### **EDFE**

# Stage 2 Consultation for Sizewell C

(end date of consultation Feb 3<sup>rd</sup> 2017)

# Response to the Consultation from

# TASC (Together Against Sizewell C)

Co / Wood Farm, Westward Ho! Leiston, Suffolk IP164HT

(formerly CANE Communities Against Nuclear expansion)

We must point out in the first instance that TASC is opposed to the construction of Sizewell C.

# Some of the reasons we are opposed to the building of SZC are as follows:

- a) The area to be used for the development of SZC is in an AONB designated for its landscape qualities.
- b) SZC is to be situated on the Suffolk Heritage Coast. The area has many other environmental designations which have received little or no attention from EDFE.
- c) It is suggested by EDFE that there is mitigation for the loss of part of the SSSI however we contest this statement. Aldhurst Farm Habitat Creation does not recompense for the loss of Sizewell Belts SSSI
- d) The geographical site for SZC is in a very sensitive rural location on an eroding coast, with poor transport links, in an area which depends heavily on tourism for the best part of its economy. Many people visit the area because of the peace and tranquillity they find here.
- e) We believe the development, with two reactors and their chimney stacks, is far too large. They will dominate, spilling over to the east and west and will be too high in the low-lying coastal scene, creating an unacceptably prominent industrial appearance.
- f) The Access Road to service the development severs the AONB and the corridors for wildlife..
- g) The lay-up area and the batching plant are again situated in the AONB in a very sensitive site.
- h) We believe it will decimate the Tourist Trade which is of essential economic value to the area. It will take many years to recover.
- i) There is a serious risk of coastal erosion. If the site is protected from the sea there will be a knock on effect elsewhere on the coast.
- j) We are concerned about the amount of potable water SZC will need in this dry area of East Anglia

### TASC would also like to make this statement

National Policy Document EN6 states "Sizewell is a potential site", it is our opinion that the site should have been assessed in much greater depth and been ruled out, when all the many difficult facets of such a development were known from the Royal Haskoning Report in the early stages of this process.

Since the Government's National Policy Statements EN1 and EN6 were approved in 2011, many new innovative technologies have been developed and become less expensive than the proposed SZC. We therefore believe that Imperative Reason of Overriding Public Interest, IROPI, which allows for inappropriate industrial development in an AONB, is not valid in this case.

We submit there are other means of sustainable electricity generation, which are not huge producers of CO2, which ensure a supply of electricity and do far less environmental damage

with no radioactive waste or security risk. These new technologies have rendered SZC totally unnecessary, therefore SZC is not in the public interest.

We believe that the Government is responsible for this scenario via its Energy policies which must be reviewed because of the many alternative methods of electricity production which have occurred so rapidly since approval of EN1 and EN6 in 2011.

# Response to the 2<sup>nd</sup>Consultation

### 1) Consultation Period

We note with interest that the local authorities Suffolk Coastal DC and Suffolk CC as (Joint Local Authorities Group, JLAG) have stated in their response to the EDFE SOCC (Statement of Community Consultation), that the period of time given for the 2<sup>nd</sup> Consultation including the Exhibitions was not acceptable, considering it was over the Christmas holiday period and should indeed have been extended by two weeks. EDFE have refused this request leaving very little time to consider all the aspects of this complex, massive consultation, and shows very little regard for the communities and local authorities with whom EDFE profess to be considerate good neighbours.

We concur with JLAG and feel aggrieved that more time has not been forthcoming from EDFE particularly as the time between the  $1^{\rm st}$  Consultation and the beginning of the  $2^{\rm nd}$  has been 4 years. We think, at the least, another two weeks for the Consultation would have shown respect for all who wish to respond, and to those who also have a statutory right to respond.

### 2) General Comments on the consultation

The document is full of unknowns and many questions arise which we have not had time to seek answers.

The document fails in as much as it is more about what is not said and lacks facts that must be known.

It is in our opinion not in the public interest or that of EDFE to refrain from giving all known facts to enable informed decision making.

It also states several times that there will be more consultation on different aspects, but there are no time scales given or any information regarding how and when these consultations are to be carried out.

