

To: Public Accounts Committee (PAC) re Call for evidence: Sizewell C

From: Together Against Sizewell C (TASC)

18th May 2026

1. TASC believe the justification for new nuclear on the basis that it is 'clean' and 'homegrown' is both disingenuous and an attempt to gaslight the UK public. The toxic pollution caused by the mining, milling, fabrication and enrichment processes for uranium fuel, combined with the emissions to air and water from operations and the highly radioactive spent fuel that remains potentially dangerous for thousands of years, all mean that nuclear power is far from 'clean'. The UK has no homegrown source of uranium nor control over any supplies so is beholden to overseas suppliers at a time of increasing demand and reduced supplies.
2. TASC is firmly of the opinion that Sizewell is not a suitable site for new nuclear – Sizewell C (SZC) is sited in Suffolk's National Landscape, on one of Europe's fastest eroding coastlines, surrounded by designated wildlife sites, immediately next to an operating nuclear power station, in the UK's driest drought-prone region, with a footprint too small for a project of its scale. DESNZ's (BEIS then) failure to update National Policy Statement (NPS) EN6 (2011), despite commencing a consultation in 2018, has enabled the above issues regarding the SZC project to be considered acceptable e.g. if BEIS had updated EN6 adopting the Environment Agency March 2018 recommendationsⁱ that DESNZ should be, *"Strengthening the criteria relating to flooding, climate change and coastal processes to give further weight to these matters at the strategic stage"*, and *"Strengthening consideration of potential impacts to groundwater"*, the SZC site may have been deemed unsuitable.
3. Recent rapid coastal erosion of up to 27 metres over the last year in places at Thorpenessⁱⁱ, just 2 miles from Sizewell, has resulted in eleven homes having to be demolishedⁱⁱⁱ. In front of the Sizewell C development site the beach may need to be replenished due to recent erosion - before the nuclear plant has even been built^{iv} – demonstrating the threat of erosion is real and immediate and should be a wake-up call for government that Sizewell is not a suitable site for new nuclear.
4. TASC previously expressed our concerns to PAC regarding how DESNZ were supporting the Sizewell C project and trust the observations set out in our letters dated 12/02/25, 11/03/25 and 22/04/25 will be used as evidence for this inquiry^v. Below is a summary of TASC's previous comments:-
5. DESNZ has presided over an ideological pursuit to implement the SZC project prior to a FID, irrespective of the risks to both the public finances as well as the environment,

6. The government's position pre-FID was that SZC is going ahead, nothing will stop it – a message confirmed in December 2024, seven months prior to FID, when TASC met with the new local Labour MP where she advised she couldn't entertain the possibility that a FID would not happen.
7. The awareness that SZC would go ahead regardless, meant DESNZ lost huge amounts of bargaining power, leading to greater cost to the public purse and electricity consumers paying increased RAB charges.
8. Straight out of the HS2 playbook, there was a deliberate policy to spend as much on SZC as early as possible pre-FID, to support an argument that too much had been spent to cancel the project – despite DESNZ being in effective control of SZC with a shareholding approaching 90% prior to FID, they facilitated this.
9. DESNZ had conflicting roles as promoters, negotiators, quasi-judicial decision makers, responsibility for financing via RAB and subsidy schemes, FID and the Business Case.
10. Billions of public funds were expended and major components committed to, prior to a FID despite some major issues with the project not having been resolved e.g. lack of a guaranteed sustainable potable water supply; lack of final design of sea defences.

11. Risks to the project – therefore, risks to the Value for Money claims

12. TASC's view is that there are multiple risks to the SZC project which undermine Value for Money (VfM) claims. Including coastal erosion, lack of sustainability and resilience when climate change impacts are properly considered. Also, lack of sufficient detail in the approved plans due to overuse of the 'Rochdale Envelope'.

