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## **Members' responses to Sizewell C Stage 3 consultation**

### **1. SIZEWELL C PROPOSALS OVERALL**

Friends of the Earth are opposed to civil nuclear power because of its association with nuclear weapons and because there is still no satisfactory answer to the problem of the waste, some of which will not degrade for 240,000 years – far longer than modern humans have walked this planet. It is not possible to 'dispose' of nuclear waste. There are many other reasons for objecting to Sizewell C, some of which are described below.

#### **Policy context**

Chapter 3 of volume 1 Stage 3 Consultation refers to the planning policy context and the need for nuclear power. However, the government's energy policy as stated in EN-6, published in 2011, is now out of date and this is currently being revised. Since then renewable forms of energy have overtaken nuclear in terms of cost and speed of construction, showing that nuclear is now old-fashioned. The government's statement that the need for nuclear power is 'urgent' is clearly false, as the lights have not gone out. The reality is that there is no need for nuclear.

#### **Finance**

Nuclear power is hugely expensive and it is our belief that the public should not have to pay for it through subsidies, guarantees and insurances. Decommissioning and storage of waste need to be factored in. It is still unclear how EDF and CGN will raise the funds to pay for Sizewell C.

We cannot believe that it is possible to build a copy of Hinkley Point C at Sizewell at 20% less the cost, bearing in mind that the site for the reactors is a marsh as opposed to a rocky foundation. Having to create a curtain wall and go down to a depth of at least 35m is surely extremely expensive.

### **2. THE MAIN DEVELOPMENT SITE: OVERALL**

The site at Sizewell was identified as only 'potentially' suitable. There are many reasons why it is entirely unsuitable, most particularly because the Suffolk coast is subject to significant erosion. With climate change, rising seas and more extreme weather, this can only get worse. New hard defences to protect against incursion from the sea will accelerate erosion and flooding either side of

the power stations, increasing the risk to these communities and threatening Minsmere RSPB Bird Reserve.

The site is also in flood zones 2 and 3 and government policy is not to put infrastructure in such areas.

### **Designated sites and tourism**

It is entirely within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast, a most unsuitable place for a massive industrial complex. The permanent access road would cut the AONB entirely in two and be an ongoing danger to the resident and visiting wildlife. It is directly adjacent to RSPB Minsmere reserve, with its EU designated habitats and Ramsar. The two reactors and access causeway would be built directly on Sizewell Marshes Site of Special Scientific Interest (SSSI), important for its wet fen meadow and ditches, supporting uncommon flora, a large community of invertebrates and assemblage of breeding birds of national significance. Of the plants, Frogbit and Soft Hornwort are classified as Nationally Scarce, as are a considerable percentage of the many invertebrates; some have special protection under the NERC Act 2006, s.41, being classified as Species of Principal Importance.

Fen meadow cannot be recreated nor compensated for. Such destruction is unacceptable. It is not good enough to say that you will restore an existing piece of fen meadow. Which? Where?

The loss of habitats and the animals that depend on these would have significant knock-on effects on our tourist industry, as would the loss of beauty of landscape and tranquillity.

The huge size of the spoil heaps would be a terrible eyesore during construction. They would be within our AONB. These, together with the borrow pits, are likely to create a large amount of dust and noise, which would be intolerable to local residents and seriously disturb the wildlife of Ash Wood, where there are protected bats.

The four very tall pylons, newly introduced into the proposals, would also be detrimental to the special landscape qualities of the AONB.

### **Marine environment and beach**

According to the Environment Agency the cooling water infrastructure would result in the death of many tonnes of fish, despite the installation of a capture and return system. This would affect the sea birds and harbour porpoises that depend on such fish for food. This marine environment is part of the Outer Thames Special Protection Area (SPA), designated for the rare Red-throated Diver and Little Tern. There is still much work to be done concerning the impacts on marine life. You say that further details will appear in the Environmental Statement. Why are they not included in this consultation?

We see that dredging would be necessary to provide a clear passage for barges to reach the beach landing facility. How would the regular dredging and the arrival of the barges avoid the Sizewell and Dunwich banks, which you say protect the Sizewell coast?

Under 2.14.1 you state that the beach landing facility 'would have no significant effect on waves, sediment transport or the adjacent beach'. We know from experience of the BLF for SZB that this is patently untrue. The BLF had such a deleterious effect on coastal processes that the councils were obliged to demand that it be taken away. Where anything projects into the sea, there is erosion on the southern side, as any of the groynes clearly demonstrate. As the BLF would be constructed at the north of the site, this means that there would be erosion directly in front of the new power station.