The maps used in the consultation are very difficult to understand, in some cases they have no reference points, no legends and details so small that they are difficult to see and comprehend. There are no contour lines shown on maps.

The abbreviated consultation document does not cross reference to the Master Document. Much important information lacks clarity, this is particularly true on transport where modes/loads/type/quantity/and direction of travel are not clear. To make a meaningful response we wish to see a comprehensive Transport Strategy for all modes of transport before we are able to fully comprehend the implications of what is being proposed Details on many other issues are also missing these below are just a very small sample of questions which are not answered. How much potable water will be used during construction?

How much brackish water will be pumped out during de-watering and what is its destination? It appears that is it to be discharged into the Leiston Beck then finally into the North Sea? What effect will there be on the Sizewell beach (well used for recreational purposes) and for what period of time?

What are the stages for the total development as no specific time line is included?

As the 2<sup>nd</sup> Consultation facts emerge we are faced with an even worse situation than we considered at the 1<sup>st</sup> Consultation. The constrictions of the site now come into view and the land take is far larger than was at first envisaged and as indicated in EN6. The main development and all its ancillary sites is spread far and wide, which feels more like a takeover bid of East Suffolk.

The difficulties of getting materials and plant to the site become even more obvious, none of the options appear well founded or considerate. Nothing can prepare or mitigate for the utter disruption to so many peoples' lives that will occur during the construction period. The damage will spill over into every corner of East Suffolk across at least a 30 mile radius. We hear the word mitigation over and over again, however the mitigation for the overall loss of a way of life peace and tranquillity is hardly touched on in the 2<sup>nd</sup> Consultation. It appears from the 2<sup>nd</sup> Consultation that EDFE have barely scratched the surface of how to ameliorate the extensive disruption to people, habitat and our way of life, which is very disappointing.

### 3) Lay-out of the Site which is to become SZC Licensed Nuclear Site

We have no idea of the actual footprint of the site which will become a licensed nuclear site. From our own calculations the footprint of the reactors and ancillary buildings are far too large for the site previously nominated in EN6. The site is constricted by marsh to the west and by dunes to the east. It is cramped and EDFE are trying to "squeeze a quart into a pint pot". The area shown to the east is forward of the east sight line of Sizewell B It is exacerbated by the east coast sea protection bank and containment wall. Encroaching onto the bent hills/dunes to the east will lead to coastal squeeze, and environmental damage to the Sizewell Belts SSSI and marshes to the west.

In our opinion and by our own calculations the site is far too small to accomplish the aim of two EPRs with all the necessary ancillary buildings, which will have to include a dry fuel store capacity building that must be factored in at this stage.

The height of the platform the whole site on which the buildings will sit is at a higher level than that of SZB, adding to its visibility in the landscape.

Not forgetting that for 10/12 years minimum the whole site will be dominated by cranes, large vehicles, building materials and all other paraphernalia such a development needs on a daily basis, as well as the fuel etc and human beings which will be on site. SZB site changed the ambience of the Sizewell and Minsmere areas. SZC will definitely have a worse impact. If the size scale and form of the proposal stay in their present suggested form, the site will be visible for many miles away and will dominate the Suffolk Coastal skyline for hundreds of years. **Response** 

We submit that EDFE have not considered the impact on all aspects of such an intrusive development, within the AONB and on the Suffolk Heritage Coast. The height of the buildings and overall footprint is not acceptable, and will be a dominating feature on the intrinsic landscape of the AONB.

It is our opinion that there is no mitigation available to overcome this overall situation.

# 4) Permanent Access Road approx 2.2 kilometres (or11/2 miles) long

It is the opinion of TASC that this access road which will in effect become a single carriage highway, private road which will be carrying up to 5000 employees, heavy plant etc is totally unacceptable. It will become yet another dominating feature of the landscape and will completely dissect a massive area of undeveloped AONB, shutting off corridors for wildlife and displacing them. Loss of this type of habitat is deplorable environmental vandalism.

It is a known fact that amphibians and reptiles return to places of their origin and this will not be possible. The route of the access road is at present an undisturbed habitat for plants, insects, bats, animals and a hunting ground for some of our most threatened birds of prey. It will introduce noise and light into an otherwise remote area, disturbing all wildlife by day and night.