13. Climate change risks

- a. Sea level rise, increased storm surges and more extreme weather events

14. Our letter to PAC on 11th March 2025 says, *"Disclosures by SZC Ltd in 2024 and documentation published by the Office for Nuclear Regulation (ONR) supporting their grant of a nuclear site licence (NSL), have revealed there are now two substantially different SZC projects, the one in the DCO approved by the then SoS, Kwasi Kwarteng, and the one still being considered by the ONR as part of the 'site safety case', contrary to the 'Overarching Principle' set out in the joint ONR/EA guidance^{vi}"*

15. The ONR's May 2024 NSL documentation^{vii} revealed adaptation was required to protect the landward flank of the SZC site in a credible maximum climate change scenario, requiring construction of two huge 10-metre high 'overland flood barriers' (OFBs) with a combined length of approximately 1.5 kilometres. For SZC to obtain a NSL, the ONR state in para 56, *"SZC Ltd has committed to install overland flood barriers should climate change be worse than is reasonably*

foreseeable, to protect the site from extreme still seawater level". TASC discovered under FOI in late 2024 that EDF knew about the need for the OFBs in 2015^{viii}. Furthermore, EDF ascertained in their 2017 platform height analysis^{ix} that their chosen nuclear platform height of 7.3m AOD would, along with the adapted sea wall on the eastern flank of the site, require the two additional flood defences to prevent the nuclear platform from flooding from the west, in the event that sea level rise reaches a 'credible maximum' scenario leading to a major breach of the low-lying coast to the north of SZC and south of the Sizewell nuclear cluster. However, while EDF rightly included the adaptive design of the eastern sea defences in their DCO application, EDF chose not to include the southern and northern OFBs in the application, meaning there was no assessment of the OFBs or consideration of alternatives, such as raising the platform height, during the DCO examination - hidden flood defences equate to hidden costs!

16. PAC will be aware from our previous correspondence, TASC advised the Secretary of State (SoS) for DESNZ regarding the approved project's lack of resilience to extreme sea level rise in March 2025, this being several months before the FID. Perhaps, naively, TASC believed EDF/SZC would be held to account, and the developer's failure to deal with the lack of resilience would be addressed. However, DESNZ denied our request for the OFBs to be assessed now. This meant that there will be no public scrutiny or formal assessment of likely impacts from the construction and operation of the OFBs now, nor will there be any review of EDF's decision in 2017 to elect for a 7.3m high nuclear platform rather than a more expensive, yet safer, higher platform height^x. A higher platform would negate the need for and expense to future generations to construct the OFBs.
17. The SoS's decision regarding the OFBs, meant TASC's only option was to legally challenge his refusal. The court held that it was too late to challenge the approved DCO project [this must be done within 6 weeks of the 2022 DCO approval - even though the OFBs existence was not revealed till 2024!], and determined that the SoS could decide to 'kick the can down the road' thereby avoiding any public scrutiny, meaning the Environment Agency, Natural England and the District Council [responsible for coastal processes] have all been denied the opportunity by DESNZ to assess the impact of the OFBs on the receiving environment now. Also, the Planning Inspectorate has been denied the chance to consider the veracity of the platform height decision. The result - there is no provision or legal requirement in the approved DCO for SZC to install the OFBs nor is there reference in the Coastal Processes Monitoring and Mitigation Plan to a trigger for the OFBs to be constructed. We also advise, SZC do not own or control all the land needed to build the OFBs. This is contrary to the ONR and

EA's joint guidelines for dealing with flood risk^{xi} and could result in additional costs to acquire the land.