In order to construct the BLF and the new hard defences the whole beach in front of the power stations would have to be dug up. This is a County Wildlife Site (CWS) composed of vegetated shingle, which supports rare plants including sea pea and yellow-horned poppy. This shingle is also a Biodiversity Priority Habitat, which should be conserved and enhanced. Suffolk shingle beaches are important globally. You say that you will mitigate for the loss by saving seed and replanting on the defences. Such delicate plants will not survive on rock armouring at a height well above sea level. They thrive through an extensive underground network of roots seeking out water – not possible on such an engineered structure.

Moreover, you propose to take away a further 5m of beach by positioning SZC forward of SZB. This will create coastal squeeze, with less space for natural roll-back, further increasing pressure on designated sites and communities either side. This is not acceptable.

### **Potable water**

You do not say where the vast amounts of potable water would come from, necessary not just for the thousands of workers, but also to mix the concrete for the construction. This region suffers from drought and water is already short. No application should be submitted unless this has been sorted out. There would be direct competition with our farmers and the tourist industry. Moreover, the Environment Agency now declares that, in 25 years, due to climate change, there will not be enough water for people to drink.

### **Drainage**

The hydrological balance in this marshy area is extremely fine and some rare and uncommon plants would not survive if this were in any way altered.

We are concerned about the whole drainage issue and the impact of the very large causeway leading to the reactor platform. The Leiston Drain takes the excess water from the Leiston sewage works and out to sea. Rather than an

open river, as it is now, which naturally floods into the marsh either side as necessary, you would be squeezing this into a concrete culvert and on another side would be the concrete containing wall. What would happen, therefore, during a storm and high seas, when waves would be driven towards the causeway, preventing the natural outflow of the river? This could cause serious back-up flooding, which could be a disaster for wildlife, such as ground nesting birds and those that nest in the ditches, e.g. swans. There is also the question of sudden precipitation, worsening due to climate change. You do not indicate how you would cope with such matters.

While you say that you would build a containing wall down to 35m for the main platform, then drain the marshes within that, we do not see how you could create this without some sort of general drainage. There is bound to be an effect on the surrounding marshland. We recall the building of Sizewell B, which caused land heave. We wish to see the precise calculations of how the surrounding marshland and fen meadow would be protected – and if this is impossible, then a statement of how much would be damaged in addition to the platform area.

What would you do about the very acidic water withdrawn from the peaty marshes? How could it be safely disposed of? You do not say. This is a crucial matter.

### **Size of site**

We are not convinced that it is possible to build the two reactors and additional buildings within the stated 32ha. Hinkley Point C is at least 45ha. We have noticed how the amount of land taken has gradually increased over the years. Now you want to destroy Coronation Wood and take even more of Goose Hill, with very substantial loss of trees. This is totally unacceptable. What next?

## **3. PEOPLE AND ECONOMY**

### **Jobs and training**

While it is true that local people need good jobs it is our view that it would be infinitely preferable to offer these from the renewables sector rather than nuclear.

As far as construction jobs are concerned, there is in fact a lack of suitably experienced people available and building firms are already struggling to fill their vacancies. So where are the workers to come from? If local, then they would have to be lured away from small firms by the offer of better wages. When Sizewell B was built, some such firms went out of business as they were unable to secure good staff. Otherwise workers, according to EDF Energy, will be brought from Hinkley Point C, many of whom come from abroad. Nuclear jobs are highly specialised and there are few local people with the necessary

expertise. We are not at all convinced that there will be many jobs for Suffolk people.

You should not be claiming that there will be 25,000 jobs. This gives the impression that they are newly created jobs available to local people, which is a total nonsense. Hitachi was closer to the mark by saying that, for the nuclear power station at Wylfa, there would be 25,000 'roles' 'globally'. Many of these would go to existing companies and employees within the supply chain. Your statements need to be corrected.

We don't want to see local children and students trained in such a potentially damaging industry. We would greatly prefer to see education and training in the much more benign renewables sector.

Although there may be a benefit to the local economy in the short term, the likelihood is that there will be a boom-bust scenario, exactly as with Sizewell B, the 'bust' occurring after all the construction workers have left.

### **Social impacts**

Our experience of the building of Sizewell B tells us that, despite a Code of Conduct, it is highly likely that drugs will be brought into the area, as before. Considering that most workers will be single males, there could well be a repetition of prostitutes being attracted to Leiston and Saxmundham. Putting a large accommodation campus so close to the small village of Eastbridge will clearly overwhelm the local community and upset social cohesion.

### **Health**

Since the publication of the Kikk report in Germany, which shows a clear link between 16 nuclear power stations and leukaemia in children within 5km of the sites, there remains a serious concern about the health of the nearby population. Government policy is that developers must care for the health of the local population. How do you propose to do this and protect the public from radioactive emissions?

