



# Together Against Sizewell C

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## Response

### EDFE Stage 3 Consultation for Sizewell C

4<sup>th</sup> Jan to March 29<sup>th</sup> 2019

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#### Preamble

**TASC is strongly opposed to the building of Sizewell C.**

**But we feel it is our duty to respond to the 3<sup>rd</sup> Consultation**

a) Many of our members have lived in East Suffolk all their lives. It was so obvious to TASC at Stage 1 consultation that a building project of this magnitude in the proposed situation on the coast at Sizewell was going to cause massive environmental, societal and untold disruption in and around East Suffolk.

b) However we had no idea then of the magnitude of what is now suggested for our area. In trying to make the project fit and pacify people who have quite rightly shown concern we believe the 3<sup>rd</sup> Consultation has shown us all exactly what devastation is to be foisted upon us.

Disrupting everyone's way of life, rural roads, beach and coastline, walks and bridleways, the special environment and the tranquillity which people who visit from far and wide require for their health and well being.

c) We have no doubt that EDFE have considered some aspects of the 10 to 15 year building project and the eventual impact of 2 nuclear reactors on the Heritage Coast and we recognise the work undertaken over the past two years to present the latest round of Consultation.

d) EDFE has tried to paper over all their cracks and have failed dismally. In trying to make the project fit into this unsuitable area the project has spread over a much larger area. EDFE know, as do the Government and our elected leaders, exactly what devastation is to befall us, having seen the problems and disruption at Hinkley Point C. The propaganda is all about selling the project and we hear over and over again of the economic benefits, the well paid jobs, apprenticeships, but very little of the environmental destruction or of the damaging effect and problems it will have on the local population for 12 years.

**TASC is more convinced than ever that the Sizewell C potential site is totally unsuitable and the list of environmental and societal dis-benefits far outweighs any perceived benefits. We are aware that BEIS is consulting on a revised NPS EN6.**

**Since its first publication in 2008 there has been a great deal of development in alternative means of generating electricity and the cost of wind and PV solar are continuing to reduce. Notwithstanding the SZC location is nominated as a potential site in the existing EN6, why is EDFE pursuing such a profoundly sensitive site at Sizewell with its many environmental hurdles, in such a remote spot in an AONB and Heritage Coast with unsuitable means of transport? SZB spent nuclear fuel is stored at Sizewell, We are very concerned at the prospect of additional spent nuclear fuel being stored from SZC for the lifetime of the plant and beyond. It would appear that EDFE wish to go ahead with their plans however impossible, and the existing population and environment will have to live with the total disruptive consequences if Planning Consent is eventually given by the Secretary of State.**

### **Consultation Response**

TASC will attempt to answer the SZC Consultation Questionnaire in the order in which they are set out. But as it is such a vast subject we may stray off the path from time to time and may add relevant subjects.

### **Q1.Sizewell C Overall Proposals**

a) The Government proposals in the National Policy Statement EN6 2008 and adopted 2011, states that Sizewell is a potentially suitable site.

b) At the EDFE Stage 1 Consultation November 21<sup>st</sup> 2012 to Feb 6<sup>th</sup> 2013 CANE/ TASC stated that the SZC site was totally unsuitable, as it is set in the AONB with many other environmental designations. To make the site accessible and because of its remoteness EDFE included an Access Road to the site which would split and divide the AONB. Causing massive environmental damage to Sizewell Marshes. TASC asked at Stage 1 and Stage 2 why this route was chosen and asked that alternatives were proposed, this has not happened. We were told by EDFE it was chosen for safety reasons. This has not been verified by anyone other than EDFE.

c) Now at Stage 3 all that was said at Stage 1 and 2 is still true, The Nuclear site when completed will be a massive blot on the landscape of the AONB. The access road is to be a permanent two lane carriageway of approximately 3km length; it is not compatible with the AONB designation.

Changing it to single carriageway when the SZC project building work is complete is not satisfactory as it will continue to compromise the AONB.

d) We recognise that EDFE have tried to make Sizewell C fit in this beautiful area of East Suffolk, but with two reactors, access road, batching plant, an area for road and or rail deliveries, with lighting, noise, dust and untold pollution, including damage to the coast and beach area, they have failed miserably.