(We note that Hinkley Point C is a 24/7 operation)

The proximity to RSPB Minsmere is of grave concern.

There is also the possibility of petro-chemical run off and although some provision is made to counter this, it is a known fact that pollution can and quite possibly will still occur, fouling the water courses which are the life blood of Sizewell Belts and Minsmere Levels.

The suggestion of building over, and or bridging the SSSI at the north west area of the proposed development site to enable road access into the site is inconceivable, totally unacceptable and may interfere with the two way flow of water from Minsmere Sluice and from the Leiston water catchment area, and may well cause problems for RSPB Minsmere. It makes a total mockery of the SSSI designation.

We have no comment on the possibility of bridging the existing water courses. Except to say it must not be allowed to happen and an alternative solution must be found for the access road.

The water courses are absolutely vital for the well being of Sizewell Belts and Minsmere Levels, not forgetting Leiston Sewage Works.

We submit that the Access Road is not acceptable and therefore neither are suggestions of interfering with the water courses by bridging or any other means.

### Response

NB these points were made by many consultees at Stage 1. EDFE have not tried to find any alternative site or other solutions, only what method of bridging of water courses may be acceptable

There are no suggested alternatives or mitigation measures suggested which would make this road or the bridging of the water courses tolerable or acceptable

Therefore EDFE must seek an alternative, less damaging access road and refrain from damaging the SSSI with its unique habitat, water courses and all other designations affected by this crass development.

### 5) Additional issues on the route of the Access road

- a) Not only will the Access Road produce a horrific scar on the AONB landscape but it is intended to enable a lay —up area, hard standing, a concrete batching plant and other elements of the building process which are to be accessed from it and linked to the Nuclear site. The amount of damage to the environment this will cause, in such close proximity to the many environmental designations that exist, is incalculable.
- b) At the junction to the B1122 the Access Road is to be linked to the Accommodation Campus which is to house 2000+ workers and their recreation area, all in very close proximity to the Theberton and Eastbridge Parish which has a population of approximately 280 registered electors. This will introduce light noise and a built environment the size of a small Suffolk town: TASC believes this is deplorable. Whilst we understand the need to house employees as close to their work as possible, and to reduce the need for travel, the access road and accommodation as suggested are all in entirely the wrong place and other solutions should be found.

#### Response

All EDFE suggestions in this instance are for the convenience of EDFE and NOT for any consideration to the unique environment or the well-being of the people who live in close proximity to EDFEs proposals.

Therefore once again we have to respond by saying we firmly believe another solution to this damaging road and all its proliferation of ancillary buildings and accommodation must be given further consideration.

### **Relevant Historic information**

# <u>Sir Frank Layfield recommendation from the SZB Inquiry and upheld by the Secretary of State</u>

Quote

"I recommend that deemed permission for the construction, outside the site, of the proposed  $2^{nd}$  Access Road to the Sizewell site should be refused".

### **Nuclear Electric Local Community Liaison Committee**

At a Local Community Liaison Committee held on the 15<sup>th</sup> April 1992 Len Green Public Relations Nuclear Electric was asked why Nuclear Electric had purchased 526 acres of land, 60% of which was SSSI and were also negotiating to buy a further 16acres also SSSI from another landowner

Len Green replied "that nuclear Electric were only concerned about the land as an environmental buffer to SZB" He added "that as the land was SSSI it could not be developed and that Nuclear Electric had no intention of doing anything other than managing the area in an environmentally sensitive way"

LCLC Minutes 15-4-1992 Page 8 minutes 361and 362

Local people were suspicious of this and rightly so. Obviously it became a very valuable site for British Energy to sell at Privatisation stage, and once again the environment of Leiston cum Sizewell Parish was not considered.

### 6) B1122 Roundabout for Access Road

We have stated our objections to the proposed Access Road, and we have therefore the same comments to make on the roundabout. It will introduce light and noise into an otherwise rural area, and will impact on the Grade 1 listed building of Leiston Abbey. There will also be a noise issue for the nationally acclaimed Pro Corda School of Music.

