

From: [Together Against Sizewell C](#)
To: [SizewellC](#)
Cc: correspondence@tasizewellc.org.uk
Subject: Response to BEIS letter of 18th March 2022 re SZC DCO
Date: 08 April 2022 15:15:01
Attachments: [mapiaqbifaiidap.png](#)
[TASC post exam response to BEIS letter of 18Mar22.pdf](#)



TOGETHER AGAINST SIZEWELL C



Dear PINS/BEIS

Please find attached TASC's response to the BEIS letter of 18th March 2022 for the SZC DCO file.

Please acknowledge receipt.

Yours faithfully

Chris Wilson for TASC



Together Against Sizewell C

TASC Post-Deadline 10 Submission TASC IP no. 20026424 April 2022

Post Sizewell C examination comments in response to BEIS letter of 18th March 2022

FAO: Gareth Leigh on behalf of the Secretary of State, BEIS

Dear Mr Leigh,

Ref: EN010012

TASC have issued this letter in response to your letter of 18th March 2022 published on the Planning Inspectorate's website.

TASC note your question to the Applicant at paragraph 3.2, regarding the possible use of the desalination for the entire operational period, and comment as follows:-

- A) Have BEIS considered the need for potable water beyond operation, for the defueling and decommissioning periods?
- B) In DCO document 9.121 'Written Summaries of Oral Submissions made at Issue Specific Hearing 15: Proposed Temporary Desalination Plant (5 October 2021)' [REP10-161] at para 1.3.57 it says *"Dr Breckels explained that the desalination plant would cease prior to cold flush testing, so the concerns raised previously in relation to in-combination effects with hydrazine and other commissioning discharges from the CDO are no longer a consideration."* ; at para 1.5.3 it says *"...Phase 5 cold flush testing commissioning works must not commence until the operation of the desalination plant has ceased."* ; at para 1.5.5 it says *"The Applicant noted the queries around the precise timing of the removal of the desalination plant, but observed that the principal environmental concern is its operation..."*
TASC consider the above comments clearly indicate that there are environmental concerns about use of desalination for the operational period and confirms the need for desalination to cease before Sizewell C is commissioned.
- C) In DCO document 9.122 'Revision: 1.0 Written Submissions Responding to Actions Arising from Issue Specific Hearing 15: Proposed Temporary Desalination Plant (5 October 2021)' [REP10-122] it says in para 1.5.1 that, in connection with possible disturbance caused by the use of compressed air to clean the intake heads: *"Assessment of this potential effect has not been advised by any statutory consultees, and this is taken to mean they agree with the conclusion that the activity does not present a significant risk."* **TASC do not consider that this sufficiently deals with this matter as the fact that the issue was not raised in the**

Applicant's impact assessment, means it was not brought to the attention of the statutory consultees. The statutory consultees should be requested to comment.

- D) In DCO document 9.122 [REP10-122] on page 20 the ExA states: *"It is clear that the desalination plant is only required for the construction phase. It has been assessed on that basis. It has not been assessed for the operational phase and the ExA does not understand the Applicant to be suggesting that the plant would be used for the operational phase....Accordingly, provision in clear and unambiguous terms that the desalination plant may not be used after and must be decommissioned before operation of the power station is essential."* Bearing in mind the ExA's statement, TASC are puzzled as to why the Secretary of State would even consider that the desalination plant could be considered for the period of operation. **If it becomes apparent that there is not a guaranteed sustainable supply of potable water available for operation, then the SZC project should not be consented.**

- E) At deadline 8 TASC, in document REP10-282, set out a list of questions that we had submitted in the change 19 consultation about the desalination plant, these being supposedly answered in the Applicant's document REP10-160, appendix S. TASC's first question was:-

In January 2021, EdF published document 6.14, an Environmental Statement Addendum1 . At Appendix 2.2.D to that document, at Table 1.2 on page 11, the Applicant states, in reference to *"Desalination: Installing modular desalination plant on the main development site and abstracting seawater for treatment"*: *"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)."*

Could the Applicant explain why there is now a proposal for the very technology it had previously discounted?

Can the Applicant explain what has changed in respect of its assessment regarding the adverse impacts of desalination of seawater and why it now claims that the discharge of brine is acceptable?

Will the Applicant publish the original assessment of the impact of desalination which supported its view in January 2021?

The Applicant's response set out in REP10-160, was to refer to para 1.3.11 REP10-161 and section 1.2 in REP10-162. However, para 1.3.11 REP10-161 was a response to a query by another IP and just referred to consideration of alternatives. Similarly, para 1.2 REP10-162 deals with queries from another IP and fails to address TASC's three questions above-this deflection by the Applicant in not answering questions that expose the weakness of the Applicant's position, is a theme that has run throughout the DCO process. **TASC request that the Secretary of State ensures he is satisfied that, since the end of the examination, the Applicant has furnished the information that TASC requested in our three questions above, particularly providing a copy of the original assessment setting out why they believed a desalination plant was too environmentally damaging. The Applicant's answers to these TASC questions should be made public on the PINS website.**

- F) TASC would like to point the Secretary of State to the Applicant's answer to TASC question 10 in REP10-160 Appendix S where the Applicant stated: *"A permanent desalination plant*

does not form part of the Development Consent Order application and therefore any grant of the DCO would not authorise its development on a permanent basis.” So, it is clear from the Applicant’s statement, that the permanent use of the desalination plant for the operational period cannot be consented.

Together Against Sizewell C

8th April 2022

TASC, 