**TASC opposed SZC with two reactors in 2013 again in 2016 and we strongly oppose it now in 2019. TASC firmly believes the access road and the 32 hectare proposed site is not a suitable area for this development.**

**Q2. Main development site.**

a) We submit the site of 32 hectares (as quoted by Jim Crawford at the Community Forum on 23<sup>rd</sup> January 2019) which includes the loss of 5+ hectares of SSSI. The increased intrusion of the site to the east on the bent hills / coast line adds to the cramped overdevelopment of the site. TASC submit the 32 hectare site is not large enough for everything which is needed for the operation of two nuclear reactors.

b) Raising the SZC platform height, causing it to be higher than the SZB platform raises the profile of the buildings in the long distant view of the AONB landscape, and will dominate the Heritage Coast.

c) The design, scale and colour of the two reactor buildings cannot be altered, due to the GDA. They will be offensive to the visual appearance in the AONB landscape and are not in any way compatible with SZB.

d) The two turbine halls will be overpowering, being an unsightly form in the coastal scene and adding to the total industrialisation of the site. The 4 dominant pylons which appear to be higher than the other proposed buildings and reactors, add to the massive visual intrusion on the Heritage Coast. This complex of industrial buildings, pylons and overhead wires will be a blot on the landscape when viewed from the North Sea and many other points in East Suffolk.

e) At Building Stage for 12 years and when the Station is operational the impact of light into this area and for the Access Road is totally unacceptable. It will have a damaging effect on many species of night flying insects and bats.

f) This also applies to the noise pollution, until EIA we do not have details of how this may affect species in this sensitive area.

**TASC oppose the proposals for the potential SZC development. The site is unacceptable on all environmental grounds, the visual intrusion to the Suffolk Coast and Heaths AONB landscape, and it despoils the designation of the Suffolk Heritage Coast**

### **Curtain Wall**

a) When the Curtain wall is built there will be a need to de-water the site, any water which is pumped out will be highly acidic, and it was mooted that it may be pumped into the North Sea or the existing water courses. To date we do not have this information, but neither of the possible discharge routes is acceptable.

### **Excavations of Reactor Sites etc**

a) The excavations for the reactor sites will cause massive amount of peat, clay and other materials to be removed off site. We have asked but do not have information as to the quantities. Transport of this highly acidic wet peat, clay spoil off site is in itself an environmental hazard.

b) Carrying it by lorry or other means across the marshes to dump it on fields in the open landscape is nothing short of vandalism, causing run off and water pollution to foul the delicate water quality needed for the well being of Sizewell Marshes and Minsmere levels.

We are told there will be a water management zone via the drainage strategy but to date it is not available.

c) The fact that borrow pits are to be dug in the AONB in which to eventually place materials stated above has not been properly assessed, and may create more problems for ground water and the water table elsewhere.

We believe more work should be undertaken before we are convinced that the materials extracted from these pits are suitable for the required use, and in sufficient quantities to make all the proposed disruption acceptable. Proper assessment is needed to understand how the water in this area is to be managed; we are told that a Water Management Strategy will be presented with the DCO. Being aware that environmental damage, additional CO2 and visual intrusion may occur and acidic water leached into the surrounding environment or depleting ground water from other areas, and unsure of the materials to be extracted

**TASC strongly object to the borrow pits as we do not have sufficient data for the above points.**

### **ACCESS Road and ancillary buildings and Causeway**

**Which covers the width of the AONB.**

a) TASCs objections are strengthened by the realisation that to build on the potential SZC site will cause much environmental damage, exacerbated by its remoteness. The damage will stretch the total width of the AONB and the area now being considered is not as stated in the 2011 adopted NPS EN6 Document

b) The Access Road is to be a permanent carriageway of approximately 3km length; this is not compatible with the AONB designation. It will divide the AONB and restrict free movement and breaking up the corridor for wildlife, it is totally contrary to the 25 Year Environmental Plan. Adjacent to the Access Road is a lay up area, which will be the junction for lorries and rail to off load all building materials including many thousands of tonnes of aggregates, cement, to be delivered to the concrete batching plant, plus all the water it will need and the steel etc. [We have asked EDFE but as yet do not have the tonnage figures.](#)

c) All the building materials including the millions of tonnes of concrete will be transported onto the SZC site via the causeway. All sited in the AONB and in a delicate marshland habitat, including the SSSI and in close proximity to RSPB Minsmere. The noise, light, and diesel pollution 24/7 is totally unacceptable in this sensitive location. We believe this damage must not be tolerated.

d) TASC believes only one criteria is correct for the AONB and that is **avoid** as there is no possible mitigation for an area of wet lowland which has taken hundreds of years to develop and which contains a multitude of flora and fauna, which is impossible to replicate.

How could EDFE compensate future generations for the loss of such a precious habitat and wildlife sanctuary?

Aldhurst Farm Habitat Creation does not compensate in any way for the loss of Fen Meadow and 5+hectares of SSSI.

