



Together Against Sizewell C

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Response
EDFE Stage 4
Pre application Consultation for Sizewell C

July 19th to Sept 27th 2019

Pages 1 to 7

Read in conjunction with stage 3 (on the tasc website under planning)

Preamble

- a) We are including our Stage 3 Response in addition to our considerations for Stage 4 as many of the points we raised then have not been addressed.
- b) We remain even more strongly opposed to the building of Sizewell C as the full concept of what may be before us is more fully understood, but as we stated at Stage 3 we feel it our duty to respond.
- c) We consider that EDF are trying to make a 32 hectare potential site accommodate two reactors. However, set as it is, in a remote marshy area bounded by many nationally designated sites, the North sea, an internationally renowned RSPB Minsmere in close proximity and within the Suffolk Coast and Heaths AONB, the planned development will result in nothing short of extreme vandalism causing irreparable environmental damage with the situation being made much worse by attempting to fit the entire Sizewell C development onto a site which is too small for what is planned.
- d) The **access road** from B1122 to the SZC site cutting the AONB in half has not been reconsidered: it will become a permanent road with lighting and noise, scarring the unspoiled landscape. We do not understand why a less damaging route has not been sought, particularly as it is to become permanent. We asked this question at each stage of consultation with no satisfactory answer forthcoming.
- e) Because of the remoteness of Sizewell, it is not easily accessible by road. Transport issues have become a paramount concern for local people. Every time there is a new piece of road, railway lines and alterations to each, we lose country lanes, bridleways, footpaths and in some instances. Well known historic routes will be lost forever causing many people to be deeply concerned about the effect on their daily lives. Their routes to work, doctors, school may be barred and in some cases their very homes are threatened.

f) There has been little if any concern from the EDF team or in any Consultation about blight. Many people will be affected, some minor and others in a very major way, from road building or alteration and rail building and traffic. There will also be a loss of earnings for some whose businesses rely on tourism. All we hear from EDF is that it will be addressed at DCO stage. There is little understanding of the stress and strain this has put on to many people over many years with the value of their property being reduced, or their earnings being reduced or lost. To employ a lawyer to fight for their rights is totally out of the reach of some people. Why has EDF not recognised this?

g) Lastly we have said many times that SZC is the wrong development in the wrong location. Therefore we will fight for it to be refused at DCO stage, but if the Secretary of State is minded to give an Approval if recommended by PINS it will be incumbent upon EDF to ensure it goes ahead with the least environmental damage. Using what is existing and not destroying so much of the East Suffolk Countryside and the quality of life which we and the many visitors to the area enjoy at present.

Sadly this is in no way reflected in many of the ill conceived proposals which make up the 3rd and 4th Consultations, many of which are purely for the convenience of EDF and do not take into account the people who live and work in this area or the many thousands of visitors. Lastly and even more galling is the total lack of respect for habitat and all flora and fauna which make up the richness of our fragile world.

4th Consultation Response

We will try to follow the Questionnaire:-

Q1 Sizewell C Proposals

- a) Our views are the same as quoted in Consultations 1, 2 and 3 and we are now even more convinced that the Sizewell C site is totally unsuitable for a building project of this enormity. The site is cramped and we note that the forward line towards the sea is way beyond the green line shown for SZB. The loss of the north end of the SSSI is yet another reason for our rejection of the entire project.
- b) In the long term, because of Climate Emergency, sea level rise and unpredictable weather patterns, it is totally illogical to build a two reactor Nuclear Power Station which will be in situ for 100 years on a vulnerable coast. As the 2008 NPS EN 6 states, Sizewell is a **potential** site, TASC says it is NOT suitable for such a development and the precautionary principle should be paramount.

