Sizewell C/D borders SSSI land and land adjacent to RSPB Minsmere?
- Yet another pipeline out to sea to feed the desalination plant. More building and disruption to beach.
- The production of brine which will be returned to the sea and collect on the sea bed. damaging and destroying sensitive sea life. A pollution problem.
- Chemicals also from the filtration cleaning system polluting the sea. A pollution problem.
- The use of diesel powered pumping facilities causing the need for fuel to be delivered. Therefore more noise and more road tankers to deliver fuel oil on already congested link roads.
- More noise from large diesel motors to drive this plant.

I am assuming that that before 2024 fresh water will need to be brought in by lorry. So much water needed for a vast range of needs, on a construction site at so many points of construction.

We have also heard at the 11th hour that there is a proposal to build a 28 km pipeline to remove water from the River Waveney via a proposed pipeline from Barsham. The River Waveney is a small river that it is thought will provide will provide 3.5 ML a day. The River Waveney is a very small river and I am very concerned that this will destroy the river for the local people and tourists who enjoy the river and all the facilities it brings. Like the region around Sizewell, potable water is in short supply: domestic , agricultural irrigation, and other needs are paramount.

If a pipeline is built, from Barsham to Sizewell, I am given to understand a length of 28 km, that will involve more upheaval and disruption particularly in sensitive areas nearer the site. No plans

as far as I am aware have been revealed regarding a proposed route for this pipeline. That is not satisfactory.

Too little far too late regarding a major resource needed to build Sizewell C/D. Sizewell is not a suitable site, for building because the water resources needed to build and run the proposed stations are not available.

██████████

From: [REDACTED]
Sent: 25/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]

[REDACTED]

Subject: Desalination plant consultation

Dear EDF,

The new fresh water supply proposals are now to abstract water which will be delivered initially via tankers and then via a 28km water transfer main from Barsham, while awaiting the construction of the desalination plant. The additional environmental impact of these developments seems unconsidered. Presumably the water is to be extracted from the River Waveney - in 2016 found to be the most polluted river tested in Britain for pesticides. Further extraction from this river catchment can only have a seriously deleterious effect on its ecology.

Before the pipe can be constructed, 40 tankers of water a day will be delivered to Sizewell for the first several months (who knows how long this would actually continue?) which, in addition to the existing HGVs, will have a horrible impact on this area, including exhaust pollution, noise, traffic congestion and CO2 emissions when we have a climate and biodiversity emergency - nuclear energy plants are not green! With the desalination plant there will be a diesel generator power supply - how green is that?

The desalination plant itself will entail more damage to wildlife and the environment: dredging, fish and other organisms killed at the intake head, further damage to the beach, interference with coastal processes and, by the discharge of brine and cleaning chemicals such as chlorine, create a toxic environment for marine life. May I remind you of the absurdity of this proposal, succinctly put in your own words (in document AS-202 Water Supply Strategy Update) - "This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of

desalination may not be suitable for discharge through the combined drainage outfall". How sustainable do you now consider your desalination plant proposals to be?

Constructing something with such an enormous demand for water in an area with such low annual rainfall is just another absurdity illustrating the impossibility of the Sizewell C project.

Imagine being the MP for this exceptionally beautiful and environmentally precious area. How proud you would be. How you would love to champion its uniqueness, to improve and expand its biodiversity across Suffolk. The jewel in the crown of East Anglia - if you stand at Orford Ness you can see areas protected for nature and for the quiet enjoyment of people from Lowestoft to Felixstowe, encapsulated in an Area of Outstanding Natural Beauty - and Sizewell sits in the middle of this complex. Wouldn't you be filled with passion to protect and nurture it? And instead of enthusing over big business and giant developments, wouldn't you wish to help develop small businesses and a sustainable economy based on its abundant and existing natural resources? I think the recent successes of the Green Party in the local elections reflect the desire of local people for someone who truly represents us. And what we do not want is two more nuclear reactors and the associated intolerable demands on the environment and people of this area.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 26/08/2021
To: sizewell@edfconsultation.info
Subject: Water Supply etc.

Regardless of all y our other responses you now find that during construction you need more Northumbrian water say NO. Seems like VERY BAD PLANNING they should be sacked. Taking sea water what effect will tis have on coastal erosion this plant should add a fair it to the cost of C - HARD LUCK. 9large ships to house the equipment will ruin the view for all while pipes areburied this should upset residents and visitors to the beech. Water to be delivered by road for months as this was NOT included in your estimated lorry movements previously the claim of the number will NOT increase is untrue. You make NO mention of the efect this will have on the sea birds some of which are protected - Suggests that you do not care.

You claim about Carbon is very impressive but you are the only one that produces long lasting toxic waste.

You work with the local councils regarding tarting up Leiston suggests corruption

If I was a customer of yours if I discovered that you funded things that should be provided by councils this so your planning application will be rubber stamped I would change suppliers.

Review of the SZC Co. Public Consultation (3rd to 27 August 2021)



Introduction

██████████ have participated fully in the Sizewell C Pre-Application Consultations and the dDCO Process since 2011, including the first 'Post dDCO Application Consultation' which marked the commencement of ██████████ ninth year of responding to a plethora of; 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' that have subsequently largely been; qualified out, significantly modified, re-badged or still remain subject to 'continuing analysis'.

Nevertheless, ██████████ have once more committed hours of work to review the 24-page document, not only in the context of the previous Pre-Application Consultations, but also the huge volume of documents accompanying the ongoing dDCO Application and Examination.

As is now clear, having set 'hares running', SZC Co. have chosen to further exploit the intense pressure on limited community resource by bringing forward another proposal that yet again largely remains incomplete or lacking in; underpinning data, detailed analysis, necessary agreements, any appraisal of likely unforeseen consequences and their wider efficacy. ██████████ have flagged their concern about the issue of potable water supply on many occasions and it is disappointing that over half way through the examination we are now having to consider how to safeguard water supplies to a seriously 'water stressed' part of Great Britain and Northern Ireland.

Nevertheless, ██████████ recognise that it must continue to participate in the prescribed process in order to try to safeguard the community of Kelsale-cum-Carlton and Coastal Suffolk from the worst excesses of SZC Co.

The following pages summarise ██████████ review of the SZC Co. Consultation Document.

In summary, we are committed to ensuring that residents have 'water in the tap' should the project be granted approval. We are also concerned about potential environmental impacts and the current seeming indifference of the Applicant to any new environmental impacts or consequential changes within the consultation document.

Note: The absence of a specific comment in this response does not imply, nor should it be interpreted as implying ██████████ having no issues pertaining the paragraph where there are no views expressed.

CHAPTER 1. INTRODUCTION

1.1.1 No comment

CHAPTER 2. TEMPORARY DESALINATION PLANT (PROPOSED CHANGE 19)

2.1 Introduction - No comment

2.2. Water Supply Strategy

█████ attach [at Appendix A] some of its more recent communications with SZC which flag the issue of potable water.

Having received a follow up email to a meeting in March 2021 which supplied links to a number of SZC documents, some of the section relating to water strategy which was flagged has been extracted and is also included [at Appendix A] for contextual purposes.

It cannot be acceptable, either morally or legally, to denude the rest of the area of water to construct SZC, so an environmentally neutral (at worst) solution to this issue must be found, should SZC be granted development consent.

It is of concern that as of 23rd July 2021 it is stated by Walker Morris LLP on behalf of Northumbrian Water Limited (NWL) that *“the information provided to NWL by the Applicant regarding the peak water supply requirements for Sizewell C has recently been updated and materially increased and is still not fixed”*, Particularly as the document (referred to above) stated the water figures included in January were supposed to be upper requirements.

This combined with another issue in the same letter, where we saw confirmation of an issue raised by informed residents of KcC many times, that *“the Environment Agency considers all NWL abstractions in the Blyth Water Resource Zone to be over licensed and therefore NWL is not able to provide any additional water supplies by simply abstracting more water than it currently does”*

2.3. Description of Proposed Change 19

It is unclear apart from the Main Development Site, how the other proposed developments would be supplied with water. Would this be bought in from the Main Site desalination plant (should it be accepted) or/and tankers? Alternatively, would this further exacerbate an already over abstracted water supply? A water supply which coincidentally, MPs warned on 10th July 2020; *“Some parts of England are at serious risk of running out of water within the next 20 years ...”*.

2.4. Environmental impact of Proposed Change 19

█████ expect a thorough re-evaluation of the combined short, medium and long-term impacts on the marine environment, especially as desalination may become a longer term ‘fix’ to a fundamental issue.

Moreover, █████ stunned at reading SZC’s own reasons for discounting it in January 2021 (see screen-print below) from the document: The Sizewell C Project, January 2021, 6.14 Revision: 1.0 Applicable Regulation: Regulation 5(2)(a) PINS Reference Number: EN010012 Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 2 Main Development Site Appendices 2.2. A-D Update to the Description of Development.

| Option | Conclusion |
|---|--|
| Desalination <i>Installing modular desalination plant on the main development site and abstracting seawater for treatment</i> | Discounted. <ul style="list-style-type: none"> This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO). |
| Ship tankering | Discounted. |

If the Applicant had already discounted this option in January 2021 having presumably undertaken a thorough analysis, how can it be an acceptable solution now?

CHAPTER 3. RESPONDING TO CONSULTATION

3. No comment

review of SZC Co.'s Public Consultation (3rd to 27th August 2021) ends.

APPENDIX A

██████ has been concerned about potable water issues for some while. Some of the more recent exchanges are given below:

1. Minutes from Sizewell C Community Forum EDF Energy 3 July 2019 at which Cllr Edwina Galloway attended on behalf of KcCPC:

"Edwina Galloway queried how EDF would ensure drinking supplies, and farming and tourism activities would not be jeopardised in the driest part of the country during the construction operation and decommissioning of Sizewell C. Jim Crawford explained that EDF intended for there to be no impact on local communities"

2. Notes from a meeting held with ██████ & SZC C representatives – 16 March 2021

Present: Edwina Galloway – Vice Chair KcCPC, Marie Backhouse – Clerk to KcCPC, Tom McGarry – Head of Stake Holder Engagement for the Sizewell C project, Carly Vince – Chief Planning Officer for EDF Energy, Richard Bull – Associated Development and Transport Elements of Sizewell C & Steven Henry – Community Relations Officer for Sizewell C

TMG – *"Yes, you said the impact on the water supply, as we are in the driest part of the country, on national significant natural history, on habitat*

RB – *With regards to the supply of water, to Sizewell C, it's obviously an issue we have been working with for some time, with the Environment Agency, Essex and Suffolk Water, we understand the constrained nature of the Blyth management water zone which is the one where Sizewell sits, and generally the constrained situation on the supply of peoples water generally in Suffolk, being dry, so we have been working with Essex and Suffolk water, to come up with a scheme that they can deliver and through their own development rights to bring more water in, to the Blyth management area that will supply water from the start of the construction to Sizewell C and also provide, a benefit to the region on an ongoing basis by increasing the interconnectivity from the Blyth are to the wider water network; this is about bringing in water from the Waveney area further south down to Saxmundham into the Sizewell area so we are, as I say, working with Essex & Suffolk water and the environment agency to ensure that we have got a viable source of supply, and that work is progressing very well.*

EG – *How do you propose that will actually work because obviously last year we were finding in some parts of Suffolk, they were bringing in water in tankers from Essex; so, it is a huge concern.*

RB – *Absolutely, I think, as you would expect, the Environment Agency obviously are very aware of that and hence we are looking to bring water in from outside the area to support Sizewell not rely on the local water in the Blyth area, and, as I have said, when the construction period is over then we will utilize that supply for the operational period it will also provide a legacy benefit and more resilience for the water network in the area. When we are talking about topping up the Saxmundham water tower with road tankers, hopefully going forward, that would not need to be required, because of this additional resilience within the network.*

EG – *Ok, so where would the water actually derive from, because obviously a lot of East Anglia is dry.*

RB – *As I say, it would be coming from the Waveney catchment area, so from the north. We have been working very closely with Essex & Suffolk water to link into that supply, it will require an enhanced mains network to get it through but that will be for Essex & Suffolk water to deliver and we are working closely with them to ensure that they can.*

EG – *Is there any kind of timescale on that?*

RB – *We are confident that we can get that supply of water for the start of the construction period. The water demand curve, we have included, within the January submission which we should provide you with a link to that document as that is the water supply update, which will hopefully confirm what I am telling you. The peak of water demand is actually when we are starting to use the tunnel bore machines for the offshore tunnels that's when we need the highest amount of water, so that's a number of years into the construction period, by which time we will have the full supply of water from Essex & Suffolk water. The first one to two years of water demand can be covered again through their scheme so they will provide up to one and a half mega-litres per day, at the start of the construction period and that will increase up to three and a half during the tunnel bore machine use. We will send you the link to that update, it summarizes things quite nicely.*

EG – *That would be interesting because I know in Essex, Tiptree, the Queen's Jam makers, ran into trouble because local residents were finding their water supply dipped every time, they did something major. They had to actually adjust what they were doing, but putting further piping in. I would be interested to see in what you say because, with East Anglia as a whole, being dry and the kind of summers we have had over the last couple of years, we do seem to have gone through a phase where we are getting extremes of weather already.*

CV – *I am going to cover landscaping and the ecology system.....*

Following on from this meeting, an email was received dated 19th March, with links to relevant documents, the relevant paragraph being below:

SZC to provide a link to the Water Supply Curve /latest information on water supply for SZC from the supplementary information provided to PINS in January 20201.

The update to the Water Supply Strategy is available on the link below from page 134, see:

<https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-003013-SZC Bk6 6.14 ESAdd V3 Ch2 Appx2.2.A D DoD.pdf>

The ExA's attention is drawn to the Water Supply strategy update in this document, which states:

Construction of the Sizewell C Project would entail many activities that would require water supply, both potable and non-potable. SZC Co. has continued to develop its water supply strategy by engaging with stakeholders including the Environment Agency, Essex & Suffolk Water and Anglian Water to discuss and assess potential sources for this water supply.

The principal supply for the Sizewell C Project is unchanged from the original Site Water Supply Strategy (APP-601) and would come from mains water, provided by Essex and Suffolk Water. 1.1.2 In order to provide security of supply, and to ensure that all the water requirements of the Sizewell C Project can be met, SZC Co. has continued to work with stakeholders to assess the water supply options.

This document provides an update on those options by providing further detail on those that are retained as options and providing a justification for discounting others.

1.1.3 Retained water supply options are reviewed in Chapter 2 of the ES Addendum to determine whether they have the potential to give rise to any additional significant adverse effects.

1.2 Estimated water demand 1.2.1 SZC Co. has updated its estimated water supply requirements during construction, based on a more detailed understanding of construction requirements and further findings from Hinkley Point C (HPC). 1.2.2

Plate 1.1 provides an illustration of the indicative demand profile for both potable and non-potable water throughout the construction period. During the 'early years' water demand continues to peak around 1.5Ml/d. This is related to the construction of the cut-off wall. During the main construction phase, potable water demand is predicted to peak at 3Ml/d during tunnelling works (4Ml/d including non-potable water), before returning to up to around 2Ml/d. This assumes no recycling of water by the tunnel boring machines, which would significantly reduce demand. After the completion of the tunnelling, forecast demand falls below 1Ml/d and then gradually decreases through the remainder of the construction period to around 0.5Ml/d. The demand during operation continues to be expected to be significantly lower than during construction.

1.2.3 SZC Co. considers that these estimates are reasonable and robust for the purposes of planning.

1.3.2 Tables 1.1 – 1.3 summarise all of the water supply options that SZC Co. has considered during the water strategy development process and concludes whether they are now being discounted or retained for further consideration, either as part of this project or separately. Each of the options considered falls into one of the three categories described above.

Options are being taken forward in all categories.

Essex & Suffolk Water transfer from nearby Water Resource Zone; Transfer of surplus potable water via a new pipeline from Barsham. **Retained.**

Essex & Suffolk Water transfer from Essex Water Resource Zone; Transfer of surplus potable water via a new pipeline from further afield. **Discounted.**

Anglian Water Strategic Pipeline; Transfer of surplus potable water via a new pipeline from North Lincolnshire **Discounted.**

National Framework; A long-term strategy to re-balance water resources across the country **Discounted**

Regional Strategy; A long-term strategy to improve water management across the East of England **Discounted.**

Non-potable water transfer from Benacre pumping station; Transferring surplus non-potable water via a new pipeline from Benacre. **Discounted.**

Non-potable water transfer from Minsmere Sluice; Transferring surplus non-potable water via a new pumping station and pipeline from Minsmere Sluice. **Discounted.**

Non-potable water transfer from Aldeburgh sewage treatment works; Transferring surplus non-potable water via a new pipeline from Thorpeness, or discharging into and then abstracting from the Hundred River. **Discounted.**

Ship tinkering; Filling large vessels with non-potable water outside the region and pumping water onto the site from offshore. **Discounted**

Compensation discharges; Seeking to facilitate various activities to help free up water from the environment that would allow increased local abstraction by Essex and Suffolk Water. **Discounted.**

Non-potable water transfer from Leiston sewage treatment works; Transferring surplus non-potable water via a new pipeline. **Discounted**

Programme works to avoid periods of high 'water stress'; Scheduling construction works to avoid high water demand activities during the summer months. **Discounted.**

What is retained is:

Use of water efficient practices on-site, use of water efficient fixtures and fittings, SZC construction site effluent reuse, Greywater reuse, Recycling tunnel boring machine water, Re-using concrete wash water, Rainwater harvesting and Re-use of dewatering water.

Water Resource Storage Area (WRSa); A means of capturing and storing excess water on-site for construction use. **Retained.**

Licence trading with local abstractors; Brokering licence trade(s) between abstractors and Essex and Suffolk Water to increase available abstraction volumes, or taking on nearby licences directly. **Retained.**

Sizewell B effluent reuse; Taking the unused output from the existing Sizewell B sewage treatment works and diverting it for use as a water resource. **Retained.**

SIZEWELL C PROJECT

Representations from [REDACTED]

Response to Consultation on Change 19 – Water Supply Strategy

[REDACTED] was surprised that this change is being proposed at this point in the planning process. The issue of potable water has been raised since the Stage 1 consultation and, in view of its importance to the project, either this solution or a better one might have been expected long before now.

If a desalination plant were being proposed independently of the SZC planning process, we would expect detailed assessment of the environmental impact including the energy use and the pollution. It is not, in our view, sufficient to subsume them into the impacts of the whole project and to say that a desalination plant will not make any significant difference to the adverse impacts of the whole project. It is not enough to say that the effects on marine biology will be much less than those of the cooling water system and therefore they are insignificant. Sufficient time must be given for some expert and independent evaluation of these issues.

We are also concerned about the extra HGV movements required before the desalination plant is operational. 40 deliveries per day in the early stages is a further 80 HGV movements each day, that is between three and seven every hour depending on a twelve or twenty four hour day. EDF say that the number will still be within their agreed limits. Nevertheless, it is a significant increase and will inevitably have an impact on the local community – increased traffic, noise and fumes, affecting air quality.

[REDACTED] main priority is to make sure that our residents have sufficient clean and safe drinking water and that this is not put at risk either in the short or long term by the Sizewell C project.

We have a number of questions about the proposals:

- Initially the desalination plant would be powered by diesel generators. How would this affect emissions and the carbon footprint of the project?
- How would the additional HGVs affect the carbon footprint of the project?
- Will this proposal further restrict access to the beach? Sizewell beach is a valued and well used amenity for [REDACTED].
- Will these measures supply the water for the hostel?
- What is the impact on the marine environment of concentrated brine and phosphate discharges? How effective are diffusers?
- Will the dry solid waste contain any hazardous substances? How will it be monitored at the time of disposal?
- What will happen when the plant is out of action for routine maintenance or because it breaks down? Will further HGV movements be required to bring in water?
- Will Sizewell B's water supply be affected?
- Will there be sufficient water for emergency use?
- Will fire hydrants remain useable at all times?

In view of a number of serious concerns we are not happy that this change is subsumed into the whole process. Sufficient time for all these issues to be properly evaluated by all relevant parties must be given.

Subject:Desalination plant . Sizewell C

Ref .EDF Desalination plant. Sizewell C

To EDF.

Dear Sir Madam,

So , At least 10 yrs in and millions of pounds spent from the start of EDF's exhaustive long-term planning , reactor design suitability ,feasibility studies , long project management for twin nuclear reactors in an area of outstanding natural beauty, we find ; They don't have enough water to make the concrete with. A cynic might well say, well maybe they knew all along and just hoped nobody would notice? That, the millions of litres of water a day required for the concrete, we'll worry about later , you know, when we get planning go ahead. The cynic may well be forgiven. They can't say they weren't warned from the outset , by many, but clearly didn't listen.

To get the water needed in the period of early construction EDF want to use lorry /tankers as transportation. EDF claim that putting even more lorries on the road won't increase the amount of lorries on the road ? In between the tanker delivery period and water pipe supply completion EDF claim they need a desalination plant ,to provide the necessary water. This raising yet more issues of concentrated chemicals pumped back into the sea in a highly concentrated form polluting what will be an already over industrialised beach , inland sea area with its accompanying diesel fume pollution , AND noise from generators should consent be given. Then , just to make our daily commute from Theberton to Beccles even more interesting, Suffolk and Essex water plan to pump water from Barsham bore using a water pipe snaking up ,over, under , who knows, 17 miles across Suffolk roads , fields and villages. How anyone can claim this is not a change to the original planning application is simply bewildering.

For the general public outside looking in at how this project is unfolding, it is fast appearing a literal farce and plain to see why investors won't go near it with a barge pole . Nobody is surprised. To quote French energy minister Barbara Pompili in 2020 on EDF'S attempt at building an identical reactor in Flamanville France , " I think its clear the Flamanville EPR is a mess".

And we can see why.

This latest , major issue with something as basic as organisation of a potable water supply shows clearly this whole ridiculous project needs to be stopped **immediately** before any more public money is wasted .

*Please note , I am [REDACTED] not part of "Your Sizewell c community " as EDF propaganda flyers dare to claim.

Yours , 



24 August 2021

Interested Party ref: 20026566

To: info@sizewellc.co.uk

CONSULTATION RESPONSE

The Sizewell C Project

PROPOSED CHANGE 19 (NINETEEN): TEMPORARY DESALINATION PLANT

Dear Sirs

When my neighbour applies for planning permission to add a single-storey extension to his house, the Local Planning Authority gives me 21 days to submit any comments - to support or object to the proposal.

Your company has been preparing its proposals for Sizewell C since 2010. The DCO Examination of your proposals for a £20+bn project has been underway since April. One might have thought that ensuring adequate supplies of potable and non-potable water for the construction of a double reactor nuclear power station, was an issue that you would have been keen to get right - an issue to demonstrate how seriously you were taking the project and the planning process.

We know that your company has given the matter some consideration because your Site Water Supply Strategy, updated previously in January this year, assured us that:

“SZC Co. has continued to develop its water supply strategy by engaging with stakeholders including the Environment Agency, Essex & Suffolk Water and Anglian Water to discuss and assess potential sources for this water supply. The principal supply for the Sizewell C Project is unchanged from the original Site Water Supply Strategy (APP-601) and would come from mains water, provided by Essex and Suffolk Water.”

All very clear. Stakeholders on board. And helpfully, you also described all the options which had been considered but discounted. One of those options was:

“Installing modular desalination plant on the main development site and abstracting seawater for treatment.”

To which, your response ... back then ... was:

“This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).”

Yet here we are, more than half way through the Examination and you are forced to inform us that the stakeholders are not on board after all. After 11 years of planning, you suddenly realise that you don't have enough water. I'm tempted to say that you couldn't make it up. But of course we could. This is just the latest last-minute change to your plans for this bafflingly incompetently planned project. It would make an amusing little passage in a comedy drama:

Help! Don't panic! We've just discovered that we don't have enough water for our mega nuclear power plant!

So now, against a 21 day deadline - the same length of time that I'm given to tell my district council that I'm not keen on my neighbour's stone cladding - you invite us to respond to a new proposal which will, after all, involve desalination as the principal source of potable and non-potable water. It will operate for the first 4 years of the construction phase and, I strongly suspect, longer - a view apparently shared by the local MP, who continues to ignore the wishes of large numbers of her constituents as she doggedly maintains her unwavering support for these flawed proposals.

To all of which, the obvious response is (and thank you for setting it out so clearly):

*“This option ~~has been~~ **MUST CONTINUE TO BE** “discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).”*

It doesn't stop there. You tell us that your desalination plant, which will run 24 hours per day and which will discharge brine continuously, will be powered by diesel generators. Non-stop diesel generators next to an existing, operational nuclear power plant! Do you have any idea how preposterous that sounds?

What will the additional financial cost of these last-minute changes to your proposals be? Where is the updated project cost estimate to accompany this proposed change? You don't tell us.

With regard to item 2.4.30:

“No significant effects are predicted in the ES, as updated by the First ES Addendum, as a result of emissions during the construction, and it is highly unlikely that the additional temporary generators would give rise to any significant effect. These

generators would be regulated through an environmental permit which will set controls on emission levels and plant operation, as appropriate."

Before deciding that you were wrong and that you'd need it after all, you told us that "*the desalination process is typically energy intensive*"; now in 2.3.12 you're a little more precise and say that the new plant would need to provide "*up to approximately 1.5 MVA of electricity*".

So, having given us this information, do you seriously expect us to accept that adding 4+ years of continuously running diesel generator powered plant will not "*give rise to any significant effect*"? Quite apart from air quality impact (dismissed as within the ES baseline) what are the associated carbon emissions? This is completely new plant - plant that until last month, your project did not include.