**TASC therefore objects in the strongest possible terms to this total disregard of the AONB designation with its unique habitat, flora and fauna, the SSSI and close proximity to a RAMSAR site and internationally renowned RSPB Minsmere.**

**We repeat once again that no other Access Road has been considered by EDFE.**

**TASC does not accept EDFE reasons for this route, it is not, as they suggest, verified by other organisations and the fact that is the shortest does not mean it is the least damaging.**

**It is incumbent on our Councillors, and Government Ministers to have “A Duty of Regard” to the designated AONB landscape and insist that EDFE reconsider this environmentally damaging road, associated ancillary buildings and workings, in the AONB and that to proceed with SZC EDFE must consider an different route.**

e) **Causeway** as the Access Road has to cross several waterways it is suggested this will be by a causeway to cross the SSSI. This is not an acceptable solution.

All water that drains through this causeway/ culvert is collected from a wide catchment area, including the whole of Leiston town. The Leiston sewage works depends on the free flow of water down to Minsmere Sluice. It is known that the area around the Sizewell complex is in the Environment Agency Flood Zones 2 and 3. When Climate Change predictions state that heavier and more frequent rain storms become reality, there is the need for all water to have free flow to the sea via the Minsmere sluice or it will take up the entire flood zone. We firmly believe EDFE has not given enough consideration to Leiston townspeople and what may happen if Leiston Sewage works is inundated. It is also a concern for Eastbridge homes and businesses as they depend on any outfall from their septic tanks having free flow to the sea via Minsmere sluice.

**TASC therefore strongly objects to the Causeway as a way of crossing the SSSI and to this form of water management, and reiterate the comments made concerning the Access Road.**

### **Q3) People and the Economy**

a) TASC believes that we have the experience of SZB to remind us of all the promises made before. “Leiston was to become a boom town” but they forgot to say after boom comes bust.

We believe that our area of East Suffolk should not have to be burdened with the economic well being of the County. There will be long term pain with very little long term gain. 900 permanent jobs coming after 12 to 15 years of total disruption is not a worthwhile legacy.

Would someone explain where are the 900 people who are to fill these posts ?.

We recognise that during the build programme jobs will be created, and equipment and materials will generate a profit for some, but we question who and where those Companies and Businesses who will benefit are. We have low unemployment in this area, albeit some work is low paid.

However as stated above having experienced the boom /bust from previous experience this causes many other problems. People quitting existing jobs leaving employers with staff shortages, higher wages for short term contracts then not being re employed and ending with debt. History will repeat itself.

**b) Apprentices** are always to be welcomed but they need to be generic NOT in New Nuclear. The nuclear industry is going to become obsolete

while there will be plenty of work in dismantling what exist now. Not a rosy future for young people.

**c) Tourism** is the life blood of this area from Lowestoft to Felixstowe, the attraction is the lack of motorways, the coast and heaths, fantastic countryside, architecture, nature reserves and the peace and quiet of the area and the quaintness of East Suffolk.

Many people are employed in the tourist industry and after 10years at least, will the tourists wish to return? It denies those who need a quiet retreat to recharge their batteries particularly from London and its environs.

**This is a case of the many disbenefits far outweighing any benefits and the case for the Project has not been made.**

#### **Q4) Accommodation Strategy**

With the number of workers coming to the project rising from 5600 originally, to over 7900, we are concerned as to how this is going to be physically managed. It will mean a great imposition on the roads even with the Park and Ride sites. As some of the increase may be due to road and or rail building we can only assume some of the 7900 will be for this purpose. We cannot think the strategy EDFE are suggesting can in any way be controlled, neither do we understand the Consultation Doc.

Volume 1 Fig 4.1 and 4.2 graphs as they appear to make no sense. But common sense says that this amount of people cannot be accommodated in the East Suffolk Area. If they are set farther out then there will be more traffic on the roads.

We do not wish to see similar experiences to those of SZB and even at outages of sleeping in cars on the side of the road, or three or four people knocking on doors at all hours trying to find a bed for the night.

#### **Q5) Temporary Campus and Caravan site**

**a) Campus** We understand the need to keep these close to the actual site to avoid more traffic on the roads. As stated in EN1. The reason they are in this rural position is due to the fact that they are linked with the Access Road. The campus location may also affect the emergency plan for Sizewell B (SZB).

**TASC believes the plan for the Access Road in its present position ensures the Accommodation Blocks are also wrongly sited.**

The Accommodation Blocks will increase noise and pollution and have a detrimental effect on the Grade 1 Listed Building Leiston Abbey.