Q2 Main Development site.

a) We have previously stated our belief that the main site platform is not big enough to support two EPR reactors and associated equipment. The lack of a properly grid-referenced map does not allow any understanding of the many constraints to the development, whether eastwards where the berm appears too far near the sea and out of

line with the green line of Sizewell A and B, southwards at the Sizewell B live nuclear site boundary, or westwards at the SSSI regarding loss of SSSI features, habitat or adverse ground conditions. At the north is a constraint including the northern mound defence for Sizewell B. There is no masterplan indicating any buildings common with Sizewell B and no indication of how the site will be accessed in the early years. The use of a causeway to access the site at final site platform level is not acceptable as it will restrict the freedom of movement of wildlife. The inclusion of buildings for spent fuel storage from SZC at this AOD level may not be acceptable. The Dry store for SZB is on the SZA platform at 10metres AOD. The raising of the SZC platform above that of SZB would also increase flood risk to SZB. The principle of raising of flood defences for SZC in response to sea level rise over years is not acceptable and against National Planning policy guidance. There is no evidence that the borrow pits have sufficient material of the correct grade and specification for use on the power station and nothing to give confidence that consequently more transport to or from the site onto public highways will not become necessary. The consultation makes no mention of the essential need for town water for construction and operation. There was no attempt made to answer this question satisfactorily at the consultation events.

Q3 Pylons

a) All options are unacceptable in the AONB, designated for its landscape quality. They will be seen from a great distance, particularly from the north including Southwold harbour. Therefore it must be the least intrusive option and which is the least damaging to the SSSI.

Q4 Freight

a) Our main concern is that the Severn Hills Freight Site and its traffic should not impinge on the daily traffic to the Crematorium.

Q5 Transport of Freight Road or Rail

a) As we stated at Stage 3 **we support the Rail led strategy** and the Green Rail line. However we are concerned that until the Green line is built the existing rail line is to be used. We believe that the option of keeping the siding facility to the north side of the Sizewell Road is the best option, thus moving it further from existing homes and not having to close the Crossing gates on the King Georges Avenue.

b) However this option does mean that the trains will be passing close to houses in Westward Ho and Carr Avenue. Overnight trains must be avoided. The closure of the crossing gates on the B1122 will require careful consideration to avoid traffic build up during busy times at am and pm.

There is also concern for the strength of the Valley Road Rail Bridge, which must be upgraded.

Therefore, while we object to SZC, we think the rail led strategy is possibly the least damaging to the environment of East Suffolk.

One of the reasons we grudgingly support this option is that, in years to come, a Leiston Station and Passenger Line may be acceptable near the Eastlands Estate.

Q6 Link Road and By-Pass

- a) We do not support the A12 Sizewell Link Road as it will cause far too much destruction to the existing countryside, family farms and country lanes, and will introduce pollution, light and noise into otherwise quiet areas which are ecologically rich. The suggestion of its removal when SZC is complete beggars belief. It must not be built in the first place.
- b) We believe it is for the people of Theberton and Eastbridge to consider if a bypass gives the relief which they need. Again it will introduce light pollution and noise into an area where none exists at present. It will undoubtedly be heard in the village.
- c) If it is the wish of the Theberton and Eastbridge Community to accept the bypass, we consider much more thought should be given to the existing community and their patterns of travel when leaving and entering the village, in particular Moat Road and Pretty Lane crossings. What is suggested at present is not acceptable; priority is given to EDF traffic and not the people who use the roads to access Saxmundham, their places of work and in some cases to tend animals. Priority should be for the local people. It also affects well-used footpaths and some listed buildings. We suggest much more work is needed if this plan is to be acceptable.

d) Where is the plan for traffic management on the existing B1122 at Theberton, with or without the by-pass? Pavements, crossing points and speed monitoring as cars and vans will continue to be required for safety of all users. Theberton and Eastbridge PC should be asked by EDF to input into a Traffic Plan for their village.

Q7 Road Improvements

a) 2 Villages By Pass

The A12 Farnham bend has long been a problem, however the two villages by-pass does not appear to be the correct solution, passing close to listed buildings and cutting off part of the village.

The roundabout to the Northern end seems excessively large and too far to the East. We believe there are better solutions, but have no other comment.