### Response

Same as for the actual Access Road: it is totally inappropriate in this setting. There is no mitigation available for this suggestion.

# 7) U2831 East bridge Road.and Accommodation facilities

The removal of the existing U2831 to another location and the erection of vast accommodation blocks is an insult to the environment and shows a total lack of consideration to people who live and work in the area. It is an appalling suggestion.

It will have an adverse effect on the existing farm and its viability, which also houses a prize herd of cattle, and will impact on several farm workers who may lose their livelihoods. Many of these have been employed at this location all their lives, and some have young families.

Again our response is that we believe this is totally the wrong situation for Accommodation Blocks with all the related noise, traffic movements, lighting etc 24/7.

We are not told how potable water and sewage, electricity etc. is to be dealt with at the site or other utilities that will be needed.

Just connecting all this up to existing facilities will cause disruption to the local area.

The same goes for the U2831 road. This is a historic road to Eastbridge the thought that EDFE can even suggest moving it to another area for their convenience is beyond belief.

### Response

EDFE should think again and remove all this concentration of roads, buildings and roundabouts to a more suitable situation which must consider the Suffolk Countryside and the people who live, visit, and work here.

We submit there is no mitigation for this despoliation of the area

# 8) Soil and Water management for the development site of SZC and linked to the Access Road.

We were not consulted on this proposal at the 1<sup>st</sup> Consultation.

The depth of peat and clay to be excavated for SZC and for the water that will invade the excavation to be removed, is an issue which needs much more explanation from EDFE. We have calculated that **approximately 6,000,000 tonnes of peat crag and clay** will have to be removed from the development site creating around **200,000 lorry loads** of material which will need to be taken off site, across the Access road and then placed into borrow pits at Theberton /Eastbridge where the borrow pits will be dug to an depth of ??? to allow for disposal of unsuitable material from the reactor site and then used for back filling the reactor sites. The material from the borrow pits is to be stockpiled for use when needed on the actual development site. We have no idea how long this process is likely to take, the means of transport and what shift patterns of work will be used to carry out this massive operation.

The effect of this operation on the local residents, any visitors to Eastbridge, the caravan sites for holiday lets and the Eels Foot Inn is unacceptable and intolerable.

It is also the route to RSPB Minsmere for visitors who come from the south east of the A12 area including Aldeburgh, Snape etc and many Hotels, B&Bs and holiday lets. They will not wish to pass through an area of waste management operations, which will happen even with the movement of the road,

There should not be underestimation of the knock on effect to the local economy of the loss of tourism of this proposal

It is also extremely environmentally damaging. How much CO2 will be released which is at present locked up in the peat etc? Moving so much material by lorry to and from the site, which is in effect a waste management operation, the number of movements to and from this operation should be revealed along with the pollution caused by the many vehicle movements. We also note that the borrow pits will be de-watered. How is this water to be moved to the intended locations? Is this proven technology? What happens to them after they are no longer needed?

# Response

The use of agricultural land for this exercise and for borrow pits and stockpiling of soil is not acceptable.

It is also noted that the soil from the borrow pits is to be stock piled to a height of up to 35metres and will be yet another intrusion in the otherwise flat landscape.

There is no mitigation for this operation as we contend the materials excavated are unsuitable for other use. We do not know if Wallasea Island will accept this material. Until we know the facts we suggest EDFE come up with another plan.

There is no suggestion of amelioration or mitigation for the people who live in close proximity to this proposed operation.

### Water Management of the Excavation for SZC (Water Framework Directive)

Water has to be pumped from SZC site in what is called de-watering. This needs much more explanation. Vast quantities of acidic water were pumped into the sea when SZB was built, by large pipes crossing the dunes and Heritage coast path.

We have no idea of when this process is likely to take place for SZC or the period of time it will take, nor the quantity or quality of the water. We also do not know how environmentally damaging it may be, or which means of disposal is to be used, but there is no doubt that it needs a full investigation and explanation. We understand that it may be pumped into Leiston Beck along with other surplus water from the site, eventually making its way to the North Sea via Minsmere Levels. We do know that the water will be very acidic and that there may be a knock on effect for RSPB Minsmere , particularly affecting food supplies which are necessary for Bittern, Egret etc. Eels may be intolerant to vast changes in Ph levels.

