



Wahlkreis

To the Minister of Energy & Climate Change

The Rt Hon Edward Davey

3 Whitehall Place

London

SW1A 2AW

Berlin, den 13.03.2013

In advance via e-mail

Complaint regarding EIA procedure for NPP project Hinkley Point C: Lack of transboundary participation for the German public

Dear Minister Davey,

unfortunately, my first letter to you is of a somewhat unpleasant nature. Please let me assure you that I do regret that it is not on a more agreeable subject.

Alas, necessity requires it that I hereby want to lodge a complaint regarding the lack of a transboundary participation for the German public in the environmental impact assessment procedure for the nuclear power plant project Hinkley Point C.

In my opinion, the German public is highly concerned. There is no scientific proof in accordance with the state of science and technology, like for example up-to-date beyond design basis accidents studies (BDBA studies), that Germany would not be affected in case of a major accident at Hinkley Point C. Quite the contrary, the Austrian dispersion modeling project "flexRISK" emphasises the potential that there is a significant probability that Germany would be affected.

Furthermore, according to the EU directive concerning the environmental impact assessment in a transboundary context, the German public is concerned if it states respectively that it feels so. Please let me assure you the German public –unlike the German government– is concerned, speaking not only for myself and several colleagues of mine in the German parliament but also having received letters and calls from citizens.

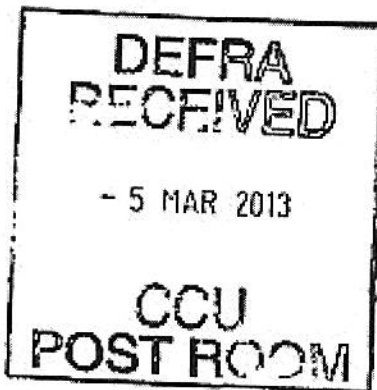
I would kindly request that you provide Germany with a prompt notification to ensure that we, the German public, still can participate in the EIA procedure for Hinkley Point C. So

far, Germany has not been notified according to an answer I recently received from the German government.

Thank you in advance for you help in this matter!

Looking forward to your response,
respectfully,

12 reception in
constituent pls.



Ref subsidies for Nuclear

Dear

I find it quite extraordinary that DEFRA are twisting the meaning of their promise "not to subsidise Nuclear Power" with a commitment to guarantee a price for the energy way into the future. This sounds like Gordon Brown's PFI scheme for funding new Hospitals which has proved in very many cases incredibly poor value for money. Do these promises mean nothing?

Does not the fact that a majority of the sites for new Nuclear are in the Flood Plain, and that after all these years no place has been found for the very dangerous waste fuel, make such projects totally unacceptable?

Hinkley Point, which is only 30 miles from Bruton as the radiation flies, has not yet got planning permission, and as far as I can understand has not taken account of DEFRA's own assessment that it is in a Flood Area. Their estimated rise in sea level over this century has risen from 50cm to 100 cm which may well be optimistic. Even if the station itself can survive such a rise it would flood the homes of the operating staff and others. Even at 50 cms they say it will already reach Bruton. And that is ignoring the possibility of a giant wave from the Atlantic such as happened not so long ago.

Why are we not proceeding with the proposed Severn Barrage which would produce the output of 4 to 5 Nuclear Stations. It could be done in a similar time scale and would be much less of a threat. RSPB's and Friends of the Earth's objections to it, because the wild life will be disturbed, are surely groundless as much of will have moved on to new sites anyway as climate change progresses. This is already happening in the Mediterranean areas.

And there are alternatives to the Barrage like Lagoons and Wave and Tidal devices which could be invaluable if only their programmes were expedited and given the necessary priority and funding.

Is it too much to ask for an explanation as to why we are not pursuing these other options rather than the extremely risky Nuclear one.

Yours sincerely

RECEIVED

01 FEB 2013

29 January 2013

Rt Hon. E Davey MP
Sec. of State for Energy and Climate Change
House of Commons SW1A 0AA

Dear Minister,

Hinkley Point C Transport Access

I believe you will be responsible for the final decision on permission for the above nuclear power station. You are, therefore, the last chance of a sensible decision on access.