Consideration needs to be given to traffic management for the existing A12 in Farnham and Stratford St Andrews and the businesses that rely on passing trade.

b)Yoxford Roundabout

We do not understand why the Village of Yoxford has not been considered as a total unit. The A12/A1120 junction is in close proximity to the A12/ B1122 roundabout with the

village sited either side of the A12. We believe the proposed roundabout, in whatever position it is in, will cause problems for the village if that stretch of road is not treated as a whole package. The problem of speeding cars on the A1120, passing by a school and well-used shop and church, will be exacerbated by Sizewell cars and vans.

A traffic management plan for Yoxford Village must be undertaken in cooperation with the Parish Council.

Q8 Siding at Sizewell Halt

We strongly object to Option 1.

We prefer Option 3.

Further comments have been made at Q5.

Q9 Park and Ride Darsham

- a) We have concern that Willowmarsh lane may become an access road for cars, vans etc coming from their lodgings to the park and ride site. Several farms and houses all need access to this narrow road. How is this to be managed?
- b) The assumption is that abnormal indivisible loads are coming from the north/south A12 to access the roundabout and while they are making that manouvre along with other vehicles trying to get to and from the P and R site it could cause a back up on the A12. It is unclear the point of origin for AIL and whether these routes take account of the needs of any other users.
- c) What will the consequences be for Darsham village whose main access is just a few yards south of this access roundabout? Once again, it seems that all thoughts are for EDF traffic with little or no thought for local people.
- d) We do not think enough work has been done to push the EDF P and R boundary back from Darsham Cottage and Moat Hall. The effect on these two properties and to a certain extent White House Farm is deplorable.

e) It would appear that there is no pedestrian access at the southern end of the P and R site to allow rail passengers to access, or to allow workers on foot to access the services on the opposite side of the road. This may need a new crossing facility.

Q10 Consultation Process

Not all sites stated in the SOCC were visited.

Some venues were inaccessible for people with disabilities.

No facilities for people with hearing or visual difficulties.

Some staff were very rude.

EdF representatives told consultees that there was a solution to radioactive waste management when this is not the case, creating a false impression that one of the most critical issues facing a host community had been solved.

People were left for up to 15 minutes awaiting answers.

Some people were promised written answers which never arrived.

Maps were, and are, lacking in road numbers and contour lines.
Map legends are difficult to see and decipher.

Further Observations and Unanswered Questions

Following on from Stage 3 when so many questions were asked, more details of these are still not forthcoming at Stage 4.

- 1) Total lack of EIA information. Not available till DCO.
- 2) Footprint plan of total Nuclear Site Not available till DCO.
- 3) Replacement mitigation for Fen meadow SSSI. Far too little information on either Site 1 or Site 2. This type of habitat is irreplaceable.
- 4) Replacement habitats for Marsh Harriers.
This is unbelievable. Marsh Harriers forage over these areas at present, and it is not only Marsh Harriers but many other BAP species that will be disturbed. The destruction of habitats is proving to be the worst situation for all species and should be avoided - not a satisfactory solution.
- 5) The Fish entrainment at the cooling water intakes is still unknown.
(Hinkley C proposals is still under discussion and not agreed.)
- 6) Potable Water quantity and source is still unknown and still under discussion.
- 7) Sewage Plant for SZC, where is it to be situated and where is the disposal route and final discharge point is still unknown.
- 8) Dry Fuel Store: size, location, and how spent fuel is to leave the site still unknown,
- 9) Beach Landing Facility transport to the site: how is this to be undertaken?
- 10) Beach frontage. The Green Line as agreed for SZB is not being adhered to, the berm is too far forward of this agreed green line. How is this to be addressed?
- 11) Disposal route for de-watering?
- 12) Traffic Management Plan for Leiston Town?
- 13) Policing the area? Traffic management and how to accommodate the influx of employees?
- 14) Monitoring of accommodation need and usage?
- 15) Monitoring water levels on Sizewell Belts and Minsmere levels?
- 16) The claim by EDF that CO2 emissions from SZC life time are very low are not disclosed or proven
- 17) It has not been proven that the benefits of SZC outweigh the dis-benefits. The socio-economic case only points out the perceived gains but says nothing of the loss particularly for a decrease in house and business values.

In conclusion.

TASC Objects to the EDF SZC Project. For all the above reasons and those stated in our Stages 1, 2 and 3 responses.