



Together Against Sizewell C

TASC Response to the EDFE Sizewell C Consultation on Revised Plans Nov 18th 2020 to Dec 18th 2020

TASC continues to be totally convinced that the siting of Sizewell C (SZC) in the remote coastal Area Of Outstanding Natural Beauty is a disaster for east Suffolk. The responses to EDFE's four consultations have thrown up so many problems most of which EDFE have ignored, it now appears that they are only taking these concerns seriously due to Suffolk County Council's DCO representations. It is blatantly obvious that the problems of siting, transport, roads, rail, accommodation, the unimaginable environmental damage and the unbearable strain on people and businesses cannot be tolerated.

This has started already with the felling of a 100 year old historic woodland before any DCO planning consent has been given.

The many environmental and societal disbenefits far outweigh any perceived benefits.

TASC therefore remain firmly opposed to the SZC Project.

We will attempt to answer the consultation questionnaire in the order in which it is set out. Rather than resolving any issues, we see these proposals as an attempt to put a small sticking plaster on a massive gaping wound. TASC is also disappointed that after 12 years of deliberation and four previous consultations over 8 years, EDFE is still referring to options and possibilities without supplying supporting evidence. TASC believe this is a further flawed consultation by EDFE due to the lack of detail provided and the poor quality of the images presented, e.g. maps with no grid lines, with keys that are virtually impossible to read, indistinct pictures with insufficient reference points. It is such a vast project we may stray off the subject at times and add matters which we deem relevant.

1) Freight Rail

The main reason for the new revised figures for rail movements are the many objections to the previously proposed numbers of HGVs. The efficacy and appropriateness of the use of rail was very doubtful in the first instance and any increase of use will exacerbate the difficulties. This is noted in Network Rail's Relevant Response to PINs. To date, we have no clear figures for the amount of materials and no indication of the location of their source, so how best to deliver to the SZC site must still be questionable.

2) Increased frequency of Freight Trains

The disturbance at night to people on the East Suffolk Line will be intolerable. Interference to the number of passenger trains on the East Suffolk Line should not be allowed.

We are doubtful of the accuracy of the noise survey as the train test undertaken may not have been carried out under the correct conditions.

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We also have concern about the first 2 years of movement of freight which will be undertaken through residential areas of Leiston, and the distribution of loads when discharged at LEEIE which is then to be conveyed to the SZC project area.

Another issue for any increase in the number of trains will be the disruption to road traffic and to farm vehicles at level crossings causing delays and tailbacks.

Increasing rail use may alleviate the number of HGVs from the roads, if rail use is workable (which we doubt), but will cause severe problems of noise, pollution and vibration in and around the East Suffolk Line and the Leiston Branch Line area and disturbance to its residents in what is a reasonably quiet, unpolluted part of the country.

TASC disagree with the implication at 3.1.13 " that a significant number of deliveries would be smaller HGVs implying 3.5 tonnes would be the norm. Typical Articulated vehicle deliveries would be 44 or 38 tonne GVW , Rigid tippers 32 tonne GVW or Mixers 26tonne GVW.

TASC submits that the alterations to the proposed freight transport strategy simply reconfigure the problems associated with access to such a remote site and demonstrates again that the SZC project is not acceptable. Therefore, the suggested changes are inappropriate.

3) Enhancing the Permanent Beach Landing Facility (BLF)

Increased Materials by Sea and BLF

The damage to the coast and marine environment will be exacerbated by pile driving and by the suggested 30+m extension. The MMO has made observations on the previous proposals in its relevant response with well researched evidence that the BLF as originally proposed will have a detrimental effect on marine species and on sediment drift and will require continual dredging. TASC did not agree with the BLF in the earlier consultation so cannot agree with any suggested increase to length and construction.

We were told in the early days that any landing facility on the coast would be temporary: now it is to be permanent and there may be two of them.

This is inappropriate and unacceptable.

4/5 Temporary Beach Landing Facility

TASC considers none of the proposed options are feasible as the idea of a pier was considered too environmentally damaging in respect of both coastal erosion and sea-bed scour. All of the comments at 4 also apply to this suggestion.

Therefore, including yet another temporary BLF cannot be accepted.

3/4/5) No matter how the problem is disguised by artist's impressions, all the materials which may arrive by sea will have to be transferred to the site. The environmental damage to the Benthills, the Heritage Coast and Walks cannot be quantified as we do not know the volume of materials, frequency of the loads etc. All will need human intervention and will cause untold damage and will visually impact the AONB.

We recognise aggregates and soil are suggested as loads, but we have no idea of quantities or source of either. If sea dredged aggregates are to be amongst these loads it brings up further questions.

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Also, far more information is needed on both temporary and permanent BLF including release of the previous environmental impact assessment that supported EDFE's contention that a larger BLF was too environmentally damaging.

TASC consider the suggested works to the permanent and temporary BLFs should not be entertained and both are inappropriate.

6) SSSI Crossing

TASC has requested at every consultation that an alternative access road should be considered. This has been ignored. The permanent access road leads to a crossing of the SSSI. Covering such a valuable area with concrete to install an access to the SZC site is the most appalling desecration of an SSSI.