We also need to know what other types and quality of water are likely to end up in Leiston Beck and eventually the North Sea.

### Response

The Environment Agency must vigorously pursue these issues, under the Water Framework Directive

### 9) Outfalls

We are not convinced that the proposals will in any way decrease the damaging effects to the marine ecology. We also do not know if there will be more damage to the drift of shingle sand etc which such vast quantities of water from the sites could have on the coastline. It may affect and interfere with the natural North Sea drift. Thorpeness has already undergone some remarkable changes since Sizewell A stopped production. More information is needed on this subject.

We also need to understand what methods are going to be used to prevent the ingress of fish eggs, fry, fish and shellfish. We understand that there is a great loss of full-grown fish etc into the SZB system and we must be told of any loss expected from SZC. The loss of sand eels for instance has a knock on effect on terns and other species.

### Response

This information must be known so that ways and means can be undertaken to limit any damage. Without the information we are NOT convinced that there will be minimum or no damage. Properties as well as the marine ecology may be affected.

# 10) East and seaward of the proposed Development Site a)Jetty, Molf\_

We are concerned about the pile-driving and construction of these facilities which may have an impact on coastal drift breaking into two sand /shingle banks. If these facilities go ahead it is imperative **that they are not permanent.** As this area is a feeding ground for many birds, including the red throated diver, porpoises and seals, and this may well have a deleterious effect on the ecology and sustainability of the area. Any possible dredging that will have to occur over time would have the same effect. Thorpeness, Aldeburgh, and Dunwich may all be affected by interference within the coastal strip

#### Response

These facilities must not be allowed to become permanent and much more information is needed,

## b) Hard Pad Landing Facility,

There is little explanation on how this will work, but we note it is proposed that it would become a permanent feature. What type of loads will this deliver both to and from the development site? What type of landing craft is likely to be used? How will equipment be loaded and off-loaded? Are cranes to be used? Whatever the answers are to these questions, it does show that for the MOLF, Jetty and the Landing facility some means of getting to and from the development site will have to be deployed.

This must mean a full scale metalled road, and lifting gear will be needed to carry heavy loads crossing the dunes dissecting **Heritage Coast Footpath 21** and becoming a permanent feature in the landscape. These dunes and the vegetated shingle are a designated site containing rare plants. It is one of the favoured walks of visitors and locals alike and will be a grave loss as it is a well loved recreational facility.

### Response

Whilst we can see the benefits of using sea borne traffic we find it unacceptable that a better solution has not been found to assist in this operation, any route to the site and from the sea must not be allowed to be a permanent feature.

The MOLF the Jetty and Hard Pad Landing should not become a permanent feature. Free passage must always be given over Footpath 21 Heritage Coast Path: the suggested alternative route is unacceptable.

### c) Flood protection SZC East Frontage

The proposal to construct a flood defence barrier containing rock revetment for coastal protection is protruding even further into the dune area and is forward of the SZB site line. This will cause coastal squeeze.

### Response

<u>Unless this flood defence can be sited further back and in line with SZB it is yet another intrusion into the Heritage Coast. Other solutions must be found.</u>

# 11) 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 Grade1 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/Thorpness. 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 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 Suffolks' 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.

<u>i)) Footpath 3</u> 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.

<u>Automatic barriers must be in place at Buckleswood Road Rail crossing for walkers, cyclists and horse riders.</u>

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

therefor 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

### **12) Roads**

### a) U2416 Buckleswood Road (Also affects Footpath3)

It is suggested that this road which is also part of Westward Ho! will be crossed by the Green Line Rail route and will be stopped up because EDFE believe they will not be allowed to put in automatic barriers or a pedestrian crossing at this point.

This will cause severe problems for all people of Westward Ho! who use the road on a daily basis, and also for several businesses which need access to farmland and for deliveries. Many cyclists use the route as an alternative route to the busier B roads. Buckleswood Road is also used by all means of travel by visitors to Cakes and Ale Caravan Park

All emergency vehicles (fire, police, ambulance) that use satellite navigation will use the quickest route to any emergency. Coming from the west they will use Abbey Lane- to Buckleswood Rd rather than going into Leiston via Waterloo Ave and Station Road and Westward Ho!

