

EDF Energy
Stage One Consultation
for Sizewell C
November 21st 2012 to Feb 6th 2013
Response to the Consultation
from
Communities Against Nuclear Expansion (CANE)
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IP164HT

CANE Aims and Objectives

The purpose of the group is to protect both people and the environment from inappropriate development now and in the future and from the risks and dangers of radioactivity by preventing any further development of nuclear expansion in our communities.

To this end the group has five broad aims:

- 1.to raise public awareness of the potential consequences for health, environment and safety regarding proposals for new nuclear development,
- 2.to identify key issues of concern and to gather credible and responsible research and information to pursue the case against nuclear power development,
- 3.to challenge any proposals for future nuclear expansion at the Sizewell site, presenting robust evidence and arguments to local and national decision makers, regulatory bodies, the nuclear industry, non government organisations, environmental agencies, the media, the general public as well as to local industries,
- 4.to support the long term protection and conservation of the Sizewell coast which includes Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest,
5. to call for an open, transparent and deliberative decision making process in which local communities are afforded full access to all information and involvement in key decisions affecting them.

Our response will concentrate on CANE objectives 3, 4, and 5

Summary

We believe that the consultation period 21st Nov 2012 to Feb 6th 2013 is insufficient, particularly as this was over the Christmas and New Year holiday periods.

The maps and the indicative plans are very difficult to comprehend with no grid references, and very few location points for reference.

We also consider that for many very important issues EdF Energy has failed to submit the evidence and data needed to come to satisfactory conclusions.

This is particularly noticeable for Transport proposals and for Environmental issues

It is also very scant on crucial details of other important factors.

So much so that we are not able to give any conclusive answers and reasoned judgement for the suggested options.

For example

Permanent Access Road. This is a very controversial aspect of the proposed development; it will introduce light into an otherwise dark environmentally sensitive area. Yet there is no mention of how this will be managed. No details of numbers of HGVs, Cars, large plant etc which will use this proposed Access

Transport The Jetty, we can come to no conclusions as to the environmental damage to the coastal processes, the studies to date are inconclusive.

Environmental. SSSI. Loss of habitat and species here we can see no suggestions for replacement of habitat or for water management.

Local Population The documents are also very weak in their considerations of the local population of Leiston cum Sizewell and the surrounding villages and environs.

Traffic management For example there are no details of traffic management for Leiston cum Sizewell, for Leiston Town itself, or the traffic management of the B1122. Only those for the Sizewell C transport requirements.

These are just a very few of our concerns and where there is not enough information to form a comprehensive response. More will be seen in the body of our submission.

In summary we firmly believe there are far too many unknowns and missing elements of the Consultation for a proper response, we feel that the 1st Consultation is flawed and has not fulfilled its purpose.

We are requesting more detailed studies, and evidence to enable EdFE to carry out its duty so that a comprehensive Stage 1 Consultation can take place.

Major Issues

Permanent Access Road. Length 2.2 kilometres.

The area shown is not the same as the area shown on the NPS EN6. It is a much greater land take and should not be considered as the only option. Other options to access the site must be considered and consulted upon.

The access road as shown

Sir Frank Layfield recommended to the Secretary of State in 1986 that *“crossing through this sensitive area of land an access road to the site should be refused because it would fragment the area”*.

The then Secretary of State ruled against the Access Rd.

Time has moved on but the reasons for refusal still stand. The environment has changed very little since then and because of the good management of Suffolk Wildlife Trust in some areas it has actually improved. It is even more important now to protect these quiet undisturbed areas where there is little light pollution, no noise, and only agricultural vehicles passing by. This is an East Suffolk habitat which is rare and which is full of BAP species of flora and fauna. Including rare bats. Who forage over a very large area, light pollution 24/7 should not be introduced into this area

Introducing a building regime and traffic into this area over many years is nothing short of environmental vandalism. Nothing can mitigate or ameliorate the intrusion.

It contravenes the EU Habitats Directive.

We also query the assumption that being in the AONB that IROPI operates as other options are available and should be explored

We therefore request that other Options are considered and put into the Consultative Document

Further permanent Access Road Issues

The suggested route is on rising ground and as such will be visible particularly at night through 360degrees. Which include the hamlet of Eastbridge, the National Trust property at Dunwich, the RSPB Internationally Important Bird reserve and from the beach at Sizewell, It will also contribute to sky glow.

We request that more studies are undertaken as to the most environmentally sound method of lighting for any permanent road. This should be undertaken for any possible route.

Permanent Access Road at the entrance point into Sizewell C site and possible flooding Issues (approximately TM 472 645)

The suggestion that at this point all water should be piped and then built over to allow vehicular access via a bridge needs much more consideration and other options given for the following reasons

The current proposals for this area are very difficult to comprehend.

