

To: EDF Energy

PROPOSED SIZEWELL C/D NUCLEAR POWER STATIONS & ASSOCIATED DEVELOPMENTS

SUFFOLK COASTAL FRIENDS OF THE EARTH: REPOSSES TO STAGE 1 CONSULTATION

Landscape and visual impacts

The main Sizewell C/D site, as well as some proposed associated developments, fall entirely within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, which has legal protection and which is of great value to local people. It was designated as such by Natural England for its natural beauty, its tranquillity, its 'lonely north sea coastline' and because it is 'one of the most important wildlife sites in Britain'. Natural England makes clear that the AONB sets out to protect this 'unique lowland landscape'.

The built environment within this area is predominantly old and small-scale, with medieval market towns and villages with colour-washed cottages. The economy is rural, depending on agriculture and tourism. Indeed it is this uniquely Suffolk character, along with its wildlife, that attracts so many visitors to the area. Huge power stations, high modern offices and accommodation buildings and large concrete park and rides are totally out of keeping with the traditional character of the area. Indeed, they will seriously detract from its natural beauty. Any such constructions will be very detrimental to our tourist industry.

As it is, the existing A and B power stations at Sizewell are a serious visual blot on this otherwise unspoilt, low-lying landscape. These should be decommissioned as soon as possible and the land returned to nature (as was promised to us a few years ago by the NDA at the consultation of the decommissioning of A).

It is the qualities of tranquillity and small-scale build with the visual beauty of the open landscape that need to be preserved. Indeed, not only should this landscape be conserved, but it should be actively enhanced, in line with the provisions of the designation of AONB.

Archaeological and historical heritage

The Sizewell area is rich in history and is highly valued by us as local people. It is a part of our heritage.

Archaeological excavations so far have been piece-meal, but have produced interesting artifacts, including evidence of salt workings and other ancient industries, Viking finds (especially around Leiston Abbey), medieval ovens, and part of an Anglo-Saxon ship, such as that found at Sutton Hoo.

It is crucial that both the proposed main C/D site and areas of associated development (e.g. the park and ride at Hacheston on a known Roman town) are all properly surveyed and excavated and a comprehensive archaeological and historical report written up well before any further development is carried out. Our heritage

should under no circumstances be lost. All of this should be financed by the developer.

Some of the hedgerows and field patterns are very old and of historical as well as wildlife value. These should be preserved for their landscape value as well as being an important part of our heritage.

Geological and hydrological considerations

Flooding from the sea

Many of our members have lived in the Suffolk Coastal area all of their lives and are only too well aware of the dynamic ever-changing coastline. Storm surges are a reality. The severe flooding of 1953 with much loss of life could occur again, the likelihood increased with global warming and changing weather patterns, causing more frequent sudden deluges and severe storms.

Sea levels have gradually been rising along our coast since the Ice Age, due to the dipping of eastern England as Scotland rises. Add to this the greater depth of sea as the Arctic ice melts, and it is quite obvious that Sizewell is a totally unsuitable site for two more nuclear power reactors, especially with the associated highly radioactive fuel storage.

While at present some protection is offered by the underlying sandbank off the coast, this is also moving and there is no guarantee that such protection will continue.

Flooding on land

Drainage across the Sizewell Belts and down to Minsmere sluice is already delicately balanced. Building across this area on the Sizewell Marshes SSSI will seriously upset this balance. With more frequent deluges and storms, there is a high probability of back-up, causing serious flooding all the way to Leiston. Our members in the Leiston area are very seriously worried about this. It is especially likely to occur if the Minsmere sluice has to be closed due to high sea levels, in order to protect the internationally important Ramsar site. EDF Energy must not in any way interfere with the existing drainage system.

Dewatering during construction

You admit in your Environmental Report that 'dewatering' will be necessary during construction (4.10.13). It is totally unacceptable to drain any part of such an environmentally sensitive area, especially the Sizewell Marshes SSSI, which has legal protection and is subject to the EU Habitats Regulations. Any drainage at all will upset the very delicate hydrological balance which supports the entire ecology of the area.

There is also the possibility of damage to/pollution of the underlying aquifers, an important source of fresh water. It is known that the peat here is strongly acidic. Local residents recall that land heave occurred as concrete was poured for Sizewell B. C/D will be twice as heavy. How will you guard against this?