This intrusion and the damage it will cause is intolerable, ugly and totally out of keeping with the AONB and SSSI. The new suggested 30m long span bridge is, in effect, still a culvert, just wider, and will be a permanent feature of the AONB landscape. Trying to disguise it with trees, suggesting it will reduce the possibility of flooding and will assist with water management is simply not credible.

It will be a constant haul route for many thousands of tonnes of materials by cars vans and lorries for the lifetime of SZC. It will also be used for taking AILs from the Beach Landing Facility.

It introduces HGV pollution, noise, light and dust into an otherwise dark quiet area which is currently linked to other designated habitats such as RSPB Minsmere and used by many animals, insects and birds for foraging. EDFE cannot be allowed to do so much irreversible damage.

TASC believes this suggestion is inappropriate as was the earlier proposal.

7) Fen Meadow Replacement

This is just not possible. To use the word 'replacement' just proves the absolute lack of understanding of the unique and rare habitat which is Sizewell Fen Meadow. To suggest it can be built over and recreated is utter nonsense.

EDFE may create new habitats but they will never replace that which they will destroy; the suggestion to the contrary is totally inconceivable and inappropriate.

8) Water Storage Area

This suggestion changes the water management of the area and it is our belief that it may not work. Wet woodland is a very specialised habitat and requires careful management. We are not convinced that safe retention of this habitat will result from EDFE's plans.

9) Surface water

This is the same method EDFE are suggesting for the discharge of water when dewatering the site. It would appear that none of this water will be monitored for pollutants from petrochemicals or any other contaminants and will simply be discharged into the sea. The North Sea is a precious resource and should not be used indiscriminately. We would wish to see a rigorous monitoring regime before agreeing to this proposal.

Therefore, at present we believe it is inappropriate.

10 Other Site Changes

a) Sea Defence

This suggested sea defence is a further 8 metres too far eastward of the green line causing further coastal squeeze, the suggested height exacerbates it as a dominant feature, its intrusion into the Heritage Coast and the AONB is unacceptable and it will be an eyesore in the coastal landscape. We suggest it will also cause flooding to the north and south.

TASC considers that the proposal to raise the height of the sea defences from 10.2 metres in the plans submitted in May 2020 to 14 metres a few months later in this October consultation, highlights the vulnerability of the Sizewell C site to the risk of flooding and the unpredictability of sea level rise, increased storm surges and more extreme weather events resulting from climate change. We should all be concerned that EDFE had obviously underestimated the likely impacts from climate change in their previous plans and the risks they still present.

The above supports TASC's opinion that the Sizewell C site is totally inappropriate for siting of a new nuclear power station and interim storage of its spent fuel.

b) Height limits and construction activities

It would appear that at every turn, EDFE want to use yet more land to accommodate their proposals. We do not agree with yet more space for stockpiling. EDFE were taking up too much land in the last consultation: adding further areas for stockpiling should not be allowed.

High structures on Sizewell Beach Landing Facility are inappropriate in the AONB.

c) Tree Retention

This is a loss of trees, not retention of them, due to taking up more land on the construction site, which is already cramped.

d) Boundary Changes

Main Construction Site boundary changes as proposed simply represents development creep and is unacceptable.

The other suggested changes for habitat creation will never replace what is to be lost from the Parish of Leiston cum Sizewell.

We do not agree to EDFE owning land outside the Project Area. These habitat areas should be given over to the parish, a management committee or Trust if and when they have been created.

e) Bridleway

This is an insult. Considering all the changes and diversions of the many historic sheep walks, bridleways and ancient footpaths that EDFE are to undertake over a large area of East Suffolk, it is inconceivable that this is the only one on which is being consulted on.

The loss of routes of many old footpaths, many which are connected to Leiston Abbey and the coast, is inexcusable.

We previously asked that a Community partnership was set up to consider the many changes to the RoW before it went to the DCO. It obviously did not fit in with EDFE's Plans.

11. Sizewell B Facilities Relocation (SZBFR)

TASC consider the SZBFR demonstrates EDFE's contempt for the views of the local community-no one who responded to the initial planning application to East Suffolk Council agreed with the felling of Coronation Wood, yet EDFE's chainsaws are in the process of destroying it as this is written. EDFE have already been given permission to proceed with the SZBFR, have plans in their original DCO application, now have 2 options here and have submitted further plans to ESC. TASC are concerned that this reinforces the view that EDFE are either incompetent or have not bothered to develop clear plans for the Sizewell C development causing undue stress and uncertainty within the local community. TASC's opinion on the SZBFR options are:-

- They are inappropriate as there should be no further development creep into the AONB by the nuclear complex.
- Pillbox field should not be developed because of its visual impact on the AONB.
- Tree planting on Pillbox Field is unlikely to be successful due to the nature of the ground conditions.
- Sizewell A land should not be used for Sizewell B facilities as it should be returned to the community as a greenfield site in line with previous promises.
- It is a travesty that Coronation Wood is being felled for a car park and other facilities that could so easily be located outside the AONB, at a time when we know more than ever we should be protecting such carbon stores and biodiversity. All to make way for a project that may never happen.

In conclusion, TASC consider that the many suggested changes in the 5th Consultation show clearly that the SZC project can never be achieved, however you wrap it up. It will have a lasting long term damaging effect on the wellbeing of residents and cause irreparable environmental damage to the whole area of East Suffolk.

NB: This is an interim response, and we expect to make a further submission in due course.

TASC 09/12/20