## **4. ACCOMMODATION: OVERALL STRATEGY**

In your calculations of 'home-based workers', you include people commuting from as far away as Norwich and Colchester. Who would want to spend three hours a day travelling to and from work? We think this is unreasonable.

We agree that it is a good idea to have a register of available local accommodation, so that those who wish to remain in the tourist industry, and not rent out to Sizewell workers, can do so. We also agree that people should be encouraged to rent out spare rooms.

You mention a Housing Fund, but it is not at all clear what this would consist of, how it would be administered and used, nor whether it would realistically help to alleviate any shortage of accommodation. There is currently a shortage

of social housing in Suffolk. Less well-off people could be pushed out of the rental market. How would you prevent this?

## **5. ACCOMMODATION: TEMPORARY CAMPUS & CARAVAN SITE**

While we welcome a reduction in size of the campus for workers, we are nevertheless still opposed to this, as stated in our Stage 2 response. We consider it to be intolerable to the nearby residents of Eastbridge to have 2,400 mainly single personnel (88% male), so close to this very small village.

### **Safety issues**

Moreover, despite the Code of Conduct, we continue to be concerned about the security of the young people at the Pro Corda music school.

In addition, we worry about the safety of the wildlife in the nearby woodland, meadows and marsh. Some people may not be aware that our wildlife in England is protected, and that no one is allowed to harm the birds and animals, nor dig up any wild flower. ***We would specifically ask that you add a 'care of wildlife' clause to your Code of Conduct.***

We would much prefer to see workers accommodated in the towns, where there is suitable infrastructure, and then brought by bus or train to the site. We emphasised this in our Stage 2 response and are disappointed that so little notice has been taken of our views.

### **Impact on AONB**

The proposed campus would be within a Special Landscape Area (SLA) directly adjacent to the Suffolk Coast and Heaths AONB. Although the height of the buildings has been reduced to four storeys, these modern blocks would nevertheless be totally out of keeping with Suffolk's built heritage and would spoil the setting of the AONB.

### **Caravan site**

We are not opposed in principle to the caravan site, and it would be close to Leiston town with facilities and infrastructure available there. However, it appears that the pitches would be adjacent to stock-piling areas. We would need to know whether such materials could be a hazard to residents in the caravans.

Its proximity to the Aldhurst Farm habitat creation is a problem, as the lighting and general rumpus would deter birds and other wildlife from settling or visiting here. How could such impacts be minimised? We commented on this at Stage 2. It would be good to have an answer.

## **6. TRANSPORT: MOVEMENT OF MATERIALS**

## **Which is appropriate: a rail-led or road-led strategy?**

Friends of the Earth are disappointed that a marine strategy with jetty has been ruled out, despite some of the extra problems it would have presented, as this would have relieved much of the pressure on our roads.

### **ROAD-LED STRATEGY**

We are in principle opposed to the building of yet more roads. Research consistently shows that a) new roads lead to a greater volume of traffic, and that b) they cause loss of habitat and division of the landscape so that wildlife is no longer able to thrive. Loss of our wildlife is already catastrophic and further losses cannot be justified, especially for something which is not absolutely essential. In addition, both the building of roads and the extra traffic lead to more greenhouse gas emissions at a time when it's crucial to be cutting back. This in turn also results in poor air quality, which can damage people's health. We are therefore opposed to a road-led strategy.

We give further details below as to why we object to the Link Road and Theberton Bypass.

#### THE SIZEWELL LINK ROAD/THEBERTON BYPASS

##### **The problems shifted elsewhere**

While we sympathise with house-holders who would suffer from extra heavy traffic and inconvenience should Sizewell C be given the go-ahead, they must surely understand that by demanding a new Link Road, the problems of noise, fumes etc. are simply shifted to someone else's front door or land. Unfortunately the construction works would also mean massive extra disruption to East Suffolk.

##### **'Legacy' not needed**

Under 5.1.3 you talk about leaving the link road as a legacy after Sizewell C is completed. However, as the B1122 is nowhere near capacity such a legacy is obviously not needed.

##### **Housing pressure**

This new road will simply be an invitation to yet more development. East Suffolk is already under far too much development pressure and we don't want to invite any more.

##### **Noise/recreation**

So far noise levels have not been determined, yet we all know from experience that road noise carries for a long distance over open countryside.

There are 11 public rights of way that would cross the Link Road and 5 affected by the Theberton Bypass. As it is, these make a delightful, quiet network of walks, some offering circular routes that are greatly appreciated by

ramblers and dog-walkers. People going for a quiet countryside walk do not want to be faced with crossing a noisy, fummy road full of lorries. This road would totally ruin the tranquillity of this area of countryside and the associated enjoyment of it.

