

**RESPONSE TO SECRETARY OF STATE'S REQUEST FOR  
INFORMATION DATED 25 APRIL 2022 IN LIGHT OF EDF'S  
RESPONSE TO S OF S QUESTIONS OF 18 MAR AND 31 MAR 22**

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20026479**

**INTRODUCTION**

I have been a resident of Yoxford since 1992 and witnessed the commissioning of Sizewell B in 1995. I am not, in principle, opposed to nuclear power, and, being a Parish Councilor since 2015, I have taken any opportunity offered by EDF to engage constructively in the planning and mitigation for Sizewell C.

As an individual I have engaged actively with every stage of the consultation process from Stage 2 pre-consultation in 2016-2017 through to the Stage 5 post DCO submission consultation and, subsequently, on the Proposed Change 19 (Water Supply Strategy). As a Registered Interested Party I have followed the Inspectorate's examination of the application for a DCO for Sizewell C in detail, attending almost all the hearings on line and making written submissions at deadlines 2 (2 Jun 21); for ISH 2 (7 Jul); ISH 3 (8 Jul); ISH 6 (14 Jul); at deadline 5 (23 Jul); at deadline 7 (3 Sept); for ISH 11 (14 Sept), ISH 12 (15 Sept), ISH 13 (16 Sept), ISH 14 (17 Sept); and Deadline 10, following ISH 15 (5 Oct). I will not repeat the content of these submissions but I have reviewed them and they remain relevant and inform my subsequent comments.

Rather than drill down into the detail of the Applicant's response and duplicate the work of others (and the reading to be conducted by the Inspectorate!) I would like to endorse in full the Joint Group submission of the Theberton & Eastbridge PC; Middleton cum Fordley PC; Stop Sizewell C; Minsmere Levels Stakeholders Group and the B1122 Action Group.

**GENERAL**

This is a large and very complex project and is therefore inherently high risk. The complexity and risk is exacerbated by attempting to impose the 'Hinckley Point C model' on a piece of land that is too small within a District with a fragile infrastructure. A regrettable mark of the project has been a reluctance, until forced to do so, to recognize these different circumstances, consult effectively and to devise credible *workable* solutions. When challenged the applicant has tended to fall back on a combination of statutory provisions, legalistic arguments, and piecemeal adjustments to their proposals to satisfy criticism. These adjustments have sometimes led to contradictions and incoherence. These tendencies also characterize the Applicant's reaction to the questions from the Secretary of State.

## **WATER SUPPLY AND DESALINATION**

**S of S Question 3/1 -3/2.** The Applicant's response to this question is consistent with previous behavior. East Suffolk is one of the driest parts of the country and domestic and agricultural demands for potable water it growing. Potable water is crucial for both the construction and operation of Sizewell C and its provision was raised as an issue at the Stage 1 Consultation over 8 years ago. EDF refused to acknowledge that there was a potential problem until forced to do so towards the end of the consultation. Northumbrian Water are struggling to meet current needs, their plans to resolve the wider issue are yet to be approved and, in any case will take a number of years to execute. Para 2.1.9 of the response is about the early stages of water planning, and 'clutches at straws'. The reality is that delivery of sufficient potable water for this massive project cannot be assured, notwithstanding 'statutory provisions'. The S of S should take NO comfort from this answer.

**S of S Question 3.3.** It is entirely understandable that the S of S should ask this question. In studying the answer it should be kept in mind that earlier in the planning process EDF stated that a desalination plant "*has been discounted in favor of alternative option, due to concerns with power consumption, sustainability, cost and wastewater discharge*". It should also be noted the prevalence of conditional wording in the answer: 'unlikely'; 'may'; 'likely'; 'in SZC Opinion'. This is not reassuring. There *are* options within this very cramped site for a permanent desalination plant, but all options have difficult implications as explained in detail in the Joint Group submission. EDF's submission lacks detail and slides over the difficulties. The S of S should be skeptical about 'no in principle difficulty' (Applicant 2.2.11).

**S of S Question 3.4.** In essence the applicant cannot answer this question effectively at this stage because Northumbrian Water's planning has only just started. As so often in the past the applicant reverts to reliance on case law in place of plans based on data.