Finally, I am baffled by your disdainful statement at 2.2.2. That:

"The Sizewell transfer main would be provided by ESW and does not form part of the Application."

As I understand it, the new desalination plant will only be required because the proposed 28km Sizewell transfer main from Barsham Water Treatment Works will not be available in time - more proof of your failure to engage with "stakeholders" in a competent and timely manner. But the main will still be required. It will still form part of the project. It's just that it won't be there in time for you to use in the first few years. Its purpose is solely related to Sizewell C and is therefore an essential element in the overall project.

How can you, the Applicant, unilaterally exclude it from the DCO application? I suggest that this is not your decision to make. I will be urging the ExA to instruct your company that the transfer main is to be included within the Application and to insist that proposals, fully developed and agreed with the relevant "stakeholders", are submitted, so that the route of the main and its environmental and capacity impacts can be considered within the Examination process.

You have had more than a decade to get this right. You have been pressed repeatedly on the issue of site water supply. You told us (and the ExA) that the matter had been resolved. Now, in the middle of peak holiday period, two thirds of the way through the Examination, you invite us to accept a solution that you had discounted as inappropriate on grounds that you yourselves listed in your own earlier document ESA Appendix 2.2D. And you give us 21 days to respond.

I would be laughing if I wasn't so angry and I sincerely hope that the Examination team will see this as final, conclusive evidence of SZC Co's incompetence - dangerous incompetence.

Yours faithfully



From: [REDACTED]
Sent: 25/08/2021
To: SizewellC@planninginspectorate.gov.uk
CC: sizewell@edfconsultation.info [REDACTED]
Subject: The Sizewell Project - Proposed Change 19
Interested Party Ref: 20026566

25 August 2021

Dear Sirs

The Sizewell C Project EN010012 - PROPOSED CHANGE 19: TEMPORARY DESALINATION PLANT

I submitted my response on the above to the Applicant yesterday and copied it to you (attached here for reference).

I am keen to raise one specific point, the last in my response to the Applicant, with the Examination panel directly:

The Applicant's document outlining Proposed Change 19 contains the astonishingly disdainful statement at 2.2.2. that:

"The Sizewell transfer main would be provided by ESW and does not form part of the Application."

As I understand it, the new desalination plant will only be required because the proposed 28km Sizewell transfer main from Barsham Water Treatment Works will not be available in time for the commencement of construction - yet more proof I suggest, of the Applicant's failure to engage with stakeholders in a competent and timely manner. The main will still be required and still forms part of the project. Its purpose is solely related to Sizewell C and it is therefore an essential element in the overall project.

How can the Applicant, unilaterally and brazenly simply tell us and you that they have excluded it from the DCO application?

I suggest that this is not their decision to make. Surely it is for the ExA to decide what is included and what is excluded from the process. I urge the ExA to instruct the Applicant that the transfer main is to be included within the Application and to insist that proposals, fully developed and agreed with the relevant stakeholders, are submitted, so that the ExA is able to consider the route of the main and its environmental and capacity impacts, in the proper manner. I understand that this may result in delays but the ExA should not permit the integrity of the process to be undermined by the incompetent, dangerously inept performance of the Applicant.

Given that the Applicant has had to admit at this late stage that they have failed to reach agreement, with the key relevant stakeholder, over their preferred option for site water supply, there must now be some question as to whether the transfer main will ever actually be viable - whether there is sufficient capacity in the wider water supply network for the later construction phases and for the operational phase of the completed project. It is clear from

her own response, that the local MP anticipates that the desalination plant is likely to be needed for much longer than we are being led to believe by the Applicant.

Is this really likely to be a temporary solution? I feel sure the ExA will want to probe this issue and I urge you to be firm with the Applicant on this point.

Yours faithfully

[REDACTED]
[REDACTED]

Ref: 20026566

From [REDACTED]
Sent: 25/08/2021
To: sizewell@edfconsultation.info
CC: sizewellc@planninginspectorate.gov.uk [REDACTED]
[REDACTED]

Subject: Sizewell C Water Desalination proposal
Dear EDF

I write in light of your recent proposal to build a water desalination plant in order to deliver sufficient potable water for Sizewell C. I find it incredulous that this fundamental issue remains unresolved at this (very) late stage. It was back in 2010 that the *East Anglian Daily Times* published a letter written by one of Together Against Sizewell C (TASC)'s members, highlighting that securing enough potable water for such a mammoth project as Sizewell C in famously dry East Anglia would be a gargantuan undertaking. And yet we find ourselves, eleven years later and at the eleventh hour, deep into the DCO process, with the Applicant only now seeking to find an answer to this huge problem and, in so doing, raising yet more questions as to both the expertise and the integrity of EDF in this process. This integrity is further brought into question by the timing of this submission, which is not only outrageously late in the process but is also timed for the peak holiday period when so many who would want to contribute their thoughts will be hard-pressed to do so in the hugely restrictive timescale.

There are also significant gaps in the information required to fully understand the impact of this proposal. The fact that 28km of new pipeline is not in the DCO means that it is not subject to any scrutiny, while the disruption and activity are not part of EDF's figures. To compound this, EDF give no indication of what this will add to the overall cost of the project. EDF's track record on delivering projects to budget is a very poor one, so I'm afraid that this only enhances my lack of confidence in their financial projections.

I would like to ask why EDF's apparently strong objections to desalination - as outlined in their Water Supply Update (Document AS-202) - have evaporated without apparent trace or acknowledgement. In that document EDF stated:

*'This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).'*

Please tell me what has changed to cause the remarkable strategic u-turn that now sees EDF presenting water salivation as a pivotal part of their proposal.

In addition to the above, the prospect of a water desalination plant presents some very worrying concerns:

- water discharged will be 1.6 times more (brine) concentrated than natural seawater and will probably exceed screening thresholds for zinc and chromium. This will have a very concerning impact on fish and other marine life.
- the plant will take 4-6 months to build, with supply by road being the only viable option as it has to be installed at the very beginning of construction
- drinkable water will need to be brought in by tanker for the first 9-12 months of construction (c.40 trucks per day, meaning 80 movements). I find it hard to accept EDF's assertion that this will not raise HGV 'caps'.
- The plant would operate 24/7 using diesel generators until onsite power is available. This will contribute to significant CO2, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NOx and volatile organics which have health impacts.

I continue to be alarmed at the continued and repeated additions to EDF's planning submissions relating to Sizewell C, and the water desalination proposal in particular illuminates the poor planning and superficial consultation that has characterised this project from the start.

Yours sincerely

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 25/08/2021
To: sizewell@edfconsultation.info
Subject: SZC: CONSULTATION ON TEMPORARY DESALINATION PLANT (Change 19)

TO WHOM IT MAY CONCERN : INFO @ SIZEWELL C deadline: midday 27/8/21!

The water situation should not be coming up at this late date. There will be insufficient time before the end of the Examination (14 Oct) for the Water Strategy (such as it is) to be properly scrutinised. That leaves only 24 days for a Change Consultation where there should be 28!. The document lacks essential details and further information will only be forthcoming after the end of the consultation, i.e. 3 Sept, when the official request for the Change to the SZC Application goes in to PINS. THAT IS UNACCEPTABLE!

Water would be extracted from the R. Waveney. This is a relatively small river, greatly valued by local people. A permit would have to be granted and this would be subject to the Water Framework Directive, whereby two main obligations must be met: i) to prevent the deterioration of the water body; ii) to protect, enhance and restore the water body in line with the regional environmental objectives. The Waveney Valley is notable for its wetlands which are rich in wildlife.

Essex & Suffolk Water are carrying out modelling to determine whether such extraction would be sustainable. We still don't know the outcome - so I would want to know what pressure would be put on the R. Waveney due to such a large extraction? And what environmental impacts would there be to the fragile wetland ecosystem? What will EDF do if such a large extraction is deemed to be unsustainable?

EDF say you are committed to saving and re-cycling water where possible but note the use of non-potable water to suppress dust (2.2.9). Does that mean salt water to extract dust? If so where does that flow out so as to not cause environmental damage?

To build the plant fresh water would have to be brought by tanker – up to 40 a day. It would take 4 to 6 months. A further lorry each day would remove the salt 'cakes'. Another large tanker is needed each week to deliver diesel. This is unacceptable road use and destructive for the community and environment.

The process of reverse osmosis, whereby sea water is pumped under pressure is very energy intensive at around 3 to 3.5kWh per m³. Diesel generators would have to be brought to the main platform, where the desalination plant would be initially. The generators would need a permit from the E.A. to operate. This is more toxic fumes pumping out.

Presumably this means more dredging necessary to install the intake and outflow heads which means more fish and other organisms killed at the intake head (in

addition to the millions killed by the cooling water system). The tankered water is coming from where exactly? Tankered means yet more lorries: Noise, fumes and smell from generators, also particulates, CO₂ and NO_x emissions. As this is all a stone's throw from Sizewell Marshes Site of Special Scientific Interest (SSSI) immediately to the west of the platform and Minsmere-Walberswick Special Area of Conservation (SAC) directly to the north – it will surely affect rare plant communities due to increase in nutrients as well as contribute to Greenhouse gas emissions not to mention the risk of diesel spillage and contamination.

After the salt is removed, the remaining water needs further treatment and storage but you do not specify where. The brine would be continuously discharged to the sea between the inner and outer sand bars. It's at least 1.6 times more salty than the sea water and, despite disperser heads, would collect at the bottom, where organisms would be unable to survive. It would amount to about 6,000m³ per day. This is environmental disaster and jeopardises fishing.

Various chemicals are used to keep the headworks and membrane 'clean', including anti-scaling acids and biocides against bacteria such as chlorine, all of which would end up in the sea. The intake headworks would be maintained with periodic 'shock chlorination'. If badly contaminated, the membrane would need emergency flushing with inhibitors. Surely this is 'environmentally dangerous as sensitive marine habitats can be irreversibly damaged.

If the mains water from Barsham isn't forthcoming for peak construction, another desalination plant would have to be installed. THIS IS DOUBLING THE DANGERS!

When the station platform area is needed for other works, the plant(s) would have to be moved north over the SSSI crossing to the Goose Hill construction area, a location very close to the Minsmere-Walberswick SSSI. Very long inflow and outflow pipes would have to be installed. This is untenable. IT IS ENVIRONMENTAL MADNESS - IT IS LIKE CUTTING BUTTER WITH A CHAINSAW!

STOP SIZEWELL C - it is obsolete even before it has begun.

NO DESALINATION PLANTS FOR SIZEWELL!

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██████████████████

From [REDACTED]

Sent: 25/08/2021

To: sizewell@edfconsultation.info sizewellc@planninginspectorate.gov.uk

[REDACTED]

[REDACTED]

Subject: Sizewell C Development Consent Order - proposed desalination plant August 2021 consultation

Dear Sir or Madam,

My family and I live at [REDACTED], just [REDACTED] from the proposed Sizewell C construction site. I am a [REDACTED] ([REDACTED]), a [REDACTED] [REDACTED] and [REDACTED] group. Further to previous representations this is our response to the August 2021 Sizewell C Development Consent Order - proposed desalination plant consultation.

On 3 August 2021 EDF announced its consultation on how it can obtain enough drinkable water to build Sizewell C. We understand that EDF's problems have arisen because Northumbrian Water Limited and Essex & Suffolk Water cannot build the 28km of replacement or new high pressure water mains, to deliver up to 4million litres of potable water each day to the Sizewell C site in time – potentially as late as 2026 – and have issued a “Holding objection” to Sizewell C. EDF's solution is to propose a water desalination plant.

We are astonished that this fundamental issue remains unresolved at this late stage in the planning process, two thirds of the way through the examination. Campaigners and communities have been asking questions about water for a decade. Please see the joint letter to PINS from TASC and Stop Sizewell C .

It is unacceptable to have such a short, late consultation during peak holiday period when many people are away.

We do not understand why 28km of new pipeline from Barsham is not in the DCO? It means it would not be the subject of detailed scrutiny as will the remainder of the Sizewell C development.

You give no indication of what cost this will add to the project.

Your previous objections to desalination seem to have evaporated (in document AS-202 Water Supply Strategy Update, EDF states; “*This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall.*”

If approved the plant would take 4 – 6 months to build and be brought in by road; but because it cannot be installed at the very beginning of construction, drinkable water will need to be brought in by tanker for the first 9 -12 months of construction; up to 40

trucks/day (80 movements). EDF claims tankers and plant transport would not raise HGV “caps” but we are doubtful.

The plant would operate continuously using diesel generators until onsite power is available. This will contribute to significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics which have health impacts.

Water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. Impacts on fish and other marine life from this and the water intakes are concerning.

Kind regards

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted contact info 1]

[Redacted contact info 2]

[Redacted contact info 3]

[REDACTED]
Dear Planning Inspector

Sizewell C, Potable Water

I write to express my absolute outrage that at this late stage in the planning process, EDF Sizewell C has added yet another consultation as Northumbrian Water Ltd has advised that Blyth Water Resource cannot supply the required water to meet Sizewell C requirements, EDF knew about this over 10 years ago and have done nothing about it until now!

This consultation is for a desalination plant which local residents only have a short period of time to put their views forward and EDF Sizewell C have done this to coincide with the peak holiday period, hoping to get it passed without a full consultation. This is a major issue as it will affect a large population living in the vicinity of Sizewell C for years, before a new 28Km pipeline can be installed from Barsham.

We are advised that the desalination plant will take up to 6 months to build, in the meantime water that will be needed will have to be delivered in tankers by road for up to a year. This is yet more lorries on the A12 and B1122, as the new link road will not be open at this time!

The desalination plant will be operating 24 hours a day constantly throughout this time contributing carbon monoxide (CO₂), Nitrogen Oxides (NO) nitrogen dioxide (NO₂) and sulphur dioxide (SO₂) and other harmful air particles into the atmosphere, which will increase breathing difficulties to local residents breathing in all these deadly particles, increase asthma numbers in this area. There is also the increase in noise pollution on top of all the other noise associated with the actual reactor build, this is just totally unacceptable, when will it end?

The water from this desalination plant will be 1.6 times more salty than natural seawater, it is also warmer, making it difficult for marine life in the immediate vicinity of the discharge to survive and thrive. Copper and chlorine are added to the seawater at various stages in the desalination process to control bacterial growth or reduce corrosion and many end up in the wastewater and into the sea. These chemicals could potentially end up being in our food chain and being swallowed by swimmers, yes people do swim in the sea along this coast!

Storing these chemicals onsite along with other stored chemicals could leak into the surrounding ground water.

I still cannot see why after all the issues raised to date why this process is still on going. It has shown this is the wrong site for a nuclear power station. Devastating for wildlife, nature, people's lives, no major transport infrastructure, no water supply, doesn't meet the government own carbon immersion date and to top it all, none of these EPR Reactors in the world WORK! They are all behind completion date by years, cost overrun by billions. The only EPR reactor the Chinese have got to work is at Taishan in China. It worked for 3 years and has had to close for maintenance due to a radiation leak caused by damaged fuel rods, this would be devastating if it happened at Sizewell as a radiation leak could contaminate Suffolk, Norfolk, Essex, even the Netherlands, Belgium, Poland and France just to name a few countries, just look at Chernobyl.

How loud do the warning bells have to ring for everyone to realise the whole proposal is just totally unacceptable and should be thrown out.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 24/08/2021
To: sizewell@edfconsultation.info

[REDACTED]
[REDACTED]
[REDACTED]
Subject: EDF consultation on water supply

Dear Sir/Madam

I am writing to object in the strongest terms to EDF introducing, as a minor amendment to the DCO, the issue of potable water at this very late stage in the planning process.

Water supply is fundamental to any development, particularly one on the scale of the proposed Sizewell C.

East Anglia has long been known to be in the driest part of the country and is already struggling to maintain adequate water supplies for essential domestic and agricultural use. It seems something of a ludicrous oversight that this fundamental issue has only just been raised by EDF and has been presented as only a minor issue with a totally inadequate consultation period. Discussions on water supply difficulties for SZC have been taking place for over a decade!

EDF's proposed solution to build a de-salination plant presents a whole raft of additional questions and potential negative impacts which need detailed investigation, consultation and inspection before any consideration is can be given to ascertain whether it is feasible let alone desirable.

A desalination plant is a highly significant proposal and should have been included in the full DCO - not at last minute and minor change to the existing consultation.

The potential impacts of the plant include :

- It is understood the desalination plant will take 4 – 6 months to build and be brought in by road, and because it cannot be installed at the very beginning of SZC construction, drinkable water will need to be brought in by tanker for the first 9 -12 months of construction. Both of these will mean more HGVs causing further unacceptable traffic pressure and pollution to neighbouring towns and villages
- The desalination plant would operate 24/7 using diesel generators until onsite power is available. This will contribute to significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics which have health impacts. It is difficult to see how this activity can be justified or make SZC carbon neutral.
- Water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. Impacts on marine life of this are as yet unknown and need far more investigation.

I will therefore be urging the planning inspectorate to require EDF to produce much more detail on the proposed desalination plant and to require it to have a full and adequate investigation and consultation.

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: 25/08/2021

To: sizewell@edfconsultation.info

CC: [REDACTED]
[REDACTED]

Subject: Sizewell c proposed desalination plant and pipeline.

The recent and belatedly announced plans for the creation of a desalination system at the Sizewell C site provide yet another reason to reject the construction of this power station with its unproven technology. There is clear evidence for extensive, scientifically demonstrable environmental damage consequent on the construction of desalination plants (see Elsaid et al., 2020, 'environmental impact of desalination technology: a review', Science of the Total Environment 748, 141528). Air, marine and land pollution are well-documented consequences of this technology. Disregarding this and other impacts of Sizewell C would be quite outrageous.

[REDACTED] .

Subject: Sizewell C water

Dear Sizewell C I am shocked and outraged that this fiasco of trying to arrange the delivery of drinkable water for the building of Sizewell C at this late stage of the of the planning process. Firstly the madness of delivering water by tankers on a daily basis until the desalination plant is built. (contributing significant CO₂ to the atmosphere) Secondly building a desalination plant ..run by diesel generators (contributing significant CO₂ to the atmosphere) The desalination plant will also impact on public health and the wellbeing of the Marine environment. Thirdly the plan to bring water from Barsham (the Waveney River) to Sizewell by a new pipeline. (More CO₂) I thought we were all trying to cut our carbon footprint in order to help with Global warming . The way this is all going it will be Too Late. Hell in a Hand Cart springs to mind ! Yours sincerely [REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info

Subject: Proposed Change 19 - Temporary Desalination Plant

Dear EDF,

We write with absolute dismay at the above proposal for a Temporary Desalination Plant in an attempt to resolve the basic issue of supplying potable water to the Sizewell C site at such a late stage in the planning process.

We do not understand why the 28 km of new pipeline from Barsham is not in the DCO. Which means it has not been the subject of any scrutiny, neither into the disruption caused or costs associated with it meaning they will be additional to those already submitted!

It is rather strange that your previous objections to desalination due to concerns with power consumption, sustainability, cost and wastewater discharge are no longer considered relevant!

Our specific objections to the proposal are:

1. The plant will take up to 6 months to build and during this period water will need to be brought in by tanker increasing further the number of truck movements per day during the period of construction until it is complete.
2. The water discharge will have a higher concentration of brine with likely increased levels of chromium and zinc. The effects of these upon fish and other marine life are a concern.
3. Until power is available diesel generators would operate 24 hours a day increasing further the CO2 and Nitrogen Oxides emitted during construction and not so far accounted for.

In view of the above we would urge you strongly to reconsider this proposal and look forward to learning of your response to each of the objections raised.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
From: [REDACTED]
Sent: 26/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]
Subject:

Comments on the 19th SizewellC Change Consultation on the Desalination Plant and Pipeline, 25 August '21

I write to express my ongoing concerns regarding the above.

The Desalination plant will contaminate the sea and sea-bed in a large area, causing damage with the outpouring of substances such as zink, chlorine and phosphorus, which could be irreparable.

A constant dredger will be needed while the plant is being built.

Apparently, 40 tankers of water would arrive on-site every day; also diesel for the generators.

There might not be enough water for the concrete needed for the largest site in Europe to be built in one of the driest counties in the UK.

It is difficult to imagine that nearby Minsmere SSSI would not be affected.

[REDACTED]
[REDACTED] Tel. [REDACTED]
[REDACTED] email: [REDACTED]

Sizewell C Desalination Plant Consultation

We object strongly to this proposal.

The delay in recognising that the source of sufficient potable water supply for a huge project as Sizewell C is astonishing. In the driest area of Britain, which is already suffering water shortages, which will be worsened by huge numbers of new dwellings being built throughout the Blyth and Waveney catchment, you have now realised you need vast quantities of potable water to build Sizewell C.

This consultation is extremely late in the planning examination, and falls short by 4 days in duration that is required for consultation.

It is appalling that there has been no detailed Water Strategy for the Sizewell C & D construction published to date. The need for potable water at the site is a key requirement for the construction of the two nuclear power plants. EDFE is remiss in not taking this into consideration until now. There will be insufficient time before the end of the Examination (14th October) for the Water Strategy to be properly scrutinised.

The fact that Northumbrian Water Ltd cannot meet the Applicant's water requirements - '...the Blyth Water Resource Zone, within which Sizewell C falls, does not have 4ML/d of supply headroom that is needed to meet the Applicants requirements'. The suggestion that an alternative source from the River Waveney can be piped 28 Km from Barsham water treatment works and that the River Waveney is a sustainable adequate source is totally not true.

When Northumbrian Water planned the upgrade of Barsham Water Treatment Works in 2017 to meet the needs of the maximum abstraction licence of 326 L/sec (maximum abstraction 28 million litres per day), did they factor in the extra 4 million required for Sizewell C and the extra needed for all the new housing in the area? If so why did they not make clear in their planning that this was proposed?

East Anglia has the lowest rainfall in the UK, it is very dry and water management is likely to be under severe stress due to climate change in the future.

It will possibly take till 2026 to build the 28km pipe, hence the further proposal for a "temporary water desalination plant at Sizewell". As far as we are aware there has been no planning application for this.

The Waveney is part of the Broadland Catchment. The river levels at Diss are between 0.0m and 0.95 m 90% of the time and at Beccles Quay between 0.0m and 1.1m 90% of the time (measured from mean sea level as tidal). This indicates to me that extracting between three and four million litres per day from the Waveney is unsustainable. Please provide the evidence that this is not the case.

The River Waveney currently completely fails in its chemical status (pollution by agricultural run off including neonicotinoids, pesticides, nitrates) and therefore the water is not potable without a significant amount of processing.

A permit for extraction would be needed and this would be subject to the Water Framework Directive, whereby two main obligations must be met: i) to prevent the deterioration of the water body; ii) to protect, enhance and restore the water body in line with the regional environmental objectives.

We cannot believe that the Environment Agency or Essex and Suffolk Water have recommended this. It will devastate the wildlife of the River Waveney and its associated wetlands, affect the tourism industry on the Broads and affect the local amenity value of the

River Waveney for the local people. We have lived within ■ miles of the River Waveney for nearly ■ years and my family have enjoyed the area for walking, swimming and canoeing and wildlife watching and photography and would hate to see the water meadows and beautiful landscape and wildlife affected by this- the opportunity to even canoe on the river will be reduced if the water levels are any lower. What studies have been done to examine the environmental impacts of this proposal? We believe that only now are Essex and Suffolk Water are carrying out modelling to determine whether such extraction would be sustainable. What consultation for this has taken place? – None whatever as far as I am aware– the public have a right to be fully informed and consulted and to refuse to allow this.

If the River Waveney is not a sustainable source then the ‘temporary’ desalination plant will not be temporary and an additional plant will be needed to meet the needs of potable water for the Sizewell C construction.

Until such time as a new water source is found to build the plan EDFE would require the fresh potable water to be brought by tanker – up to 40 + 40 lorry movements a day. It will take 4-6 months to build the new plant.

The proposal for a desalination plant is completely unacceptable on many grounds.

By nature desalination plants are extremely polluting – in terms of the chemical and concentrated brine risks to the sea and existing aquifers and contaminating ground water. It will be extremely destructive to the sea life – fish, marine mammals, birds, sea algae and flora – the biota.

In addition the proposed construction of a desalination plant would of itself be destructive to the surrounding environment (sea, SSSI etc), further lorry movements daily, use of diesel to fuel the plant – air and noise pollution, risk of ground contamination with diesel leaks and spillage, also diesel storage, diesel transport, transport for removal of the salt cakes (to where?) – further lorry movements.

The process of desalination is reverse osmosis whereby sea water is pumped under pressure (1.1 to 1.7 cubic metres a second) through a fine membrane, thus removing the salt and other minerals. The energy used is at around 3-3.5kWh per cubic metre – so will generate further carbon dioxide emissions – which again negates the carbon neutrality claimed for the nuclear power plant. Diesel generators would need a permit from the Environment Agency to operate, and the smell, noise and air pollution have not been factored in. (notwithstanding the huge carbon emissions also generated in the massive concrete needed for the construction of the nuclear installation).

More sea floor dredging will be necessary to install the intake and outflow heads causing more biota destruction.

Noise, fumes (carbon monoxide; nitric oxide; nitrogen dioxide and sulphur dioxide) and particulates from the diesel generators would seriously damage the adjacent Sizewell Marshes SSSI immediately to the west of the platform and Minsmere-Walberswick Special Area of Conservation (SAC) immediately the north and also will have a harmful effect on public health.

There is no mention in the proposal about storage and further treatment of the desalinated water. The waste brine from the desalination plant will be continuously discharged to the sea between the inner and outer sand bars. The brine will be at least 1.6 times more salty than the sea water and despite. Disperser heads would collect on the sea floor where organisms would be unable to survive. The volume of brine would be in the order of 6000 cubic meters per day. Brine underflows deplete dissolved oxygen in the receiving waters.