### **Loss of good agricultural land/problems to farmers**

It is a deep concern that more than 120 ha. of grades 2 and 3 agricultural land would be lost as a result of building these roads. With every-increasing populations and the need to grow more food, we cannot afford to lose such land. For a road that isn't absolutely necessary, this cannot be justified.

Moreover, some farmers would be faced with division of their farms, so that they would be unable easily to travel with feed, stock, harvested goods etc. from one side to the other. This problem has not been addressed.

In particular, we note that adjacent to the proposed Theberton Bypass there are both Entry Level and Higher Level Stewardships Schemes, plus an area that is farmed organically. This farmer could be at risk of losing his Soil Association accreditation, due to lead and other forms of pollution affecting his crops.

### **Pollution/protected habitats**

Despite well-designed drainage, as proposed, we are concerned that there could still be polluted run-off from the road. There is also the chance of leaks and spillages from the many lorries that would be using the new roads. It would be all too easy for these pollutants to be washed into the several streams that would be diverted through culverts under the carriageway. In turn, these streams feed into the Minsmere River, which is associated with the nearby Minsmere/Walberswick EU designated habitats and Ramsar. Oils and other pollutants seeping into these areas could have a devastating effect on the wild bird populations and other wildlife. We need to know how precisely these habitats would be protected from such incidents and accidents.

The whole route lies within Flood Zone 1, with Zones 2 and 3 close by. Bearing in mind climate change, increased precipitation and sudden deluges, there is a significant risk that the roads could become flooded, particularly at the crossing points with the several rivers. There is already a 'high risk' of 1 in 30 at these points. The SuDS drainage systems would not be effective in such a situation so that pollution could well be washed into Minsmere River and beyond. This is not properly addressed and needs to be.

### **Ecological impacts**

As no proper ecological surveys have yet been carried out, impacts on habitats and wildlife cannot be realistically assessed. Moreover, it is difficult for respondents to this consultation to make informed comments as so few details are supplied.

Under 5.3.18 and 25 you say that you intend to carry out surveys for the Environmental Statement, which we understand should be ready by the end of 2019 or early 2020. There is not sufficient time to do proper surveys within this time frame. Two years should be allowed at the very least, with surveys repeated at different points throughout the year. We need to see details of such surveys.

It is well known that barn owls use this area for nesting and foraging. You suggest that 'dense landscape planting' would be carried out to deter them from foraging along the verges, yet it is unclear why this would be helpful. Moreover, it would take years for such planting to become established and be useful. Meanwhile, there is no doubt that birds would be killed on the road. Owls forage along verges because the rough grass and hedgerows provide good hiding places for their main prey of small mammals. What would be very helpful to them would be large areas of rough grassland over which they could safely hunt - but this is not what you are offering.

Both owls and bats need old and veteran trees in which to find nesting holes and crevices. Yet you would be cutting some of these down. Here again, no details are given of what would be lost and what the impact would be.

We would certainly welcome under-road passageways and culverts for otters, water voles and great crested newts, with fencing to guide them through. You suggest that bats may also use the culverts to cross the road safely. However, you have not yet carried out surveys to identify commuting routes, which could be different from the existing waterways. It is our view that culverts would not be sufficient and that high planting along the roadside would also be required to encourage both bats and owls to fly above the height of passing lorries. Here again, you are making these proposals far too late within the context of the Sizewell C build.

### **Speed limit**

It is highly likely that owls and other birds would be killed on this road, as they cannot judge speeds of 50mph. This is far too high. If the road does go ahead, then we would demand a limit of 40mph at the most. This would also reduce noise, which would be more tolerable for both local residents and walkers.

### **Lighting**

This presumably would be a country road, so we cannot understand why lighting could be required. No reasons are given. We would be utterly opposed to lighting. Dark skies with stars and planets are an important part of nature, in particular to the local astronomy group known as DASH. Not only are they important to people, but darkness is crucial to nocturnal animals, including protected badgers, otters and bats, which live along or close to the proposed route. Lighting the road would be extremely disorientating to bats in particular.

## **RAIL- LED STRATEGY**

We would prefer the use of rail over road wherever possible, as this significantly reduces the impact of vehicles, lessening congestion and cutting down on green-house gas emissions. This last point is a particularly important consideration bearing in mind the recent IPCC report on the climate, which emphasises how crucial it is now, within the next decade, to minimise such emissions.

