

Yoxford Parish Council – Response to Consultation on Construction Water Supply

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 Yoxford Parish Council 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. Yoxford Parish Council 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). As good neighbours, 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.