## **TRAFFIC AND TRANSPORT**

**S of S Question 4.1.** The Applicant has not answered the question! Instead they have regurgitated the arguments they have used to justify their current plan and focus on possible consequences (some of them fallacious, such as the effect on 'mass balance') of changing the plan. EDF's failure to consult effectively, take advice, draw on previous local experience, and develop plans harmonized with local needs has resulted in years of delay and an over-complicated plan riddled with forced compromises. By carrying out mitigation work *concurrently* with

launching the main project, the applicant is adding complexity to the 2-3 'early years' period and will put very considerable pressure on the fragile transport infrastructure of this area, the effects of which will extend well beyond the B1122. The ensuing problems and congestion are likely to have an adverse impact on the delivery of the project, imposing the very delays the applicant claims to be seeking to avoid. Ironically, were the applicant to put the SLR and bypasses in place *before* Phase 1, the project could go more smoothly, and costs saved on additional mitigations that would not be required. Even better would be to replace the SLR with route W, a much better legacy preferred by SCC and communities, and of more use to Scottish Power and other energy developments in the area.

**S of S Question 4.3.** Yoxford is grateful for the agreement to a pedestrian crossing on the A12 (Applicant 3.4.8 -3.4.9)

### **COASTAL CONSIDERATIONS, SPENT FUEL AND RADIOACTIVE WASTE**

Notwithstanding all the detailed work that has been carried out by the applicant and others, scrutiny by the Planning Inspectorate and the answers provided now to the Secretary of State on these topics, I and others retain deep misgivings at the long term risk of siting Sizewell C, with its legacy of spent fuel and radioactive waste, on this exposed and vulnerable coastline when we are all now far more aware of the serious implications of climate change, rising sea levels and unprecedented weather events. Committing to this project on this site now with all the uncertainties, inadequacies and concerns exposed by the examination process will be a terrible legacy for our successors well into the Twenty Second century. I remind the S of S that Sizewell 'A', commissioned in 1966, shut down in 2006 was not de-fueled until 2014. The buildings will not be removed until 2030 and final clearance not completed until 2088-2098. The cost of building Sizewell A rose from a planned £56m to £65m. The current estimate for decommissioning is £1.2 bn!

I support the submission of Mr Nick Scarr "Sizewell C- Coastal considerations and TR553, and the comments of the Joint Group.

### **SIZEWELL C : A STRATEGIC MISTAKE -AND SOME!**

My submission at Deadline 2 on 2 June 2021 examined why, at that time , Sizewell C was a Strategic Mistake. Strategic mistakes occur when objectives are pursued hubristically in spite of changing circumstances and when the ways and means of achieving the desired ends are inappropriate and inadequate. Almost 12 months after that submission there are several *additional* reasons to suggest that proceeding with Sizewell C will be a major strategic mistake.

**Energy Crisis.** Secure energy is crucial to national security. Nuclear power is an important component BUT even if the applicant's optimistic forecasts are fulfilled (and NO project of this size has been delivered on time – Hinckley Point C has just slipped by yet another year this week, from 2017 as originally forecast to 2027), Sizewell C will not start generating energy until 2033-35. Meanwhile the Government has recognized that there *are* other nuclear options being developed that are cheaper and quicker to build as well as the growth of renewables.

**Economic Crisis.** The cost of energy is driving up not only the cost of living but also project costs. The cost of Hinckley Point C has just risen by £3 billion. It is inconceivable that Sizewell C can be delivered within the claimed £20 billion. Moreover, unlike Hinckley C, the full cost of delivery and any over-runs will be borne by the tax payer. The Applicant will have less incentive to keep to budget than at Hinckley. The current demands on public finances are formidable and likely to grow. As well as being High Risk Sizewell C is NOT value for money.

**Geopolitics: New Cold War and Military Threats.** The full implications of Russia's invasion of Ukraine are still being absorbed, but the geopolitical situation has changed fundamentally and is more dangerous. During the Cold War an important military task, of which I had personal experience, was the protection of 'key points' from sabotage, especially along the east coast. Transmission lines (far less elaborate than now) were (and are) particularly vulnerable to sabotage and difficult to protect. Sizewell C will represent 7% percentage of our generating capability, and in addition the power lines will carry the energy generated by off-shore wind. Sizewell itself is vulnerable to conventional attack from the air and the sea, but such would constitute an act of war. The power lines and their pylons are vulnerable to sabotage, which is deniable, and our enemies have significant capabilities to conduct such attacks. Building Sizewell C will put a lot of expensive 'eggs' in one basket. Much better to build more, smaller power stations dispersed to less vulnerable parts of the UK nearer to where the power is needed.

## **CONCLUSION**

Sizewell C, as currently constituted is a badly planned, very expensive, and high risk project which, when there are other credible options to meet the Nation's energy needs by 2033-2035, will constitute a major strategic mistake. The application for development consent should be rejected.

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