18. Once SZC's 7.3m platform is constructed, the platform cannot be raised at a later date. TASC consider it immoral to burden future generations with the cost and added responsibility of determining a viable and least environmentally damaging option to keep the SZC site safe till all spent fuel is removed from site in the late 2100s.
19. DESNZ claim to have learnt the lessons from the Fukushima disaster^{xii} and a government spokesperson was reported as saying, "*Climate change is at the heart of this government's agenda, both adapting for the future and...*"^{xiii}, but these claims cannot be justified when they know SZC is extremely vulnerable to the impacts of climate change and that the project approved in the DCO is not resilient to a credible maximum sea level rise scenario over its full lifetime. Indeed, SZC is progressing without knowing if the OFBs are a viable and acceptable option - contrary to NPSs EN1 and EN6^{xiv} which state that the site must be protected for its full lifetime i.e. until all spent fuel leaves the site, and that the design needs to include adaptation measures that may be required to deal with a credible maximum sea level rise scenario. The project under construction i.e. the one approved in the DCO, only includes adaptation proposals for raising the hard coast defence feature (the sea wall on the seaward flank of the site) but no adaptation to protect the landward flank from flooding in a sea level rise above the 7.3m platform height. Throughout the DCO, EDF claimed that the site lifetime i.e. spent fuel removed and the site decommissioned, was 2140, this being the date up to which the flood risk modelling was conducted. TASC challenged this date during the DCO, but it wasn't until 2024 that SZC admitted to East Suffolk Council, to obtain a DCO Requirement discharge, that 2160 was the site lifetime. The 20-year lifetime extension makes it more likely that the OFBs will be required. It also increases the likelihood that there will be additional costs due to the need to replenish the 'soft coast defence feature' for a longer period.
20. As mentioned above, SZC is due to be constructed with a nuclear platform height of 7.3m with no flood defences on the landward western flank. Yet, as can be seen from 'Table 12' below (from Sizewell C's Site Data Summary Report, Rev 6.0 dated November 2025^{xv}, obtained by TASC from ONR under an FOI request) the 7.3m-high platform is below some of the credible maximum (CM) forecasts for still sea water levels for the 1 in 10,000 year design basis e.g. a sea level of 7.6 metres in 2105, 55 years before SZC's 3,900 tonnes of spent fuel is removed from the site. In a significantly beyond design basis (sBDB) there is a forecast sea level of 7.4m in 2115 in a reasonably foreseeable scenario.

Table 12: Summary of EHSIs over the SZC Station Lifetime [182]

Year	Site Challenge / Design Basis (m AOD) 10 ⁻⁴ p.a. at 84 th centile		jBDB (m AOD) 10 ⁻⁵ p.a. at 50 th centile		sBDB (m AOD) 10 ⁻⁶ p.a. at 50 th centile	
	RF	CM	RF	CM	RF	CM
2017 (baseline year)	5.01		5.42		6.32	
2035	5.13	5.36	5.54	5.77	6.44	6.67
2095	5.79	7.20	6.20	7.61	7.10	8.51
2105	5.94	7.60	6.35	8.01	7.25	8.91
2115	6.09	8.02	6.50	8.43	7.40	9.33
2120	6.17	8.23	6.58	8.64	7.48	9.54
2160	6.83	10.00	7.24	10.41	8.14	11.31

- 21.
22. Given that spent fuel needs approximately 55 years to cool before being suitable to place in a geological disposal facility, SZC could, because of the flood risk, be in a situation where operations may have to cease before the slated 60 years or an alternative above-ground storage facility found. TASC are not aware that any consideration has been given to this or the potential cost of the OFBs in the SZC Business Plan/VfM assessment.
23. SZC routinely advise that they have carried out thousands of hours of flood risk modelling^{xvi} but fail to mention that in a credible maximum sea level rise scenario the site will flood without the OFBs. DESNZ claim that the cost of building SZC will be 20% less than HPC, some of this due to SZC being an above-ground replica of HPC. However, HPC is a 'dry site' i.e. its 14m platform is of sufficient height to prevent it from flooding, this being in accordance with the ONR's preference^{xvii}. SZC with a much lower platform height is a 'protected site' so SZC Ltd needs to demonstrate that the entire site can be protected against flooding for its full lifetime i.e. to 2160, by use of '*permanent external barriers such as levees, sea walls and bulkheads.*'^{xviii} Being a protected site increases SZC's construction costs, as well as operational costs due to the need to replenish the shingle in front of the SZC site.
- a. Increased frequency and longer duration of droughts leading to lack of potable water
24. SZC is located in the driest region of the UK, described as a 'Serious Water-Stressed Area' with growing demands from new housing, agriculture, industrial processes etc while at the same time extraction from the local rivers Blythe and Waveney is having to be reduced because over-extraction is causing environmental harms. Despite warnings from interested parties as long as 15 years ago, by the end of the DCO SZC had still not secured a guaranteed, sustainable source of potable water, without which the plant cannot operate – the failure to identify such a source led the Planning Inspectorate to recommend

refusal of the project. Although the current plan for the operational period is for a permanent pipeline, it is still not clear to TASC that the average 2.2 million litres/day of potable water needed for operations can be sourced without negatively impacting local residents, businesses or ecosystems in East Suffolk. As the water strategy plan relies on new infrastructure being built sometime in the future and it is anticipated there will be longer, more intense periods of drought resulting from climate change, there is a risk that SZC will not be able to operate as intended, thereby impacting its commercial viability.

a. Increased air and sea temperatures

25. Climate change induced higher air and sea temperatures could have major implications for the commercial viability of SZC as both have the potential to reduce the efficiency of the plant. The Site Data Summary Report at endnote (xv) has had the information related to increased air and sea temperatures redacted on the grounds of commercial sensitivity – we suggest that PAC might like to request the redacted details due to the insight they may reveal about this added risk to the project’s commercial viability.