The area to the north and west of the proposed Sizewell C is marsh land with the exception of Kenton and Goose Hill. The point at the north/ west corner of the proposed site is a SSSI. It is here that it is suggested by EdFE that an access road is raised up and a bridge formed over the water courses. This point is a pivotal area for several water courses, which carry out the purpose of drainage for the Sizewell Belts, Leiston River (ditch) and Leiston beck. Leiston River carries the treated water from the Leiston sewage works, which includes all the rain water from Leiston catchment area leading to Minsmere sluice.

North of the proposed access point are Minsmere Levels and the RSPB Bird reserve, where there is a constant battle to maintain the water at a sustainable level.

This leads to the significance of Minsmere Sluice.

This is the only point of egress for all the water courses, from Sizewell Belts, Leiston River and sewage works, Minsmere Levels and the Minsmere Cut and River, all of which converge at Minsmere Sluice. With sea level rise, and more unpredictable weather patterns, at times the sluice gates will need to be shut to prevent sea water inundating the marshes*. At the same time there may be unpredictable storms and fluvial flooding inland. Any piping of the water courses which would be expected to manage either fresh water or sea water may mean that Leiston itself will be inundated.

Leiston sewage system which was built in Victorian times even now has problems with getting water away from the town. The marshes are liable to flood to a depth which could render the sewage works inoperable. The access road and the access bridge are to be a permanent feature, we therefore submit that the consideration of allowing a permanent access and piping water in perpetuity at this point could have a very great detrimental effect on the future water management of the area, and is not acceptable for all the above reasons.

It would also entail permanent lighting impact site in a higher position on the elevated bridge on NT Dunwich Heath, RSPB Minsmere Bird Reserve and Sizewell beach) and to all designated sites.

* See Environment Agency Web Site

We therefore request that studies are carried out to enable options, for the least environmentally damaging access to the site which will ensure that flooding possibilities are kept to a minimum .

Other buildings adjacent to the Access Road.

These will take up a further 300 hectares of AONB. We believe these areas are outside the area nominated in NPS EN6 and as such alternative sites should be given as options which are outside the AONB.

Visitors Centre

There is no need for the Visitor Centre to be alongside the Site Access road in the AONB. We cannot see that it is in accord with IROPI. We submit that further consideration should be given to the sitting of the Visitor Centre, particularly to where it could be of a greater economic value to Leiston. We do not agree with the other options given.

Permanent Jetty In take and Out flow of sea water

The size and scale of this proposal as suggested, is totally out of keeping with the Heritage Coast and the AONB.

It is a Landing facility calling it a Jetty is disingenuous

Have all the environmental considerations been crossed matched for the different loads and for the differing modes of transport which would ensure the best environmental options for transporting loads.

It may seem like a good idea for removing bulky traffic off the roads or rail but needs much more careful consideration. Here we are making judgements which will encroach on one of the most rural areas of coast for long into the future.

We do not have the knowledge or cast iron predictability of the coastal processes to make judgement when there are so many unknown factors. Even the best experts on Coastal Management disagree on the effects of such an undertaking.

We have no doubt that modern engineering can ensure a permanent landing facility is a possibility in this position on the Heritage Coast of Suffolk and that it could be built and dredged, allowing ships, or barge loads access to Sizewell C site. It would of course mean constantly dredging the sand and gravel banks to form and keep open the channel, because of the dynamics of the coastal drift of sediments.

Human interference to the coastal processes in this area are totally unpredictable. Many eminent people have considered all the scenarios of low pressure, high tides, surge waters, following winds, shifting and loss of

sand banks, and now climate change etc, and the probabilities of interfering with the natural processes.

This could mean that in years to come or even in a decade, engineering solutions would have to be undertaken to prevent sea incursion not only at Sizewell but also on the coast from Dunwich to Thorpeness and further impacts on the Shoreline Management Plan for Suffolk.

To date this has not been fully explained or any suggestions given as to how this would be engineered, in the realms of sustainability. Also is this the best environmental solution to the traffic issues, are there other less unpredictable solutions.

There is also the prospect of the intake and outflow of sea water when the two plants plus Sizewell B plants are running. We should be told how this will influence the Coastal processes.

We therefore cannot make a judgement on the Jetty proposal, and would wish to know the answers to the many questions of which the above are just a few.

Beach Area Bent Hills and Foreshore

The traffic and heavy plant which will be needed to transport all the loads from Jetty to Site back and forth will cause permanent damage to the SAC and mean a hard route will have to be formed across the beach and foreshore. We are not told how long this will take place but if the Jetty/landing facility becomes permanent then it will remain as a necessary route for traffic. It will also mean the Heritage Coast path which is a RoW will be closed off for a period of time, and when it is open it will mean that for Health and Safety reasons it will have to be fenced and with gates, as will the area of beach, bent hills and foreshore.

This is an area widely used by locals and visitors alike and contributes to the tourist trade. It will become a no-go area as it did for Sizewell B.

We submit that figures should be given for loss of amenity to local people and visitors and also for the time it is likely to take to return it to the present state.

We request that more detailed information is given for this complex area. Also for the way it is to be fenced and secured.