It is notable, however, that the thinking and planning behind the rail-led strategy lags behind that of the road-led proposals. The feasibility and time scales of implementing the necessary rail improvements are being questioned. The impression given, therefore, is that the railway proposals are not on an equal footing with those of the new roads. The railway improvements would also be more expensive. We would like to see an equal amount of effort and commitment behind each strategy.

## **THE GREEN RAIL ROUTE**

We commented on this route as part of our Stage 2 response. As the route remains broadly similar to that described at Stage 2, most of our comments made at that time remain valid.

## **Heritage assets**

We pointed out that the route ran too close to Grade II listed farms and houses and in particular we felt that it would have a deleterious effect on the setting of Leiston Abbey/Pro Corda Music School, very fine listed buildings, Grades I and II. It is therefore disappointing that there are no modifications suggested to the proposed route. It is two years since the last consultation and we would have expected that the setting of heritage assets would have been progressed further, especially in terms of consulting with Historic England and the District Council, with at least some idea of mitigation proposals. If this is to be the final consultation, as stated, then we will have no further opportunity to express our views.

We commented at Stage 2 on the significance of the archaeological remains and that investigations should be carried out. Yet, even though two years have gone by, discussions with the SCC unit have not yet begun. Here again, we need further details in order to make an informed response.

## **Noise**

The music school could also suffer considerable noise and vibration effects both during construction of the line and during operation, especially at night. Initial calculations lead to the conclusion that vibration will not be significant, but there is no explanation on what these calculations are based. It seems that noise levels may be significant for some nearby premises and there is an acknowledgement that further work is necessary. We queried the lack of noise

modelling at Stage 2, pointing out that you had already had four years since Stage 1 in which to achieve this. While initial work has now been carried out, there still need to be more detailed assessments.

### **Woodlands and wildlife**

It is better that the contractor's compound would now be within the main development site, rather than next to Buckles Wood, where we understand there would be a smaller compound. Even so, we are concerned that there would be construction activity here, which could cause dust to contaminate this ancient woodland, along with noise and lighting that would disturb the resident wildlife, especially protected bats. It seems that most of the ecological surveys referred to covering this area were via desk-top studies rather than up-to-date surveys on the ground. It would be crucial to carry these out. It would be greatly preferable to move this compound away from this ancient woodland and County Wildlife Site (CWS).

You mention that 16 trees with bat roosting potential would have to be felled, but you don't say which these are. Indeed, it is not clear whether the surveys referred to cover only the area between Saxmundham Road and Abbey Road, or whether they also include the eastern part running into the main development site. We therefore remain extremely concerned about the Green Rail route going along by Fiscal Policy woodland, Kenton Hills and into Goose Hill. As pointed out at Stage 2, these are ecologically very sensitive areas, with rare bats, including Barbastelle, breeding and foraging here. These animals have established commuting routes. Yet we can find no mention in the documents that up-to-date surveys have been carried out to identify these routes, nor what mitigation you might propose. A rail terminal and handling area are now in the plans adjacent to Kenton Hills. The noise, movements at night and lighting will all be extremely disturbing to protected bats.

As for Great Crested Newts, we would be glad to see the restoration of existing ponds, the creation of new ones and of more foraging habitat, to help to offset any damage that could be caused to this species, whether incidental or otherwise, as a result of the construction works and later removal of ballast.

### **PASSING LOOP AND TRACK CROSS-OVER**

We would certainly welcome any improvements to the East Suffolk line, especially as many of our members regularly use the passenger trains. However, you do not say on what the Network Rail feasibility study was based nor why the three options for the loop were selected. As it is, the chosen location is within the Special Landscape Area of the River Deben valley, involves flood plain grazing marsh, a BAP habitat of principal importance, and is adjacent to ditches that criss-cross this area. It would be important to investigate these habitats for use by wild species and assess the impact of the passing loop.

The map on p.257 of Vol 1, figure 8.9 'Proposed passing loop' is utterly baffling, as we can see no actual 'loop'. There is also no indication of where precisely the second track would leave and re-enter the main track. We assume, therefore, that this has not yet been determined.

In our feedback at Stage 2 we recommended that the passing loop be situated at Wickham Market station, where there used to be a double track. There is therefore already space to reinstate the track. Although we understand that local residents objected to this, we should point out that these people bought their houses in the full knowledge that they were adjacent to a railway track, so they can hardly now complain of noise from trains. We do not approve of the chosen site, which, by its nature, must be of ecological importance.

The ecological assessments for both these proposals are so sketchy that it is impossible to make any comments from the information provided. It is utterly wrong to lump the two proposals together, as the habitat of each is totally different the one from the other, i.e. unploughed grazing marsh as opposed to arable land.