### Response

TASC considers if EDFE decide to use the Green Rail Route it must also secure an automatic crossing with a pedestrian footway across the track at Buckleswood Road and that an automatic barrier is absolutely crucial for all access.

We do not want a footway/ bridge in this rural situation.

### b) U2831 Kemps Hill

If the caravan park goes ahead this road may need widening for access, if so a bridleway/ footpath should be constructed inside the EDFE boundary.

### 13) B1122 Yoxford to Aldeburgh and A1120 Yoxford to A14 Stowmarket

a) A12/B1122 junction

This junction is bounded by Historic parkland, Listed buildings, sewerage works and the River Yox.. All these factors and the increasing traffic need careful consideration but must not be carried out in isolation. The A1120 Yoxford to Stowmarket, at present a designated Tourist Route, must be considered at the same time.

b) B1122 The work done so far by EDFE is inadequate; this route needs much more consideration, with full consultation with Suffolk County and the local residents.

The speed of all traffic will need careful monitoring and funding should be in place to ensure prosecution of those who disobey the law.

Much has been said about HGVs on this route, however all others vehicles including cars, vans and heavy farm machinery will also be on this road. We therefore agree with the suggestion EDFE and the Suffolk County Council is to consider a 40mph on the whole of the road with 30mph in the villages. (noted in the document)

We would also like to suggest that the B1122 is considered for a very strict maintenance regime including continuous cats eyes, white lining, re-surfacing, safety surfacing and more lay bys. There must be safe havens for people in the villages with footways and crossings places. This must be funded by EDFE

c) The A1120 is a designated Tourist Route through Yoxford to the A14, passing through many small villages on the route and needs amelioration now. This work needs to be discussed with Suffolk County Council and EDFE must be involved before SZC is started. The residents and the

many tourists who travel its length from the A14 must not be deterred by SZC traffic and robust measures must be in place early in the process.

### **Response**

- a) Any scheme for the A12 /B1122/ A1120 junctions and traffic must be environmentally sound and be of benefit to all road users when SZC construction is completed.
- b)The EDFE suggestions for the B1122 at present are totally inadequate. Much more consideration and discussion (including local residents) should be undertaken. This should include the A1120
- c) St Peters Church at Theberton Grade 1 Listed must be a major consideration for EDFE by ensuring there is no damage to the Listed Building

TASC as stated is opposed to SZC and one of our major reasons is the remoteness of the SZC site. We do not wish to see the destruction and despoilation of more of Suffolk's countryside with more roads. Any new roads would be a permanent feature for a temporary need. EDFE states the Government policy for new roads in EN1.

We note there is no consultation for a new road from the A12 to Sizewell.

There is a case for improvement to the A12 Farnham Bend and Stratford St Andrews. New rail lines will be temporary and will at least be eventually removed albeit after many years.

# 14)Railways

# **Existing rail line Leiston to Sizewell Halt**

TASC supports the use of rail to relieve road traffic, but notes with interest that EDFE wish to use the existing rail line for approximately two years whilst the spur line is being constructed. If this is the case then people in houses on the route and at the Eastlands estate at line-end should be consulted separately to this consultation. Many people are under the false impression that all rail transport will be using the spur Green or Blue line routes.

### Response

Automatic barriers should be installed at the crossing of the B1122 by Westward Ho! which are at present manual gates.

People affected by the close proximity of the line must be consulted by EDFE as it will have an adverse effect on their lives during construction. In particular the impact of the noise element.

An updated rail-line for passenger use may be a useful legacy for the Leiston area

# **Green line Rail Crossing Farm Gatehouse to SZC**

It suggested that this is to be temporary however, as it will be in place for the duration of the construction phase, our major concerns are its intrusive nature in the rural landscape, the proximity to Leiston Abbey and Pro Corda Music School

As the B1122 is the main arterial route for all businesses at Masterlord Industrial Estate and all residents and visitors etc to Aldeburgh and Leiston. With automatic gates on the B1122 crossing with the very large diesel engines hauling heavy loads, the noise and pollution will need careful consideration as will the waiting queues of traffic getting to and from Leiston and Masterlord estate and those using Lovers Lane to access Eastlands estate.