To site the workers accommodation and access road roundabout off the B1122 with the amount of heavy traffic, the roundabout will have a major

detrimental effect on B1122 road users. This is a major Large Goods Vehicle route and access to Sizewell B and Leiston and may well cause drivers to divert to minor rural roads.

TASC objects to the Access Road and in turn to the Campus.

**b) Caravan Park Leiston.**

It is difficult to see how 400 caravans and their residents can dwell in this area of Leiston without causing disturbance and disruption locally and on routes leading into Leiston town. Traffic flows onto Lovers Lane, which is a fast road, to and from the caravan park may need a different approach to avoid accidents. This may also conflict with the emergency plan for SZB. The site is also quite close to older peoples' homes.

TASC cannot support this plan.

**TASC objects to the Access Road and in turn the wrongly sited Accommodation Blocks, however the Accommodation blocks must be sited close to the SZC site as stated in EN1 to avoid traffic issues.**

**Q 6 and 7) Transport - Road/Rail or Rail /Road**

This is a quandary and one of TASC's biggest dilemmas and one of the major reasons for objecting to SZC.

However despite our objections to SZC, TASC prefers a Rail led strategy, believing it to be the least worst environmental option, apart from the fact the rail line should not terminate in the AONB.

Sizewell A was built because of the low population in the area and an evacuation plan was deemed feasible if there was a nuclear accident and existing roads, rail and workers buses were used during the project.

Sizewell B followed still using the existing roads and rail with a few changes and upgrades. However it was not without its problems. Luckily the majority of East Suffolk was able to keep its identity.

**a) This is not the case with SZC** as the potential build with two reactors is a much larger project set further north and over a greater time span of up to 12 years. This will impose a great traffic burden on people living and working in the area.

The problem is the geographical position of the potential site, set deep into an almost unspoilt area of the Suffolk Coast. No matter which route is taken from the A12 it will cause major disruption to other road users, to people, houses and listed buildings along whichever route is chosen cutting across farm land, some of which have been in families over four generations and the possible Compulsory Purchase Orders, cutting off lanes and footpaths, felling trees and copses and crossing water courses.

New roads should be avoided. They cause disruption and environmental damage and excessive CO2. Reducing road traffic is part of the Government's 25 year environmental strategy and EN1.

If EDFE support new road building they would need to build prior to SZC itself and obviously must be subject to a full EIA.

b) In the first few years we are told EDFE will be using the present infrastructure. The B1122, U2822 Lovers lane, C228 Sizewell Gap road and the U2831 Eastbridge Road, along with the existing Railway Branch line and Leiston siding.

c) These traffic movements will continue relentlessly until other transport facilities are built, including rail lines, bypasses, or new roads and the access road. Lay up areas required for materials and support services will have to be prepared. The programming of all this work is absolutely paramount if the existing population is to survive the onslaught. We will expect to see an EIA for this preparation work which must include a lighting strategy and noise and air quality monitoring schedules. The existing rail line into Leiston must be upgraded to include the rail bridge in Valley Road. This work would hopefully leave a legacy of a direct line to Ipswich or Lowestoft which would benefit Leiston in the long term.

d) We would request the preparation of the two Park and Ride sites off the A12 to be constructed before the SZC Building work begins.

e) It is difficult to make a meaningful and informed response on road management matters as we do not have enough data or information. To date we are not told of the quantities of materials such as cement, steel, aggregates, etc that will need to be delivered straight into the site, nor the direction from which they will be travelling and returning, this will have a major effect on any transport proposals.

**f) Yoxford**

We are concerned that there is no comprehensive overall traffic management plan for Yoxford. It is set on the A12 and is a feeder road for the A1120 and the B1122. The A1120 is also used as a Tourist route straight off the A14 from Stowmarket. The B1122 is well used by tourists to reach Aldeburgh. This creates an east-west and north south flow of traffic through the village. The increase of traffic at the A12/ B1122 roundabout may cause problems for the A1120 /A12 junction. Use of the A1120 will increase therefore we request that there is consideration given to an overall management plan for the whole village. Including a

controlled Pedestrian Crossing on the A12 and another on the A1120 particularly by the village shop which is people's desire line when crossing the busy road. We also consider a 20mph speed limit for the built up area of the A1120

**TASC prefers a Rail led strategy despite our objections to SZC and the lack of information, believing it to be the least worst environmental option, however it should not run into the heart of the AONB.**

**TASC is not in favour of the Road /Rail in the first instance, therefore we do consider any of the considered routes from the A12 to Sizewell to be appropriate.**