High salinity and reduced dissolved oxygen levels can have profound impacts on benthic organisms, which can translate into ecological effects observable throughout the food chain.

Various chemicals are used to keep the head works and membrane 'clean' including anti-scaling acids and biocides against bacteria such as chlorine and copper which would all end up in the sea. The intake head works would be maintained with periodic 'shock chlorination' and if badly contaminated the membrane would need emergency flushing with inhibitors. This is likely environmentally risky and sensitive marine habitats can be irreversibly damaged. Antifouling chemicals may end up in the sea in addition to the chlorine and by products of phosphorus and naturally occurring minerals and chemicals removed from the sea water will be returned to the sea in a more concentrated form causing poisoning to the sea biota.

The environmental impacts of the proposed desalination plant have not been assessed adequately and are dismissed as being within the overall effects of the cooling system. This is unacceptable.

When the station platform area is needed for the ongoing construction the desalination plant(s) will have to be moved north over the SSSI crossing to the Goose Hill construction area, a location very close to the Minsmere-Walberswick SSSI needing very long inflow and outflow pipes to be additionally installed.

It is extremely obvious to us that the proposal by EDFE for a Desalination plant is totally unacceptable and seriously flawed. The need for potable water for construction will incur massive further costs to the already huge cost of construction both in financial and environmental terms. Compared with renewable power sources, nuclear power is extremely expensive. Sizewell C and D should never be built.

From: [REDACTED]
Sent: 26/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]
Subject: Sizewell C: Consultation on Temporary Desalinisation Plant (Proposed Change 19) - August 2021

Dear Sir/Madam,

[REDACTED] reviewed the Proposed Change 19 Consultation Documentation, we note that the Applicant proposes the change to be non-material. The proposed desalination plant will extract 10 million litres of sea water a day, keep 3 million litres of freshwater and pump back 7 million litres of concentrated sea water. It is not clear to [REDACTED] if this addition is a non-material change, but it may be that any potential impacts introduced by the temporary desalination plant will not dominate those generated by the overall development site when taken as a whole. [REDACTED] would welcome further clarity on this from the Applicant.

We provide you with the following comments and questions in relation to coastal processes, ecology and environmental protection matters:

Coastal Processes

[REDACTED] do not consider that this proposal would introduce a significant negative impact on coastal geomorphology or coastal processes. We note that the proposal includes intake and brine outfall pipework which is due to be '*installed under the beach and under the seabed using a trenchless construction method such as Horizontal Directional Drilling (HDD) or similar*' (2.3.17). Section 2.3.20 states: '*The flow velocities within the 35cm diameter pipeline would be between 1.1-1.7m/s*'. We note that with an assumed internal diameter of 0.35m and an average flow velocity of 1.4m/s, the throughput would be calculated as follows - $\text{Area} \times \text{Flow Speed} = [3.142 \times (0.35/2)^2] \times 1.4 = \sim 0.135\text{m}^3/\text{s}$ which is equivalent to 11,640 m³/day (~11.6 million l/day). With a forecast water demand of 2,500 to 4,000 m³/day it is apparent that there would be a sufficient supply. However, we would like to understand why there is an excess capacity in relation to the peak daily requirement. Our

understanding is that more detail will be provided as part of the DCO application process and we look forward to reviewing this material in due course.

The proposed pipeline installation is due to be located below both the beach and the seabed, however we would like to understand how deep this will be. It is also noted that the desalinisation plant may be retained for the duration of the construction period in reference to Section 2.3.4 which states '*for approximately the first four years of construction, i.e. to 2026 as set out in Paragraph 2.2.4 above. However, it should be assumed for the purposes of consultation that the desalination plant may need to be retained for longer * – potentially throughout the majority of the construction period*'. Following the proposed service life of the plant (being decommissioned once the Transfer Main is fully available), our understanding is that the buried section of pipeline is to be abandoned. The Applicant will therefore need to advise and confirm that exposure of the relic infrastructure will not present a coastal problem in the long term. ■■■■■ are concerned that this may present a risk further down the line that is beyond our control and request that sufficient contingency is provided for this.

Section 2.3.25 states that '*The seawater intake headworks would be decommissioned and removed once the transfer main is fully available. The buried intake pipeline would be grouted, capped and would remain in situ*'. ■■■■■ would like to know what the proposed burial depth of this pipework would be given that this is below the beach level, i.e.. how much future erosion (lowering) has been considered. What is the risk of the buried pipes becoming exposed by an eroding beach? What impacts on coastal processes and beach user safety are possible if the pipes are exposed? What mitigation measures are proposed if the pipes become exposed? ■■■■■ would request a requirement that the pipelines are removed should they become exposed.

■■■■■ wishes to highlight that Figure 2.3 implies an angled connection, however we presume this is only for illustration purposes. Neither the directional drilling nor the outfall pipeline would cope with a sharp change in angle as shown and the Applicant needs to clarify how this detail will be constructed. The figure shows both the intake and outfall pipelines redirected to the Construction Area after 4 years (if needed). The routing shows a sharp change in angle running north along the seaward side of the proposed HCDF. Is the (re)connection to be made using a coffer dam, and is the remainder of the pipeline route to be carried out by normal terrestrial engineering? ■■■■■ has concerns regarding potential disturbance to the upper beach, with appropriate measures needing to be confirmed and clarified. ESC also requests clarification on how the proposed land section pipelines will cross within the Temporary Hard Coastal Defence (SSP wall).

Is it possible that the Desalinisation equipment will be operational at the time of construction of the permanent HCDF and SCDF? If yes then please explain if and how the Desalinisation equipment line and level will be modified and / or if the HCDF and SCDF structures will be modified.

Section 2.3.30 states that *‘Localised dredging is assumed to be necessary in the immediate area surrounding the diffusers’*. What type of dredging is proposed, would this utilise plough or suction techniques, and how will the bed shear stresses change due to the intake and particularly the outfall head in the nearshore zone – is additional modelling on this still to be done? The Applicant will be obliged to monitor and maintain offshore structures regarding the potential for scour, so [REDACTED] are hopeful that further details will follow.

Section 2.4.7 states that *‘The Coastal Processes Monitoring and Mitigation Plan (CPMMP) would enable detection of unexpected effects on these features and will apply equally to any potential small scale impacts associated with the desalination works’*. [REDACTED] will expect to see a section added to the next iteration of the CPMMP to describe the monitoring activity (bathy and RPA topo) and any mitigation required to cater for potential impacts of this new feature in the marine environment.

It is noted that the location of the proposed intake pipe is seaward of the bar, but the brine outfall head is much closer to shore. Section 2.3.27 states that *‘The pipe would extend approximately 200m seaward from the temporary Hard Coastal Defence Feature (HCDF). The indicative location of the pipe is shown in Figures 2.3 and 2.4. This location is between the inner and outer longshore bars and would place the outfall pipe in water approximately 2.5m deep at lowest astronomical tide level. It would be sufficiently distant from the intake to minimise re-entrainment of the brine water’*.

[REDACTED]

requires clarification as to whether this outfall could cause sediment entrainment and a salient to develop on the shoreface (similar to the existing Sizewell B outfall pipe). Increased flow velocities could

deflect suspended sediment alongshore which then is deposited elsewhere. [REDACTED] would like to have access to the assessment that was undertaken, including any modelling, to identify an optimum location for the outfall.

Ecology

[REDACTED] note that terrestrial ecology has been screened out of further assessment (para. 2.4.2). Given the details provided on the installation and operation of the proposed equipment, we have no objection to this. The containerised equipment will be located within either the main platform area or the TCA (dependent on construction phase) and pipe work will be installed using HDD to avoid the beach area.

With regards to air quality, this has been scoped in for further assessment and we will need to consider the outcomes of this (although Natural England are the lead organisation for this matter).

[REDACTED] will therefore defer any comments on marine ecology to Natural England and the Environment Agency.

[REDACTED] would also like to raise a matter which does not appear to have been covered in the consultation documentation, if the proposed equipment is moved to the “subsequent location” in the TCA, will the pipes crossing the SSSI Crossing result in any changes to the design of the structure? It is noted that a lot of work has gone in to trying to ensure that the design of the SSSI Crossing minimises ecological fragmentation as far as possible and we do not wish to see this undone by needing to install more pipes over the crossing.

Environmental Protection (plant noise):

[REDACTED] understand that the proposed plant will operate continuously with the use of diesel generators. This gives rise to noise concerns in the same way that other plant on the main development site has been assessed. Whilst this is likely to form part of the overall site's noise, it is something that will require assessment as it is semi-

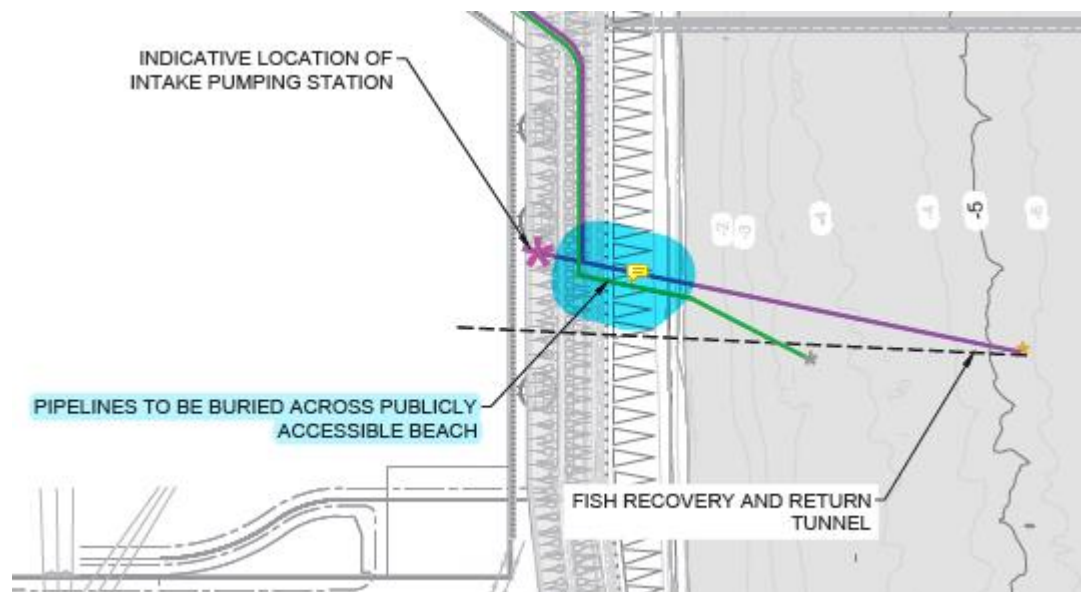
permanent fixed plant and unlikely to be subject to processes designed to catch construction noise issues in the Sizewell C Noise Monitoring and Mitigation Plan (NMMP). Other plant of this type (such as the combined heat and power plant at the campus) are likely to be subject to a 35dB LAr noise limit so this may also need to be the case for the proposed desalinisation plant. Ultimately, [REDACTED] ask that the potential for noise impacts from the temporary desalinisation plant are given due consideration and the findings of this assessment are made available for scrutiny at an appropriate time as part of the DCO process.

The Applicant has confirmed that a proportion of the potable water created by the desalination plant will be destined for domestic use (that is to say drinking, washing, cooking and such) and therefore as a surface water source non-mains supply would fall within the scope of the Private Water Supply Regulations 2016, most likely as a Regulation 9 supply. As a Private Water Supply of this type, it will be regulated by [REDACTED] to ensure that it remains a wholesome supply, as defined by the Private Water Supply Regulations 2016, and we will be engaging with the Applicant further on this matter in the event the supply is confirmed.

[REDACTED] has some concerns that this late addition will not be able to be fully assessed and examined in the remaining Examination period and we seek to ensure that [REDACTED] is not disadvantaged by not being able to properly assess the change in the DCO process.

We trust our comments and questions are helpful.

Yours faithfully



Construction water supply consultation
Water Supply Strategy
Proposed Change 19
Consultation on Temporary Desalination Plant

To whom it may concern,

I write in respect the SZC Desalination Plant proposals, which as you will see (above), seem to have many more names than I consider helpful.

In composing this response I have read (among many, many, other of your publications):

- Water Supply Strategy [APP-601]
- Water Supply Strategy Update [AS-202]
- Sizewell C Community Newsletter [August 2021]
- Consultation on Temporary Desalination Plant [August]

Overview

I will keep my comments short, as I intend to make a fuller response in a Written Representation to the Planning Inspectorate in due course.

I am a retired [REDACTED] professional and therefore feel I have a responsibility to put aside personal issues with the SZC Project and provide honest and hopefully constructive feedback to the Applicant.

Obviously I have not been party to the development of the SZC Project, but do have an insight afforded by involvement in the Pre-Application Consultations and have five observations;

‘Fail to prepare, prepare to fail’

Paraphrasing Benjamin Franklin’s “failing to prepare is preparing to fail” may not be the most original thing to say. However, my observation over the last decade is that the Applicant has not been as well prepared as I would have expected for an “unusually large and complex” project.

At first I thought it might be that I was not sufficiently familiar with the modus operandi of the infrastructure and civil engineering sectors. I now believe, having led [REDACTED] and [REDACTED] across not far short of a dozen business Sectors, that insufficient preparation has been invested in the strategic anchors of the SZC project.

‘A little knowledge...can be a dangerous thing!’

After experiencing Pre-application and the first half of the Examination, it would seem more sensible had the Applicant; prior to the Sizewell site being nominated for ‘one or more reactors’, commissioned a full ‘fresh eyes independent appraisal’ of the site and its environs for ‘do ability’ - something akin to due diligence used in virtually all other business settings.

However, as is now evident, this could not have happened, and as a consequence, assumptions or conditions that may have pertained and been adjudged adequate in the 1970-80’s have now been found to be; inadequate, inappropriate, inaccurate or no longer valid.

‘Inspection, Inspection, Inspection’

I suspect that; too much of the Applicants preparatory work has been conducted via desk/internet research, diminishing the level of experiential knowledge and understanding of; the locality, the communities, the people, landscape, nuance etc. that becomes obvious through traditional ‘inspection’, there is no substitute!

‘Get the basics right’

What the proposed **Change 19** exemplifies to me is; that the SZC Project suffers from an over dependence on the NSIP classification and all the flummery that appears to come with it. From my perspective it seems that; the ‘top trumps’ mentality NSIPs seem to engender, can become a proxy for paying heed to the basics. How else could it be that; a large corporation like the Applicant,

could be comfortable entering into a critical part of the 'approvals process' for a £20billion commitment without having confirmation of the adequacy of supply for a fundamental ingredient to so many facets of the Project?

Real Stakeholder Engagement

Irrespective of how and when the Applicant developed their *Water Supply Strategy*, had they fully committed to true Stakeholder Engagement, they would have been aware of the potential threat of inadequate potable water, from a very early stage, not only from the potential suppliers, but also from the chorus of Parish Councils, Local Authorities, residents and businesses who tried to forewarn them, only to be told it was *"progressing very well"*.

Unfortunately, the Applicant has never really capitalised on the huge benefits good Stakeholder Relations can bring to a Project, preferring instead to re-run the hackneyed and dated approaches favoured by the less egalitarian nationalised dinosaurs of mid-century Europe.

One ringing endorsement of this assertion is, the statement made by a very well known *'face of SZC'* who responded to a Councillor relating the view of many residents that, 'the SZC proposals were not popular' with the heart-warming response all stakeholders will cherish that; "...this is not a vote!"

Conclusion

In my view, I see the *Change 19* proposal as the culmination of 10 years of the Applicant avoiding facing the realities of Eastern England; and in this case specifically the weather, the infrastructure, the environment and the site.

The truth is, this part of East Anglia is a water stressed area, this means; the natural environment as well as public water supplies. For the avoidance of doubt 'water stress' is defined in the regulations as *"the current household demand for water is a high proportion of the current effective rainfall which is available to meet that demand. Or, the future household demand for water is likely to be a high proportion of the effective rainfall which is likely to be available to meet that demand"*

Consequently if the Applicant thinks robbing the natural environment to maintain public water supplies, plus their desired 2,500,000 to 4,000,000 litres per day is a potential answer, they need to think again.

One only needs to look at Fig 1. [Page 13] In the Environment Agency's *"Updating the determination of water stressed areas in England Consultation document" of the 11 February 2021* to see the extent of water stress on the East Coast, stretching all the way from the Humber Estuary past the Thames and around to the South Coast beyond Portland Bill.

What many Coastal Suffolk residents may not be aware of is that *"The final assessment will provide our advice [Environment Agency] to the Secretary of State on the areas that should be determined as areas of serious water stress. The purpose of the determination is solely to inform whether water companies should be able to consider the option of charging by metred volume for all customers (compulsory metering). This is alongside other options to manage water supplies in their plans."*

Looking at the prospects for East Anglia, it seems clear to me that the Applicant should more properly be examining the impact of having to operate desalination during the whole construction period, the operational life of the station and throughout the decommissioning, until such time that potable water is no longer required.

Finally, as mentioned at the outset, I have a great many questions in respect to the operation of a temporary desalination plant (as proposed) and will be including them all in my Written Representation to the Planning Inspectorate.

Response ends

Subject:Desalination plant.

As a local resident I am writing to raise my very serious concerns re the proposal by EDF to build a (temporary) desalination plant.

Firstly, this is a major piece of infrastructure which should be regarded as such and not included as an add-on to the Sizewell C proposal.

Secondly, there are a number of difficulties that could well arise from building such a plant and the pipe needed to feed it in an area that is consistently regarded as being fresh water poor, including and not limited to :

- CO2 emissions

□ □ □ □ • the effect of anti-scaling agents, chlorine removing chemicals and high salt levels that will no doubt have a severe negative impact on the surrounding eco-system

- yet more land being buried under concrete
- cost

Thirdly, it is very poor that this consultation is being carried out at short notice during the Summer holiday period.

██████████

RESPONSE TO CONSULTATION ON CONSTRUCTION WATER SUPPLY STRATEGY: PROPOSED CHANGE 19

Introduction. Thankyou for meeting my request for a hard copy of your August 2021 Consultation Document, which I have read carefully. Before commenting on the content of Chapter 2: The Proposed Desalination Plant, I would like to make some general points about the timing and conduct of this consultation.

Reasoning, Timing and Conduct of this Consultation.

The issue of the availability of sufficient potable water in an area where it is recognized that water is at a premium, was raised at the Stage 1 Consultation over eight years ago. Reassurances have been consistently been given by the Applicant that this issue had been thoroughly addressed. The fact that the supply requirements 'had been recently updated and materially increased and is still not fixed', which caused Northumbrian Water Ltd (NWL) to submit a holding objection to the DCO application process (Walker Morris letter dated 23 July for NWL), brings into serious question the credibility of the applicant's plan for this project.

The submission of this proposed Change 19, on a fundamental issue, in the middle of the DCO application process, appears to be a measure of desperation by the applicant. That impression is reinforced by requiring answers to the consultation within 3 weeks, not four. The timing, in the month of August, a time when residents and councillors and staff at Parish, District and County level might reasonably expect to be on holiday, makes a coherent response more difficult and partly invalidates the credibility of the consultation.

Comments on Chapter 2: The Proposed Desalination Plant

2.2.1 Water Supply Strategy Update: AS-202. In this document the Applicant states that *"This option (a desalination plant) has been discounted in favour of alternative option, due to concerns with power consumption, sustainability, cost and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO"*. This statement calls into question the subsequent assertions in the chapter, many of which, in any case are framed in very conditional terms: 'anticipated'; 'expected'; 'likely'; 'unlikely'; 'not anticipated'; 'on a preliminary basis'.

2.2.5. SZC Co 'Expectation'. The Applicant suggests that this proposal stems entirely from the recent notification by NWL. Bearing in mind potable water has been an issue for 8 years it seems remarkable that this demarche has only just

occurred and calls into question the effectiveness of third party engagement by the Applicant.

2.2.9. and 2.2.10. Minimizing Demand. I would welcome more detail on exactly how this would be achieved. In particular non-potable water is also in short supply in this area (which has lower rainfall than elsewhere in UK and difficult issues with ground water).

2.2.4; 2.2.11; 2.3.6: Duration of Need and Dependence on NWL. I note the uncertainty of the length of the requirement: 'at least 2 years', '2026 or later', '4 years +'. The construction of a 28 km pipeline is a not inconsiderable task in itself, and appears to be crucial to the project. Will this be incorporated in the plan as part of the DCO?

2.3.3: No impact on local supply of potable water nor impact on ground or surface water. These are assertions which, given the lack of detailed evidence, are questionable, and a source of concern. They impact on a number of areas that have already been the subject of detailed questioning earlier in the examination.

2.3.5: Potable water by tanker trucks for the first 9-12 months of construction. Given that the plant cannot be started until the Main Platform is suitably prepared, and will then take 4-6 months to build, it seems likely that tanker trucks will be required for more than 9-12 months. It would be helpful to know what a 'delivery' would be: ie size of tanker; capacity; how many per day to provide up to 2500 cubic metres per day. How does this relate to the number of tankers per day over the period?

2.3.5, 2.3.8 and 2.3.9 Amount and Control of Road Movement. With up to 40 tankers a day (80 movements), all using the B 1122 in the 'early years' before the SLR, it is understood from a statement by Suffolk CC that this can be achieved within the HGV daily limit by 'smoothing out the profile. In addition to the water, there are the Containerised Plant Modules ('unlikely to be AILs') to be considered within this profile. To achieve this within the profile control of vehicles will be crucial. It appears that the tankers will come down the A 12 from the north; how will they be managed by the Freight Management facility which is located near Ipswich?

2.3.12 Diesel Generators operating 24/7. How long will this go on for? What will be the additional CO₂, Nitrogen Oxides and other harmful emissions that will add the environmental cost of this project and the additional noise associated with the site? These issues have only just been examined in Issue Specific Hearing 8 on 25 August 2021.

2.3.12 Disposal of Solids. Where will this be disposed off site?

2.3.27 Location of Outflow between longshore bars. Will not the dispersal of the concentrated brine with other minerals between the longshore bars give problems of concentration?

2.4: Environmental impacts. This section suggests that 'based on the *assumptions* in this chapter' (2.4.1) the environmental impact of this proposal is *likely* to be within the calculations of the overall DCO submission. Given the amount of detailed environmental issues that have been and are being considered by the Planning Inspectorate, this suggestion by the applicant should not be accepted without rigorous expert examination.

Conclusion. I would be grateful if these issues could be addressed before your submission to the Planning Inspectorate.

Yours sincerely

██████████

██████████

26 August 2021

[REDACTED]

Re EDF Proposed water desalination plant

Dear Dr. Coffey,

I am appalled by EDFs proposal for a water desalination plant and I wish you to take issue with them.

I wrote to you on the [REDACTED] (copy of letter on request) posing the following question...

Given the estimated volumes of fresh water required for the Sizewell C & D build, how and where will this be sourced?

You replied that

Ongoing dialogue between EDF Energy and Essex and Suffolk waterhas not identified any difficulty in meeting water demand for the construction and operation of Sizewell C.

I asked a further question regarding the impact of water abstractions on the surrounding countryside to which you replied ' there will be no significant impact'.

Six years on local people are faced with the prospect of a desalination plant which EDF itself discounted (AS-202) in its Water Supply Strategy Update citing their concerns with power consumption,sustainability, cost and wastewater discharge.

What is going on? Who am I to believe?

This consistent stream of confusing information (further compounded in my response to SZC second consultation, January 2017, which referred to mains water use to comply with Suffolk Ecological Principles for the build needs to be in the public domain and it's implications for the general public openly discussed) seems to be a constant theme of the project. There is no transparency in the information we are given by EDF.

Yet again Theberton residence will suffer further noise and added traffic pollution from the water lorries and construction traffic to build the desalination plant.

Diesel generators operating round the clock must have impact on air quality and concentrations of brine discharged into the sea cannot be good for marine life. I fear for both my mental and physical well-being and for everyone in the area.

I am of the opinion, for EDF not to be aware of the water issues , in this the driest part of the country, they are collectively either incompetent or deliberately devious.

To submit this request outside of the DCO with only three weeks consultation time, during school holidays and unprecedented post covid isolation time when older folk, (retirees are significant in this area, many not having physically seen children etc)...and without any costing, is cynical in the extreme.

There is little to trust here.

I look forward to your response,

[REDACTED]

From: [REDACTED]
Sent: 26/08/2021
To: sizewell@edfconsultation.info
Subject: Proposed change 19

Dear Sir/Madam

I am writing to you regarding your proposal to construct a desalination plant as part of the Sizewell C and D development. I object to this proposal on several grounds particularly:

- Because of the pollution caused by the discharges of residues into the sea and the resulting effects on the aquatic life and food chain.
- There is a lack of detail.
- There is a need for a full environmental impact assessment for the whole scheme before it can be properly considered.

PINS registration ID: [REDACTED]

Yours faithfully

[REDACTED]

The first one he sent was cut off half way down. I will update accordingly.

From: [REDACTED]
Sent: 26/08/2021
To: info@sizewellc.co.uk
CC: sizewellc@planninginspectorate.gov.uk
Subject: Fwd: Desalination proposal
[REDACTED]

Dear Sir/Madam,

I am outraged that you the Applicant have totally ignored local concerns regarding the requirements for potable and non potable water.

You have fundamentally failed to take any notice of commentators that ten years ago asked “you” where is the water coming from?

You also rejected the desalination plant in previous documents because in your words "This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)."