# Response

We must know what usage there will be over the period of time (12 years existence)which it will be in use, and how many trains (we are told 5 in, 5 out daily, at 400 metres long and traveling at 10 mph) but will this be all?

There is no legacy for Leiston from the green line route when the Construction is finished.

### **Lay-up area for Green Line**

We object strongly to a lay-up area for equipment and construction material for the green line on the field to the east of Buckleswood County Wildlife site. It will become an industrial area (lights, noise etc) in a very rural situation.

# Response

Yet another example where EDFE are only considering their own needs, with no regard to the environment, the livelihoods and the tranquility of those who live and work here.

This is unacceptable and EDFE should think again

### 15) Park and Ride Sites for 1000 cars

How many traffic movements per day will these facilities generate? All of which will be traversing the A12 when either arriving or leaving, including buses. We submit this will have an adverse effect on existing traffic moving north and south on the A12 especially at peak times and in the summer months.

### Response

The traffic movements need to be known.

# 16) Lorry management

Facilities must be in place for HGV drivers and other truck and van drivers somewhere, it is a well known fact that there are not enough toilets, showers, rest areas for lorry and other drivers in the whole of Suffolk. We do not like the thought of the alternative scenario if this is not considered.

### Response

If this could be addressed it would be a legacy for the whole Area.

### 17) Coastal Erosion

This is a major issue for those of us living on this coast and who witness the effect and untold damage the sea, wind, rain and adverse weather conditions inflict on low lying land and sandy cliffs. Wrecking homes and causing great areas to disappear into the sea. This is very well documented. Dunwich and Sizewell histories tell the story.

This is not something with which to take chances, with climate change, the east coast tilt and changing weather patterns, we know the Suffolk Coast is a very vulnerable place. It is also part of its amazing beauty and charm.

The impact of human interference on the coast can cause severe adverse effects on coastal drift, sea patterns and have serious knock on affects on areas at a distance from the actual changes. Much of this is understood, but we have no idea on what the future holds in the way of weather patterns, sea level rise etc. It is with respect to meteorologists and scientists that we put forward our commonsense approach.

Which is that SZC is too close to the North Sea and so is the accompanying storage of nuclear waste. It is an accident waiting to happen sometime in the future. If SZC is built it could cause a catastrophe.

It is not only the sea which causes concern but also the low-lying area of Sizewell Belts and Minsmere Levels. The Environment Agency map shows how severe flooding could overcome the area.

# Response

It is with this in mind that we believe SZC should not be built. It makes no sense and is not sustainable. We look to Environment Agency for a comprehensive response to this subject

### 18) Socio Economics

a) Much use is made of the word "local" in the documents. But a 90minutes drive is not what most people think of as local. The term is used for employment and for access to goods and services

It is stated that the Community Impact Assessment will accompany the DCO. This will be too late for the people of Leiston, Theberton and other small towns and villages to comprehend exactly what they may achieve in the way of economic development or fully understand whether the disadvantages totally out-weigh any benefits.

East Suffolk should not be seen as the scapegoat for the whole of East Anglia.

For instance, how many of the 800 companies who have registered "an interest" are within a 10 mile radius of SZC?

### Response

The Community Impact Assessment should be available for comment before the DCO goes to the Planning Inspectorate.

# b) Education Skills and Employment.

If EDFE are genuine in trying to educate and up-skill people (all ages) it would be helpful if a copy of the proposed strategy could be seen before it is submitted to Planning Inspectorate. One of the biggest hurdles for training/ up-skilling in the immediate area of SZC in East Suffolk is transport.

### Response

**Education Skills and Employment Strategy should be available before the DCO is submitted to the Planning Inspectorate.** 

### c) Visitors Centre

If this is to be of benefit to Leiston-cum-Sizewell Parish then it need to be situated close to or within the town so that the visitors have the ability to use Leiston facilities.