**TASC believe the by pass for Theberton is a subject for the residents but the view of our group is that the crossing of the two country lanes of Pretty Road and Moat Road in the way suggested is not something we can support. If it is undertaken it needs a far better layout for free passage on the two country lanes. If this by-pass is approved we also have deep concern for the dissecting of family farms in this area and believe everything should be done to ensure as little disruption to their livelihoods as possible.**

**Yoxford must be considered for an over all comprehensive Traffic Management Plan before any work is undertaken at Sizewell itself.**

### **Rail**

TASC favours the Rail/ Road Strategy and the Green Rail Route rather than road building. We believe it to be less polluting and removes some traffic off the roads. But as a condition it must be removed when haulage of materials is completed. We also suggest that much consideration is given to screening any new rail line creating corridors for wild life. Consideration still needs to be given to the loss of recreational facilities where they intersect, particularly the bridleways and footpaths. We would request EDFE to work closely with local communities and where appropriate the Ramblers to consider preferred options, as many of the footpaths are well used and historic. We request that warning lights are placed where walkers/ cycle or horse rider cross rail lines and that they are open and shut gates NOT bridges which cause barriers to many, including people with disabilities.

**Rail may cause some minus points and problems and we request:-**

- a) It must not interfere with the daily hourly service Lowestoft to London that has taken so long to achieve.**
- b) We would prefer the rail line NOT to terminate in the AONB.**
- c) Further consideration should be given to public rights of way.**

**d) Hours of working and use of lay-up areas should not disturb local residents.**

**e) We would request EDFE work with Network Rail to ensure a good package and to leave a better legacy for the East Suffolk Rail Line, and the branch line into Leiston.**

### **ROW Leiston Theberton and Eastbridge**

At 2<sup>nd</sup> consultation TASC submitted as part of its response our concern at the loss of Rights of Way, we note that very little has changed in the 3<sup>rd</sup> Consultation Document. We are concerned at the number of diversions and closures that EDFE are considering with little consultation with local organisations.

**We have therefore copied our previous Stage 2 Document ROW observations at the end of this Response rather than rewrite it. We would like to request that EDFE facilitate a group of local people to include the Ramblers Association and the Town and Parish Councils to consider some alternative routes to those suggested.**

### **Sizewell Halt or New Siding**

If SZC is to be built TASC believes there should be a new siding north of the Sizewell Road. To use the existing siding would cause problems with crossing gates on King Georges Avenue and the progress of vehicles into Eastlands Estate and existing SZB. It would also remove some of the noise from the nearer properties.

**A new siding could leave a legacy for Leiston as a Passenger Rail Platform.**

### **Q 8) Rail Led Buckleswood Road / Westward Ho U2416**

Whilst TASC has said it prefers Rail over Road to suggest a rail footbridge in this position is the very worst option, it shows lack of understanding on how some of our unclassified roads are used and is crass to say the least.

Saying it would be temporary is not feasible either, as we know EDFE's idea of temporary is 12 to 15 years.

This road is used by walkers, some with dogs, cyclists and horse riders and is part of a circular walk which includes some of these footpaths.

Many people from estates in the area use this rural route. Some with mobility vehicles travel to the end of the road and then return. Please do not deny them this ability. Cyclists also use it to stay off the B1122 and B1069.

Several local businesses would also be badly affected as it is used by tractors and small lorries to gain access to farmland, buildings, businesses and facilities. Also by blue light services in emergencies.

**TASC strongly object to a footbridge and request a level crossing with gates too allow free passage for all road users, if this rail option is agreed.**

**Q9) Transport Level crossings Saxmundham to Leiston**

It has long been the wish by Leiston to return a passenger service to the town. The financial consideration has in the past stopped this happening. To upgrade the crossings and the rail bridge in Valley road would be a lasting legacy. As stated above.

**Q10) Transport Level Crossings Rail Led East Suffolk Line**

This issue needs to be considered by the East Suffolk Lines Committee, East Suffolk Travellers Assn (ESTA) and the Ramblers Assn.

**TASC are not qualified to make comment but feel if changes are to be made they must be for the long term benefit of the people of East Suffolk with their knowledge and understanding.**

**Q11) Transport Freight management**

We note that there is no reference to lay-up facilities for Lorry Drivers or their personal requirements anywhere other than the Innocent Farm area at Trimley.

**We hope this situation is recognised and facilities are put in place where they best serve lorry and bus drivers.**

**Q12) Transport Park and Ride Sites**

Lighting needs to be kept to a minimum, monitoring points and cleaning procedures need to be put into place. Any personal facilities for drivers will need to be personally supervised at all times. CCTV would be welcomed by local people.

Management of traffic will cause problems if not properly controlled on and off the A12.