You are now saying that this is actually a suitable method for supplying your water requirements, it seems to me that you are clutching at straws and will say and do anything to get approval for this project.

I am not an expert but can clearly see that this project is far too large for the site and the infrastructure available in this area of Suffolk, non availability of massive amounts of water surely is a fundamental flaw to your plans.

This is so typical of your approach throughout your planning application, you have always been “tell tell” rather than listen, accommodate and mitigate.

It appears to me that it is only when faced with imminent failure that you start negotiating and listening

I sincerely hope that the Planning Inspectorate consider this the final straw and dismiss this application forthwith as you the applicant have failed to research, explain and assure the majority of the local community and stakeholders at virtually every stage.

Please can you explain to us lay persons how a discounted proposal for a desalination plant is “NOW” the best way forward, the lack of water is surely is a fundamental requirement for now and the future.

As this approach was not planned for you are now stating that “no” more HGV will be used during the construction and running of this desalination plant although tankers will be needed for several months if not years. Please explain what HGV movements will be cancelled to accommodate these new movements and therefore will it take even longer to build the Power station as you have to cancel HGVs for the main construction phase...

My understanding is that the plant would operate 24/7 using diesel generators until onsite power is available. This will contribute to significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics which have health impacts.

I am told that the water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium.

What are the impacts on marine life from this and the water intakes.

Reports state that the primary byproduct of desalination is brine, which facilities pump back out to sea. The brine sinks to the seafloor and wreaks havoc on ecosystems, cratering oxygen levels and spiking salt content. Antifoulants reportedly are used in the process, particularly in the pretreatment process of the source water, these then accumulate and discharge to the environment in concentrations that can potentially have damaging effects on ecosystems.

Please can you share with the planning inspectorate and generally why you think your plant will be safer and less harmful than other plants around the globe.

Furthermore I strongly believe that as you had prior knowledge of the water shortage in this area that a credible plan should have been put forward an outset so that all stakeholders large and small could read and understand your proposals.

By leaving this fundamental aspect out of the planning process you have not allowed this to be properly studied and reported on, given hard pressed District Council and Stakeholders a few days notice is completely acceptable. How are new interested parties going to respond to a probable disruptive and lengthy construction of the infrastructure for your new water supply. Who is going to pay for this and realistically how long will the planning and construction cost.

None of these aspects have been studied at length and it cannot be acceptable to put them in the equation at this late stage especially for new interested parties that may have their lives and property blighted by otherwise unknown infrastructure pipeline

I further note that byproducts from the sea water other than brine would be dried out and removed from site at a later date, what are these by products? Are they harmful? And could they seep into Minsmere also where is this By product going to be disposed of? "Landfill"....

The remaining brine also contains phosphorus what guarantees do we have that "phosphorous bloom" will not occur in the future...

Thank you for taking the time to read our concerns

Yours faithfully

████████████████████

From: [REDACTED]
Sent: 26/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]
[REDACTED]

Subject: Consultation on Sizewell C water supply

I am responding to the new proposals for the water supply to the proposed Sizewell C nuclear power station.

At the outset I would want to say that it is simply appalling, and so characteristic of EDF's approach throughout, that such an issue has arisen out of the blue. The way the plans are silent on some issues, the way things keep changing precipitating another round of consultations and the way some things remain unresolved and left hanging makes a mockery of the planning process and, frankly, undermines the authority of the inspectorate. It is virtually impossible to come to a sensible view on half baked plans - and that is what EDF has expected the inspectorate and the residents of east Suffolk to do throughout.

What else in the the plans to which EDF were at the outset so confident to put their name will they want to change? And when will anyone know about it? EDF's plans simply now lack credibility.

Again, EDF are trying to bulldozer this through with only a short time, over the holiday period, being given for interested parties to consider the suggestions being put forward. Just as they exploited the difficulties presented by Covid to local people to come together and consider carefully their plans, they are forcing through changes at breakneck speed. Presumably they are not confident that their proposals would stand up to detailed investigation. Similarly the exclusion of the pipeline from Barsham suggests that they believe transparency is not something that will prove beneficial to the process.

As ever, the new proposals are uncoded and unthought through. Personally, I was happy to believe EDF when they explained (I believe in AS-202) that desalination was not practical thus:

*"This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)".*

Specifically, in addition to EDF's highlighted criticisms above, I object to the proposal because:

- * it is implausible to suggest bringing building materials for the plant in by road will not require more HGV transport (and so how can a view be taken on the current road proposals when they are already now clearly out of date?);
- * the plant will use dirty diesel generators and result in greater pollution;
- * insufficient consideration has been given to the impact on the natural environment of the resultant brine.

There is a very real danger that this project is on the verge of spiralling out of control with any number of changes being forced through to address unconsidered or poorly thought through issues with the result that the final outcome resembles very little that which originally EDF thought had some merit. At some point someone has to say stop and either give up on the plans or resubmit them properly as a viable whole which can be subject to proper, transparent, scrutiny.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 26/08/2021
To: sizewell@edfconsultation.info
CC: sizewellc@planninginspectorate.gov.uk sizewellc@suffolk.gov.uk [REDACTED]
[REDACTED]

Subject: SZC 19th Change Desalination Plants and Waveney Valley to Sizewell water pipeline. IP 200225970

Comments on the 19th EDF Sizewell C Change Consultation on the Desalination Plant and Pipeline, 26 Aug 2021, from [REDACTED]

[REDACTED] Tel. number [REDACTED]
[REDACTED]. Sent by e-mail [\[REDACTED\]](mailto:[REDACTED]). IP [REDACTED]
[REDACTED]

Before I make my comments I would like to say that as [REDACTED]
[REDACTED]
[REDACTED]. [REDACTED]
[REDACTED]
[REDACTED]. How can one comment on a new pipeline and that not show where it is located? And there were so many cross references to other documents, instead of clear explanations, that it was impossible to understand what was being explained. This was particularly noticeable in the last 4-5 pages the 'Environmental Impact' which was littered with cross references. The proposal document really needs to be re-done. I was surprised that a large company such as EDF could not produce a clear document that contained all the information – there was a great deal of a lack of information in this one, especially about the pipeline, which will affect so many people.

The Water Pipeline. I have walked the Angles Way along the river Waveney from Lowestoft to west of Diss, and this is a very small river with variable depths. It also has amazing wildlife. I would say that it is not suitable for water extraction and that EDF should look elsewhere if they really need a new pipeline. This wildlife needs protecting and more extraction from the river is inevitably harmful to it.

The Desalination Plants. (I believe there may have to be two of these constructed according to the document). The huge amount of pollution that these plants cause is well documented (Elsaid et al., 2020, 'environmental impact of desalination technology: a review', Science of the Total Environment 748, 141528). The chemicals they put out into the sea, and the thick brine concentrated layer that will cover the seabed, are not conducive to current thinking regarding protecting the marine environment, together with dredging and other works. The plant appears to be run by

diesel generators, which will cause pollution so are not environmentally friendly, brought in by a tanker no doubt, again more pollution.

Regarding tankers bringing in water during the early years of construction. If these are still within the numbers of HGVs predicted then the original prediction must have been wrong, and 40 HGVs is a long way to be incorrect. If EDF can be so wrong about something so simple, it does not give lay people like myself any confidence in them being able to build a nuclear power station. Especially one in this country of untried and unproven technology, and on a sinking and eroding coastline where the towns of Sizewell and Dunwich are well under the sea. I began visiting Sizewell beach over 50 years ago and much of the coastline has disappeared – no more space for cricket matches, or the TA's Rifle Range – all that land has gone just within my living memory.

Sizewell C if it goes ahead is a disaster waiting to happen, and these ideas about desalination plants and a new pipeline just shows that EDF are clutching at somewhat belated straws, and are really out of touch on environmental matters. For years local people have been asking 'Where will the water come from?', and when I asked this at one of the early consultations I was told that when Sizewell C gets the go ahead the water companies will be obliged to provide water. In one of the driest counties of England, in an area where new boreholes are no longer allowed, the water just isn't there. So,.....why did it take EDF so long to realise what everyone else could see so clearly? It does not inspire any confidence in them as a company. Or perhaps I could be cynical and say that they deliberately left out this controversial, highly polluting and environmentally disastrous idea about desalination plants, from the initial consultations, as they knew how damaging and unpopular they would be.

It is time that we started caring more for our marine environment, not less, but EDF clearly has no understanding of this need.

██████████



**Comments on the
Temporary Desalination Plant
Consultation Document
for the
Sizewell C Project**

August 2021

Desalination plant proposals

Consultation document¹

1. Coastal Geomorphology impacts

- 1.1. The small scale works for the intake and outfall headwalls are not anticipated to have a significant impact on longshore processes or the inner or outer bars. It is intended that these will be captured in the Coastal Processes MMP and any unexpected impacts will be identified through monitoring. Should there be an unexpected impact it is not clear what mitigation measures could be undertaken though.
- 1.2. Section 2.3.24 of the Consultation document states '*The [Fish Recovery and Return] FRR is not required until the operation of the power station and use of the desalination intake pipe would cease before the FRR begins any commissioning tests towards the end of the construction period.*' Given the provision of the potable water supply is uncertain, we would recommend that impacts associated with the intake pipe still operating when the FRR begins commissioning tests should be considered.
- 1.3. It is also not clear from section 2.4 that the hydraulic force of the discharge of the outfall pipe and the potential effect on coastal processes has been considered.

2. Marine impacts

- 2.1. Section 2.4b explains that brine with potentially raised levels of phosphorus, chromium and zinc will be discharged to sea via the outfall pipe. It is acknowledged in the Site Water Supply Strategy² that a the "*key environmental concern associated with desalination would be the disposal of the brine waste product*". Impacts on marine ecology (including direct and indirect impacts on birds) should therefore be assessed, including consideration of interactions with other marine impacts of the Application and the previous Change Applications.
- 2.2. As stated above regarding coastal geomorphology, the potential for the desalination plant to still be operating during any commissioning activity associated with the FRR should be considered in relation to potential impacts on fish discharged through the FRR given the proximity of the FRR to the desalination plant outfall.
- 2.3. In addition, impacts of localised dredging (described in 2.4c) on marine ecology should be assessed, again including consideration of interactions with other marine impacts of the Application and the previous Changes.

3. Noise impacts

- 3.1. It is stated in section 2.3.8 that the desalination plant would need to operate 24 hours a day. Noise impacts on terrestrial and coastal ecological receptors will require assessment to cover both its initial location within the main platform and its later relocation to the temporary construction area. This noise assessment should also include the use of the diesel generators before the main power supply is available.

¹ [Sizewell c project consultation document updated v2-compressed.pdf \(edfenergy.com\)](#)

² Paragraph 1.4.17 of Planning Statement Appendix 8.4K Site Water Supply Strategy ([APP-601](#))

- 3.2. Section 2.4g states that noise screening or noise suppression measures would be used to avoid impacts. We query the screening that will be possible given the height of the equipment reaches 10m.

RESONSE TO CHANGE 19 DE-SALINATION PLANT

Once again we have an 11th hour change as EDF come to terms with the fact that the local infrastructure is just not able to deal with such a huge development.

The fundamental issue of water has been raised with EDF since stage 1 and it is only now three quarters through the examination process that EDF has come to the conclusion that it will not have enough water and will need to install this plant to dig it's way out of this position.

We are disgusted that after all this time we are given just 3 weeks to respond to a proposal that has little detail in the height of the first holiday season as COVID restrictions lift.

A Desalination plant has a huge demand for power which will be delivered by a 'diesel farm' operating 24/7 for years pumping out greenhouse gasses include carbon monoxide, nitric oxide , nitrogen dioxide, and sulphur dioxide so adding significantly to the projects already huge carbon footprint.

The plant will return concentrated brine up to 1.6 times more concentrated than the sea water extracted as well as polluting phosphorous. The denser water will sink to the sea bed and could remain for periods when the sea is calm with potential to affect marine life. There is also a high risk of impingement to marine life at the intake.

Not only will all this infrastructure have to be delivered by road but so will all the potable water requirements until this plant can get up and running. This will add to the HGV's along the B1122 as well as pollution.

It will also add a significant cost to the project in both construction and running costs escalating the total build cost to an organisation that by it's own admission cannot afford to build it.

We are totally opposed to this change for the above reasons.

[REDACTED]

[REDACTED]

rom: [REDACTED]

Sent: 26/08/2021

To: sizewell@edfconsultation.info SizewellC@planninginspectorate.gov.uk
sizewellc@suffolk.gov.uk [REDACTED]

Subject: Comments on the 19th EDF Sizewell C Change Consultation on the Desalination Plant and Pipeline

This late introduction of a proposal for a desalination plant raises many questions, and cannot be considered acceptable at present. Among the issues it raises, and the reasons for my objection to it, are

1. Can the River Waveney provide sufficient water without damage to its important ecosystems?
2. The desalination process is itself polluting. Energy is required to operate it, and the extracted material will require disposal. If this is back to the sea, what are the consequences for the local ecosystems?
3. It is stated that the tankering in of water will not increase the number of lorry journeys. How can that be unless the original estimate of lorry movements include some headroom for this sort of eventuality? What other estimates have included headroom, and are thus inaccurate?

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Email: [REDACTED]
[REDACTED]

27 August 2021

Sizewell C Consultation
EDF
Leiston

Dear Sir,

Temporary Desalination Plant- Statutory Consultation Response

We were astonished to be informed of yet another further amendment (number 19!) to your application for the Secretary of State's consent for your proposed development. Launching a last minute consultation on in the middle of the holiday season, with such a short time allowed for response when the public examination of your application is very close to finishing, is quite extraordinary. Given that the issue of water supply in this, the driest part of the UK, has been repeatedly raised with you over almost ten years of consultations, it beggars belief that this has not been central to your planning strategy.

Given the totality of the amendments, including those on transport, a new jetty and a very different coastal frontage, submitted by your company since your application for a Development Consent Order was submitted we are now faced with a development plan that is very substantially different from that which we, as lay members of the public, have responded to over the four stages of your consultations since 2012.

Assuming that this has not been all part of a strategy of calculated deviousness on the part of your company to minimise any public scrutiny of your plans, it raises two very fundamental issues. The first is as to the suitability of the Sizewell site given the vulnerability of its rare natural environment, the fragility of the geology of its coastline and the huge problems of transport links. The second is to the competence of your company and whether you are capable of safely delivering and managing this highly complex project. Your record to date in Finland, Normandy and elsewhere does not inspire confidence either.

Turning now to the consultation document itself, we wish to fully associate ourselves with the detailed response submitted to you by Theberton and Eastbridge Parish Council, but also raise several specific points:

- You are now cheerfully commending the virtues of the desalination process when you had explicitly discounted this in document AS 202 on the grounds of sustainability, power consumption, cost and waste water discharge. You give no clear indication of what the environmental consequences of this about turn will be, in particular of the impact on the carbon footprint of the construction process.
- Mr McGarry of your company, in his letter of 24 August to the East Anglian Daily Times justifying the change of strategy appears to point the finger of blame for this fiasco at the water supply companies. We think he is being economical with the truth because in its letter of 23 July 2021 to the Planning Inspectorate Northumbrian Water took the extreme step of submitting a formal holding objection to your planning application, citing, amongst other concerns, the ‘materially increased water requirement’ of which it has only been recently notified and which ‘is still not fixed’.
- It is clear from the letter from Northumbria Water that your planners have failed to distinguish between the very considerable ‘domestic’ water supply that will be required for the huge new workers campus and other staff accommodation sites, which in itself could have put the local community supply at risk, and the even greater demands of the construction works. Why on earth were these obvious issues not anticipated? If a new 28 km pipeline from Barsham is required, why had the planning agreement not already been long secured and Northumbria Water already getting the work underway?
- You assure us that the trucking of water before the desalination plant is in place will not breach the agreed caps on HGV numbers on the B1122. What happens if a combination of very probable delays on the opening of the Sizewell Link Road and the new plant makes it impossible for this cap to be sustained?
- Finally, the submissions from our parish council raise very serious issues about the potential environmental impact of the discharges of brine and other material from the proposed desalination plant which your consultation document only considers in a very cursory way.

We trust that you take these comments into account as you reformulate your proposal. We also forward this response to the Examining Authority of the Planning Inspectorate, Dr Coffey, our MP, the leaders of Suffolk County Council and East Suffolk Council and our Local County and district councillors.

Yours truly,

██████████ ████████████████████

From: [REDACTED]
Sent: 26/08/2021
To: [REDACTED]
CC: sizewell@edfconsultation.info
Subject: Sizewell desalination plant proposal

It is with concern that I read about the need to build a desalination plant to enable the building of the new Sizewell nuclear power plants to proceed. This new proposal will mean disruptive delays and add significantly to the cost of a project that we will ultimately have to foot the bill for.

The scale of this new proposal is far too important to slip in with a three week consultation over the summer holiday period when many people who might want to respond are away. Nevertheless, I have written to EDF to explain my concerns as follows:

1. To propose creating a new 28k pipeline without giving the implications of this the scrutiny it requires at this stage, can only lead to further hold-ups and costs around the already extremely expensive project as a whole, not to mention disruption to local industries, farming, residents and the natural world.
2. Previously, EDFs own objections to desalination as an option, due to concerns over wastewater discharge, cost, sustainability and power consumption meant that this option was ruled out. It is not necessary to outline what the problems are, since EDF already spelt them out in AS-202 quite adequately. The one thing I will highlight is the potentially toxic impact of phosphates that will be discarded into the sea. The later will make the briney water even more of a threat to sea life, to humans and to costal industries and activities that make this currently an attractive destination for visitors.
3. Furthermore, as I understand it, the plant will take around half a year to build (assuming it and the water supply get consent). Whilst it is built, several tankers of water per day will be needed, on top of the vehicles scheduled to deliver materials to the site. Unless the whole build is slowed down to take even longer, at extra cost, this will inevitably lead to an even heavier pressure on the limited road network in this area.
4. I am particularly concerned about how the resulting traffic build up and inevitable bottlenecks, especially at peak times that will occur will impact on local residents and businesses. It is important to bear in mind that Suffolk Coastal has some of the lowest unemployment

levels in the UK and a relatively low proportion of young people reaching employment age, as a region it has an above average elderly population and above average number of carers who look after them. For this demographic, with complex health issues and no major accident and emergency hub nearby, additional delays getting to help could be a matter of life and death. For example, my own [REDACTED], [REDACTED], who also lives [REDACTED], has to make frequent visits to clinics in [REDACTED] and [REDACTED] and this month [REDACTED] [REDACTED] had to be taken by ambulance to [REDACTED], following a [REDACTED] [REDACTED]. Luckily traffic was quiet and [REDACTED] was ok.

5. Since services are not on people's doorsteps, they have to rely on private cars, taxis, the occasional bus or other motor vehicle to travel from home to hospital or clinic. The volume of HGVs, along with workers commuting to the site by bus or in their own vehicles (if they live East of the A12) will create toxic traffic conditions. How local people or emergency services will be expected to operate during this period of disruption is a matter of deep concern. Lives will be hugely disrupted or even, potentially, lost, due to delays.

For the above reasons, I object to the addition of a desalination plant . If nuclear power is still the power of choice, may I suggest that EDF review the way forward and consider building new plants up at its Hartlepool site where potable water, provided by Northumbrian Water may be in better supply and where there is a younger population of people. badly needing employment opportunities.

Yours sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 26 August 2021 15:10
To: SizewellC <sizewellc@planninginspectorate.gov.uk>
Subject: Sizewell C Co Potable Water

Dear Planning Inspector

Sizewell C, Potable Water

I write to express my absolute outrage that at this late stage in the planning process, EDF Sizewell C has added yet another consultation as Northumbrian Water Ltd has advised that Blyth Water Resource cannot supply the required water to meet Sizewell C requirements, EDF knew about this over 10 years ago and have done nothing about it until now!

This consultation is for a desalination plant which local residents only have a short period of time to put their views forward and EDF Sizewell C have done this to coincide with the peak holiday period, hoping to get it passed without a full consultation. This is a major issue as it will affect a large population living in the vicinity of Sizewell C for years, before a new 28Km pipeline can be installed from Barsham.

We are advised that the desalination plant will take up to 6 months to build, in the meantime water that will be needed will have to be delivered in tankers by road for up to a year. This is yet more lorries on the A12 and B1122, as the new link road will not be open at this time!

The desalination plant will be operating 24 hours a day constantly throughout this time contributing carbon monoxide (CO₂), Nitrogen Oxides (NO) nitrogen dioxide (NO₂) and sulphur dioxide (SO₂) and other harmful air particles into the atmosphere, which will increase breathing difficulties to local residents breathing in all these deadly particles, increase asthma numbers in this area. There is also the increase in noise pollution on top of all the other noise associated with the actual reactor build, this is just totally unacceptable, when will it end?

The water from this desalination plant will be 1.6 times more salty than natural seawater, it is also warmer, making it difficult for marine life in the immediate vicinity of the discharge to survive and thrive. Copper and chlorine are added to the seawater at various stages in the desalination process to control bacterial growth or reduce corrosion and many end up in the wastewater and into the sea. These chemicals could potentially end up being in our food chain and being swallowed by swimmers, yes people do swim in the sea along this coast!

Storing these chemicals onsite along with other stored chemicals could leak into the surrounding ground water.

I still cannot see why after all the issues raised to date why this process is still on going. It has shown this is the wrong site for a nuclear power station. Devastating for wildlife, nature, people's lives, no major transport infrastructure, no water supply, doesn't meet the government own carbon immersion date and to top it all, none of these EPR Reactors in the world WORK! They are all behind completion date by years, cost overrun by billions. The only EPR reactor the Chinese have got to work is at Taishan in China. It worked for 3 years and has had to close for maintenance due to a radiation leak caused by damaged fuel rods, this would be devastating if it happened at Sizewell as a radiation leak could contaminate Suffolk, Norfolk, Essex, even the Netherlands, Belgium, Poland and France just to name a few countries, just look at Chernobyl.

How loud do the warning bells have to ring for everyone to realise the whole proposal is just totally unacceptable and should be thrown out.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

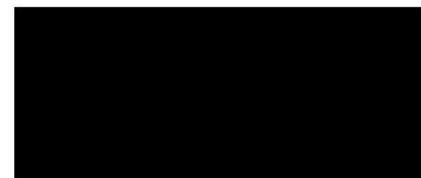
[REDACTED]

[REDACTED]

Date: 27th August 2021

Contact: [REDACTED]

Email: [REDACTED]



SZC Co.

By email only

To whom it may concern,

CONSULTATION RETURN

PROPOSAL: Consultation on Temporary Desalination Plant: Proposed Change 19

LOCATION: Sizewell C

1.1 While the [REDACTED] does not object to the proposal more information is required to confirm that the impact of the proposal is not significant and for the [REDACTED] to fully appreciate the risks associated with the whole water strategy.

Water Supply Strategy

2.1 Construction of the new 28km main (2.2.3) from Barsham to Sizewell will have transport impacts, particularly if construction is planned for some time between 2024 and 2026 (2.2.4), coinciding with SZC construction traffic.

2.2 Consideration should be given to:

- at an early stage to a holistic approach to the construction activities associated with the water main to minimise disturbance on local communities i.e. whether elements of this work could be included as part of the SLR construction programme in order to minimise further disruption to the road at a later date, which may occur as a result of the delivery of the water main.
- to whether a cumulative assessment of the additional impact of delivery of the water main is required given the likelihood of its delivery during construction. This is likely to require additional construction workforce movements, freight movements and associated traffic management, with additional impacts on communities as a result.

2.3 In 2.3.1 SZC Co states it will continue to work closely with Essex and Suffolk Water. As part of this process the [REDACTED] would welcome an explanation from the applicant on how new water supply pipe will be secured for the DCO, so the [REDACTED] can understand the risks associated with this strategy.

Transport and Environmental Impacts

3.1 In the consultation document the applicant states that up to 40 HGVs are needed to deliver water for the first 9 to 12 months of construction (2.3.5).

3.2 The applicant has identified the source of water that will be transported by HGV in the early years as most likely to be Barsham, near Beccles (2.2.2). The comments in 2.4.25 that the transport impacts assessed in the Environmental Statement are unlikely to be exceeded is only valid if the proportion of HGVs using the northern route is fewer than 90 movements i.e. 15% of



600 movements in the early years cap originally assessed in the original CTMP in the DCO submission, and fewer than the 5% (30 HGV movements) modelled travelling to Norwich (i.e. using the A145). The additional 80 movements (40 HGVs) would form a significant part of this, and potentially exceed the original assessment. The [REDACTED] notes that during the initial scoping of the TA and its subsequent development the applicant did not inform the [REDACTED] of a scenario where 80 HGV movements a day are routed to Barsham. Specifically, the [REDACTED] raises the road safety impacts of these additional turning movements at the A12 / A145 junction. Further work and assessment is needed from the Applicant on the issue of additional HGV movements and a potential to confirm whether there is an unassessed material impact.

3.3 In 2.3.9 the applicant states that the plant will be delivered by road. The [REDACTED] presume that @380m long 350mm dia pipe inlet (2.3.15) and 250mm dia outlet pipe (2.3.16) will be delivered by road as well as the plant. It is noted that approximately one HGV will be required to dispose of solid waste off site (2.3.13). Greater detail of the likely number of HGVs required to deliver and remove all the apparatus associated with the desalination plant would be welcomed as would confirmation that these are included in the traffic modelling for the scheme and included within the relevant HGV caps, as set out within the CTMP.

3.4 Any AIL movements associated with the Desalination Plant would be subject to the same controls and processes for all site AILs as set out in the Construction Traffic Management Plan (CTMP) and Traffic Incident Management Plan (TIMP). Confirmation will be needed on how the HGV movements are covered within the relevant management plans.