Hostels etc

We contend that the large block of these facilities to house up to 3000 in the suggested areas are totally out of keeping with the landscape, they are far too large and will have no future use for local people. They will have to be lit

24/7 and will also cause noise pollution wherever they are sited. Particularly galling is the fact that they will be demolished when no longer needed, causing even more noise and more pollution. The suggestions are so flippant and appear to have been just thrown into the pot as Options. No mention of how all services will be managed including the sewage removal

Option 1

This is totally for the convenience of EdFE with no consideration given to the local people particularly those from Theberton and Eastbridge, which have a total population of no more than 300. It is not appropriate to even consider such a development on their doorstep, which along with the access road is a total blot on the landscape. It will also cause a problem for people wanting to use the B1122.

Options 2 and 3

As before these are too large and contain far too many people and are totally inappropriate. Leiston cum Sizewell people deserve much better.

In conclusion we would want to see some more solutions to the need for accommodation, the size and quality of design, and the options for where such facilities may be sited and future use.

B1122

We believe that Sizewell C should not be built for many reasons, one of which is the transport problems it will bring to the area. Which ever route or means you decide upon.

We do not agree with building new roads in the East Suffolk countryside. We believe the B 1122 is unsuitable and would need major alterations to carry the bulk of the traffic. We realise and understand the discomfort and sadness for the people of Yoxford, Middleton and Theberton knowing they would have to suffer the constant disruption of all types of traffic, impacting on their lives 24/7 for over 10 years. Therefore a programme of management for Middleton, Theberton and Yoxford should be worked up with the communities giving them every consideration.

Even if other routes are considered, much more thought must be given to alleviate the problems on the B1122 overall which will undoubtedly ensue. People who could be affected, must be engaged in considering options best suited to them. A management plan for the B1122 overall must be considered

Queuing which could occur if Option 1 for a hostel is agreed along with the entrance to the Access Road must be considered as a stand alone traffic management plan and widely consulted upon. To ensure all local people access to all the local amenities, work, services and schools in Leiston, Also for tourists (if there are any left).

Rail

We believe Option1 existing rail plus an extension for the rail head onto the field bordered by Lovers Lane, Valley Road and King Georges Ave is the only acceptable option. Again we do not want to see further destruction of the East Suffolk countryside with more railways and the accompanying noise and light pollution.

Road proposals

A 12 improvements we feel these are for the people most affected to make comment.

Park and Ride

We make no comment except to say that much more is needed to be known about the constant use 24/7 lighting and access into the sites. We believe the A12/ A144 Site to be totally unsuitable. It is a known accident spot.

What is missing from the Consultation ?

Dry Fuel Store Where will the Sizewell C two reactors High level waste be stored when the pond is full.? We have just had to accept a Dry Fuel Waste Store (100metres by 50metres) for B Station as the pond will be full by 2015, there is no other facility for this waste.

Sewage Works The Sizewell A and B sewage works was built in the late 1950s. We are told it will have to be replaced. Where is it to be situated given the cramming on the Sizewell C site, and its sensitive location.

Desalination Plant, as East Anglia is known as one of the driest areas of the Country, and the absolutely vast quantities of potable water needed for two plants +Sizewell B. Where would this facility be situated if it is needed in the future?

Conclusion

Sizewell C Site with two reactor buildings and associated problems

In conclusion and here is the crux of the matter. The Government has suggested in NPS EN6 that Sizewell is a potentially suitable site for development of a new nuclear power station.

We submit that all the issues above tell us that the site is not at all suitable. The scale, form and setting of two EPR nuclear power plants and their associated works in this very rural and remote position in East Suffolk and on the Suffolk Heritage Coast in an AONB, with so many environmental designations is appalling in pure planning terms.

The site designated for the two EPRs is not big enough to take all the buildings needed, which is why some have spilled over into the SSSI and outside the designated area in NPS EN6. Also causing issues for the water management of Sizewell Belts and Minsmere Levels.

The many millions of tonnes of concrete and 5500 persons needed to build such an enormous undertaking in this vulnerable and beautiful area should not be contemplated.

It is so remote that a permanent access road is to be built, in the Suffolk Sandlings over a SSSI and AONB. Slicing through a corridor for wildlife. We are told the access road is at the demand of the Office for Nuclear Regulation in case of an emergency.

Local people can contemplate for over 10 years at least, greatly increased road use, associated developments, hostels, rail extensions, lorries parks, and park and ride sites, and a permanent jetty/ landing to bring in abnormal loads and to take away peat and clay from the excavation. Lighting, noise, dust and constant traffic for so many years into the future 24/7. Cannot be ameliorated or mitigated against. The overall effect on local people, their well being and quality of life cannot be accounted for or quantified

All the above issues and many more show that EDFE are trying to pour a quart into a pint pot and EdFE Consultation Documents show the development spilling all over the East Suffolk Countryside.

The price to pay and the irrevocable damage to this unique corner of our green and pleasant land and to the people that live here should not be considered at all.

At the very least we would expect far better consideration to be given to sustain our way of life, our countryside, the flora and fauna, and the people who live work and play in the area.