**TASC requests removal of every trace of these sites at the end of the build period.**

**We also query how workers who are local (i.e. Saxmundham, Yoxford Leiston etc) will reach the SZC site. Will they be expected to use the P and R site, or travel to the access road to reach SZC?**

**Q13) Two Villages By Pass**

TASC recognise the need for an improvement to the Farnham bend but believe the land take for this mitigation and its alignment is not correct, and should be considered in consultation with Farnham parish Council.

Once again there is not enough environmental information to make a judgement. We also believe the Roundabout at the A12 – A 1094 should not be impinging on the Cottages on the A1094.

#### **14) Transport Road Improvements**

There is not enough detail to make comment but we are aware that speed and safety must be of paramount concern. Also there is concern at how the networks are to be monitored and policed.

#### **15) Consultation and Consultation documents SZC 2019-03-10**

- a) TASC feels that the SOCC Statement 2016 used for the 2019 Consultation is misleading as it often refers to Stage 2 not Stage 3.
- b) We recognise that although parishes and towns were invited to request meetings it was not what was stated in the SOCC document.
- c) The consultation venues in some instances had a lack of knowledgeable personnel, and there was a lack of facilities for people who had sensory problems.
- d) The mapping does not show grid lines and key elements are not shown, neither are many road numbers. In some instances class B, C and unclassified roads are not clearly shown. This is a grave mistake when considering how many times the suggested road and rail lines will cross these well used routes, footpaths, bridleways and country lanes, all used for quiet recreation.
- e) In some instances in the summary document the script is incorrect, see fig 5.18. In others the red outline is misleading see 5.5 and 5.8.
- f) TASC are very concerned about the lack of detail in the 3<sup>rd</sup> Consultation Documents, we are acutely aware that this is at PEI stage, but allowing for that, it is blatantly obvious that there is much more research and study to be carried out on many aspects of the project before considered accurate responses can be made.
- g) We note that further studies and information gathering is still to take place however the results of this work will only be seen by a few elected members of SCC and SCDC and NOT members of the public who are residents of the area and who will be most affected. Many of whom have taken the time and trouble to respond to the 3<sup>rd</sup> Consultation.
- h) Leaving so many issues undisclosed until DCO, so that members of the public are not fully conversant with the Plans, which including the EIA, feels like an insult to peoples diligence in replying to the 3<sup>rd</sup> Consultation.

**TASC feel strongly that before a DCO is submitted a 4<sup>th</sup> Consultation on some matters of detail should be undertaken.**

## **Below are issues which are not in the Consultation Questionnaire**

### **1) Beach landing Facility, Bent Hills, Piles and roll up road**

TASC recognise the loss of the MOLF, due to problems with coastal processes will lead to additional transport requirements elsewhere. We feel the BLF is a massive and permanent intrusion into the coastal environment leading as it does to a crossing over the beach and dunes, both very sensitive areas. In particular the vegetated, shingle a very rare coastal habitat.

We are told by EDFE that the BLF will not cause problems with coastal erosion. This is not the view of other experts in the field of coastal stability.

The coastal strip from Dunwich to Aldeburgh is dynamic, the area in front of the nuclear complex however is suggested as being stable, however this is not the case north and south of the site. Any interference with this delicate balance and bearing in mind sea level rise and climate change we would suggest the precautionary principle.

If as we are told the BLF is needed as a permanent facility to deliver AILs. Then we strongly object to the long term disruption to the coastal scene and on the damaging haul route over the dunes and benthills.

We also object to the closure of the Heritage Coast Path as mentioned in the attached document.

### **2) Berm Hard Defences**

This is yet another visual intrusion into the Heritage coast and, whilst it may protect SZC, it will exacerbate the possible sea intrusion north and south of the Nuclear Complex. Both at RSPB Minsmere and Thorpeness.

**TASC objects to these hard sea defences which may protect the Nuclear Complex but may do untold damage to the natural roll back of shingle banks leading to marine inundation of Sizewell Belts and Minsmere Levels.**

### **3) Fish Stocks Inlet Outlet Pipes and Flows**

We are not satisfied that the quantities of fish stocks, crustaceans, fry and eggs which are to be lost is acceptable. We also expect to see a far more accurate study of the potential impact on coastal process and temperature of the marine environment due to the cooling water from SZC.

### **4) Sewage works**

#### **a)Accommodation Blocks**

We are told that this sewage will be treated at a point within the temporary construction area and then be discharged to the North Sea.