3.5 Given the Applicant's stated ability to accommodate these movements within the original Early Year's estimates, further consideration should be given to whether the peak construction caps could be reduced with good management, especially given that the Early Years HGV traffic exhibits a peakier profile particularly during the latter half of the first year of construction, when the desalination plant will not have been constructed.

3.6 The Council also note the profile of the likely water demand shown at Figure 2.2, which indicates the demand increasing in the early years at approximately 18 months, and the risk that this might present to HGV movements if the desalination plant is not delivered by this time.

3.7 If, as stated in 2.3.11, the desalination plant needs to be relocated how will potable water be provided during this move (e.g., would this require additional HGV movements)?

Terrestrial Ecology and Biodiversity

4.1 We understand that the intake pipes are considered "small bore" even with a bore of 1 square metre. We don't know much about screening, guards, deterrents or other measures in place to deter/protect fish and marine mammals (such as Harbour Porpoise and Seals). It is anticipated that they will run parallel with the main FRR system but we note concerns raised by other stakeholders in relation to the existing fish and marine mammal mitigation proposals.

4.2 We understand that some salt will be taken away as "cake" and heavily saline water will be returned to the North Sea via a diffuser. Even in a saline environment such as the sea, too much salt will sterilise an area. What measures will be in place to avoid this?

4.3 We understand that the De-Salination Plant will be in an "developed" part of the site but would seek assurance that the operation of this facility would not materially add to disturbance caused by the MDS in terms of light, noise, dust, vibration and associated factors.

4.4 We understand that the intake and outfall pipes for the De-Salination Plant will be installed using Horizontal Directional Drilling methods and seek assurances that this will not interfere with marine risk factors such as benthic structures and species nor with the Coastal Vegetated Shingle both within and outside the County Wildlife Site.



4.5 Finally, what forms of monitoring will be in place to understand impacts upon any ecological features and what sorts of mitigation strategies are available to deal with impacts upon, for example, fish and marine mammals by the operation of the De-Salination Plant?

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
CC: [REDACTED]
Subject: Response to Consultation on Water Strategy closing on 27 August 2021

I am writing as the delegated representative of [REDACTED] in response to your latest consultation closing on 27 August 2021. [REDACTED] also participants in the [REDACTED] process.

1. Before getting into the specifics of your proposals, we would like to record our objection to your consultation approach. We were given only 3 weeks, at the height of summer holidays and with little attempt to bring this major alteration to the attention of Interested Parties and the community. We have joined with other local councils in objecting to EDF's approach on such an important and major change to the DCO.

2. Your brochure, in which you mentioned the consultation, was highly misleading. First, we note that you did not mention the consultation until after pages of claims about how Sizewell C will improve the natural environment. Like other interested parties, we contest the claims EDF is making about its impact on biodiversity in the area. It was particularly shocking to see your claims of helping the Marsh Harriers. In fact, I wrote about and had an exchange with your representatives at the ISH on biodiversity and the environment specifically on this topic. EDF itself admits that you will be displacing the Marsh Harriers from the Sizewell Marshes. And yet you put pictures of Harriers on your brochure and made claims that you were improving the environment for these birds. Given that this species was saved from extinction in the UK in these marshes and that it is your proposed construction that is causing the threat to their habitat and continued existence here, your communications appear highly misleading.

2. In terms of your proposal for using water tankers and then constructing a desalination plant, again your brochure is misleading. You say that you are proposing desalination as a result of "listening to the local community". That is hardly the case. The local community for years has been pointing out that Sizewell is an inappropriate site because of the lack of potable and non-potable water. Instead of admitting that you have been caught out by your failure to take this constraint into account, you appear to want to make the local community believe you are doing us a favour by building a desalination plant. This is clearly inaccurate.

3. We object to the proposals by EDF to bring water to the site. This includes the proposals in 'early years' and thereafter:

- There have already been lengthy objections and discussions with EDF about your failure to put in place transportation mitigation measures in the 'early years'. You are now proposing to put 40 additional tankers on the local roads, per day, when no transport mitigation will be in place. At the same time, you will be trucking in materials to build the plant and presumably trucking in diesel fuel to run it. Yet you claim that this will not impact your overall number of HGVs. This cannot be correct. Either your current caps have been set excessively high or you are already planning on over-running your HGV movement numbers and have simply factored in these additional tanker movements into your calculations. Your consultation says nothing of the cost overruns that will come with providing potable water by tanker and desalination which will have to be passed on through financing mechanisms and higher electric costs to the public.
- In terms of the desalination plant, your consultation document lacks sufficient detail, but it appears that there will be a minimum of 4 years using diesel and possibly much longer than that. In fact, if the water pipeline isn't built, then the desalination will be running for the lifetime of the nuclear reactors. Desalination is one of the most environmentally harmful, carbon intensive processes and will produce many tons of CO₂ everyday of its operation. Because of these excessive costs and carbon intensive processes, desalination is only a rationale choice in the most extreme water deprived, drought-stricken areas. Building desalination in Suffolk cannot be justified.
- You claim that there will be no change in baseline assessment for noise and vibration and air pollution. How can that possibly be correct when diesel generators create a tremendous amount of noise, vibration, CO₂ and other greenhouse gases? Whether people living near the site hear it or not is unknown given your lack of detail and analysis, but surely the wildlife in the area will be disturbed by it and you have made no meaningful analysis of this impact.
- EDF is already being challenged on its claims related to marine life impact. You are now arguing that you will be able to run a desalination plant without creating any additional impact, despite the fact that desalination plants are known to have significant negative impacts on marine life in terms of fish larvae and other marine animals being sucked into the intake and in terms of pumping back brine into the sea. Desalination has also been linked to algae

blooms. We note too that you will be using daily additional HGV movements to take some slurry out of the site by truck. What is that impact on transport? And what potential impact might any run-off of this slurry and brine have on the surrounding AONB. There is absolutely no guarantee that you will ever receive piped water to the site and therefore the impact of desalination and its costs could be a permanent feature of the site. It is up to EDF to provide a full and accurate assessment of impact, of risk and cost and prove that its desalination plant will have NO additional impact on marine life, the sea or the AONB.

4. What is very clear from your latest proposal is that this desalination and tanker solution would be a major change to the DCO. Moreover it is further evidence that Sizewell C is the wrong project in the wrong place. If EDF insists on building two EPR reactors, then you need to find a suitable site. As the absence of water demonstrates, the Suffolk coast is clearly not it.

Response to the temporary desalination plant for Sizewell C (Change 19)

Interested Party Reference Number: [REDACTED]

It is staggering that this change has come so late in the examination process. It suggests incompetence or intent to make comment and objections difficult and the examination to be less than full. 19 changes show that the application was premature.

The desalination plant will cause further industrialisation of this part of the Suffolk coast.

The impact of 6000m³ of concentrated brine will have this area is not well described in the consultation document. It says that a diffuser will be used, however I assume that this will be on or near the seabed, so I would the brine will still tend to sink and settle to the seabed and accumulate. There is no indication of whether the brine will be diffused over a height range. Also the depth of water is shallow so there is little option to diffuse over varying depths.

I object to the addition of the desalination plant on the above grounds.

The proposal to abstract 3500m³ per day (over one and a quarter million cubic meters per year) over the construction period and beyond could have a serious effect on a relatively small river. Recently we have seen periods greater than a month when the total rainfall has been only a few millimetres. What would be the impact of extracting this volume of what in this situation. Suppose the months of April and May were exceptionally dry (as April was this year) what would be the cumulative of farm irrigation and Sizewell C abstraction? I feel that the impact in this situation could be extremely damaging to the health of the River Waveney.

I object to the abstraction from the River Waveney on the above grounds.

EDF have not shown thatb they have a sustainable supply of potable water for Sizewell C construction.

Sizewell C Nuclear Power Station
Response to Consultation Proposed Change 19 August 2021
Temporary Desalination Plant

From [REDACTED] PINS REF No [REDACTED]
and [REDACTED] PINS REF [REDACTED]

We note that this Consultation is very late in the day considering the Applicants have known that vast quantities of potable and pure water will be needed both for construction and during operation if SZC is given planning permission. The consultation falls short of the time allocated for any consultation in Advice note 16 from PINS. We understand that after consultation a formal application will be submitted to PINS.

It has come to the fore because of the details in the letter from Northumbrian Water to PINS, dated 23rd July 2021, that the amount of water the applicant is seeking will not be available in the time scale needed for the applicant's Construction Timetable. Many people, including the Environment Agency, have asked the applicant for a detailed Water Strategy from as long ago as 2010. Yet after 4 previous consultations and many respondents pointing out a possible difficulty with water supply, the applicant has left it until the eleventh hour to realise via Northumbrian Water's solicitor letter, dated 23rd July 2021, that the water needed is not available and therefore NWL submission of a holding objection. It was also pointed out by Northumbrian Water in their response to PINS EXA dated 1st June 2021 AS-202 that SZC Co were notified in 2018 that supply from the Blyth water Resource zone was not available. This report indicated that all raw water in the Blyth Water Resource Zone was assessed by the Environment Agency as over licenced and potentially over abstracted. Potentially placing that water company at risk of failing its obligations to customers and its ability to comply with environmental licences.

This national resource issue of water and potential impacts of climate change, is possibly now finally being recognised and a neighbouring water company, Anglian Water, is reported as stating "East Anglia could face a water shortfall of 30 million litres per day by 2025". Their solution requires a £400 million pipeline from North Lincolnshire, and a number of connecting mains throughout their supply area. An area which surrounds that of the Essex and Suffolk water company. In addition we have noted that Yorkshire water are concerned about reservoir deficits in capacity in future years.

Without seeing a proper Water supply strategy, authorised by Environment Agency, we will have no confidence that water will be available to this project, as it is now nationally recognised that potable water is a scarce resource. We also anticipate that a full Environmental Impact assessment will be required in view of the potential multiple receptors of any pipeline project.

We have been given no indication as to where is the source of supply for up to 40 water tankers per day, which we estimate would require 1200 cu metres (1.2 million litres) per day. Also there is no indication where the water will be discharged and stored.

We also note a potential requirement for additional water for a proposed Hydrogen plant in this vicinity.

As previously pointed out we have consistently raised the issue of town water at all consultations, but also have on file details of water which was required by Sizewell B particularly at outage and for flushing of pipework during commissioning. In fact the 1993 Nuclear Electric application for twin PWR at Sizewell recognised a potential need for a permanent desalination plant. The 2012 IAEA nuclear power station siting standards (Managing Siting Activities for NPS ref NG-T-31) at ref 4.57 also indicate a need for many uses of town water.

To turn to the desalination proposal we object to the principle of desalination and believe there is no justification for this polluting process which will increase salinity in the local marine environment, add to pollution and damage to species. There is also a concern about the possible damaging impacts of siting a desalination plant in Goose Hill, any spillage of chemicals and pollutants should be avoided. Again a full EIA is needed.

Operation of the plant will require additional power supply for desalination and pumping, disruptions due to construction of pipework and storage capacity and may require temperature control, all of which will add to the carbon footprint of the construction and the overall cost of this project.

Therefore we strongly object to this proposed desalination plant and believe the risks to the environment cannot be justified.

[REDACTED]

[REDACTED]

[REDACTED]

27th August 2021.

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
Subject: Sizewell C - strong objection

I object strongly on these grounds:

I am very concerned about the water demand for Sizewell C construction.

This is a very dry region, water has to be shared already between the needs of local farmers as well as tourists, and all the local inhabitants. I understand that the Environment Agency is no longer granting permits for new bore holes within the Blyth area.

Surely you should have sorted out the water supply question years ago. I fear that there will be insufficient time before the end of the Examination (14 Oct) for the Water Strategy (such as it is) to be properly scrutinised. Your document lacks essential details. We are supposed to have a minimum of 28 days for a Change Consultation, but only have 24.

If you go for taking water from the **River Waveney** what damage will this do to the river and its surrounding wildlife-rich wetlands? [REDACTED] [REDACTED] from the River and highly value the wetlands along the valley.

If this is decided to be unsustainable what will your next option be?

Wheel washing/dust suppression - If you use recycled / non-potable water for dust suppression what will its chemical content be? Is there not a danger of polluting the designated sites?

As I understand it the proposed **desalination** plant will require yet more dredging for the intake and outflow heads. Yet more fish and other organisms will likely be killed at the intake head (in addition to the millions killed by the cooling water system). I am led to wonder where will the tankered water come from? The plant will be very close to Sizewell Marshes Site of Special Scientific Interest (SSSI) immediately to the west of the platform and Minsmere-Walberswick Special Area of Conservation (SAC) directly to the north. I worry about the effects on rare plant communities due to increase in nutrients as well as the greenhouse gas emissions and the risk of diesel spillage and contamination.

In general I think you have given insufficient information about water treatment and storage.

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 27/08/2021 12:41:58
To: sizewell@edfconsultation.info
CC: [REDACTED]

Subject: Consultation on the Provision of Potable Water to Sizewell C
Body:

Dear sir,

I note the increasing frequency of amendments to your submission to the Planning Inquiry with bewilderment and some amusement. It is barely conceivable that, after eight years of consultation, you have suddenly 'discovered' that you do not have a suitable water supply to the proposed site. Such a situation in any other industry would result in the immediate dismissal of the managers involved in the disaster. All the public relations efforts and the glossy brochures that are shoved through our doors cannot make up for your lack of preparation. If you are in such a state at the planning stage then god help us all if this project ever gets approval for construction.

My immediate riposte to your proposal for a desalination plant is to draw your attention to the words that you wrote in one of your documents when you discounted such a plant.

"Installing modular desalination plant on the main development site and abstracting seawater for treatment Discounted.

• This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)."

If this solution was not thought to be suitable previously then why has it suddenly been brought back into the proposal despite the drawbacks that you drew attention to when it was discarded?

I would now like to continue and put to you some of the other reasons why your solution is not viable.

The East of England is the driest part of the country and already suffers from water shortages. With increasing climate change this problem is likely to increase with rainfall being unpredictable and, when it comes, to occur in large scale downpours rather than the smaller amounts that we have been used to. Given these factors, attempting to secure a predictable water supply will become increasingly difficult.

The proposed desalination plant would further despoil the Area of Outstanding Natural Beauty and provide yet more reasons for tourists to look elsewhere for their holiday breaks.

This solution will add considerably to the cost of a development for which EDF is already unable to explain where the finances are coming from. It makes a mockery of the planning process when one party is unable to demonstrate that it has the basic financing in place before its plans are submitted.

The interim solution of shipments of water by road tankers will add considerably to the already large number of additional HGVs on the road. Even today, the A12 is a congested highway. For example, I was unable to make an appointment today owing to the sheer numbers of vehicles on the road including farm vehicles.

The longer-term supply of water via pipeline is a substantial additional cost and this addition has not even been included in the DCO. Are you hoping that we will not notice this 'small' additions to your proposal?

I can only conclude that your proposal to build a new nuclear power station at Sizewell is not a serious one and that at some point in the near future, it will suddenly be discovered that you have an alternative plan which is more attuned to reality.

Yours,

██████████

██

[REDACTED]
From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info sizewellc@planninginspectorate.gov.uk
[REDACTED]
[REDACTED]

Subject: Mini Consultation Re Potable water Supply ending 27th August

We are writing in response to the latest 'Mini-Consultation' from SZC the Applicant, on a temporary Desalination Plant which was launched on 3rd August.

We are amazed at both the naivety and arrogance of the Applicant; not to have verified and secured access to potable water supplies (of up to 4000m³ pd) at this late stage of the design/planning process is unforgivable.

We question whether the Applicant would have 'come clean' on this issue unless the solicitors for NWL (trading locally as Essex & Suffolk Water) Walker Morris, had not written to the Planning Inspectorate on 23rd July to formally notify the authorities of their **Holding Objection** coupled with their reservations as to delivery of additional infrastructure. NWL talk of 2026 as their objective for delivery, but also express further concerns that could lead to material delays....

Until the 'temporary' modular desalination plant is operational, the Applicant proposes to transport potable water to site in HGV tankers – using up to 40 deliveries per day (total 80 movements) during the initial 4/6 moths of construction. The Applicant states that these additional HGV movements are all within daily limits 'established' during Early years – we feel that such a volume of flexibility questions the Applicant's original traffic data projections as contained in the DCO yet further as exposed at recent PINS Hearings.

We note that the Applicant also plans to have storage for up to two days potable water useage – where are tanks with capacity of 8,000m³ to be located?

To state the obvious; this project is based upon an unproven technology (Taishan has had to be shut down), with all of the three other projects incomplete, over budget and behind schedule.

Only at the ISH this week, the Applicant could/would not provide an up to date revised project costing beyond the original £20bn, yet every other

capital project in the UK is currently witnessing inflationary materials cost increases of up to 20%.

How much longer are we all to spend considering these death throws of Big Nuclear – the cost to us all, both financially and physically, is immense.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

From: [REDACTED]

Sent: 27/08/2021 16:01:56

To: sizewell@edfconsultation.info,sizewellc@planninginspectorate.gov.uk

Subject: Comments on the Additional and very late in the day Consultation on SZC DCO and a desalination plant
Body:

To The Sizewell C Team:

Yet another consultation, why? Have you not thought on the water issue before. You have been given ample warning from your first consultation, yet you continue to ignore the valuable knowledge of the localc don't seem to be able understand the complexitiesXo sultatiin

Your outrage that this fundamental issue is unresolved at this late stage in the planning process, two thirds of the way through the examination. Campaigners and communities have been asking questions about water for a decade. A joint letter to PINS from TASC and Stop Sizewell C will give some ideas.

That it is unacceptable to have such a short, late consultation during peak holiday period when many are away.

That we do not understand why 28km of new pipeline from Barsham is not in the DCO? It means it is not subject to any scrutiny and the disruption and activity are not part of EDF's figures.

EDF give no indication of what cost this will add to the project.

EDF's previous objections to desalination seem to have evaporated (in document AS-202 Water Supply Strategy Update, EDF states; "This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)

Your specific objections to the proposals, eg:

The plant will take 4 – 6 months to build and be brought in by road, but because it cannot be installed at the very beginning of construction, drinkable water will need to be brought in by tanker for the first 9 -12 months of construction, up to 40 trucks/day (80 movements). EDF claims tankers and plant transport won't raise HGV "caps" but we are doubtful.

The plant would operate 24/7 using diesel generators until onsite power is available. This will contribute to significant CO2, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NOx and volatile organics which have health impacts.

Water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. Impacts on fish and other marine life from this and the water intakes are concerning

[REDACTED]
From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info [REDACTED]
[REDACTED]
[REDACTED]

Subject: Desalination Plant Sizewell C

Sir, Having taken further time to study your proposals I need to add to my previous correspondence. Your proposals have no costing.....in hard finance or for all inhabitants on the impact of these latest developments. There lingers the nasty prospect of this desalination plant becoming permanent. I suspect this is what you are after and have known this for some considerable time, holding back precisely so it was outside of the DCO because of the cost and your previous dismissal of it. This needs to be in the DCO.....fully costed. Your submission makes a mockery of any claim you make to consider the local community. Yours [REDACTED] Ref

[REDACTED] Sent from
[REDACTED]

[REDACTED]
From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info

Subject: De-salination

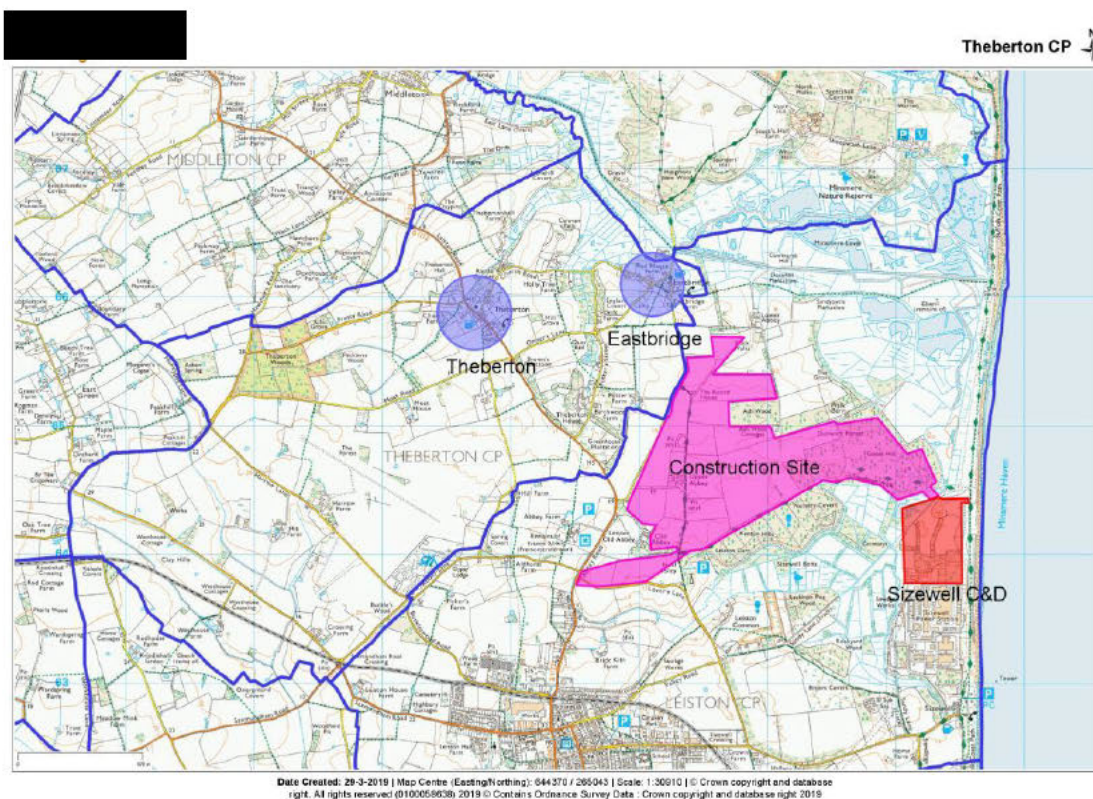
The latest update on your Sizewell project is truly alarming. The fact that you are now proposing a de-salination plant, having discounted the option previously because of environmental and other concerns. Your own Catch-22? Insufficient time for objections to be raised & aired too. This project is a total white elephant, and I am amazed that you are continuing to pursue it. Or are you so far down the track now that you can't turn back? The whole thing is an appalling mess. [REDACTED]

EDF ENERGY - SIZEWELL C – DESALINATION CONSULTATION

RESPONSE FROM [REDACTED]

AND [REDACTED]

Introduction



Theberton

Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C (SZC) large twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village entrance sign. Within the village of Theberton there is St Peters Church, a Grade I listed thatched roof church with an unusual round tower, a Grade II listed public house, a village hall, two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside. The successful village hall offers many activities and classes to the community and surrounding areas.

Eastbridge

Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or speed limits. It borders the Minsmere River which cuts through an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is also the location of RSPB Minsmere Reserve. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via National Trust's Dunwich Coastguards Cottages.

Both villages are chiefly agricultural, and people live there historically or by choice for the tranquility, dark skies, and the proximity to the Suffolk Heritage Coast. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasants, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors enjoy the close proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.

1. Response

- 1.1 **This Desalination Consultation response should be seen as an extension to all our previous consultation responses, Relevant Representation and Written Representations. Where previous responses reference, reject or support proposals/options presented by EDF and additional options are presented in this consultation, our support or otherwise for the newly presented options do not negate our prior support for previous options or change our view that in many cases, insufficient assessment and justifications have been provided by EDF for the progression of their preferred option or proposal.**
- 1.2 [REDACTED] is, once again, disappointed that EDF have submitted this extremely late consultation and that it is for less than 28 days during a holiday period giving scant time for [REDACTED] to react, respond and approve any response to this consultation.
- 1.3 It is even more concerning that the subject of provision of potable water supplies to the project has been an area of concern ever since the first pre-application consultation over 10 years ago and regularly resurrected as a concern at all subsequent consultations.
- 1.4 It beggars' belief that we now find ourselves in a situation where Northumbrian Water submit a holding objection to the DCO examination with serious concerns that it will not be able to provide the required supply before 2026.
- 1.5 In the Statement of Common Ground with Minsmere Levels [REP2-091](#) EDF expressed confidence that a new supply from Barsham would be available to "to enhance capacity and security of supply to NWL's existing customers within the local distribution network near Sizewell". It appears that such optimism has fallen well short of reality and reflects the optimism that has been evidence throughout the entire consultation process where assurances were given that water supply was not an issue.
- 1.6 If the only problem were potable supplies of water, it is also the case that the needs and sources of non-potable water for dust suppression and other critical environmental operations are also vague and unclear despite the SZC DCO proposal being made in the driest area of the UK which is clearly subject to water supply stress at all levels.
- 1.7 In [AS-202](#) Water Supply Strategy Update, regarding desalination you state;
This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).
- 1.8 We note that the current consultation does not propose to use the CDO for discharging the brine back to the sea.
- 1.9 However, in Section 2.4 of the consultation document it would appear that concerns expressed in [AS-202](#) regarding various sustainability and environmental factors have suddenly become "not significant", are within already provided assessments in the Environmental Statement or will be subject to further H1 assessments which are unavailable at this consultation.
- 1.10 Once again, it would appear you are consulting without providing sufficient information to your consultees to be able to make an informed response. For instance;

- a. There is no information regarding the efficacy of mixing in the space between the beach and the inshore bank where the brine will be discharged. Brine being denser than the seawater, will tend to sink and potentially become trapped in this inshore area.
 - b. There is no information on a larger scale that examines whether the brine in this inshore space will slowly migrate to the space between the inshore banks and the Sizewell Dunwich Bank complex and then beyond the banks into the North Sea.
- 1.11 Diesel generators to run the plant for 3-4 years continuously will contribute to significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics (always present in building environments due to diesel machinery etc.). Effects can be particularly bad from late spring through early autumn when temperatures rise and sunlight is strongest. Ozone can cause the muscles in the airways to constrict, trapping air in the alveoli. This leads to wheezing and shortness of breath. Depending on the level of exposure, ozone can cause coughing and sore or scratchy throat. Such effects will be particularly bad for those who already have respiratory issues such as Asthma or COPD.
- 1.12 A detailed breakdown for the early years of construction of the expected HDV and other traffic on the B1122 is awaited within the DCO Examination.
- 1.13 We also await clarifications of how the proposed Sizewell Link Road (SLR) will be able to act as a “haul road” for 10,000 two way HGV journeys for backfill material transfer to site (from the Two Village Bypass, Yoxford Roundabout and SLR) whilst still being under construction, along with vehicle management proposals for HGVs exiting the SLR south of Theberton onto the B1122 en-route to the Main Development Site (MDS) entrance.
- 1.14 We are not convinced that the assurances of “no need for change” in maximum limits for HDV numbers in the early years given the statement that up to 40 deliveries per day will be required to deliver the potable water requirement, during this time in the project.
- 1.15 We are also unhappy that the eventual provision of a new piped source of potable water from Barsham is not being assessed within the Development Consent Order process along with its CO₂ and other environmental impacts that a new ~20km pipeline entails.
- 1.16 To be raising this nineteenth change requirement now within what is supposed to be a front-loaded application process goes to show that insufficient efforts by EDF have been applied to the overall pre-planning process resulting in a project that lurches from one crisis to another with little coherence.
- 1.17 As a result of the lack of detailed impacts as a result this proposal, we cannot support this given that there has been plenty of time over the past decade to properly arrange and source potable water supply along with the required infrastructure.

