

Issue Specific Hearing 15 (ISH 15)

These submissions are made by Cllr Josie Bassinette on behalf of the Walberswick Parish Council.

Number: 20025708

The following is a summary of oral submissions and other issues of concern being provided in writing where the points could not be made during the hearing itself. Headings are aligned with relevant agenda items.

Agenda 2: Water Supply Update

Prior to the material change in the water strategy, there were already many flaws in the argument for locating two new nuclear reactors at the Sizewell site. But the absence of a sustainable water supply during construction and especially during operation should conclusively argue that this is the wrong project in the wrong site. A simple home would not be allowed to be built in an area with no source of water. It is unthinkable that a £20 billion nuclear power station would go forward under these conditions. For EDF to argue that it is immaterial to them whether or not they know in advance how/if they will have water during the plant's operation is incredible and indicates that either EDF's future depends on the building of the station (rather than its operation) or that they are confident that competing users (i.e. consumers and other businesses) will ultimately be sacrificed in order for the power station to have the water needed to operate. It is clear from the statements of Northumbrian Water that they see no means of providing both Sizewell and non-Sizewell consumers with scarce water resources. One party or the other will be sacrificed. We know that the power plant, once built, won't be turned off. Until and unless there is a guaranteed, sustainable source of water that does not take from existing or planned future users, this development must be rejected.

Allowing the plant to be built, knowing that there is no identifiable sustainable water source, would be the worst derogation of public duty. It basically sets up a situation where EDF has the ability to demand that the nuclear plant is prioritised for available water or that any means of providing water for operation – no matter how damaging – must be agreed. As they have done throughout the hearings when faced with the environmental destructiveness of the construction, the impossibility of sensible mitigation or the unavailability of the housing and infrastructure they require, EDF argues that they are so “nationally important” that nothing must stand in their way. Indeed, if having a nuclear power plant is so critical and nationally important, then EDF should not be attempting to build it at Sizewell, but instead EDF, or another provider, should build a plant on a suitable and sustainable site. It is not right to say there is no time to consider alternatives and environmental and other impacts of EDF's proposed water strategy. It is only too late for EDF to expect approval of its DCO under these conditions.

We are particularly alarmed to have learnt during ISH 15 that the plant cannot even be tested with the “temporary” desalination in place. Is EDF saying that they will never have desalination on site or only that the location of the temporary plant (and or the size/design of the temporary plant) is not appropriate? In either case, this admission alone should lead to the DCO being rejected as there is no credible means by which this plant, once

constructed, can operate. EDF is trying to escape scrutiny of desalination because of its “temporary” nature. But although they are saying that they cannot operate with the “temporary desalination”, there is no comfort that the destruction during the temporary stage will not become a permanent feature with a different desalination plant. We note too that there is no effort being made to provide an analysis of the cost impact of the water strategy or who will be expected to pick up the cost of desalination.

Agenda Item 3:

Sub-item (a): As we heard from Natural England, the EA and all interested parties, the environmental assessments and supporting documentation for the temporary desalination plant and new water strategy are inadequate. They also contain important errors in data, approach and argument as was confirmed during the course of ISH 15. For EDF to try to correct for these problems in their last submissions at Deadline 10 makes the hearing process biased as there is no opportunity for IPs to consider EDF’s additional information and provide input to the Inspection Panel. We find that the argument, put forward by EDF, that the inadequacies of its assessments are relatively unimportant because the impact of the main development is so overwhelming that a bit more destruction is immaterial, is wholly unacceptable. That is precisely the argument that has gotten us into the situation of global warming and the loss of biodiversity – ‘everything is already so bad, what difference does it make if my investment makes it just a little worse’. The ‘temporary’ water solution needs to be fully analysed, fully assessed and made transparent prior to any consideration of the DCO for approval.

Sub-item (b): We do not believe that the transport implications of the ‘early years’ tanker use have been adequately addressed. It is impossible, without an agreed and identified source of the tanker water, to understand the implications of the tanker strategy on the transport network. It was made clear at ISH 15 that there remains some uncertainty if the tankers will come from the north, south or west and subsequently what roads will be used. Therefore, the statement by EDF that it can absorb the additional tankers as well as the construction materials for the desalination plant within the current caps cannot be confirmed. It would seem highly unlikely that an increase of some 10% over the caps could be absorbed. If it were, then EDF would simply be pushing the cap-breaking later in the construction phase. We challenge the statement made by EDF at the hearing that they would manage the tankers as part of their current transport strategy and plans. If they do not know where the tankers are coming from, how can they know how to take them off the road within their current transport strategy? Moreover, we question the argument that mitigation can be provided by drawing down transport mitigation funds if the situation deteriorates. First, doing so would simply leave fewer funds for later in the project. Second, what could possibly be put in place to address the impact except to stop bringing in water? Therefore, there are no credible mitigation plans to address the caps being exceeded, for the impact of the tankers on the current transport strategy, nor a credible method of addressing unforeseen impacts.

Sub-item (d) Air quality: We would like to point out that there is a discrepancy in Rep 9-024 and Rep 9-025. One provides analysis saying that there will be desalination run on diesel for 244 days, the other that it will be run on diesel for 3 years. We heard today that there is no certainty when/if desalination will stop as there is no likelihood of a pipeline being built and no other source of water. Analysis, therefore, should be done during the entire time of construction with a conservative estimate of the time using diesel. We do not have, therefore, an adequate assessment of impact until this discrepancy is addressed and the analysis is redone using the proper period of when the desal starts, when it uses diesel and when it uses electric and what this will mean during the entire period of construction.

We also note that in the document labelled Desalination Plant Air Impact, para 3.4.3 with regard to Ammonia, it says that the impact on Minsmere does go above the threshold of insignificance. It then goes on to argue that this can be dismissed by rounding down their assessment. It would seem that, given that we are talking about the impact on such an essential preserve as Minsmere and an AONB, we should be using the highest standards. This becomes all the more critical as we understand from the discussions at ISH 15 that analysis of the cumulative effects are not forthcoming.

This becomes all the more worrying in what we read in para 3.5 of the same document where the applicant discusses control measures. Here the applicant is falling back on the argument that it is all temporary, so even if they have got it wrong, it won't matter because "any effects on the habitat sites will be temporary". This argument is already flawed logically, but from what we heard at ISH 15 about the great uncertainty whether a sustainable water source can ever be identified, then we cannot depend on the impacts ever coming to an end. Given that the applicant has nothing else to offer, it would appear that there are actually no meaningful control measures and the attempt by the applicant to dismiss the possibility of "significant impact" is disingenuous.

Sub-items 3 (e-j): These topics are of concern to the local community and anyone who cares about the health of the North Sea, of the AONB, Minsmere and surrounding areas. As citizens we depend on the Environment Agency, Natural England, and the MMO to be given the time and resources to come to a judgement on the impact of proposed developments. The fact that these agencies are currently not in a position to do a proper assessment argues for permission for the project to be withheld. EDF has had nearly a decade to accept that its development lacked a sustainable water resource. It was pointed out repeatedly during the consultation period. For them to introduce this change at the 11th hour and then complain about the lack of responsiveness by our national environment agencies is cynical and a misuse of the national planning processes. We are profoundly uncomfortable with any attempt to push a project for approval with these critical processes left undone. It would not be acceptable for a much smaller development in a less sensitive site to move forward in this unplanned and haphazard way. For a £20 billion investment of this size, complexity and destructive potential, there should be no possibility of proceeding at this time.