26. Other factors

27. In a progressively unstable world, nuclear power plants are increasingly being targeted by malicious forces – as evidenced by recent attacks on Chornobyl and Zaporizhzhia in Ukraine, Iranian nuclear facilities and Barakah in UAE^{xix}.

28. EDF’s EPR design has a very poor history with all other EPR projects (Olkiluoto, Flamanville, Taishan, HPC) having experienced huge cost and time overruns. Former EDF CEO, Henri Proglio told the French National Assembly in December 2022 that the EPR was “*too complicated, practically unbuildable*” but DESNZ chose to ignore the evidence and pressed ahead with this risky EPR project anyway. EDF were involved in all previous EPR projects - hardly a ringing endorsement of their ability to build EPR reactors efficiently. A recent Financial Times article^{xx} states, “*Last December, the Flamanville 3 reactor reached full power, 12 years after its scheduled start-up date and costing seven times its original budget*”, also highlighting that EDF’s priorities are outside the UK. With RAB funding providing guaranteed income and EDF’s small shareholding in SZC, the pressure is off of EDF to build SZC within time and budget.

29. The electricity grid is expected to be 95% decarbonised by 2030 and SZC is unlikely to be fully operational till around 2040 by when it is unlikely to help with our 2050 target. To be commercially successful SZC will need to be operational 24/7. There is the possibility that by the time SZC is generating, its electricity will be surplus to requirements at certain times of the year.

30. SZC’s costs have risen from £20billion in 2020 to £38billion in 2024, with the FT reporting that the total exposure to the public purse could be £100 billion^{xxi}. There are external studies showing low carbon electricity can be produced quicker and cheaper than new nuclear projects^{xxii}, TASC believe DESNZ have

failed to update analysis of alternative forms of electricity generation such as renewables plus storage combined with smart grids^{xxiii} and demand management (including an insulation programme).

31. DESNZ's calculations claim a substantial saving of grid infrastructure with SZC as compared with more renewables. However, it is clear from recent comments from energy providers that DESNZ's modelling is flawed and needs to be revisited to aim for a more flexible, agile grid e.g. Eon's boss is reported as saying, "*billions of pounds could be saved by relying on "flexibility": installing solar panels, batteries and offering new tariffs that would turn Britain's homes into miniature power plants.*"^{xxiv}
32. There is a great risk that SZC will be a stranded asset, because of rising sea levels, lack of uranium, or non-availability of potable water, meaning that operations have to cease prematurely. With the costs of renewables and storage continuing to fall, the excessive price of the electricity generated by SZC could make it so uncompetitive that it will be shut down early^{xxv}. Alternatively, future generations will be forced to pay higher bills to meet SZC's over-priced electricity and must fund additional flood protection measures long into the future.
33. We conclude that this highly intricate project fraught with hazards and risks, many of which are imposed on future generations, necessitates a public inquiry.

Chris Wilson on behalf of Together Against Sizewell C

ⁱ [Environment Agency response to EN6 consultation, March 2018](#)

ⁱⁱ Financial Times article, ["Residents lambast 'nuts' location of Sizewell C as coastal erosion gains pace"](#)

ⁱⁱⁱ Politics Home article, 17th May 2026, ["MPs Urge Support For Homeowners Threatened By Coastal Erosion"](#)

^{iv} [Sizewell C Marine Technical Forum minutes, September 2025](#) – see para 5.07

^v Hyperlinks to [TASC's previous correspondence with PAC](#)