From [REDACTED]

Sent:27/08/2021

To:sizewell@edfconsultation.info

CC:sizewellc@planninginspectorate.gov.uk

Subject:Response to EDF's consultations on water supply for proposed Sizewell C nuclear power station

Dear sir or madam,

I wish to raise the following objections to EDF's consultations on water supply for proposed Sizewell C nuclear power station.

Firstly, it is outrageous and unacceptable that this fundamental issue is unresolved at this late stage in the planning process, two thirds of the way through the examination. Campaigners and communities have been asking questions about water supply for a decade.

It is also unacceptable to have such a short, late consultation during peak holiday period when many are away.

Why is the 28km of new pipeline from Barsham not in the DCO? This means it is not subject to any scrutiny - and the disruption and activity are not part of EDF's figures.

What is the additional cost? EDF give no indication of what this will add to the project.

EDF have previously discounted the desalination 'solution' that they now propose. In document AS-202 Water Supply Strategy Update, EDF states; "This option [desalination] has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall." They were right initially to discount desalination on these grounds.

Even if approved, the desalination plant will take 4 – 6 months to build and be brought in by road. But because it cannot be installed at the very beginning of proposed construction, drinkable water would need to be brought in by tanker for the first 9 -12 months of construction, up to 40/day (80 truck movements). EDF claim tankers and plant transport won't raise HGV "caps" but how can that be the case?

The plant would operate 24/7 using diesel generators until onsite power is available. This will contribute to significant CO2, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NOx and volatile organics which have health impacts.

Water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium.

Impacts on marine life from this and the water intakes are unclear. An impact assessment should have been part of the proposal.

This proposal should be rejected, or at least not approved until the issues listed above have been addressed.

Best regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Sir / Madam

I am writing to respond to your current consultation on your proposals for a 'Temporary Desalination Plant' at Sizewell C. I wish to object to your proposals for the following reasons:

At this late stage of the DCO process it is inexplicable that EDF is now introducing a major change in the supporting infrastructure to the Sizewell C proposal. The issue of potable water supply has been well known since the start of your consultation programme and the proposal to build a new pipeline has to my knowledge been under discussion for at least 3 years. Therefore, why is this only just been introduced into the planning process. This is either that the planning and development process within EDF is poor (which raises many concerns about the entire proposal) or it is a deliberate and despicable strategy to introduce new and potentially controversial elements at the last minute.

In addition, the 'consultation' has been introduced for a mere 3 weeks in the middle of the holiday period after 18 months of covid lockdowns. This fails to meet best practice guidelines for public consultations and pays lip-service to your claim on page 3 of the August 2021 Community Newsletter 'we continue to listen to feedback from local communities and stakeholders'.

In examining the limited information, you have provided in the very short time you have made available for a response it is clear that this is a poorly thought through proposal for the following reasons:

The need for potable water:

It is of course recognised that any development will need potable water. However, you claim to have reduced the need for potable water by; recycling water through the construction process inc: *the recycling the slurry returned from the Tunnel Boring Machines, adopting a similar process for the cut-off wall and with the concrete batching process*. This should all have been included in the standard construction procedures to reduce environmental impact, therefore the claims that this will create additional savings can best be described as spurious.

The proposed pipeline:

- Why is the proposal for a new pipeline not in the DCO process? It would not be required except for the needs of the Sizewell C development, therefore with no Sizewell C there is no need for this pipeline. Therefore, it and all the relevant environmental assessments should be included in the DCO process.
- It appears that this is little more than a paper exercise without both the pipeline design and engagement with the relevant land owners who would be impacted, therefore there is low confidence that this is deliverable.
- The lack of information on the route of the pipeline makes it not possible to consider the impact that this pipeline would have on fragile habitats, people's homes and businesses. The statement that the pipeline length is 28km is not verifiable, this appears to be the direct distance between the potential water source and the Sizewell C site and therefore the actual length is potentially

significantly more after taking into account the practical implementation considerations but this is unverifiable with the information provided.

- There are no environmental impact assessments or mitigation plan to provide confidence that this has been fully thought through.
- There is no mention of the cost of this pipeline and who pays for it. It would be unacceptable for local water users to pay for this in their water bills. It must be included as part of the overall cost of Sizewell C and wholly funded by the Sizewell C financing programme.
- There is no risk assessments included so if this pipeline is delayed or abandoned for any reason. If this was to happen then is the de-salination plant the only alternative? The plans as outlined to-date indicate that there is no room on site for a permanent de-salination plant therefore approach must be considered high risk and not appropriate for this development.
- The environmental cost (including carbon emissions) must be included in the overall Sizewell C project and fully accounted for and mitigated in the overall Sizewell C proposal to PINS.

Desalination Proposal

- I note that previously you have dismissed the idea of a desalination plant. I refer to document [AS-202](#) Water Supply Strategy Update. You clearly state; *“This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)’*

Whilst you have now indicated that it will not be included in the CDO the discharge will however still be into the sea and will have a similar impact as highlighted in your own documentation. No explanation has been offered for the change in approach

- There is no environmental impact assessment for the proposed desalination plant in particular with concerns about the increased pollution. The plant proposals appear to operate 24/7 using diesel generators. This will contribute to significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s emissions. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics which have health impacts.
- The water discharged (according to your documentation) will be 1.6 times more concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. Impacts on marine life from this and the water intakes are unclear, however there is clear scientific evidence that this concentration of brine will create conditions that will be likely to generate algal blooms impacting on beach and sea users, marine wildlife and others affected by these pollutants. This must be aggregated with all the other pollutants proposed to being discharged into the sea in the EIA and HRA.

- In your documentation you state blandly ‘The addition of the desalination plant will not alter baseline conditions’. The baseline assessment has considered the potential presence of contamination in the two areas proposed to be used as a desalination plant with reference to existing desk study and ground investigation reports; this has identified no unacceptable contamination.’ You admit there will be contamination but do not detail what are the contaminants and the quantities over what period of time. Your assurances are not credible and your data is not transparent. This is unacceptable.

Initial fresh water delivery

- According to your documentation the desalination plant will apparently take 6 months to build and therefore potable water will need to be brought in by road, I note that you state that drinkable water will need to be brought in by tanker for the first 9 -12 months of construction, up to 40 tankers /day (is this 80 truck movements / day?). You do not clarify how this will contribute to your cap of HGV movements. What mechanisms will there be to count the number of HGV movements and what sanctions there will be if you exceed your limits. There is little robust substance in your claims of no increase in HGV movements.

Non-Potable water

- Whilst the consultation documentation you barely mention non-potable water. In AS-202 your suggested potential sources that are largely a wish list but have little in the way of robust plans. In view of the possible impacts on ground water levels when will there be clarity for review and an opportunity to comment on your proposals for non-potable water supply.

In reading the consultation document at this late stage, which you have yet to be submit to PINS, it is evident that the key issue of water is poorly thought through and it is increasingly evident that EDF does not have a robust, environmentally appropriate and costed solution to this fundamental issue. It highlights the folly of pursuing this particular proposal to construct Sizewell C.

I support the submissions from Stop Sizewell C, TASC and those of the Town and Parish Councils.

Yours faithfully

██████████

27 August 2021

Email letter to EDF – Sizewell C & D info@sizewellc.co.uk

Dear Sirs

Response to Sizewell C Construction Water Supply Consultation

EDF is absolutely astonishing. The proposal to construct a desalination plant to 'temporarily' supply water whilst Sizewell C is built is farcical. How has it taken the company over ten years to finally realise that potable water cannot be supplied to the site by other means during construction despite being told that was likely to be the case over ten years ago?

Does EDF not realise it's 'planning' to build a nuclear power station in one of the driest parts of the country? Your 'planning' is an absolute shambles. To allow EDF to build a nuclear power station seems an extremely dangerous idea if you're not even able to plan how to build it properly. We're sure the Planning Inspectorate will agree. You've already had to make changes mostly relating to envisaged traffic and HGV problems, those too pointed out to you on numerous occasions by numerous Interested Parties. Now you're trying a last ditch attempt to get around the water problem. What else will you suddenly realise is an insurmountable problem before the Planning Inspectorate has finished its examination?

We're two thirds of the way through the Planning Inspectorate's examination of your application for a DCO for Sizewell C and only now do you deem it sensible look at a way of getting water to the site when the lack of it has been pointed out to you by many on many occasions.

In January of this year, 2021, EDF discounted the use of a desalination plant in document [AS-202](#) Water Supply Strategy Update submitted to the Planning Inspectorate. What has changed in less than eight months?



SIZEWELL C PROJECT – SITE WATER SUPPLY STRATEGY

NOT PROTECTIVELY MARKED

| Option | Conclusion |
|---|--|
| Desalination <i>Installing modular desalination plant on the main development site and abstracting seawater for treatment</i> | Discounted. <ul style="list-style-type: none">This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO). |

As EDF stated in January a desalination plant will be energy intensive, is unsustainable, will cost an unspecified but obviously large amount of money, and the discharge of brine water after desalination may be unsuitable and may well have an effect on marine life. Is none of this now the case? How can EDF possibly justify the damage it will do to the environment and added cost to the project?

The use of diesel generators before power is available at the site will produce significant emissions harming the atmosphere and our health.

It'll take months to build the 'temporary' desalination plant during which time you'll have to truck in potable water, adding to the number of HGVs on the unimproved roads in this part of east Suffolk while you build your relief road. The roads here are extremely busy, particularly

now as so many people are taking staycations in this beautiful, unspoiled countryside. It shouldn't be a major problem though when you start construction as you'll scare them all away, wrecking our wonderful, tranquil environment and our much improved tourist industry.

Your three week consultation period is itself a farce with many people away on holiday themselves. You don't even give us as realistic amount of time to look at and comment on your proposals – or perhaps even see them in the cases of some stakeholders. You're intending to present your proposals to the Planning Inspectorate by 27 August – before this consultation actually ends. You're treating us, those you're consulting, as cavalierly as you have in other consultations and seem to be treating this whole project.

You can't afford to build this nuclear power station, this proposal adding to the cost. You know you're in vastly in debt. You don't know where the money will come from. If you think those of us who chose to use green, environmentally friendly electricity will contribute towards it we're sure there will be huge opposition to such a move.

As we've said before, this type of nuclear power isn't green and isn't sustainable. The design of this EPR is unsuitable because it doesn't work, with the one operating reactor in China having been closed down due to problems. It's time EDF faced reality and admitted that it cannot build this power station. It doesn't have the expertise to plan it properly leave alone be trusted to build something that can provide any sort of solution to the planet's energy problems.

Yours faithfully

[Redacted signature]

cc:

- The Planning Inspectorate
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted],
East Suffolk District Council
- East Suffolk District Councillors:
[Redacted]
[Redacted]
- TEAGS – Theberton & Eastbridge Action
Group on Sizewell

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
CC: sizewellc@planninginspectorate.gov.uk [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: EDF consultation regarding water supply strategy

EDF consultation regarding water supply strategy

Interested party reference number: 20026320

When will you finally admit this area simply doesn't have the infrastructure to satisfy your requirements?

Your project budgets are way out. You need to spend £20 billion just creating the infrastructure to support your white elephant. There are roads to be built, pipelines to lay, rail lines to be modified, villages to be bypassed, accommodation blocks to be built, pylons to erect, beach landing facilities to be built, shore line defences to be constructed, areas of SSSI and ANOB to be destroyed, communities to sever, lives to blight, businesses to ruin and now a desalination plant to be built. All before you've even looked at the actual power station. It's obscene and by the time the plant is finally built it will be obsolete.

Give up and go home..... please.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

■■■■■ response to the consultation on a Temporary Desalination Plant for Sizewell C

Potable water has always been a key component to the development of Sizewell C and an adequate supply has been seen as a substantive constraint, acknowledged by all parties including NNBG Co Ltd, ever since Consultation Stage 1. ■■■■■ is thus concerned that the project management team at NNBG Co Ltd has, only at the last possible moment in the DCO process, been able to recognise that delivery of an adequate potable water supply for its intended start date for the project until at least 2026 is only achievable by initial supply by road tanker and then desalination.

■■■■■ view is that this is but one of many aspects where NNBG Co Ltd has demonstrated that, in advancing the DCO application in July 2020, it had not resolved key issues. NNBG Co Ltd has thus, due to its own project management deficiencies, limited the public consultation process to a period below that deemed necessary in guidance and during a summer holiday period when consultees have limited resources to respond. ■■■■■ consider NNBG Co Ltd approach to be unacceptable and shows a disregard for the aims of the consultation process and those being consulted.

NNBG Co Ltd in the consultation documentation at §2.3.5 acknowledges that further HGV traffic will be induced by the proposal as supply for potable water by road tankers will be essential for first 9 – 12 months of construction. ■■■■■ notes that NNBG Co Ltd has assessed this as up to 40 tanker two-way movements/day. Whilst NNBG Co Ltd contends this extra HGV traffic will be within its currently proposed HGV “caps” (which the consultation document refers incorrectly to as “already established” despite the ExA challenging the proposed caps in the ISH on transport) it does not state where those extra HGV movements will be. Whilst ■■■■■ recognise the likely water source for the tankers to be supplied is at Barsham, well away from Woodbridge, ■■■■■ wish to register it objection to any proposed additional HGV via the A12 at Woodbridge which may be induced by the adoption of the temporary desalination plant.

Notwithstanding the above ■■■■■ view is that the consultation documentation on its proposed temporary desalination plant is inadequate and not fit for purpose. There is no detailed environmental assessment of the impact of the proposed change and NNBG Co Ltd has by its own admission in the document stated certain assessment have not been completed and its view is preliminary only. Detailed environmental impact assessment has been provided for all other aspects of the DCO application and should be provided before the consultation process can be deemed adequate.

The comments ■■■■■ can make on the current consultation documentation are thus limited and we reserve our position with regard to making further representations to NNBG and PINS on the proposed temporary desalination plant.

Carly Vince
Chief Planning Officer
EDF Energy

Date: 27 August 2021

By email only

Dear Ms Vince


Consultation on Temporary Desalination Plant

Thank you for the opportunity to participate in the consultation for a temporary desalination plant during the construction phase of Sizewell C. The Environment Agency has worked closely with you for a number of years to provide advice on a range of environmental matters. It was therefore surprising that we received this consultation without any prior technical discussion with us, given the potential severity of its impacts. I feel that I should remind you that your company discounted desalination as a source of potable water in January 2021, due to environmental impacts and energy consumption, and it is therefore a further surprise that you have countenanced it as an option, especially without dialogue with environmental stakeholders and an environmental regulator such as ourselves.

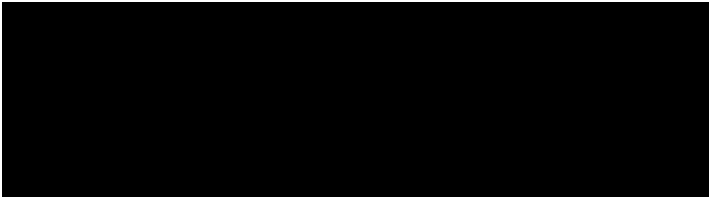
The consultation document does not contain sufficient detail for us to conduct a thorough review, but it does correctly identify the environmental topics that will need additional assessment in the Environmental Statement. In addition, we will expect the Water Framework Directive and Eels Regulations Compliance assessments to be updated. We strongly recommend you to engage with us on the matters of air quality and marine water quality because it is not clear from the consultation document whether you have identified all the additional / outstanding assessments that will be necessary to support the conclusions in the Environmental Statement.

Please be aware that if the use of the desalination plant were to extend into the operational phase of the power station, this has the potential to impact the conclusions of the other operational environmental permit applications currently in determination.

Yours sincerely



Simon Barlow
Project Manager
Sizewell C Nuclear New Build
Environment Agency



OFFICIAL

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
CC: SizewellC@planninginspectorate.gov.uk [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: EDF Consultation re Water Supply Strategy
EDF Consultation re Water Supply Strategy

Interested party reference: 20026036

This is just ground hog day!

Yet another consultation on a vital element of the project which should have been planned for and firmed up right at the beginning of the process 12 years ago! Insufficient water is a showstopper. Potable Water supplies, a vital prerequisite not just for the build but for the lifetime of the plant, have been left to chance. You should have had contingency plans for a desalination plant from day 1.

As with your transport plans, you have executed a volte face over something you previously dismissed "*This (desalination) option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall.*" None of your concerns above have disappeared but you're quite happy to resurrect the idea.

You're lack of planning is just embarrassing. No wonder the other EPR builds are so far behind schedule and so far over budget. And don't blame the water company the onus was on you to ensure there would be adequate water available not just for the built but the lifetime of the plant. This is your project not the water company's.

I don't understand why this desalination plant is temporary - you will need 4 million litres of water every day for at least 12 years followed by 2 Million litres of fresh water for the next 60 years and, for safety reasons, the plant will always be given priority over the local populace.

You are drawing on the regions' water supplies when there is unprecedented numbers of new houses being built in the driest part of the . The population is increasing and so is the need for domestic water. Climate change has meant that for the last 2 years we have had extremely dry summers, I don't want my taps running dry to support your power plant when there's insufficient water to serve the region. In addition this is an agricultural area and the farmers need to irrigate their fields. But then throughout this process you've made it abundantly clear you don't give a damn for us locals despite your claims to the contrary to the eXa.

Further questions I would also like to know the answer to

1. There are to be 80 water tanker journeys per day delivering water before the desalination plant is ready and you claim the HGV cap will not be exceeded. Oh yes and how does that work? if this is the case then some other HGV deliveries will have to be postponed extending the life of the project? Who is measuring the HGV caps and ensuring they are not exceeded? Is this another token EDF monitoring exercise?
2. What about the delivery of all these shipping containers I presume they will also not be adding to the HGV cap? I notice you are vague about the total number of containers required, 9 for the desalination plant but how many for the storage of clean water and chemicals used in the process?
3. Exactly where are you planning on dumping the slurry cake?
4. Where are you going to find room for this desalination plant? You are already trying to squeeze a quart into a pint pot. As for relocating it to the "temporary" (is 12+ years temporary?) construction area, what happens if it is necessary to make it a permanent feature?
5. Why are you even consulting us about this? You will go ahead anyway as the alternative is probably the end of the project.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
CC: sizewellc@planninginspectorate.gov.uk [REDACTED]
[REDACTED]

Subject: EDF & Drinkable Water to Sizewell C
Dear Sir/Madam

I am writing to you to express my outrage that such a fundamental issue as water has finally attracted the attention of EDF at such a late stage in the planning of Sizewell C. Campaigners and communities have been asking about this issue for 10 years.

It is unacceptable to have such a short, late consultation during peak holiday period when many are away. Also I do not understand why 28km of new pipeline from Barsham is not in the DCO? It means it is not subject to any scrutiny and the disruption and activity are not part of EDF's figures.

My specific objections to this NEW part of the project are as follows:

i/The desalination plant will take 4 – 6 months to build and be brought in by road, but because it cannot be installed at the very beginning of construction, drinkable water will need to be brought in by tanker for the first 9 -12 months of construction, up to 40/day (80 truck movements). EDF claims tankers and plant transport won't raise HGV "caps" but this is doubtful - dare I say impossible?

ii/The plant would operate 24/7 using diesel generators until onsite power is available. This will contribute to significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics which have health impacts.

I am interested in how this chimes with the government's Climate Change policies and changes we all need to make for the survival of the planet and all its inhabitants.

iii/Water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. Impacts on marine life from this and the water intakes are unclear - but we can surmise they will not be positive.

Once again in the ever rising costs of this outdated project EDF have offered no indication of the what costs this adds to the project EDF's previous objections to desalination seem to have evaporated (in document [AS-202](#) Water Supply Strategy Update, EDF states; "*This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO).*

I look forward to receiving your thoughts on this matter.

Yours faithfully

A solid black rectangular box used to redact a signature.

[REDACTED]
Sent:27/08/2021

To:sizewell@edfconsultation.info SizewellC@planninginspectorate.gov.uk

CC: [REDACTED]

Subject:Construction Water Supply Consultation - Sizewell C - EDF
To the Sizewell C Team

For the last decade the threat of Sizewell C construction has placed intolerable stress and strain on the local communities affected by the EDF application and proposals. And now, EDF has seemingly just realised that its water requirement will be enormous in a region that is noted as one of the driest and temperate in the UK! A 5-year-old child could have pointed this out to them!

This sham of a "consultation" does not mask the fact that EDF has yet again exhibited almost criminal negligence in the preparation of this appalling application for Sizewell C. To now propose a Desalination plant that will not only add enormous strain and hardship on the local environs but will forever have a negative effect physically and socially on the resources of Coastal Suffolk, beggars belief!

It is quite apparent that there is not enough water in this dry region to supply Sizewell C and so EDF was supposedly relying on water coming from Barsham via a new 28 km pipeline constructed especially for Sizewell C. However, that is apparently not viable now and they view desalination as the answer.

Desalination plants are very energy-intensive and the resulting waste slurry will have a major and long-lasting environmental impact. The slurry usually contains anti-scaling agents and chlorine-removing chemicals in addition to the very high salt levels that will most likely endanger and kill wildlife and vegetation it encounters.

The desalination plant on its own would be a huge project and would need major infrastructure changes that this area neither desires nor can it sustain.

Added to the injurious nature of this proposition is the manner of its supposed "consultation", almost delivered as an afterthought and to be "consulted" on, at short

notice. And at the height of the summer holiday season! Again an attempt to force through additional infrastructure requirements without due oversight and scrutiny. The preparation of the [REDACTED] should not be open to such wilful manipulation.

Yet again, this smacks of Corporate sharp practice from EDF.

I sincerely hope that the Planning Inspectorate views this application with the contempt it deserves. It must not be allowed to proceed.

Yours sincerely,

[REDACTED]

[REDACTED]

Response to SZC Consultation on proposed desalination plant

My overarching position is that Sizewell C should not be built but as regards the proposal to rescue EDF's water 'strategy' by building a desalination plant, I wish to make the following points:

If there were no plans to build SZC and a desalination plant were proposed for this site, it would be subject to a full consultation and a full planning process. EDF however, as with every other consultation over the years, has seen fit to present us with this proposal at a time when a great many interested parties, experts and lawyers are away on holiday, for the first time in two years. EDF has also only allowed three weeks to examine their proposal, instead of the usual four weeks, which shows up yet again their lack of engagement and general indifference to the residents of East Suffolk.

To only now admit there is no firm water strategy in place, seems both unacceptable and inept. There are many other crucial strategies, transport for one, that are also 'not in place' and it is hard to imagine how EDF allowed this situation to occur. We residents are mainly lay people and not nuclear specialists, and we are well aware that obfuscation is a favourite strategy for EDF. Consultations over the years were always set for either Christmas and New Year or the summer holidays - periods when people, no doubt including the management and staff of EDF, take a well earned break. At this particular moment, most people are taking a very well earned break, having been under heavy restrictions for about 18 months, for many the first time they will have been able to be with their families for so very long. It only emphasises the disrespect, disregard and disdain with which residents of East Suffolk are regarded by EDF. Their lives will be trashed for a huge white elephant of a project which will leave tons of highly radioactive waste for generations of our descendants to protect. To add insult to injury, they will never enjoy the Suffolk Coast and Heaths AONB or its hinterland, nor will they derive any benefits at all, but they will have a hideous nuclear island off their shore, if it hasn't already disappeared beneath the rising sea.

