



West Mersea  
Town Council

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**Environment Agency**

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SHEFFIELD

S9 9DA

**Date:** 12th Dec. 2016

**Our Ref:** WMPB2016EA01

Dear Sirs

**Magnox Ltd Applications - EPR/DP3127XBV002**  
**PR2TS/E10760C/V003, EPR/ZP3493SQ/V005**

Having studied your documentation in relation to Magnox Ltd's application we wish to advise of our deep concerns. Principally these fall into 3 sections:

**1. Proximity of Mersea to Bradwell**

Mersea Island is on the opposite bank of the Blackwater estuary, within 2 miles and downwind of the prevailing Southwest wind. West Mersea Town Council (WMTC) has not been officially contacted for a response to this proposal nor, indeed, other proposals relating to Bradwell. Whilst it appears Mersea Island is not considered necessary to contact as it is not within the planning area of Maldon District Council which covers Bradwell. However, the Government's National Planning Policy Framework is absolutely specific about cross boundary impacts (see: NPPF 181).

**2. Complexity and Obscurity of Consultation Documents**

The consultation has been repeatedly delayed from June 2015 and evidence gathered over the period to date has been presented for Public Consultation in ~2000 mainly unsearchable PDF file format documents. The consultation document has no section headings / sub headings, page numbers, index or even a list of the contents in the order that they appear. The Council's opinion is that this consultation does not meet current Government Consultation principles as it is neither clear, concise nor easy to understand (see:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/492132/20160111\\_Consultation\\_principles\\_final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf)). Therefore it is not fit for purpose.

With the nature and impact of the proposal the two month consultation period is insufficient and does not allow enough time for proper consideration and understanding of the issues to enable WMTC to give a fully informed response.

### 3. Public health, ecological and environmental issues

Professor Chris Busby has reviewed the consultation and his results have been published, which raise health and process issues (see:

[http://www.theecologist.org/campaigning/2988382/no\\_to\\_bradwells\\_secret\\_radioactive\\_discharges\\_to\\_the\\_sea.html](http://www.theecologist.org/campaigning/2988382/no_to_bradwells_secret_radioactive_discharges_to_the_sea.html)). WMTC's immediate concerns are:

- a. Children on the island will be swimming and sailing in undiluted radioactive waste and treated sewage discharged on the ebb tide. Dabchicks Sailing Club raises a fleet of over a hundred juniors in their races and the discharge plume lays in the middle of their sailing area.
- b. Further processing would result in residual levels accumulating beyond your anticipated values ( $\leq 10\%$  as in EPR-DP3127XB).
- c. In EPR-DP3127XB page 188/317 it states the FED operation is limited to "treating a finite amount of waste material". To this end please can you confirm what the total tonnage of FED was, compared to the original estimate of 205 tonnes, and what is currently remaining?
- d. Both native and pacific oysters are harvested and farmed in and around Mersea and Tollesbury, and, indeed, live and thrive all over the Blackwater Estuary, these areas neighbouring Bradwell are still ignored or dismissed in your documentation. It is clear the discharge Plume from the outlets risk directly contaminating these areas that have not been included within these studies. See current maps attached from the Tollesbury & Mersea Oyster Company and view research from 2014 on the Marine Conservation Zone: <http://dnn.essex.gov.uk/Portals/36/Documents/MCZ-Oyster-Project.pdf>).

### 4. Unreliable evidence, modelling and other inconsistencies

The evidence given by Magnox Ltd consultants HR Wallingford (HRW) is incomplete and therefore the reports HRW have prepared include errors, see below and also see 3d above:

1. Planning for new outlet pipes APPENDIX A of BRAD/EN/REP/130/FED (p41 of 43). When was planning / development and regulation permission given and under what reference number for the installation of the new effluent discharge lines for the East Outlet Diffuser arrangement? (Fuzzy drawing) We think the number is 005/013/066 (or 006/013/066).
2. What was the date of Notice to Mariners referencing the underwater structural changes and under which reference number was this provided to the Admiralty?
3. From the Public Health England website it states that: "PC-CREAM can only be used to assess the radiological impact of discharges of radionuclides to the environment if it can be assumed that these discharges are continuous and constant. PC-CREAM can not be used to model short duration releases unless these occur with sufficient frequency that they can be approximated to a continuous release." (our emphasis). Furthermore it states that PC-CREAM does not include estuarine modelling. Can you confirm whether PC-CREAM was used as the modelling software in your documents?