Over the last five years representations have been made by Parish, District, County Council, Police, Fire and Ambulance - and hundreds of residents (a number of whom currently or in the past worked in the nuclear industry) on EDF's inadequate access plan. EDF are deaf, and ministers dumb.

At present total reliance is given to the very busy A39, a single lane carriageway where in the last few years four major accidents have led to total closure for 7 or more hours. There have been many other closures, including 2 this winter (so far) due to flooding. EDF's emergency plan involves a near-50 mile detour, through Taunton and small villages, rejoining the A39 further west (where past experience shows it would also be blocked by traffic back-up).

Closures, as above, would result in staff having to work on for hours after the end of shift. That is the tiredness situation where small slips can lead to great catastrophes.

Further, the small one-through-road village of Cannington, is faced with years of heavy traffic (2700 vehicles daily including 750 HGVs, according to EDF's figures).

There is an obvious route for a Hinkley-only access road, from J23 M5, not passing through any village or town, not carrying other traffic. EDF refuse to consider this (it would involve building a bridge over the River Parrett).

Please, intervene to insist on adequate access arrangements, rather than allowing EDF to penny-pinch at the expense of local people - and national safety.

Sincerely

25 FEB 2013

Date 19.02.2013

Sir

I write as a concerned resident of Cannington Somerset with reference to EDF and the New Build at Hinkley Point

It appears that EDF is so sure of getting the go ahead they have steamed full ahead with their plans. I say their plans, as they as they have treated the residents of the area including Bridgwater, Comwich, Stogursey, Shurton & Burton with total arrogance— EDF say they have consulted with us and have listened to us NOT TRUE
We asked for two things at the beginning of all this!

1st A Dedicated route to Hinkley across the Parret to Hinkley Point thus being a safety factor for their workers and local people.

The A39 will not cope with all the extra traffic the roads are already blocked for hours when there is an accident— their answer is to tweak junctions between Bridgwater and Cannington.

2nd We said we did not want a Park & Ride in Cannington. Flooding is already a major problem here but once more we who know the area were ignored.

But after reading the Fanatical matters of EDF the last few weeks they do not appear to have enough money to complete the build----- But once more reading between the lines they are so sure the British Government, with public money, will foot the bill in the end.

Last year you made a statement to both the Press and Television that at a recent meeting you looked Mr de Rivas in the eye and told him there would be no subsidy from the British Government and what do I see in our local paper this

"A Treasury spokesman declined to comment on any negotiations with EDF but did say the Government's UK Guarantee Scheme launched last year. Was available to help kick-start projects"

So what is going on if the British Government intend to do this why not award the contract to a British owned firm and not a foreign one who is going to take our money and the profits (all this smacks of "YES Minister"!!!)

I attended all of the EDF consultations and the IPC consultations and have now come to the conclusion that IF EDF get the go ahead it is as everyone has said from the start that it was DONE DEAL and that once more a Government Department has wasted a vast amount of public money.

So in ending Mr Davey I do hope the General Public are proved wrong

Date 25th January 2013

Rt. Hon. E Davey,
Secretary of State for Energy & Climate Change
House of Commons,
London SW1A 0AA

Dear Minister

EDF HINKLEY POINT C TRANSPORT PROPOSALS

You are, I believe, the Minister who will be responsible for making the final decision on the "Hinkley C" nuclear project.

Also, I believe, you must have received many letters appealing to you that this project is not granted unless a direct road from the M5 to the Hinkley site is included as a condition.

1. EDF's proposed route for construction vehicles and workers transport is from the M5 on the A38, A39 and C182 which is already heavily congested with normal traffic. (Recorded as 4,200 plus per day through Cannington Village).
2. With the estimated increase in EDF traffic volume on these single carriageway roads any vehicle incident or emergency at the Hinkley site will endanger the safety of those involved and the whole community.
3. Gridlock situations are already frequently causing inconvenience to residents in the locality.
4. A number of fatal accidents on this route as well as recent floods and adverse weather conditions have blocked the route to Hinkley and isolated the village of Cannington for a number of hours.