The lack of potable water in East Suffolk and Suffolk as a whole, is well documented, and the matter was raised with EDF a decade ago. EDF wants everyone to believe what they say, and made it clear in an earlier consultation that a desalination plant was out of the question as they, amongst other good reasons, are so environmentally damaging. Now we are asked to believe that they are the best thing since sliced bread. There is much evidence about the negative effect desalination plants have on the environment - this one will need to be powered by diesel for a period of years, adding to the carbon footprint of the project. The innocent sounding 'brine' contains toxic chemicals, and when returned to the sea it sinks to the bottom and smothers life there. It can in some circumstances 'plume' for several kilometres, thus damaging the marine environment a very long way from source. While it is being built, potable water will be trucked in. Poor Yoxford, Theberton and Leiston. More trucks mean a higher carbon footprint of course.

Finally, a new pipeline is needed. This means many more people will have to suffer their land being dug up, more consultations, more time – one would think a rather long time –

before any connection is achieved. For all these reasons and many more, I am totally against these proposals.

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
CC: sizewellc@planninginspectorate.gov.uk
Subject: Construction Water Supply Consultation

I am writing to comment on your much belated and brief consultation on the issue of potable water supply during the proposed building of Sizewell C Nuclear Power Station.

Although this issue has been recognised for many years, I am surprised that it is only now - for a few weeks during the 2021 holiday season - that local people are being consulted on this matter; this has the appearance of conveniently avoiding scrutiny.

Furthermore, I understand that desalination is being considered as a method of resolving the issue of a shortfall in water supply, with more undesirable effects on the environment - as described by yourselves in your Water Supply Strategy Update earlier this year.

I am deeply concerned about this proposition for many reasons - here are a few:

- ~ CO2 emissions from the machinery involved in building and running the equipment for several years.
- ~ Concentrated effluent affecting watercourses and surrounding land.
- ~ Yet more infrastructure with its deleterious effect on the fragile ecosystem.

It must have been known that the Blyth Water Resource Zone would have insufficient water for your purposes a long time ago, but I don't remember being consulted earlier about a need to pipe water in from elsewhere - with the necessary addition of more infrastructure.

It is becoming increasingly clear to me that there are far more innovative and environmentally friendly methods of maintaining a reliable energy supply than nuclear coming on stream, with energy storage methods being developed, meaning renewables (wind and sun) are eminently viable alternatives.

I shall be interested to see how Boris Johnson justifies government support of building Sizewell C at COP26 in Glasgow in November, in consideration of his commitment to a Carbon Neutral target in an effort to reduce the effects of Climate Change. Hopefully someone in the Cabinet will explain to him that he could avoid a toxic legacy, and turn his attention to

recommending switching investment into a more positive direction,
benefitting UK citizens and the Climate alike.

I live in hope.

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

By on-line submission to EDF ([REDACTED])

cc'd to: SizewellC@planninginspectorate.gov.uk; [REDACTED]
[REDACTED]
[REDACTED].

104 Constable Road
Ipswich
Suffolk IP42XA

27 August 2021

**Application by NNB Generation Company (SZC) Limited for an Order Granting
Development Consent for The Sizewell C Project**

Proposed change 19: the potable water farce

I am writing in response to your current (19th) consultation, concerning potable water.

I repeat (with heavy irony) your own reference to a “consultation” although you in fact discredit both the word and the process by allowing only the briefest of time to comment on such a radical additional proposal and that during peak holiday period when many are away. Your conduct is cynical beyond belief but depressingly consistent in that regard.

It is appalling that such a fundamental issue remains unresolved two thirds of the way through the examination when so many local people, communities and campaigners have been asking questions about water for a decade. You have once again ignored all of their reasonable questions and appear not to have even been smart enough to talk to the relevant utility providers. And yet you pretend to have the expertise and capacity to project manage the construction and operation of a twin nuclear reactor! It's little wonder that local people are not persuaded.

Some specific questions, to which I would welcome your response:

- Why is 28km of new pipeline from Barsham not in the DCO (presumably to avoid scrutiny) and why is the associated, inevitable disruption and activity not part of EDF's figures?
- Why do you give no indication of what cost the proposed change will add to the project?
- Why have your previous objections to desalination been put aside (in document [AS-202](#) Water Supply Strategy Update, you stated: “*This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)*”? Which part of the ‘science’ has changed?
- Given that the plant will take up to 6 months to build and be brought in by road, but cannot be installed at the very beginning of construction so that potable water will need to be brought in by tanker for the first 9 -12 months of construction (up to 40/day or 80 truck movements) how can you claim with any credibility that tankers and plant transport won't raise HGV “caps”?
- Given that the plant would operate 24/7 using diesel generators until onsite power is available, contributing to significant CO2, Nitrogen Oxides, and PM 10s and 2.5s and Atmospheric Ozone, how can you justify the inevitable and significant negative impacts on health?

- What acknowledgement have you made of, and how do you propose to mitigate for, the water that will be discharged from the proposed plant at 1.6 times higher (brine) concentration than natural seawater, which is likely to exceed screening thresholds for zinc and chromium and impact significantly and negatively on marine life?

[REDACTED]

Ref: 20025887

[REDACTED]

SZC Consultation on Proposed Change 19

By email only: info@sizewellc.co.uk

27 August 2021

Response of the Southwold and Reydon Society to the Proposed Change 19 – Desalination Plant Consultation

[REDACTED] wishes to raise the following concerns:

1. The construction works will require large volumes of potable water and there is insufficient local capacity. This reinforces [REDACTED] belief that this is not a suitable site for a new nuclear power station.
2. Cumulative Impact. The Proposed Change 19 would mean yet more infrastructure construction (onshore desalination equipment, seawater intake pipe and associated headworks, brine water outfall pipe and associated diffusers) within this environmentally sensitive area and AONB. If the transfer main is not completed by the fourth year of construction, a second desalination module will be added, thus further increasing the cumulative impact.
3. Impact on the marine environment. The Proposed Change 19 is designed to be 'temporary' but will be required for at least the first two years of construction and most likely for at least four years as the Sizewell Transfer Main may not be available until 2026 or later. You state that it should be assumed that the desalination plant may need to be retained throughout the majority of the construction period. During this time it will be abstracting 10,000 cubic metres of seawater and discharging 6,000 cubic metres of brine water continuously every day. The discharge will include chlorine emissions, phosphorus, and high concentrations of zinc and chromium that exceed screening thresholds. The brine water will result in high salinity discharge to the seabed. The construction and operation of the desalination plant may therefore cause irreversible damage to the marine environment, yet a full assessment and detailed modeling is yet to be undertaken.
4. Impact on the local environment. The desalination plant will be moved from the Main Platform to the Temporary Construction Area if the Transfer Main is not completed by year 4 of construction, as is quite possible. This would further disturb the local environment, increasing the impact of Proposed Change 19 further and risking new and materially different environmental effects to the area and SSSI that have not been assessed.
5. Social impact. The construction of the desalination plant will take at least six months, and cannot be begun until the Main Platform is prepared, so for the first nine to twelve

[REDACTED]
[REDACTED]
[REDACTED]

months of construction potable water will be imported by road via water tanker truck with forty deliveries every day. This heavy vehicle traffic will cause noise and disruption to residents and local road users alike. Even after the plant is constructed, the slurry material produced will require off-site disposal, resulting in more lorry movements.

6. Impact on coastal processes. Infrastructure at intake and outfall headworks will be above sea level and may affect longshore transport and scour.
7. No assessment has yet been carried out to consider the potential impacts of the infrastructure on loss or change in habitat type and the potential for the spread of non-indigenous species.
8. Desalination plants are energy intensive. Diesel generators will be required on site to provide 1.5 MVA of electricity for the plant, causing further noise and disturbance.

Finally, we would express our disappointment that this important proposal and consultation should be introduced at this late stage, in the month of August, and within such a short time frame.

[REDACTED] (unique reference number 20025418)

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
CC: sizewellc@planninginspectorate.gov.uk [REDACTED]
[REDACTED]

Subject: Response to SZC consultation re Desalination Plant

Dear Sir/Madam,

I write concerning your proposal to build a water desalination plant as part of the Sizewell C project.

1. It is utterly outrageous that you should drop this proposal onto the public at this time, arbitrarily leaving us less than a month to respond, and during the summer holidays when people are taking a longed-for break after Lockdown. This continues a pattern of choosing maximally inconvenient times like Christmas, or other holidays, or the time during Lockdown when it was impossible for people without internet to access all the information needed to respond adequately. It is only too clear that this behaviour is intended to deter a meaningful response in order to rush through badly thought-out proposals. People feel treated with contempt.
2. But more importantly, this proposal **should not** be incorporated into the DCO. It is far too significant a deviation from your original plans and far too big a proposal. There should be a separate enquiry on the issue of the proposed desalination plant.
3. This latest proposal is a mongrel of three separate proposals, of which the first is not even part of the DCO process. 1.The water main from the River Waveney. 2.The desalination plant at Sizewell. 3.Trucking in water.
4. Even though EDF has been asked repeatedly (eg by the EADT) over 10 years how they proposed to obtain potable water in an arid region they have ignored such questions. Further, they dismissed the idea of a desalination plant at an earlier stage when preparing the DCO, saying that the process would produce brown water, compromising marine life, be too expensive, and that the operation would produce too many pollutants. "This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall." So what has happened to make you discount these, your own objections?
5. The failure of EDF to sort out the water supply in ten years calls into question your ability to manage such a complex project within

reasonable deadlines. There is no mention of cost in your proposal to build the desalination plant. Inevitably it will cause delay, as has been the case at Hinkley Point and Flammaville - and this in itself casts further doubt on the already highly questionable financial viability of the SZC project.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info

CC: sizewellc@planninginspectorate.gov.uk [REDACTED]
[REDACTED]

Subject: Re: SZC CONSULTATION

Dear Sir or Madam I enclose my response to your Consultation Document on the proposed Temporary Desalination Plant at Sizewell C. Local residents drew your attention to the inadequacies of your plans for potable water 10 years ago, and so I am amazed to read that you are still bringing forward new proposals even at this late stage in the planning process. I also note that your proposals are still not fully worked up. 1. Your consultation document mentions your plan to extract water from the River Waveney and to transport it to the construction site, through a water main that would be 28 kilometres long. However these plans are not included in your proposal, and so it is not possible to comment on them. I find it unacceptable that this part of your planning has been excluded from the DCO process. The water main is clearly part of the overall project, and if it goes ahead it will make an important contribution to the project's overall costs, both financial and environmental. All of these costs appear to be hidden from the DCO process. This cannot be right. 2. Your consultation document describes a new proposal, which is for a temporary desalination plant that would be located on the construction site. I am concerned that this section of your document includes insufficient data on the environmental impacts of the proposal. You do not give data on the production of air pollutants such as nitrogen dioxide and sulphur dioxide and, as explained below, you do not give data on the effects of the installation on marine biology. In your para 2.4.15 you state that the headworks of the PWWC screen would be "positioned such as to reduce the tidal forcing (of glass eels) against the screen and to minimise the approach velocities where possible" of glass eels and other marine animals, but you give no scientific data to support your claim that these effects will be "negligable." Similarly in para 2.4.16 you admit that you have not completed your assessment of "the magnitude of saline, trace metals and nutrient discharges in relation to the sensitivity of marine ecology receptors". Also, you have previously (in document AS- 202) published additional reasons for rejecting the option of a desalination plant. You wrote that you had "concerns with power consumption, sustainability, cost, and wastewater". I was therefore surprised to read in your consultation document, no mention of these concerns, or of how you have or have not overcome them. 3. My only comment on your proposal to bring water to the

construction site by road is that you have not given HGV delivery numbers before and after the addition of the new deliveries of water. Without this information it is impossible to assess your claim to have kept your delivery numbers to your previously defined limits. Finally, I must complain about the time limit that you have imposed on this consultation. You will know that individual residents as well as Parish Councils will find it difficult to reply within three weeks in August. For Parish Councils this will be particularly difficult if their Parish Clerk is on holiday. For these reasons, it is clear that your latest document is not a genuine attempt to consult the public. Yours sincerely [REDACTED] ---- On Thu, 17 Dec 2020 22:48:15 +0000 [REDACTED]

From: [REDACTED]

Sent: 27/08/2021

To: Julia.Pyke@sizewellc.com

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] ["sizewell@edfconsultation.info"](mailto:sizewell@edfconsultation.info)

Subject: SIZEWELL C'S POTABLE WATER CONSULTATION

Dear Julia Pyke,

The following letter is being sent by 32 Town & Parish Councils in East Suffolk objecting to EDF's water supply consultation which closes at midnight on 27th August 2021. Some of these councils are also sending individual responses which EDF will receive separately. This is the third consultation so far to take place during the SZC DCO examination when councils are already under pressure. That 32 councils have been able to organise support for this joint letter at such short notice, in August when many councillors and clerks are on holiday, demonstrates the very real concern about this major issue.

We look forward to hearing from you.

Yours sincerely,

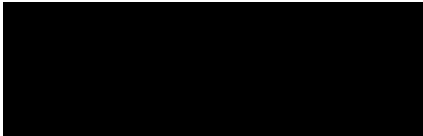
[REDACTED] & [REDACTED]
[REDACTED] [REDACTED]

26th August 2021

Julia Pyke

Nuclear Development Director

EDF Energy



Dear Julia Pyke,

Re: Sizewell C's potable water consultation

The 32 towns and parishes below are writing to express our deep concern that, more than halfway through the Sizewell C DCO process, such a major and fundamental issue as potable water supply is in doubt and that we are being subjected to yet more consultations and potential changes to your proposals.

The availability of potable water is a matter that many of us have raised since Stage 1 consultations over eight years ago, and it is extraordinary that it is unresolved at this late stage. Moreover we are in the midst of the holiday season, with many Town and Parish Councillors and clerks taking leave, yet you are limiting your consultations to just three weeks. We must assert that our ability to engage with the DCO process is being stretched beyond the limit of what is reasonable. Our concerns that this process strongly disadvantages local communities are being exacerbated by these events.

You will appreciate that these latest circumstances further undermine our faith in your ability to effectively plan this project.

Yours sincerely,

| Service | Percentage of Respondents |
|---------------------------------|---------------------------|
| Online banking | 95% |
| Mobile banking | 85% |
| Online bill payment | 80% |
| Online account opening | 75% |
| Online loan application | 65% |
| Online investment services | 60% |
| Online insurance services | 55% |
| Online credit card services | 50% |
| Online mortgage services | 45% |
| Online retirement services | 40% |
| Online estate planning services | 35% |
| Online tax services | 30% |
| Online legal services | 25% |
| Online health services | 20% |
| Online education services | 15% |

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CC: Paul Morton, EDF

Tom McGarry EDF

Planning Inspectorate, Sizewell C Case Team

[REDACTED]

[REDACTED]

[REDACTED]

Brian Stewart OBE, Chair of Sizewell C Community Group

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 August 2021

To: The Sizewell C Project Team

Via email only, to : info@sizewellc.co.uk

Dear Sir or Madam

Sizewell C Project: Consultation on Temporary Desalination Plant

Thank you for sending me the information relating to the Consultation on a Temporary Desalination Plant associated with the Sizewell C project, and for offering [REDACTED] the opportunity to comment.

The role of [REDACTED] is to lead, champion and manage a sustainable marine environment and inshore fisheries within our district, which extends from the [REDACTED] [REDACTED], and [REDACTED] nautical miles out to sea. As the proposed Sizewell C Temporary Desalination Plant is within those boundaries, and the project may generate effects which interact with our core role, we consider it appropriate that [REDACTED] comment on the proposed project.

In all consultation responses, the Authority assesses projects according to the [REDACTED] [REDACTED] vision and adherence of those same projects with policies detailed in the relevant marine plan, as directed under section 58(1) of the Marine and Coastal Access Act 2009.

The plans relevant to the Authority's district are the East Inshore and East Offshore Marine Plans. We consider whether proposed developments will have a positive, negative or negligible effect on plan policies related to the [REDACTED] vision to "manage a sustainable marine environment and inshore fisheries". These considerations also enable the [REDACTED] to provide advice in relation to the need to protect the environment, the need to protect human health and the need to prevent interference with other legitimate users of the sea

Within the project there are aspects of potential impacts on features of Marine Protected Areas. We defer to the advice and comments of the relevant Statutory Nature Conservation Body in connection with these potential impacts, except where there may be an interaction with [REDACTED] core remit.

[REDACTED]

[REDACTED]

Within the project there are aspects which may have an impact on the ability of diadromous fish to undertake their normal life history and migratory movements. We defer to the advice and comments of the relevant authority, who we understand to be the Environment Agency in connection with these potential impacts, except where there may be an interaction with [REDACTED] core remit.

We consider it important that should the desalination project go ahead as described, that the intake pipe for that project and the discharge from the fish recovery and return system for Sizewell C (which will be in very close proximity to each other) are not in operation at the same time. This is acknowledged in Section 2.3.24 of the Consultation Document.

As the proposed works involve some construction and installation works at sea, there is a possibility for some interaction with fishing activity – be it commercial or recreational – in the area. We consider it very important that developers open and maintain effective dialogue with all fishing interests who may be affected by a project (commercial fishers, recreational fishers and charter boat operators). We note the commitment made by Sizewell C in this regard as in for example Section 2.4.14 of the Consultation Document.

We think that, in so far as is possible, infrastructure associated with temporary / short term works such as described here are removed or made “non-impactful” at the end of their required period. This is acknowledged in Section 2.3.25 of the Consultation Document.

We wish to seek clarification on some points of the overall process please –

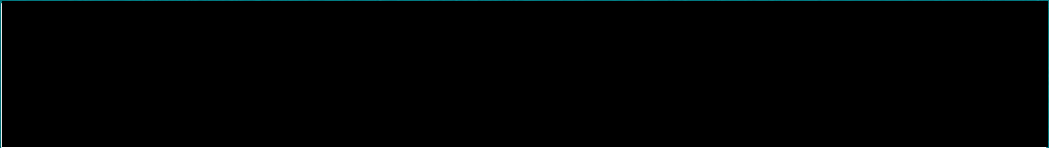
- Section 2.3.6 identifies that *“The modular desalination plant would initially be capable of producing up to approximately 2,500m³ of potable water per day. In the event that the water transfer main is not complete by the 4th year of construction, an additional module would be added to the plant to create the ability to produce up to approximately 4,000m³ of potable water per day.”* However, Figure 2.2 (page 11), *“Likely water demand profile during the construction period”* shows *“Total Potable Water Demand 3 Month Rolling Average”* (expressed as m³ / day) of slightly over 2500 in month 23, and 4000 in month 53. I would anticipate that the peak daily demand could well exceed the 3 month rolling average, when there are particularly high but short term demands on the system. This peak demand would then exceed the desalination plant capacity at that time. I’ll be grateful if you can please supply clarification on this point.

- Section identifies that 2.3.13. *“Seawater contains dissolved solids other than salt and other minerals, which are also removed as part of the desalination process. This non-hazardous slurry material would be dried to produce a cake (25% dry solids) which would require off-site disposal. At peak desalination, up to one HGV-load of this material would be generated and exported per day.”*, but Section 2.3.15. *“A desalination plant typically converts 40% of the seawater it abstracts into fresh water.”* The latter is more in line with my general understanding of the process, but this implies that dissolved materials are “exported” as a component of a more concentrated salts solution, rather than a slurry / dried slurry. I’ll be grateful if you can please clarify what will be the outputs / “waste” products from the process.

We wish to offer a comment on the overall approach of the Temporary Desalination Project. As described in the Consultation Document, the project requires a bespoke water intake, treatment plant and brine return system. I’d like to ask please what if any consideration has been given to integrating this process with the overall site sea water management, specifically to incorporating the seawater intake and brine return systems with the existing Sizewell B cooling water flow? Would it be possible to take the seawater to feed the desalination plant from this water flow – ideally after it has passed through the reactor cooling system (in which case no additional seater extraction will be needed) or if that is not possible, from the seawater system before it is used by Sizewell B. Brine produced by the process could be returned to the cooling seawater flow prior to its discharge to the sea. My understanding is that the consented abstraction for Sizewell B is of the order of 5 000 000 m³ / day, and that the proposed sea water to abstracted for desalination (10 000 m³ / day) or returned as brine (6 000 m³ / day) represent only some 0.2 / 0.12 % respectively of this.

The benefits of such an approach would be –

- The proportion of change in the amount of seawater that would be extracted is minimal, and I would imagine could well be within existing consents.
- There will be no need for new “at sea” works (intake pipe, discharge pipe) with associated potential environmental impacts, and costs.
- The brine returned to the sea would be diluted by a large factor of up to 800 (depending on the actual flow of cooling water to the Sizewell B facility at any time), and thus render any effects to all intents and purposes undetectable.



We continually seek to improve how we respond to consultations, both in terms of efficiency and content. Therefore, if any of the points raised in this response are reflected in the project outcome we would appreciate being informed

Please do not hesitate to contact me should you have any queries on the above response.

Yours sincerely,

[Redacted signature block]

From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info

Subject: The Sizewell C Project - Proposed Change 19: Temporary desalination plant

Unique Reference:
20025472

27 August 2021

Dear Sir or Madam

Application EN010012 for The Sizewell C Project by NNB Generation Company (SZC) Limited ("SZC Co.")

Proposed Change 19: Temporary desalination plant

I refer to the PINS email, on behalf of the Examining Authority, dated 10 August 2021 which provides a link to their letter dated 5 August 2021 addressed to Carly Vince, SZC Co, which incorporates the following link:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-006498-Third%20Notification%20of%20Proposed%20Project%20Changes.pdf>

This link takes the reader to a document headed:

Sizewell C Project

9.61 Third Notification of Proposed Project Changes

My initial thoughts on browsing through what I took to be a fully complete consultation document, produced by SZC Co, was that it could be upheld to be an exemplar of succinctness, if not lightness. Unfortunately, this lightness contributes heavily to the lack of detail needed to arrive at a decent assessment of this proposed change. It's not brevity which is needed but fuller information.

Having drafted the bulk of my response I then ventured, more by accident than design, onto SZC Co's project website and came across a bulkier (or if preferred a fuller) consultation document headed '**Sizewell C Project Consultation on Temporary Desalinisation Plant**'. I surmise that the consultation document accessed using the above hyperlink should be read as an abridged version of the bulkier consultation document. There are now so many documents flying hither and thither it's easy to lose the plot. For instance, SZC Co are now, apparently, on version 3 of the Updated Main Development Site Environmental Statement and Environmental Statement Addendum Figures.

I would allege there has been a bit of a failure by SCZ Co not to point out that the document headed '**Sizewell C Project 9.61 Third Notification of**

Proposed Project Changes' is more of an abridged version of the fuller document on their website. What follows next represents my comments on the fuller consultation version.

Scene Setting

It is a truth universally acknowledged that the proposed location of the Sizewell C nuclear power station lies within a water stress area. This much we know. Indeed, the Environment Agency's response to the SZC Co first public consultation over the period November 2012 to February 2013 highlighted this fact. Prima facie, the obvious need for water supply both for the nuclear power station construction and operational activities, as well as potable water for the work force, does not appear, allegedly, to have been the subject of full investigation by SZC Co from the time of the Environment Agency's initial submission, over nine years ago, to the time of the DCO application. This is despite the issue of water resources having been scoped into the Environmental Impact Assessment – see ID 4.11.12 under the Groundwater and Surface Water section in the adopted 2019 scoping report. This advised that the ES should state the source of the required water and assess adverse effects on water availability, including potable water where significant effects are likely. This requirement reflected comments given by the Environment Agency in its response to the 2019 scoping opinion, which reinforced their earlier position on assessing water resources in the 2014 scoping opinion.

The expectation seems to be that, in fairness, SZC Co considered that water supply requirements would be met from Essex and Suffolk Water's mains water supply. However, we now know with certainty, following the DCO submission, that Essex and Suffolk have confirmed with SZC Co that they would be unable to provide a mains water supply to the Sizewell C site from their local Blyth Water Resource Zone within which the SZC site is located. As stated by Essex and Suffolk Water this is because, in their words, all raw water in the Blyth Water Resource Zone is sourced from the Chalk and Crag aquifers which are assessed by the Environment Agency to be over-licensed and potentially over abstracted.

Comments on Proposed Temporary Desalinisation Plant

The information in the consultation document about the location of the proposed temporary desalinisation plant appears to be a little confusing. Figure 2.3 shows the indicative location of the plant on the main nuclear power station platform. Figure 2.4, this being described as 'subsequent location' shows an indicative location of the plant, 'if required', to the north-west of the main platform site. There is nothing in the text in the main body of the consultation document that explains the subsequent movement of the plant to this second site. It appears that the reader is expected to make the assumption that as construction progresses on the main platform site, it will be necessary to move, at some stage, the modular plant to the second site, plus further piping would need to be installed.

The paucity of certain information contained in the consultation document is such that we are not informed about the type of desalination process which SZC Co proposes to carry out in the desalination plant. It's noted in section 2.4.11

that more detailed modelling will be undertaken as part of a H1 type assessment to confirm effects of the brine discharge on marine water quality. There is an indication at section 2.4.16 that approximately 60% of the abstracted seawater would be returned to the sea following the desalination process. I have some concerns that we will have to wait, apparently, until later for the H1 type assessment and a full assessment that considers the magnitude of saline, trace metal and nutrient discharges in relation to the sensitivity of marine ecology receptors. Without these specific items of information it is difficult to exercise any judgement about the full effects of the desalination process.

Although desalination plants are in operation around the world, it would be useful to learn what advice has been given about operating a modular desalination plant and who has given that advice. Are there examples of so-called desalination modular plants operating elsewhere around the world that could be referred to for illustration purposes.

We have no information about the scale and likely appearance of the desalination modular building. With regard to visual impacts, I understand that the Suffolk Coast & Heaths AONB Unit has expressed concerns about the possibility of moving the desalination plant to a location away from the original proposed location to a position on higher ground in an area of less developed AONB which would introduce a new built element into the AONB for several years. I share the AONB Unit's view that this would not contribute to the purpose of the AONB designation, nor would it contribute to the purpose of the AONB at either the proposed location or the site it may be moved to.