**Therefore WMTC requests:**

- 1) An immediate halt to the current unlicensed discharges.
- 2) An alternative method of FED processing that does not discharge effluent into the Blackwater Estuary.
- 3) That the EA recommends that any FED processing resulting in discharge directly or indirectly to the sea is banned.

This is a public consultation and should have taken into account the views of our residents, yet to date there has been no published public information or local meetings to engage and allow questions to be asked. Consultation is not just about formal documents and responses; it should be an ongoing collaborative approach.

**This is what WMTC require from the EA to enable a meaningful consultation**

- 1) As above, an immediate halt to the current unlicensed discharges.
- 2) Sight of a consultation document that has section headings/sub headings, pages numbers index and a list of contents.
- 3) A time extension to the consultation appropriate to the potential impact
- 4) A public Meeting
- 5) A dedicated meeting between WMTC, Magnox Ltd and the Environment Agency

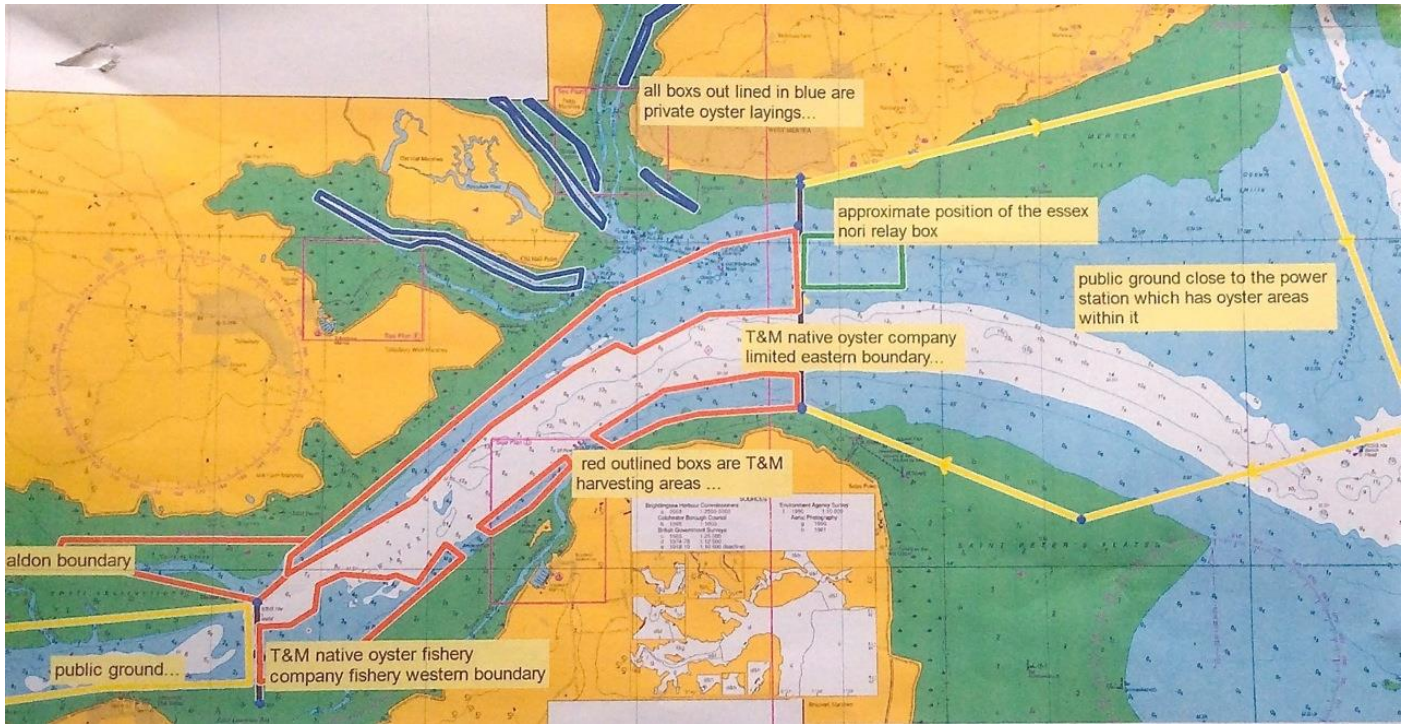
We look forward to receiving your responses to the above. Furthermore, kindly confirm, in writing, that this council will be contacted directly and advised of further consultation affecting the Blackwater Estuary as a whole, and, therefore, Mersea Island, in the future.

Yours faithfully

Town Clerk  
West Mersea Town Council



## Oyster Beds & Layings.



## Close up of Outfall/Discharge.