Ecological concerns

Many species found at Sizewell and in the surrounding area, are of great scientific and public interest, and have legal protection. A considerable number are Biodiversity Action Plan Species. This means that human activity has already been so damaging that they are at risk of extinction. Not only should every effort be made to conserve these species at Sizewell, but their habitats should be enhanced to encourage their proliferation. By building these power stations you will be doing the opposite, i.e. causing severe damage if not complete ruination.

Our members object in the very strongest terms to any damage at all to these rare and precious plants and animals. We are totally opposed to any interference at all with the Sizewell Marshes SSSI.

Socio-economic impacts

Numbers of workers

We need to point out what an adverse effect EDF Energy's propaganda has had with regard to numbers of workers. We had been led to believe that as many as 25,000 jobs would be on offer. This is now down to 5,600 at construction peak, of which 3,000 will not be local, needing a campus. Added to this are those from outside the area taking up tourist accommodation. Long-term it seems there will now be only 900 local jobs on offer. Out of this it is clear that highly specialist skills will be needed, not available locally. Moreover 'local' apparently includes people willing to travel for 3 hours per day, beyond Norwich and Colchester. This is ridiculous. These places are not local to Suffolk Coastal. Our members feel misled, with the result that we can no longer trust your information.

If indeed there is to be a significant influx of outside workers needing a campus, it should be borne in mind that the population of Leiston is only around 5,500. Putting a campus of 3,000 mostly males adjacent to the town will seriously upset the demographics and is bound to cause social problems. Foreign workers will bring with them language and cultural differences. Our Leiston members recall the trouble they had during the construction of Sizewell B. This included the arrival of prostitutes from Ipswich along with the drugs and the dealers. This will be twice as bad as this proposed development is twice as large. It is intolerable to impose this on such a small country town – and even worse if the campus is to be near to the village of Theberton.

Education and skills

It is too late to start educating our school children now. They will not be ready to be a skilled nuclear worker in time. This work needs above all *experience*. No doubt these skills will be brought from France and elsewhere.

Building nuclear power stations on the Continent has relied on cheap labour from Eastern Europe. We suspect it will be the same here.

Economic outlook

Our area suffered a boom-bust scenario with the construction of Sizewell B. As supply chains disintegrated and people left to find employment elsewhere, strain was put on personal relationships resulting in family break-ups. The situation is bound to

be the same after the building of C/D. We anticipate a long-term depression after the construction workers depart.

Investment in renewables rather than nuclear power is far more appropriate to this area. These would be far less damaging to the environment and will provide a great many more long-term jobs.

Our tourist industry

Along with agriculture this is the most vital part of our local economy. Several of our Friends of the Earth members are involved in the industry, in terms of running B & Bs, restaurants etc, and their livelihoods depend on it. People come to Suffolk on account of its beauty, tranquillity and quaintness. Who will want to come if their favourite B & B has large lorries rumbling by several times an hour? If your proposals for the C/D stations go ahead, this will be a death-knell to a significant part of our tourist trade, most particularly in and near to villages such as Yoxford, Middleton and Theberton – indeed all the places along the proposed traffic routes, especially the B1122 and A1120 (a designated tourist route), also within a wide radius of the main construction site (which includes our internationally important RSPB bird reserve/Ramsar site at Minsmere along with other nearby protected sites.

You may be offering some local jobs, but you will also be putting a great many at risk. This is completely unacceptable.

Transport

Why have you not presented us with a properly worked-out traffic model? This is a serious problem for us in considering your proposals. Your projections of traffic movements are at such an early stage and so poorly thought through, that it's impossible to make well-informed comments. Or is it part of EDF Energy's strategy to keep us in the dark until the last minute – by which time it will be too late for us to consider the implications thoroughly?

Most importantly, you do not indicate which port or ports you will be using (apart from mentioning the facilities at Ipswich). The choice of either Lowestoft or Felixstowe will make a huge difference to traffic flows, and whether these will be largely from the north or the south. Moreover you give no clear indications of what quantities will be going by sea and by how much this will relieve transport by road. Our members are seriously worried that we are once again being misled into believing that the traffic impacts will be less than the reality.

The A12

We have to make the assumption that the A12 will be a major route. This is already at full capacity in and around Ipswich and Lowestoft, most particularly on the Orwell Bridge where there are frequent traffic jams. The raising of the bridge at Lowestoft already causes major hold-ups. Increase in movements by both sea and road will only worsen the situation.