Comment on the suggested siting is impossible as it appears that SZB are putting in an application for the SZC Visitor centre to be located in Coronation Wood at Sizewell, which is not part of the SZC Consultation Document.

# Response

### This facility should be sited in Leiston.

It should not become a permanent feature in the AONB which would be accompanied by traffic, lights noise etc.

### 19) Lighting

Lighting is a major concern: there does not appear to be any consistency in the way lighting is to be managed throughout the document. We believe that all areas of development should have a lighting regime, which embraces lux levels, times to be used. We are lucky to have relatively low

light pollution in East Suffolk. We expect EDFE to produce a Best Practice Lighting Strategy for its main site and all ancillary sites.

### Response

We submit that there should be a Lighting Strategy for all the development, for all ancillary sites and associated sites. Again this should be available before submission to PINs for DCO.

### 20) Noise.

The damage this can cause to peoples' lives is well documented. It may become intrusive and unacceptable.

This will affect the construction site and the ancillary and associated sites, and any areas that are used for stock-piling or lay-up areas.

### Response

What regime will be in place to ensure the noise is kept to a minimum How is it to be monitored?

**21) Archaeology** on land which is known to contain many historic elements from many different ages, this must all be mapped and documented. Any findings, including any artifacts, must be catalogued and stay in the local area.

# Response

A plan of action for Archaeological finds must be put in place.

### 22) Purchase of land

We absolutely deplore the use of powers for compulsory purchase and rights of access to our local land owners. EDFE may have the power to do so, however if negotiations fail surely it is morally wrong to take over peoples' land when it will decimate their way of life and possibly that of their children, by reducing their ability to run a viable business or farm when land is taken. It would appear that EDFE have the upper hand on any property they wish to acquire, "If you don't sell /lease we will go for Compulsory Purchase Orders and /or Rights of Access Orders". These bullying tactics toward people who have employed local people, provided goods and services, managed farm land that has been in their families for generations, needs to stop. We know this is already happening and people who live locally are suffering because of it, stress, sleepless nights and not knowing which way to turn for the best.

EDFE do not own East Suffolk but it would appear that what they want, they are determined to get by hook or by crook. It is disgraceful behaviour.

### Response

This should be considered in the DCO Stage by the Planning Inspectors. Why is it happening now and before 2<sup>nd</sup> stage consultation?

**EDFE** Must refrain from this practice.

### 23) Exit strategy

The 2nd consultation document only covers preparation and build programme for SZC and its ancillary and associated issues.

However whilst TASC hopes that this construction never takes place, we submit if it does, that when the construction is complete there will need to be a great deal of clearance, restoration and remedial work undertaken.

Leiston town itself is little mentioned in the document, particularly for traffic management. which should be addressed. As the town will be the subject of many pressures during the build

programme, we wish to be told how any restoration for the town is to be addressed both physically and financially by EDFE.

We expect the landscape which is damaged to be fully restored and the affected villages will need direct assistance. This work should not be borne by Council Tax Payers but by EDFE

### Response

We wish to see a positive Plan of Remedial Action for the built environment of Leiston and surrounding villages when construction of SZC is completed.

We also recognize there will be many scars in the surrounding landscape brought about by ancillary and associated work which will need to be fully restored and which in themselves will create movements of waste materials for a long period of time.

We wish to see a Comprehensive Management Plan of the timescales, and methods of how all this work will be carried out,

### 24) Conclusions

TASC can only draw one conclusion from the above exercise and that is that SZC should not be built. The disadvantages far out weigh any unsubstantiated benefits, and the many difficulties which it brings to this beautiful area of Suffolk are insurmountable. It will also scar designated areas that will take many years to repair.

Destroying habitats, disrupting lives and in some cases causing financial hardship, loss of tourist trade, traffic nightmare and making a mockery of all the environmental designations listed below

AONB Suffolk Coast and Heaths Area of Outstanding Natural Beauty Suffolk Heritage Coast
SSSI Site of Special Scientific interest
RAMSAR
SAC Special Area of Conservation
SPA Special Protection Area
County Wildlife Site
RSPB Minsmere An internationally renowned bird reserve.
NNR National Nature Reserve

Joan Girling Secretary to TASC Written for and on behalf of TASC