On the other hand, land alongside railways is well known for offering a semi-wild habitat that can support a wide range of species. You mention the records of notable butterflies, including a White-letter Hairstreak, yet you state that the habitats are 'unlikely to be of particular importance to other notable invertebrate species' (4.6.6.). On what do you base this assumption? This is not good enough. We would like to see field surveys of butterflies properly carried out.

The same is true for reptiles, which often choose track sides for foraging and basking, as you admit. Yet you are not planning to carry out any further surveys for reptiles. If there is any potential danger to these protected animals due to the works, then they must be translocated to a safer area well in advance of the commencement of construction. We would like to see a plan put in place which takes account of the reptiles.

You do not give any description of how the works would be carried out, nor, for example, whether it would be necessary to fell trees or remove hedgerows. There is simply a statement that they would be 'retained where possible'. However, there clearly are mature trees along the track side, which could be important for both birds and bats. As this is a Stage 3 consultation we would have expected such basic information to be available by now.

The presence of ponds is identified and the possibility of protected great crested newts. No field surveys have been carried out although there is an intention to do so. This is important as the construction works could accidentally kill foraging newts. Here again we will have no opportunity to comment as such surveys will not be ready before the Environmental Statement. There should be at least two visits to each pond at peak activity, i.e. mid-April to mid-May offering very little time now to organise this.

## **7. TRANSPORT: SIZEWELL HALT OR NEW RAIL SIDING**

If Sizewell Halt has to be reconfigured in any case, then a new rail siding might as well be constructed, which would cause less disturbance to the residents of King George's Avenue. Loading of freight would also be more straightforward, with a purpose-made plan designed to be as efficient as possible.

## **8. BUCKLESWOOD ROAD**

We support local residents, some of whom are our members, who are opposed to the closure of Buckleswood Road. These are the main reasons:

A footbridge over the new railway line would be no good to the disabled.

Emergency services could be negatively affected and safety compromised due to a longer route.

Businesses would be affected due to difficulty of access, especially Buckleswood Nurseries and Cakes and Ale Caravan Park.

The only alternative, therefore, is the construction of a new level crossing (option 2). We would like to see the design of this to be as safe as possible.

## **9. TRANSPORT: LEVEL CROSSINGS**

We very much favour upgrades to the level crossings on the Saxmundham to Leiston branch line and indeed improvements to the entire line. For a long time our members who live close to this track have been worried about its poor state, especially bearing in mind that it is used to convey nuclear fuel casks. These improvements should be made whether or not Sizewell C goes ahead.

We would also very much like the track to be used for passengers in the future and left as a legacy. As it is, the road between Saxmundham and Leiston is winding and narrow and dangerous. If you are serious about cutting down on greenhouse gas emissions by reducing traffic impacts, then a passenger train service between these two towns would help to do that.

## **10. TRANSPORT: LEVEL CROSSINGS (RAIL LED)**

We are unclear about Network Rail's role in this. Why are they not upgrading the level crossings in any case, which appears to be necessary? Of course they should be upgraded and made safer.

### **Footpath closures**

We are somewhat aghast at the proposals to close 12 footpaths that cross the East Suffolk line. Why have you not discussed this matter with each community affected by such closures? All you have done is check with Network Rail level crossing data to see frequency of use, but these records of 2015 are already out of date. For example at Wickham Market town a large new housing estate has been built and it is likely that more residents are now using nearby footpaths. The same applies to Campsea Ashe.

Our footpaths are part of the history and heritage of Suffolk. Some have names connecting them with particular people who have regularly used them in the past, or whose land they ran across. To close such footpaths would mean a loss of our local history. We are deeply unhappy about such a prospect.

Most of the proposed diversions are far too long and would discourage people from using the paths. Others are proposed to be diverted along roads, so are in effect no longer footpaths. We would like to see all existing circular routes preserved as these are particularly attractive to both ramblers and dog-walkers.

We are left with the suspicion that the closure of so many footpaths is the cheapest option for upgrading the line and making it safer.

### **Bridges**

If these need extra support then we are again baffled as to why Network Rail expects a private company to carry these out, rather than take responsibility for them themselves.

## **11. TRANSPORT: ROAD-LED STRATEGY, FREIGHT MANAGEMENT FACILITY**

Since we are not in favour of a road-led strategy, we are not in favour of the freight management facility either, and in any case it would not be necessary. Nevertheless we would like to make some comments about the two options, both of which have associated problems.

The Innocence Farm proposals for a very large housing development are already a complete nightmare for the residents of Kirton village, currently a quiet Suffolk rural community. Adding a large lorry park will only compound all the problems.

This land is at present farmed under Entry and Higher Level Stewardship schemes, which encourage wildlife friendly agriculture. Replacing this with concrete and polluting lorries is not acceptable.