Certain stretches of the A12 are quite unsuitable for very large HGVs, most particularly through the villages of Marlesford, Little Glemham, Stratford St Andrew and Farnham, as well as Yoxford. At Farnham there is a sharp bend, which you do mention in your proposals. We are well aware that villagers here would welcome a

by-pass and we are most sympathetic that their lives are already blighted by noise, fumes and hazards. These would be made significantly worse by the EDF Energy traffic.

As an environmental group, we are critical of Suffolk County Council for not having attempted to lessen traffic by providing regular public transport. Past experience shows that building more roads simply encourages more traffic. We are not in favour of any by-pass around the four villages, as it has already been turned down by Suffolk Coastal District Council on environmental grounds. It would involve ruining yet more of our precious countryside, some of which is unploughed meadow – now a rare habitat.

All in all, it is quite obvious that our road network in Suffolk is quite unsuitable for such a major development as the building of two nuclear power reactors with associated developments.

Park and rides

Which brown field sites have you investigated for these? None, it seems, yet there are some available in Suffolk Coastal. We cannot support the concreting over of our open countryside just for car and lorry parks, even if supposedly only 'temporary'. From experience, we know that once there is a change of use on land, it generally does not revert to countryside.

Northern park & rides

All of these are on green field sites and therefore unsuitable on this ground alone.

The Yoxford Road proposals will make life even worse for Yoxford residents. The A12 turn into the B1122 is already projected to be heavily used by traffic. Any further increase will be devastating for this historic village. Most particularly the hotel and wedding venue of Satis House might as well say goodbye to its business. Who will want to be married here with the noise and fumes of heavy lorries passing by?

The Darsham option is also unsuitable. Here again local businesses will be negatively affected, e.g. the garden centre directly opposite. Hazards will also be increased for villagers walking or cycling to the station and the construction of a safe footpath and cycle way from Darsham Street would be essential. Moreover, the woodland here is a protected habitat of bats which should not be disturbed.

The only positive element is the proposed re-use of the Little Chef building opposite the A12/144 junction, but this is a very small area.

Southern park & rides

The Wickham Market option is a great worry to our residents in this town, as well as to those living in Hacheston. Naturally it will increase traffic through these places. As it is, the existing roundabout is too small for huge HGVs, so there will have to be yet more land take.

It will be right next to Hacheston Special Landscape Area. Its 24-hour lighting, noise, fumes and disturbance will have a negative impact on this special landscape. Screening will be ineffective as the land is on a rise.

You mention the Romano-British settlement at Lower Hacheston, already partly excavated. Further archaeological digs would be essential causing delays and extra expense.

The Woodbridge option would be a problem for this historic town, an important tourist centre. A lorry park here cannot be condoned when there are brown field sites available in Ipswich.

The turning at Potash Corner from Scott's Lane on to the A12 is already very dangerous and causes accidents. It would not be safe to have a park and ride here without putting in a roundabout. Moreover, detailed ecological surveys would be essential before any decision is made.

Induction centre

This should under no circumstances be put on a green field site. There are many empty buildings in Ipswich. It should be located here in town.

Lorries

What about facilities for long-distance drivers? You appear not to have considered these.

In general lorries should not be mixed with cars as this increases hazards.

The only possibility for a lorry park might be option 1, next to Ransome's Europark, already busy with traffic.

There should be no lorry park on or near our AONB (option 2).

Option 3 is next to a crematorium and a most insensitive choice. This area should remain peaceful at all times.

Our preference is not to have any more lorries at all. In addition to harmful impact on local people, CO2 will be significantly increased.

Local road network

We have no means of assessing the increased volume of traffic as you have not provided a well worked out model. You anticipate 300 lorry movements a day. Our members believe that your estimate of a 5 to 15% increase is too low.

You have not added in the effect of outages when there are a further 1,000 workers at Sizewell B.

You do not discuss traffic along the A1120, a designated tourist route. It is obvious to local people that this will be used as a cut-through from the A14 to the A12, so much so that the local council has considered reinforcing the bridge at Coddenham. Here again villages along the route will be badly affected.

Projected EDF Energy traffic impacts are a huge worry to local residents. It is unacceptable that our quiet countryside should be subjected to such monstrous intrusion.