**This is not satisfactory. Sewage will have to be piped from the Accommodation Blocks to the existing sewage plant, then when treated discharged to sea.**

**We have no idea how EDFE intend to manage this operation, which route are the pipes from the blocks to the sewage plant going to take? Same goes for the treated sewage, will this be allowed to flow into the Leiston Ditch, then onward to the Minsmere Sluice?**

#### **b)Main site when SZC is operational.**

We are told the Sewage works for SZC is to be on the nuclear site, we are again concerned about how all the suggested buildings will fit on site. As the site is cramped for space and much is to be higher than AOD we are concerned that this facility may be set outside the 32 hectares.

**If this is to be considered, it is not acceptable. We are fearful of development creep in this sensitive area.**

**The existing sewage works for SZA and SZB is not suitable for either of the above needs.**

#### **6) Lighting**

**The majority of all that is planned for SZC during its build programme will be accompanied by a great deal of excessive light. The impact will be particularly destructive on all night flying insects, moths, bats and owls.**

**This is unacceptable and we have not been given enough information as to how this will be managed.**

#### **Conclusions**

**1) TASC believes that SZC situated in the heart of the Suffolk Coast and Heaths AONB and on the Heritage Coast is not an appropriate place for 2 EPR nuclear reactors to be known as SZC.**

**2) The Site is not large enough for all the buildings needed along with the four pylons on an elevated built up platform, and will totally dominate the long distant views of the AONB landscape giving a cramped industrialised appearance.**

**3) Because the site is cramped the intrusion onto the dunes to the east overwhelms the Coastal aspect of the Heritage Coast.**

- 4) The access road should not be built in the sensitive location known as Sizewell Marshes. The causeway is an unproven means of access to the site and potentially will destroy a large part of the SSSI.
- 5) The Concrete batching plant, and all other land used for the purpose of building SZC should not be allowed as it is a massive intrusion in the AONB.
- 6) The transportation of people and materials will cause disruption to roads, country lanes, bridle ways and Public footpaths. This will also occur if rail is used.
- 7) The huge influx of up to 7900 workers will cause an increase on all local services.
- 7) The loss of Tourists will affect the economy of the area.
- 8) The ever challenging issue of flooding from Climate Change
- 9) SZC will increase CO2 and other emissions' during the 12 years build programme from traffic and plant.
- 10) The health and well being of people living in the area will be affected by so much intrusion into their daily lives.

#### Need for new Nuclear.

TASC recognise that this is the business of UK Government but believe that since 2008 there has been a major change in electricity production and storage and in conserving electricity. The need for new nuclear is not proven and it is not needed in the mix for electricity production.

#### Appendix to the TASC Response

#### TASC Document in response to EDFE 3rd Consultation

#### TASC Rights of Way 19-3-2019

#### Copied from Tasc Response to 2<sup>nd</sup> Consultation

#### Public Rights of Way (PROW).

Public rights of way and permissive paths in and around Leiston-cum-Sizewell parish form a historic network and have been used in perpetuity by many local residents and visitors. They form an essential part of the quality of life by enabling access to the countryside for quiet recreation, which is seen as a benefit to health.

Many of the following Footpaths and Bridleways are inextricably linked, and need to be considered as a whole.

Many are part of the historic walks to Leiston Abbey Grade 1, English Heritage Site on Eastbridge Marshes. Also to the English Heritage Grade 1 Listed Leiston Abbey off the B1122 both of which are well served by footpaths. Many of these links will be broken.

EDF proposals for Sizewell C will seek to stop –up, disrupt, divert and in some cases may alter forever the rural feel and the distinct historic links. During the course of construction and operation of a twin reactor power station there will be additional noise and other environmental disturbance to residents and visitors on these otherwise unspoiled walks that stretch from the coast to the west of Leiston, to Eastbridge and Minsmere, and to Aldringham/Thorpe. Many of these walks are within Suffolk Coast and Heaths Area of Outstanding Natural Beauty and on the Heritage Coast. We feel EDFE have not consulted with appropriate people to form a joined up approach for the RoWs in the area.

We have found it almost impossible to cross reference some of these Footpaths etc as their OS footpath numbers etc are not included in the maps.

a) **Footpath 21 Heritage Coast / Sandlings Walk.**

This Coast path at Sizewell is well used by local people to walk their dogs and to walk to RSPB Minsmere. It forms part of the proposed and evolving English Coast Path. The proposal to build eastward from the proposed SZC frontage and the proposed Jetty, MOLF and hard standing to allow loads to come in by sea will require vehicular access across the bent –hills/dunes and vegetated shingle to allow loads to be taken to the development site from any jetty or landing pad. This equates to the diversion of this very well used and loved Coastal walk.