It is also adjacent to registered Common Land which has several footpaths. Walkers will be significantly deterred from using the paths by the movement and presence of so many lorries.

## **12. TRANSPORT: PARK AND RIDE NORTHERN PARK AND RIDE - DARSHAM**

### **Loss of tranquillity and local businesses**

These proposals are a nightmare for nearby residents. Moat Hall, directly adjacent to the proposed car park, is run as a quiet retreat. Currently there are attractive views across the fields to the west of the house, which gives a

tranquil aspect. Who will want to come here when it is no longer a quiet retreat, but a huge car park for 1,250 vehicles, with high perimeter fence and 24-hour lighting and the constant noise and disturbance of moving cars, buses and vans? No one. The owner's business will be ruined, along with her complete inability to sell her house and her own personal quality of life. What compensation would be offered to her? You do not mention this.

The same is true of the B & B business at White House Farm. There will be few visitors coming here for a holiday once construction of the site begins.

### **Terrestrial ecology and ornithology**

We welcome your notes on the care of the great crested newts and the mitigation that you intend to put in place. However, it is not clear how these animals would find the culverts under the road that you propose. Would there be guidance fencing?

We are very surprised that you have not carried out field surveys of resident and visiting birds, especially as we made a particular comment at Stage 2 about the barn owls, which regularly hunt across the site. One is thought to nest and breed in Little Nursery Woodland on the west side of the site. These birds have extra legal protection in that their breeding sites must not be disturbed. Construction of the P & R would mean loss of its current foraging ground. We need to know what mitigation you intend to offer these birds.

### **Farmland**

It is a major concern of our members that so much farmland would be lost due to the associated developments in addition to that of the main development site. In this case the land in question is all under the Entry Level Stewardship scheme, which means that it is farmed in a way that is sympathetic towards wildlife. Not only would good arable land be taken out of production, but along with that would be the loss of wild flowers and the invertebrates which rely on them for larval food and nectar. We would like to see areas for wild plants introduced into the design.

### **Pedestrians and cyclists**

We mentioned at Stage 2 that, due to such a major increase in the volume of traffic, a pavement and cycle route should be added alongside the A12 between Darsham village and the station, for the safety of those going by foot or bicycle to and from these destinations. You have not included this at Stage 3, which leaves us with the impression that you have taken no account of our responses.

### **Potential contamination of protected sites**

There is a small river which runs from the site down towards Minsmere River. Contamination of this waterway could occur during construction of the P & R. Moreover, large car parks invariably suffer from oil and petrol leaks. Despite

SuDs drainage, there could still be run-off from the hard surface into the small waterway and on into Minsmere River, especially when there are sudden deluges. This in turn feeds into protected European sites to the east. We wish to know precisely how this would be prevented.

## **SOUTHERN PARK AND RIDE - WICKHAM MARKET**

Both of these options can only be described as utterly idiotic. They only go to show how unsuitable this chosen site would be for a very large park and ride.

### **Option 1**

Why on earth would residents wish to leave their cars in a new car park when they can currently park directly by their houses and front doors? There are already several car parks in the town - five including the supermarket and library - three of which are not fully used during the day and all of which are empty after 6pm. How could people carry their shopping from the supermarket to their home? I cannot imagine that the people of Wickham Market would agree to losing the convenience of parking by their front doors. You say that the new car park would be 'elsewhere'. Where is that?

### **Option 2**

This is completely unworkable. Members know from experience that when this route, i.e. Valley Road and Easton Road, has been used as a diversion due to road works on Wickham Market High Street, there has been a long queue at Glevering Bridge. This bridge is very narrow, with space for only one car at once, and the right-angled turn immediately after is unexpectedly sharp. This is an ancient and listed bridge, built for pedestrians and horses and carts, not modern traffic. You do not say whether you have assessed the weight it could carry. It is only suitable for very light traffic at really low volumes.

There has in the past been flooding from the River Deben both at Glevering Bridge and Wickham Bridge. With climate change this is likely to worsen. While you assess flood risk for the P & R site itself, you do not do this for the Wickham Market diversion route, part of which is in Flood Zone 3, at high risk. This needs to be factored in to any diversion plans.

There is a dogs' home situated on the Easton Road, with kennel maids regularly walking dogs up and down this road. The extra volume of traffic would be a real danger to them as there is no pavement. This road is straight and therefore any traffic tends to drive too fast. If this road were to be used for SZC traffic, then a pavement and speed limit would both be essential.