Parish, District, County Councils, Police, Fire and Ambulance authorities as well as those residents along the proposed route have expressed the above views both in writing and at meetings with EDF representatives over a period of some five years.

I am informed that the "West Somerset Coroner" has returned a verdict of accidental death by human error on four victims involved in a traffic incident, which occurred last year on the A39 approach to Cannington and stated that this is one of the serious roads under his jurisdiction

The more vehicular traffic, the more possible "human error"

Will you please explain why we, the residents of the area, can see the probable safety aspects of having an estimated 6,900 vehicles (2,700 EDF including 750 HGV's of up to 40 tonnes) per day on the proposed route, while EDF only consider profit margins and Government Departments appear to ignore those who they are supposed to represent

Sincerely

BRIDGWATER TOWN COUNCIL



TOWN HALL BRIDGWATER SOMERSET TA6 3AS
01278 427 692 07776 216670
townclerk@bridgewater-towncouncil.gov.uk

Dear Minister

23 January 2013

I am writing to express the concern of Bridgewater Town Council that the announcement promised by the Government on its approach to Community Benefit Contributions (CBC) in relation to nuclear new build was not forthcoming in 2012. There was reference to the issue in the Treasury's National Infrastructure Plan published in November 2011, which said that the Government would engage with developers and local authorities on community benefit and bring forward proposals by 2012 for reform of the community benefit regime to provide greater certainty for all parties. As a community that is preparing to host the first new nuclear reactors to be built in the UK for more than 20 years, we as representatives of the people of Bridgewater in effect the host town were naturally encouraged by those words and bitterly disappointed when the year ended without any further comment from the Government on the subject. Our MP Ian Liddell-Grainger did raise the question in the House before Christmas in response to the second reading of the Energy Bill and on that occasion he was told the Government was aware of the issue and considering it but again we have heard nothing since.

The whole community in this part of Somerset and West Somerset, at least five generations, have lived in the shadow of a nuclear power station, and could be assumed to have no qualms about the prospect of a new one in the same location but public meetings have shown that there are considerable reservations in some quarters about the size and scale of the proposed Hinkley Point C and the anticipated ten years of disruption while it is constructed. For example, traffic and highway impacts and fears of excessive congestion affecting the life of the town, the accessibility on principal routes through the heart of the town and the continuing viability of the economy are major concerns. Socio-economic impacts are another source of concern. These understandable reservations might seem less of an obstacle with a background of support from the Government in the form of a CBC scheme that recognised the local communities' tolerance of the facilities in the national interest.

We appreciate that the decision to press ahead with the development of Hinkley is likely to be taken regardless of local sentiment, but we would urge you to consider whether it is fair or reasonable that the communities around the proposed plant should bear the brunt of its impact without any recognition from the true beneficiaries. The present planning system with its provision for Section 106 Agreements does not go far enough in this regard, a point that is clearly conceded by Government in its promise to look into CBC. We would suggest it is vital that this ambiguity is cleared up before permission is given for Hinkley Point C if it is to act as the spur for a suite of new nuclear power stations across the country. Other developers and other communities will be looking to Somerset to see how the first one fares and whether or not it is achieved with the goodwill and acceptance of the people most affected.

Please could we have your assurance that this matter is indeed at the forefront now of the Government's considerations as it reflects on the Hinkley Point C development consent and that we will have an answer soon?

17th January 2013

RECEIVED BY DECC

24 JAN 2013

Rt Hon. Edward Davey MP
Secretary of State for Energy & Climate Change
House of Commons
London
SW1A 0AA

Dear Minister

EDF HINKLEY POINT C TRANSPORT PROPOSALS.

I would once again appeal to you regarding the above, before a final decision is taken. Please do not grant consent without the requirement of a new direct road from the M5 to Hinkley.