It is quite obvious to those of us who live and work in Suffolk that our local road network simply cannot support the construction of two new nuclear reactors with associated developments.

Campus accommodation

It is unclear how you arrive at these figures: 34% living at home and 2,000 to 3,000 living on campus. It is likely that more tourist accommodation will be taken up than projected, which, yet again, will have a negative impact on our tourist industry (see above).

Under option 1 (development site), it is extremely doubtful that workers would want to walk or cycle along the new access road, which will be full of polluting HGVs and other vehicles. It will be far too dangerous and obnoxious. This option is also too close to Leiston Abbey, a very fine Grade 1 listed building, and also to Pro Corda music school which depends on tranquillity.

The Sizewell Gap option is in the AONB so the campus must not be put here. Moreover it is close to the protected wildlife sites of two SSSIs and Sandlings SPA. 24-hour security lighting and traffic movements due to shift patterns will cause unacceptable disturbance.

Option 3, Leiston East, is also partly within the AONB so also not suitable. It is also next to a school which is inappropriate, and the access road crosses three rights of way.

All of these options are too problematic. None is suitable. One possible solution might be to locate the workers in a renovated Ipswich building and bring them to the site via rail on the East Suffolk line and on to Leiston. This would also help to solve the social problems that a campus near Leiston would cause.

Rail

In principle our environmental group supports improvements to rail services, especially the doubling of track on the East Suffolk line. We would also like to see a passenger service to Leiston to reduce road traffic.

Our Leiston residents are not in favour of option 1 and there are too many environmental problems associated with option 2. The red route involving night time journeys would be intolerable to residents. Additionally it enters the construction site at Fiscal Policy woodland, as does the green route, protected habitat of rare bats, which must not be destroyed.

The green and blue routes would be too close to Leiston Abbey and would cross several roads – potentially hazardous. Level crossings have caused fatal accidents in our area.

Proposed access road

It is now well established by wildlife experts that the linking of landscape elements is crucial for the well-being of wild creatures, so that they can move freely from one part of their habitat to another.

This planned access road will do the opposite; it will divide one part of the estate from another. Moreover it will cross established foraging corridors of protected rare bats, as well as a number of other species. The Bat Conservation Trust asserts that any road will act as a barrier. Continuous lighting from safety arc lights as well as headlights will be deeply disturbing and disorientating to wild creatures. The traffic itself will be a serious hazard to animals as well as birds, some of which will naturally cross over from Minsmere to the Sizewell woodland and vice-versa. Any access road would have to be securely fenced, with funnelling into tunnels beneath, so that badgers and other animals could cross in safety.

As proposed, the position of the access road cannot be tolerated on environmental grounds. There should be no division of land that supports protected species.

Wildlife

Our FoE members have the distinct impression that the Sizewell wildlife is not being well cared for. It is deeply disturbing that dead badgers have been found and that reptiles have already been moved, years before any application has even been submitted. This does not give us any confidence at all that EDF Energy will look after our wildlife and their habitats in future or take them into consideration during construction.

The consultation process

While we welcome the exhibition in our villages and the opportunity to talk directly with EDF Energy staff, nevertheless we found that there was insufficient detail. The model was misleading, as it didn't show the construction site, nor how the railways might intrude, nor make clear the damage to the Sizewell Marshes SSSI.

The 'Google earth' maps in the documents are also very difficult to follow as they do not relate to protected habitats, nor the impact of the construction site.

You do not say how these proposals compare with the National Policy Statement for Energy upon which the government identified Sizewell as a *potentially* suitable site. It is obvious that your plans have since changed and that the land take is now much larger and ecological impacts far worse.

Your questionnaire emphasises the associated developments and does not ask detailed questions on the main site. Is this a deliberate ploy to distract respondees from focusing on the main site and its ecological sensitivities?

Stage 1 is being held far too soon, before any realistic traffic model has been devised. There is virtually nothing about the jetty or sea movements or impact on our vulnerable coastline.

Your environmental statements cannot be verified by us as the research information is confidential. This is out of order. There is now insufficient time for the Wildlife Trust and others to ascertain if your statements have a sound basis, or what indeed may have been omitted.

There is nothing about the impact of outages of Sizewell B, nor how emergency measures might affect traffic and other aspects of the development plan.

What about spent fuel storage? This is another glaring omission –where, how, for how long? How does security relate to the plans?

In general we have found the consultation too superficial.