We know that if the landing pad /jetty etc is permanent, the road over the dunes will also become a permanent feature of the Coastal frontage of SZC and totally out of character with the essence of the Heritage Coast Path.

**Response**

**There is no mitigation for this disruption and the suggested diversion is not workable, practical or acceptable.**

**b) Bridleway 19 at the former District Survey Lab off the U 2822 Lovers Lane**

We have made comment on the proposed Access Road, earlier in our response. The Access Road will in effect totally remove this historic walk and bridle way as it will be stopped up to allow the Access Road to traverse across it.

On old maps BR19 is referred to as Black Walks.

It also serves Ashwood Cottages and Grade 2 Listed building Upper Abbey Farm House with its timber framed barn all of which are in the ownership of EDFE, as is the surrounding land.

This is not only an historic walkway but also has well established ancient hedges and ancient trees on either side, all of which are well used by many species of insects, mammals and birds. To lose this type of habitat

and the bridleway is sacrilege and we suggest it is not dissimilar to putting a knife into a Constable painting.  
It is also used as part of the Annual Heritage Coast Run  
We totally condemn this suggested loss of rural and recreational amenity.

**Response**

**We firmly believe the Access Road should be considered in another location which would not destroy this part of Bridleway 19 a piece of Suffolk's' natural and historic heritage and all its habitats**

**b) Bridleway Way 19** also spurs off to the EDFE permissive footpath (which used to be part of Dunwich Forestry and owned by the Forestry Commission) through Kenton and Goose Hills area and which is part of the Sandlings walk joining with Footpath 21 at Sizewell Beach. We understand that this path is to be diverted.

**b) Bridleway 19 at Sandy Lane Sizewell** This may be disturbed by the EDF proposals to enter SZB site via a route in this vicinity for an additional car park at Pill Box field. Despite this site not being acceptable to SCC and SCDC at Stage 1 it forms part of a possible future planning application for relocation of facilities at Sizewell B.

**b) Bridleway 19 at Lovers Lane Crown Farm** junction is affected by traffic, particularly in the first phase of the project.

**c) The Sandlings Walk a SCC/AONB**

A promoted walk will be lost by the extension of the site to the north and potentially crossed by traffic access to and from the development site. This is a permissive walk on EDF land and at present leads to Lovers lane Footpath/ Bridleway 19.

**Response**

**An alternative route which is acceptable to the Suffolk Coast and Heaths Project must be found**

**d) Bridleway 13** Is also Lovers Lane until it comes to the B1122 junction. This PROW was lost at the time of Sizewell A when Lovers Lane was metalled to allow for access to SZA

**Response.**

**We suggest BR13 should be replaced by a new permissive route within the Aldhurst Farm habitat site and be well screened for safety reasons, and be demanded should the Lovers Lane/Abbey Road junction be moved because of the new level crossing for the green route.**

e) **Footpath 10** From Abbey Road to Leiston Abbey is to be diverted due to the green rail route.

**Response**

**Diversion is far too long**

f) **Footpath 6** From Westward Ho! to Abbey Lane is diverted due to the green rail route.

**Response**

**Diversion is far too long.**

g) **Footpath30** From Lovers Lane via Leiston Common to Sandy Lane Will be impacted by extra traffic on Lovers Lane at Common cottages.

h) **Footpath18** Alongside the EDF Aldhurst Farm from Valley Road to Lovers Lane site will be impacted by extra traffic at Lovers Lane.

**Response**

**More work needed at east junction to Lovers Lane.**

i) **Footpath 3** The Green Rail Route crosses Buckleswood Road U2416. The total length of the footpath is from Highbury Cottages B1119 to Abbey Lane U2406, passing Buckleswood, a County Wildlife Site and Fishers Farm, a listed building, the suggested diversion for this path is both unsatisfactory and far too long.

The suggestion to stop up Buckleswood Road by the crossing for the rail line is totally unsatisfactory, causing problems for walkers, cyclists, horse riders and all vehicle users.

**Response**

**The suggested diversion is far too long and is not acceptable.**

**Automatic barriers must be in place at Buckleswood Road Rail crossing for walkers, cyclists and horse riders.**

**Bridging at this point is not a solution in this rural position.**

**Response to all RoW suggestions**

**TASC wish to see EDFE demonstrate why these public rights of way are to be diverted, closed or moved and how the variations are justified**  
**Whilst we fully understand EDFEs wish for the diversions and stopping up, we believe much has been suggested without local users input, we therefore request that a mechanism is put into place to allow a two way conversation on this subject. Possibly including the Ramblers Assn.**

**NB The one point on which there will be no movement from TASC is that of the Access Road and Bridleway 19**