1. The route from M5 to site is not suitable for the proposed volume of EDF traffic.
2. With the increased volume, it is not considered to offer adequate safety in the event of emergencies, either nuclear or community.
3. Excessive increased traffic will create undue & unnecessary inconvenience to local residents going about their daily lives.

These views have been expressed by the Councils, Police, residents and now the County Coroner. A copy of his comments in the Bridgwater Mercury of 15th January, after his findings resulting from one of the accidents occurring on the A39 last year is appended below.

"West Somerset Coroner Michael Rose returned verdicts of accidental death for all four victims. He said: "This is one of the most serious roads in my jurisdiction and every single death on it is as a result of human error."

"Human error" will continue and can only increase in ratio to the volume!

Can you please explain to me why all the above can see the folly of these proposals. The only people to disagree are EDF and Government Departments who have a vested interest without the risks.

I trust I shall have the courtesy of your reply.

Sincerely

Subject: My statement to the Hinkley Point C Hearing 9 May 2012

See article in Today's Sunday Times "Nuclear cleanup to take 120 years and cost £120 billion"
www.thesundaytimes.co.uk/sta/news/uk_news/.../article1173042.ece

NLFAB was set up to recommend a system of collecting levies from the new nuclear build in order to avoid the sort of costs resulting from its decommissioning and waste management reported today.

See

http://www.decc.gov.uk/en/content/cms/meeting_energy/nuclear/new/waste_costs/nlfab/nlfab.aspx

Extract "DECC has created the Independent Nuclear Liabilities Financing Assurance Board (NLFAB), to provide impartial scrutiny and advice on the suitability of the Funded Decommissioning Programme (FDP), submitted by operators of new nuclear power stations. The Board will advise the Secretary of State on the financial arrangements that operators submit for approval, and on the regular review and ongoing scrutiny of funding."

I think that NLFAB has reported, but its solution has been turned down by EdF.

I attended the Hinkley Point C hearing in order to get The Planning Inspectorate to add conditions to its consent as follows:-

The application should be refused or deferred until an EPR has been successfully commissioned after 2014.

The contract for the construction and commissioning between Areva and TVO of the "first-of-a kind" Evolutionary Pressure-Water Reactor at Olkiluoto in Finland, the EPR, was signed in 2003. It is now not likely to be generating until 2014, a time span of 11 years. In the meantime another EPR is under construction at Flamanville in France, expected to be commissioned in 2016. Two further EPRs are under construction in China, the date of completion of which is unknown.

With such a complex object, it is inevitable that changes in design will arise before it is properly commissioned, which will mean changes to the other three during their construction, which will introduce delays and additional costs. EdF has indicated that it hopes to decide to go ahead with Hinkley Point C at the end of 2012. It may well lead to a speedier completion if this decision awaits the eventual completion of the first EPR so that any necessary modifications can be incorporated in the NNBSGenCo EPR. A postponement of the decision for what may be 18 months, may well save years of delay and expense if major modifications to the design prove to be necessary. If the commissioning of the first EPR is further delayed, it

would indicate that its design is not viable and further EPRs will not be built.

The application is specific to the EPR, which may be withdrawn and substituted by a Franco-Chinese version of the smaller ATMEA-1. If so it should be deemed that the application has failed and a new application to be submitted.

Taking cognisance of the problems with the EPR, a smaller reactor is under development by a joint venture of Areva and Japanese MHI known as the ATMEA-1. Following the cooperation of Areva and its equivalent in China in the building of the two EPRs in China, EDF is prepared to develop an alternative to the ATMEA-1 with Guangdong Nuclear Power Corporation.

The design of the ATMEA-1 will not be completed until 2013 and if submitted as an alternative to the EPR for Hinkley Point C, would need the scrutiny of ONR's GDA, a process which could take a further two years. The involvement of Guangdong in a UK new reactor would be complex.

This is much too difficult for THE PLANNING INSPECTORATE to consider and the substitution of any other reactor than the EPR would mean that the application has failed.