There is also the matter of whether or not this proposed change constitutes a material change for the purposes of Schedule 6 to the Planning Act 2008. Given the site location for the proposed nuclear power station is within a water stress area, there would clearly be potential for significant impacts on the existing water supply, in the absence of the desalinisation plant, or any other major source of water supply. For this reason, it appears to me that this change constitutes a material change.

The construction by Essex and Suffolk Water of their proposed water supply transfer main will of course require planning permission entirely separately from any DCO granted to SZC Co. There is no guarantee that the water supply transfer main will be granted planning permission.

Yours faithfully



Response to the Proposed Sizewell "C" **Desalination Plant (Change 19).**

Introduction

██████████) was somewhat surprised at the need for this consultation at this late stage in the DCO process. East Anglia is one of the lowest rainfall areas in the country and a water supply for the construction of such a large infrastructure project should have been a major concern of the project from the very beginning. This topic was raised by many individuals and groups in earlier consultations pre-DCO application submission. This is one of many changes which we have had to research and respond to after the application was submitted. This does not increase our confidence in EDF as the applicant or in the overall DCO process. ██████ also considers the time allowed for responses to be formulated and returned is too short for such a technical issue as the disposal of a highly saline effluent in shallow coastal waters.

Response

The General Potable Water Supply:

The projected 24 km pipeline to supply Sizewell C will undoubtedly add to the disruption and blight caused by, not only the Sizewell project itself, but also the numerous cable runs being proposed by SPR and National Grid to the Friston site, if consented. The sustainability issue with regards to this supply is of course dependent upon the scenarios modelled which, with climate change happening given the various scenarios possible with this, is indeed a complex issue.

Initial Tankers:

██████ is concerned at the requirement for 40 tankers per day. For the local inhabitants extra trucks are a significant negative impact because the mitigation measures will not all be in place at this early stage. If these numbers are within the capped numbers of HGVs then the methodology of the cap setting needs to be reappraised.

Desalination plant:

1. Diesel generators:

There is a significant amount of information still required by ourselves, as stakeholders. For example: how long will the diesel generators be required i.e. when will the site mains supply be in place? This seems to be an open ended time scale.

2. Diesel storage facilities:

Given the number of generator sets it is assumed that a diesel storage facility will be needed to store the supply. It is therefore assumed that the necessary storage bunding and tanker discharge facilities will be provided to prevent/mitigate any spillages?

3. Noise:

Whilst modern large generator sets are quiet there will be noise added to the ambient level. The site boundary noise levels will therefore increase if only marginally. This needs to be monitored to assess the cumulative impact with all other noise sources at the site boundary.

4. Fumes:

The generator sets will necessarily produce exhaust emissions to join those from all the other plant working on site. Again the cumulative impact should be assessed in case of trans-boundary nuisance

5. Pumping Stations:

Again noise will be added to the ambient levels which will need to be assessed for cumulative impact. Provision must be made for leak control of the pipelines and pump/valve installations.

6. Lighting:

Such a key plant will necessarily need 24 hour access for operators and maintenance checks. Therefore there is likely to be a need for more lighting to add to the ambient levels early on. This is another possible cumulative impact

7. Storage tanks:

Part of the installation will require tankage - How many and how big - not mentioned except as being within height parameters? Please provide additional information.

8. Brine effluent:

Discharge diffusers are actually duckbill non return valves used for this type of situation i.e. discharges to the sea – open with pump pressure close with seawater pressure. They may produce some diffusion but they are NOT diffusers. Therefore the actual diffusion capability of these devices needs to be questioned.

Brine discharge seems to be being trapped between the two off shore banks is this a problem likely to cause an increase in benthic salinity. The offshore banks – there is some uncertainty re their stability.

Conclusion

██████████ has no objection to desalination processes in general but does have several concerns here with increased ambient noise levels, extra light levels, diesel storage and bunding. This is made more difficult because the proposal is only in outline and none of these practical issues have really been explored or resolved. ██████ realises of course that these issues will need to be scrutinised and consented by the relevant agencies.

The Council's main concerns are however to do with the disposal at sea of the highly saline waste effluent into a gully between two banks which are possibly not stable. This could promote benthic salinity build up and the works themselves may destabilise the banks leading to coastal erosion at the "C" site.

The increase in tankers before mitigation measures are in place, will not be welcome and a great deal more information is required on the control of these tankers and their routes along with all other HGV traffic during these early stages.

██████ is also concerned regarding the impact this plant and the construction of it on the tranquillity and rural feel of this area as an Area of Outstanding Nature Beauty, and the negative impact on the health and well-being of our residents, those who work in or visit the area, and the tourism industry upon which we rely heavily. We would also like to know why this issue was not explored earlier in the process? And at what time it became known that there would not be sufficient potable water?

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info
Subject: Desalination Plant Consultation
IP no. [REDACTED]

Consultation Response regarding the Temporary Desalination Plant Water Supply Strategy Update

Having been engaged in the SZC DCO process for a number of years now, I firstly wish to advise that I am appalled that the Applicant now wishes to introduce such a major change so late in the DCO process. However, given the Applicant's abysmal track record throughout the whole pre-application consultation and during the period since the DCO application was submitted, I am not surprised. The fact that the consultation period is only for a short period during the busiest holiday period while trying to fully engage in the DCO process, is quite frankly intolerable. The Applicant seems to have made a habit of running consultations at times that make it difficult to respond, such as during main holiday times or the Christmas period. I would further add, I understand that the DCO process was established to fast-track large development projects, but this was on the proviso that projects were front-loaded. The SZC project has been anything but front-loaded and the panic that seems to have beset the Applicant with acceptance that they do not have a secure, sustainable potable water supply at the eleventh hour, must fall squarely on their own shoulders, having been told throughout the last decade by the local community that water supply was a major concern. Typically, the Applicant has ignored the voices of the local community and I suspect they will no doubt do so again with dealing with this proposal. However, in the hope that the Applicant will take cognisance of the concerns of local residents, I would like to make the following observations about the proposal for a desalination plant:-

1. Given the need for considerable amounts of potable water over the full 150-year+ lifetime of Sizewell C (SZC), from construction through to decommissioning, I believe the entire project is unsustainable, especially if water is sourced from anywhere in East Anglia. The intention to take water from the Waveney is not acceptable-it is a relatively small river which is notable wildlife-rich wetlands, and this should not be put at risk because of the SZC project. The issue of water shortages has been highlighted by the recent AR6 report from the IPCC which warns of likely shortages of drinking water in years to come.
2. The desalination plant (DP) will use considerable amounts of diesel during the first period of use and its operation will introduce airborne pollution to a very environmentally sensitive location as well as running the risk of diesel spills. The consultation document provides no assessment of the environmental impact.
3. The vast amounts of sea water passing through the system introduce an unacceptable risk from leakages into the surface water and groundwater, with the Sizewell Marshes SSSI and other linked wildlife sites being at particular risk.
4. There is no recognition within the consultation document of the carbon footprint (CF) of this proposal. This needs to be added to the CF of the entire project (as does the CF of the construction of the 28km pipe from Barsham).
5. The consultation document fails to provide an assessment of the likely impact on the marine environment resulting from the brine and chemical residues that will be dumped back into the sea, thereby adversely impacting marine biota.

6. The consultation document fails to provide an assessment of the marine biota that will be killed by entrapment in the water intake pipe.
7. The consultation document does not provide details of how and where the 'salt cake' will be dealt with and what its environmental impact will be.
8. The Applicant stated in January of this year [per table 1.2, Appendix 2.2D, page 11 AS-202] that, in respect of installing a modular DP *"This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)."* I believe the Applicant was correct with this assessment.

For the above reasons, I believe that the desalination plant proposal should be rejected. It is too environmentally damaging and not something that should be in an AONB as it will have adverse impacts on the attributes that gave the AONB its designation and on the marine environment.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info

CC: sizewellc@planninginspectorate.gov.uk

Subject: Re Consultation for Temporary Desalination Plant

IP No. [REDACTED] It is with great despair, whilst the planet burns, I find myself having to respond to yet another EDF consultation during the Applicant's DCO process and what is supposed to be the holiday period. Another case of EDF not listening to local residents as the issue of the substantial amount of potable water being required during construction, operation and decommissioning of the proposed Sizewell C was highlighted over a decade ago by many local residents as being an issue of concern. My concerns now are that this has enabled the Applicant to leave the 28km of new pipeline from Barsham out of the DCO process meaning it will have no scrutiny and the disruption, negative environmental impacts, carbon footprint and costs will not form part of the cumulative impact of the whole proposed Sizewell C project. I believe, out of courtesy, local residents should be given an explanation by EDF as to why it has taken so long to come to this conclusion. Having spent hours researching the impacts of desalination plants on the environment, particularly as the location for EDF's desalination plant is in the Suffolk Coast and Heaths AONB with its many National and International designations, I have been alerted to the fact that in the Applicant's January 2021 document DCO AS-202 Appendix 2.2.D it states, in reference to installing a desalination plant, "This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)" I think this is extremely disingenuous of EDF not to include this information in their consultation document and highlights how devious they have been throughout the whole of the consultation process and DCO application. My own research has highlighted:- Environmental damaging dredging is required and more fish and other marine biota will be killed at the intake head of the desalination plant and this will be in addition to the millions which will be slaughtered in the SZC cooling pipes. Once the salt is removed, the water still requires further treatment and storage, it is not clear how and where this water will be stored. The brine is discharged continuously to sea and is likely to collect at the bottom creating an environment where organisms would be unable to survive. The whole process needs a cocktail of chemicals to keep it clean and operational, all discharged into the sea by EDF enabling them to use our seas as a dustbin. Diesel generators will be required to operate the desalination plant, the process being very energy intensive. The generators will cause

noise, fumes and odours, releasing CO2 and NOx emissions close to the Sizewell Marshes SSSI and Minsmere-Walberswick SAC. Diesel use will require a large tanker a week for delivery. This means there are risks of diesel spillage and contamination of waterways. Before all this starts EDF need to have water brought in by tankers meaning 80 HGV journeys a day, from who knows where? With a further lorry each day to remove the salt cakes, the destination of which I have been unable to establish.

Unbelievably, even the desalination plant plans need another 'just in case' plan. The plant may need to be doubled causing more HGV movements and environmental degradation. The existing plant and additional plant if needed will have to be moved over SSSI crossing being sited in Goose Hill very close to the Minsmere-Walberswick SSSI involving the installation of very long inflow and outflow pipes. Given the recent IPPC report predictions of extreme risks of droughts I think it needs to be acknowledged that the Applicant's EPR nuclear reactors consumption of potable water over the period of construction, operation and decommissioning is not sustainable. On this basis I think this is probably a devious tactic by EDF to make the desalination plants a permanent fixture in the Suffolk Coast and Heaths AONB. Therefore I request the ExA refuses the Applicant change request for a desalination plant on the grounds of further degradation of the AONB and marine environment. Yours faithfully [REDACTED]

[REDACTED]

Sent from my iPad

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

27/08/21

Consultation on Construction Water Supply Strategy Response

Firstly, I would like to voice my outrage at the late inclusion of the extremely important issue of a sufficient water supply for the building and safe running of Sizewell C.

I would also like to voice my disapproval at yet another consultation, with a short three-week time span and running in the middle of the summer holiday period. The Applicant has consistently chosen to stage most of their many consultations, during and including holiday periods, this latest is no different. I believe a consultation should have a minimum run of 28 days; this consultation lasts only 24 days. I notice the Exa also commented on short time frame.

Over the last ten years, many local, concerned, individuals, and NGO groups, have been asking EDF the question 'Where is the water coming from? The question now has to be 'Why so late in the day to get a workable water strategy in place?

Water Extraction from River Waveney

It seems, because of the increase in potable water needed for the project, so late in the DCO, Essex & Suffolk cannot guarantee supply and Northumbrian Water cannot install the 28km of pipeline needed until at least 2026 and possibly later. The source of the piped water will be the River Waveney, a relatively small river but nevertheless an important water source for the Waveney Valley wetlands and a much-loved river for locals. Sadly, this is also a highly contaminated

river and has been reported as being one of the most polluted in UK.

Wikipedia River Waveney

https://en.wikipedia.org/wiki/River_Waveney including a chart showing levels of contamination. Chemical Status - FAIL.

1. Who is responsible for the purification of the water?
2. What pressure would there be on the river due to such a large volume and daily extraction of water?
3. What would the environmental impacts be on the river and land along the length of pipe laying?
4. The consultation is for a temporary desalination plant. If the water agency supply is deemed too unreliable or unsustainable, would the temporary salination plant suddenly become permanent with all the environmental concerns that are associated with these plants?

Water Recycling

The recycling of water is always welcome, especially in this dry area. I do it myself. Where would the non-potable water for the suppression of dust and washing of vehicles etc come from?

Desalination Plant

Whilst the plant is being built, EDF state the water needed will have to be brought in by tanker. EDF state there will be no increase in the overall numbers of HGVs on the roads. With up to 40 x 2 lorry movements a day expected, during the 4–6-month build, presumably this will mean a decrease in other construction traffic. Will this not delay the whole build? Who will monitor these movements?

Where will the tankered water come from?

As the plant will need intake and outflow pipes and heads, more dredging will take place, more disturbance to the seabed. Yet more

fish will be impacted at the intake head and if the plant was to become permanent, fish loss figures should be added to total fish loss at SZC, if and when operating.

The use of 24hr diesel generators is totally unacceptable. They will create noise and fumes, CO₂ and NO_x emissions, at a time when diesel is a known, environmentally damaging pollutant and should not be in use.

BRINE

I find the continual discharge of brine extremely alarming and more information is needed regarding water storage and water treatment. What chemicals will be released into the sea?

There are many more points I could raise so should the applicant submit these plans and the Exa decide to accept the proposal and include it in the DCO, this will be the time for this unacceptable addition to be thoroughly examined.

I totally disagree with the inclusion of a desalination plant.

From: [REDACTED]
Sent: 27/08/2021
To: sizewell@edfconsultation.info

Subject: Sizewell C - Response to EDF's consultations on water supply

27/08/2021

To: EDF
Sizewell C Consultation - Issue Water Supplies

As a local resident who also runs a business, engaged in previous consultation stages and having studied the DCO for Sizewell C, the more I read the more I consider that approval would mean harm which would be long lasting and could not be mitigated adequately.

I also believe that the complex DCO for Sizewell C being heard virtually, and that the impacts of Covid-19 have seriously disadvantaged individuals such as myself being able to participate fully.

On 03/08/2021 EDF announced only a 3 week consultation period in the middle of August holiday to respond to what looks like a last ditch attempt by them to resolve the long standing issue of water supplies. Consultation is under way on the plans for the unit, which would take sea water and remove the salt to create A temporary desalination plant will have to be installed to provide enough water during the drinking quality water, because water companies cannot guarantee supplies.

Until the desalination plant is ready it will mean up to 40 more trucks a day visiting the site to deliver potable water. Richard Cornwell's article 'Assurance over drinking water supplies as desalination unit planned for Sizewell C' 18/06.2021 <https://www.eadt.co.uk/news/sizewell-desalination-plant-consultation-water-supplies-8238290>

EDF and Interested Parties have raised concerns over water supplies in this area for about 10 years (this being amongst the driest in the country and predicted to become drier) which also supports a significant agricultural community that already could not forego any of its water supply.

As local water cannot guarantee supplies for the construction period (and running of) Sizewell C Northumberland Water have issued a Holding Objection to Sizewell C. The EA are also about to reduce the abstraction of water here as there is such a problem here

Response to EDF's consultations on water supply

EDF's solution is to propose a water desalination plant.

I write again as an Interested Party to raise my further concerns:

1. I am astonished that such an essential issue is still unresolved at this late stage in the planning process, two thirds of the way through the examination. Campaigners and communities have been asking questions about water for a decade. I support the contents of a [letter to PINS from TASC and Stop Sizewell C](#)
2. That it is unacceptable to have such a short, late consultation during peak holiday period when many are away.
3. Why would a proposal 28km new pipeline from Barsham not be in the DCO? Therefore not open to examination and the disruption and activity are not part of EDF's figures.
4. EDF have not given any extra cost for this addition to the project
5. EDF did not favour desalination (as in document [AS-202](#) Water Supply Strategy Update, EDF states; '*This option has been discounted in favour of alternative options, due to concerns with **power consumption, sustainability, cost, and wastewater discharge**. The desalination process is typically energy intensive, and the discharge of brine water as a result*

of desalination may not be suitable for discharge through the combined drainage outfall (CDO)'

6. Desalination plant will take 4–6 months to build and be brought in by road, and drinkable water will need to be brought in by tanker for the first 9 -12 months of construction, (as it can't be built earlier) meaning up to 40/day (80 truck movements). EDF claims tankers and plant transport won't raise HGV caps – but may not be certain.
7. Use of 24/7 diesel generators until onsite power is available for the plant to operate - significant CO₂, Nitrogen Oxides, and PM 10s and 2.5s. Atmospheric Ozone will also increase as a result of the combination of NO_x and volatile organics which have health impacts.
8. Water discharged will be 1.6 times more (brine) concentrated than natural seawater and may exceed screening thresholds for zinc and chromium. More clarity needed on the impacts on marine life from this and the water intakes.

██████████
██████████

From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info

Subject: Water Supply Strategy: Proposed change 19

Dear Sir/Madam, You say the following: "During the 4-6 months it would take to build the temporary desalination plant, clean water would be delivered to the site by water tanker trucks. This would not increase the overall number of HGVs predicted for the project during the early years of construction." As these are additional trucks, how can they not add to the overall number of HGVs visiting the site? [REDACTED]

[REDACTED]

From: [REDACTED]

Sent: 27/08/2021

To: sizewell@edfconsultation.info

Subject: [REDACTED] Response to Consultation on Construction Water Supply Strategy

Dear Sir,

Timing of this Consultation

Before providing our feedback we would like to register that, once again, we are responding to a consultation at short notice, of short duration and during a period when many people are on holiday. This has happened too many times to be just an unfortunate coincidence. It appears to be a deliberate strategy and we are disappointed with the contempt with which you appear to hold us and the consultation process. It is additionally disappointing as [REDACTED] [REDACTED] has attempted to maintain constructive and friendly relations with EDF representatives recently despite our significant differences over Sizewell C.

General Points

After eight years of consultations and four months after the submission of firm plans for a Development Consent Order we expected the main parts of the Sizewell C plan to be clear in terms of strategy, approximate timescale and phasing, with the "in principle" agreement of significant third parties [REDACTED] was surprised by the size of the change in these proposals and the apparent gulf between EDF and Essex and Suffolk Water. EDF has claimed that the construction of similar plants abroad and the experience of building Hinkley Point C will lead to a more repeatable construction and efficiency improvements. It is therefore worrying that there has been a material change in the requirement for potable water that has led to the need for 28Km of high pressure water mains to be built, a temporary (four years) desalination plant to be constructed and 40 tankers (80 movements) per day to bring in potable water prior to the desalination plant coming on stream. If this has always been a possibility, it should have been consulted on sooner and included in the DCO submission. If it really is a recent discovery, it raises serious concerns about the management of the project and engagement with third parties. This is not the only example. The position with Network Rail regarding the number of freight trains that can use the East Suffolk line has been in discussion for years and is still not completely nailed down. We are concerned that more issues like this will come out before or during the development.

Specific Points

1. EDF has previously discounted the use of a desalination plant. In the DCO submission, document AS-202 says "This option has been discounted in favour of alternative options, due to concerns with power consumption, sustainability, cost, and wastewater discharge. The desalination process is typically energy intensive, and the discharge of brine water as a result of desalination may not be suitable for discharge through the combined drainage outfall (CDO)." In light of your views, how do you propose to mitigate the power consumption and sustainability concerns? What is the cost impact of the desalination plant and water tankers? The wastewater discharge was a concern when EDF did not believe they needed a desalination plant. Now they do, there is no longer a concern. We are not reassured by this change in view and

would like to see the original concerns explained and a full explanation of why those concerns are no longer held. With respect, EDF has a significant vested interest in no longer holding its previous concern. This is an area where the review of an independent third party would provide reassurance that EDF cannot provide.

2. Water tankers. The consultation document attempts to reassure us that the additional 40 tankers per day will not require an increase to the early years daily limit of HGVs. We expect that the daily limit is likely to represent the busiest day with some contingency so there is no reason to doubt that 40 tankers can fit within that envelope in the first few months. What does concern us is that the 40 tankers use up some of the contingency which increases the chance that some other issue in the project creates a scenario where there is pressure on the local authority to allow a breach of daily HGV numbers. In the issue specific hearing on the DCO, it was clear that the applicant's approach would be to use project issues impacting timescales as justification for relaxation on project constraints. We absolutely reject this approach. The constraints, such as they end up being, are there to protect the local communities from the worst impacts of this project and must not be breached no matter what issues with the project might be doing to timescales (or cost). [REDACTED], we expect EDF to willingly enter into binding commitments on HGV numbers, timely delivery of mitigations (i.e. before the impact begins) and so on. We remain disappointed that they do not want to and even appear to be anticipating scenarios where they might ask to breach them.

[REDACTED]

[REDACTED]

Annex B: Copies of all noise consultation responses

Issue Report

| | | | |
|--|--------------------------|---------------------|----------------------------|
| Issue - Project - Targeted consultation on rail noise impacts/mitigation | | | Sentiment - Neutral |
| Sub Project | Organisation Name | Contact Name | |
| | | | |
| Activity Title | Source | Page # | |
| | Notes | | |
| Transcript <p>Good afternoonReference Meeting of 21st July 2021, with .We have not received the following information all as discussed at abovemeeting ? therefore request an urgent and detailed update regarding thefollowing points:? To provide firm and detailed proposal for the Stopping Up of Fordley Roadboth North and South as discussed. ? To provide Fordley Road/SLR existing Noise AssessmentReport, as discussed.? To provide Fordley Road/SLR Noise mitigation measures toinclude acoustic fencing and bund, including full and detailed plans, asdiscussed.? To provide Fordley Road/SLR Increased landscape plantingmitigation measures, including full and detailed plans, as discussed.</p> | | | |
| <div style="text-align: right;">Last Edited - 20/08/2021</div> | | | |

| | | | |
|--|--------------------------|---------------------|--|
| Issue - Project - Targeted consultation on rail noise impacts/mitigation | | | Sentiment - Neutral |
| Sub Project | Organisation Name | Contact Name | Enquiry Title |
| | | ██████████ | Acoustic barrier Whitearch Park, Benhall |
| Activity Title | Source | Page # | |
| Fwd: SZC Project – Update on Noise assessment at Whitearch Park | Email Content | | |
| Transcript Subject:Re: SZC Project ? Update on Noise assessment atWhitearch ParkMorning ██████████. I response to the updated effect of noise to Whitearch. It is clearthat the original assessment on the noise levels to the park wererecarried out without the knowledge of the parks undulating natureand varying land types, therefore there assessment was incorrect,the latest consultation carried out between the 12th of May andJune the 11th is based on visual evidence as no acoustic trialswere carried out or any practical test involving actual trainshauling 2000 tons.We are aware that at this time the discussions are only about theeffects of noise levels at Whitearch, little consideration is beinggiven to vibration levels.IN CONCLUSION.We consider that the minimum requirement to offset the noiselevels of night trains is to construct an effective acoustic barrier,this would give due respect and consideration to our residents.IN ADDITION.The local council who made a genuine mistake by grantingplanning for twenty one residential units, appear to endeavour tocorrect this by only allowing holiday use on the remaining eighteenunits, with this in mind and in the light of noise and vibration levelthe future development of holiday units is no longer viable, we areobliged both morally and possibly legally to inform potentialholiday makers of pending disruption.The blight starts here. 3.1.7 States that the resulting noise levels will be below 70 db, it isour intention at the time of the night trains commencing to have sound engineers install equipment at various location to takereadings and to pursue what ever options are available.The Parish Council is always welcome to visit or to discuss thismatter with us. ██████████ ██████████ | | | |
| Last Edited ██████████ | | | - 18/08/2021 |

| | | | |
|---|--------------------------|---------------------|-----------------------------|
| Issue - Project - Targeted consultation on rail noise impacts/mitigation | | | Sentiment - Positive |
| Sub Project | Organisation Name | Contact Name | |
| | | ██████████ | |
| Activity Title | Source | Page # | |
| Re: Noise Mitigation scheme | Email Content | | |
| Transcript Subject:Re: Noise Mitigation schemeThank you very much for your email, rather than bother you now, I?ll wait untilthe actual go ahead happens. If you need a local person to give a positiveoutlook, please let me know.Kind Regards | | | |
| Last Edited ██████████ | | | - 11/08/2021 |

| | | | |
|--|--------------------------|---------------------|-----------------------------|
| Issue - Project - Targeted consultation on rail noise impacts/mitigation | | | Sentiment - Positive |
| Sub Project | Organisation Name | Contact Name | |
| | | ██████████ | |
| Activity Title | Source | Page # | |
| Noise Mitigation scheme | Email Content | | |
| Transcript Noise Mitigation schemeGood morning,I?m trying to find some information on the above scheme, could you help meplease, with some links.My main reason for this is, your proposal for dealing with the extra noise atnight, from the trains.I was very pleased to hear that you have the go ahead with the whole project,albeit without the Chinese; which I must admit, I?m quite happy about.I hope that most people are positive about the project. The pros outweigh thecons, massively, ██████████ | | | |
| Last Edited ██████████ | | | - 09/08/2021 |