## **13. TRANSPORT: A12 TWO-VILLAGE BYPASS**

There seems to be a great deal of uncertainty around the future of the four villages along the A12, where residents have been hoping for a bypass for some

years, with the support of the council., i.e. Marlesford and Little Glemham in addition to Farnham and Stratford St Andrew. Clearly, a decision has to be made in the very near future concerning a possible bypass: is it to be for four villages and led by the council with national finance and a contribution from EDFE, or is it to be just a two-village bypass constructed by EDFE but then passed to Suffolk County Council for maintenance? So far the government has not considered that the so-called 'Energy Gateway' is a priority and therefore national funding has not been forthcoming, although the council will re-apply. However, as EDFE aims to submit their application for Sizewell C within a year, time for the decision is running out.

Our members are utterly opposed to both these two bypasses. There are many environmental reasons why we are against this two-village bypass, some of which are set out below.

### **Lack of environmental detail and loss of habitat**

Once again, we have to complain about the lack of detail concerning the impacts on sensitive habitats and the wild creatures that depend on them. It is now more than two years since Stage 2 and still no field surveys have been carried out. There is an assumption, evidently based on assessments provided by the council, that there could be negative impacts on protected species, including great crested newts, otters, water voles and bats. How can the public comment when the statements are so vague?

The loss of grazing marsh along the River Alde is particularly unacceptable. This is a BAP Priority Habitat, which should be conserved and enhanced, not destroyed. Such marshes contain ditches which are particularly rich in plants and invertebrates. The invertebrates are food for protected bats as well as birds. Breeding waders, such as snipe, lapwing and curlew depend on this grazing marsh habitat, which also attracts winter visitors including whooper and Bewick swans. Yet you omit to mention any of this.

It is known that otters and water voles, both protected animals, live along the River Alde. Their habitats should not be disturbed. Owls also hunt across grazing marsh, as their prey tends to hide within the tussocks of grass.

### **Fragmentation**

The road would cause very serious fragmentation of the landscape and natural habitats. This would divide up communities of animals, such as great crested newts, preventing them from travelling from pond to pond and restricting their foraging range. Commuting routes of bats would be severed.

The traffic would be an ongoing hazard to the resident wildlife. Here again, a speed limit of 50mph is far too high and needs to be reduced to a maximum of 40mph. This would also lower the noise level for residents living close to the new road.

### **Woodland**

Foxburrow Wood is an ancient woodland, meaning that its ecological value is high. Yet part of its north-west corner would be taken. This is totally unacceptable as ancient woodland cannot be replaced nor compensated for. Animals that live here would be put at risk with the new bypass so close by, including protected badgers. There are bound to be resident bats, yet no proper surveys have identified them nor their commuting routes, which would be severed by the road. These, and other animals such as deer, would have been well used to passing between Foxburrow Wood and the more open woodland around Farnham Hall, currently a tranquil, rural location. These would all be put at risk by the bypass.

### **Heritage assets**

As you admit, the landscape would be changed due to the new road, which would be visually very intrusive, especially the raised sections. The setting of Little Glemham Hall Grade I listed building and its Grade II listed parkland would be particularly negatively affected, as would the Grade II listed Farnham Manor. The natural setting of the river would also be totally ruined with a modern bridge crossing this Special Landscape Area.

### **Farmland**

Almost half of the farmland that would be taken is under Entry and Higher Level Stewardships schemes, indicating that it is managed in a way that is sympathetic to wildlife. It is particularly important for wildflowers along field edges and the health of our pollinators. It should therefore not be written off merely as 'arable' land.

### **Habitat fragmentation and loss too severe**

Our members consider that damage to habitats and the landscape would be so appalling in this Special Landscape Area that we could not possibly support such a project.

## **14. TRANSPORT: ROAD IMPROVEMENTS**

Our members support any improvements which increase road safety. However, we question the very large number of new roundabouts along the very busy A12. Our concern is that they would increase hold-ups on the road, which in turn would increase driver frustration, causing people to cut through side roads or even to make bad decisions. This needs to be fully discussed with the Highways Authority.

## **15. CONSULTATION PROCESS**

Our members are very disappointed that so little progress has been made since Stage 2 Consultation, particularly as regards properly carried out field surveys of wild species. As already stated, there is now less than one year left before the

application is ready to be submitted to the Planning Inspectorate. This is far too little time to complete all the necessary work and gathering of information. We therefore worry that corners will be cut and that essential mitigation and compensation measures will not be included in the DCO. This is a most unsatisfactory situation bearing in mind the chronic damage that would be caused by this unwelcome development.

*Rachel Fulcher, Coordinator, on behalf of the members of Suffolk Coastal Friends of the Earth.*

*16 March 2019.*

*NB A draft version of this response was sent to members and subsequently re-written to incorporate their suggestions.*