Planning consent to be withheld until NNBSGenCo has finances in place sufficient to cover an extended building period, usually ten years. (OL3 in Finland is taking more than 11 years from contract signing)

Financing of nuclear build by the private sector has relied on state loan guarantees, the provision of which requires the down-payment of a premium. How the development at Hinkley point is to be financed is not yet defined. NNBSGenCo is ca. 68% owned by the French state, 20% by Centrica and the rest by EDF's shareholders.

Whatever "incentives" are in place, an investment in a project with an unknown cost and construction period without some guarantee or under-writing is an unlikely prospect. The four "incentives" incorporated in the energy market reform conceived by DECC are a disincentive to the minority shareholder, Centrica, as they penalise its core gas business.

Direct investment by the UK or the French government will conflict with EC competition policy, so any solution will be complex and expensive. With a declining electricity market it is not clear how such an investment will be realised.

The risk is that the project will start, but after some progress has been made, the financing will fail and the completion will be to the account of the UK government.

Planning consent to be withheld until ONR is satisfied that the additional safeguards requested post-Fukushima by the Chief Nuclear Inspector have been incorporated in the design and specification of the EPR.

In the aftermath of the Fukushima disaster there is an list of prospective modifications to the EPR design issued by ONR. There is a programme of consideration and agreement by EdF to be fulfilled by the end of 2012. This will enable final cost evaluations to be made in order to procure adequate financing and EdF's final decision to proceed.

Planning consent to be withheld until a mechanism for collecting adequate nuclear liability funds has been submitted by NNBGenCo and considered by THE PLANNING INSPECTORATE as satisfactory and will ensure no cost to the UK Treasury. The company structure is unable to cover its liabilities and such should be underwritten by the French State, as the majority owner of NNBGenCo.

When the privatised British Energy failed its nuclear liabilities were taken over by the UK government. Following this the intention of the UK government is that the nuclear liabilities of the new nuclear build will not fall to the taxpayer and to consider and advise a suitable financial mechanism for this to be avoided the NLFAB was appointed.

I believe the NLFAB has reported, but its findings have been rejected by EdF and in response it has been asked to put up its own suggestions. The previous system was a levy on generation, but clearly if there are interruptions or premature closures, the contributions to the fund will be reduced. Also the NNBGenCo as a joint venture could simply be liquidated to avoid its liabilities.

It may be that the only satisfactory solution is for a bond to be raised able with its interest earned able to meet the eventual liabilities, a sort of pension fund for retired reactors. However, whatever transpires THE PLANNING INSPECTORATE should be satisfied that a mechanism is in place able to avoid the costs for decommissioning and waste management associated with the new build falling to the account of the taxpayer.

It the operational life of the EPR extends to 60 years, then the decommissioning and waste management liabilities will fall in 2080 and beyond, so the financial mechanism may be somewhat complex.

I appreciate that it is not the remit of THE PLANNING INSPECTORATE to consider reactor safety. I have recently reviewed the safety issues post-Fukushima with the ONR/GDA staff in HSE HQ at Bootle and am well versed in the issues post-TMI, Chernobyl and Fukushima.

The hydrogen explosions at TMI and Fukushima followed the depressurisation of the reactors. It is my position that as the emergency core cooling systems are initiated by depressurisations, their application in an emergency, such as a station blackout, may lead to the destruction they are intended to avoid.

I just wish to record that in spite of the assurances of the GDA technical staff to the contrary I continue to hold to my convictions.

My ability to address the issues above can be confirmed by reference to my website, which contains my CV and includes a linked list of my articles on energy subjects.

I believe that the decision is now postponed until March 2013 and with the statement by NDA's . the opportunity arises to re-consider the conditions attached to the consent, if due regard has not been made to the NLFAB's requirements.

With kind regards

PS The commissioning of the first EPR in Finland is now further delayed to 2015

No attachment

From the office of the



Department of the
Environment

John Hayes MP
Minister of State
Department of Energy and Climate Change
3 Whitehall Place
London
SW1A 2AW

Telephone:

Email:

Your reference:

Our reference: SUB/1028/12

Dear Paul

21 October 2012

I am writing in respect of Charles Hendry's letter of 7 February in response to my letter of 24 January to Chris Huhne on the planning application process in respect of the proposed new nuclear power plant at Hinkley Point C.