^{vi} The joint guidance issued by the ONR and EA, ["Principles for Flood and Coastal Erosion Risk Management", 2022](#), states on page 3 that their 'Overarching Principle' is that: "*Submissions made for different regulatory and planning purposes may differ in detail, but there should be consistency between them.*" And then goes on to state, "*Submissions to ONR and the Environment Agency will respond to different regulatory requirements and expectations, but where they overlap in their predictions of flooding and associated effects on the site (for example, coastal erosion or changes to geomorphology), the predictions should be consistent. Differences in data, methods used, and judgments should be reconcilable and justified between the two analyses.*"

vii [ONR's Sizewell C Nuclear Site Licence Proportionate Reassessment External Hazards – 2024 \(1\) \(DOCX\)](#)

viii EDF's [‘SIZEWELL C COASTAL FLOODING ALARP PHASE 2 – FLOOD LEVELS ANALYSIS’](#), April 2015

ix EDF's [‘SZC PLATFORM HEIGHT: ALARP ANALYSIS DECISION PAPER’](#), May 2017

x In para 12 on page 34 of the above 2017 platform height decision paper, it states that *“This paper has shown that the construction costs of increasing the platform height from 7.3mAOD to 8.8mAOD is in the order of [redacted amount]”*

xi The joint guidance issued by the ONR and EA, [‘Principles for Flood and Coastal Erosion Risk Management’](#), 2022, states in the 2nd bullet point on page 8, *“Any land likely to be needed for future flood or coastal erosion risk management assets (taking into account climate change over the full lifetime of the development) should also be safeguarded from development that could prevent or hinder such works from taking place.”*

xii At the [ESNZ Nuclear Roadmap Inquiry evidence hearing on 22nd April 2026](#), GBN's CEO, Simon Bowen, in answer to Question 326 said, *“...all the learning from Fukushima was that the plant would have survived and would not have had the accident it did if the flood defences had been built to the design standards that were required. We have learned that, and we will continue to design to those standards”*

xiii Guardian article 18th December 2025, [“Massive disruption’: UK’s worst-case climate crisis scenarios revealed by scientists”](#)

xiv Relevant provisions from the current EN-1 that replaced the 2011 version includes paras 4.10.11, 4.10.12, 4.10.15 and 4.10.19. EN-6 includes various relevant provisions including paras 2.8.2, 2.10.1, 2.10.2, 3.6.15, 3.6.16 and 3.8.5. As an example, EN6 para 3.6.15 states, *“Based on the advice of the relevant Nuclear Regulators, the IPC should be satisfied that the applicant is able to demonstrate suitable flood risk mitigation measures. These mitigation measures should take account of the potential effects of the credible maximum scenario in the most recent marine and coastal flood projections. Applicants should demonstrate that future adaptation/flood mitigation would be achievable at the site, after any power station is built, to allow for any future credible predictions that might arise during the life of the station and the interim spent fuel stores ”*.

xv [Sizewell C Site Data Summary Report, Rev 6.0 dated November 2025](#)

xvi Financial Times article, [“Residents lambast ‘nuts’ location of Sizewell C as coastal erosion gains pace”](#)

xvii On Page 7, in Section 2 of EDF's [‘SZC PLATFORM HEIGHT: ALARP ANALYSIS DECISION PAPER’](#), May 2017, *‘The ONR has declared a preference for a “dry site” within their latest Safety Assessment Principles:...”*

xviii Refer to ONR preference for a dry site in Section 2 on page 7 of the document in the previous note.

xix BBC article, [‘UAE reports strike near Abu Dhabi nuclear power plant’](#), 17th May 2026

xx FT article, [‘EDF: Europe’s nuclear hope’](#), 14th May 2026

xxi FT article, [‘Sizewell C costs could hit £100bn including financing, modelling shows’](#), 2nd August 2025

^{xxii} See [100% Renewables for the UK – Report by LUT University, Finland and the UCL](#) report [‘The role of new nuclear power in the UK's net-zero emissions energy system’](#)

^{xxiii} Telegraph article, [‘How batteries can help Britain beat a £300 surge in energy bills’, 17th May 2026](#)

^{xxiv} Telegraph article [“How batteries can help Britain beat a £300 surge in energy bills”, 17th May 2026](#)

^{xxv} Bennett Institute article, [‘New Nuclear Is Too Late and Too Costly for the Climate Crisis’, 14th April 2026](#)