I attach a copy of a letter which I have sent to the Planning Inspectorate expressing my concerns about the environmental impact of the proposed new nuclear power stations in England and Wales, and requesting that I be consulted on all applications for development consent. I have also asked the Inspectorate to include relevant EU sites in Northern Ireland as part of their assessment under the Habitats Directive.

*I would welcome hearing from you
Sincerely*



Department of the
Environment

Telephone:

Email:

Your reference:

Our reference: SUB/1026/12

21 October 2012

Deo

I refer to the applications for proposed new nuclear power stations in England and Wales, which are for the Planning Inspectorate to consider. As Environment Minister for Northern Ireland, I would like to express my concern about the potential environmental impact of the proposed new nuclear power plants in England and Wales and, in particular, the possible effect on the population of Ireland, north and south, given the proximity of the proposed facilities.

Given these concerns, I would like to be consulted by the Inspectorate in respect of each application for development consent for a nuclear power station.

In January I wrote to Chris Huhne, then Secretary of State for Energy and Climate Change, on the subject of the Hinkley Point C application and received a reply from Charles Hendry, then Minister of State, on 7 February. In his reply, he indicated that the Examining Authority would, in consultation with the Environment Agency, be responsible for carrying out any further site-specific assessment relating to designated EU Natura 2000 sites under the Habitats Directive. I am strongly of the view that the relevant sites in Northern Ireland should be considered as part of this assessment and would be happy for the Northern Ireland Environment Agency to provide any additional information or assistance required to carry out such an assessment.

I would welcome hearing from you and a meeting in due course

From:
Sent: Wednesday, October 10, 2012 12:08 PM
To: Hinkley Point C
Subject: Fwd: Photo of SSSI legal sign

This sign was in place as the works began at the site and EDF do not have full planning permission. The sign has since been removed but it still shows that there is a massive contradiction if a company can be exempt from catastrophic damage to our wildlife and ecosystems yet it is "illegal" to damage any flora, fauna or geographical existence. This makes a mockery of environmental law and protection of nature.

I hope you will not support the proposal for a new nuclear power station at Hinkley as it will continue to damage the health and well being of our countryside and people for millennia. EDF are destroying the environment and damaging the future. Instead we need to invest in renewable, non toxic localised solutions using the power from the sun, wind, water and biodegradable waste (anaerobic digestion).

Your sincerely,

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.....

Correspondents should note that all communications to Department for Communities and Local Government may be automatically logged, monitored and/or recorded for lawful purposes.

This National Nature Reserve has been notified as a site of special scientific interest
under Section 28 of the Wildlife and Countryside Act 1981.

It is an offence, without reasonable excuse, intentionally or recklessly to destroy or damage
any of the flora, fauna, or geological or physiographical features by reason of which the site
is of special interest, or intentionally or recklessly to disturb any of those features.

A person found guilty of any such offence may be prosecuted and liable to a fine not
exceeding £20,000.

Dear Edward Davey,

After the disaster at Fukushima in Japan, please ensure that EDF does not build a new nuclear power station at Hinkley Point in Somerset by sticking to the original liberal democratic policy of:

- ① Opposition to a new generation of nuclear plants.
- ② A pledge to increase the amount of renewable generation aiming for 100% by 2050

yours sincerely

RE: Nuclear Disaster in Japan and EDF's Proposals for "Hinkley C"
Dear Edward Davey,

After the disaster at Fukushima nuclear power station in Japan, please ensure that EDF does not build the largest UK nuclear power station at Hinkley Point in Somerset by sticking to the original Liberal Democrat policy of:

1. Opposition to a new generation of nuclear power plants in Britain.
2. A pledge that 40% of our electricity will come from renewable sources by 2020 and 100% by 2050.

We also urge you to maintain your commitment to no financial support of any sort for the nuclear industry, including for insurance and waste management.

Sincerely,

Name: _____

Address: _____

