

Aldeburgh Town Council's Response to:



EAST ANGLIA TWO & EAST ANGLIA ONE NORTH PHASE 4.0 CONSULTATION



*A vision of Aldeburgh's future...
A prosperous, properly protected
coastal town that is well-organised
and proud of its past as well as being
confident in its future. A welcoming
place where visitors arrive expectant
and leave uplifted. A united town
with a definition of community that
is broad and inclusive – Aldeburgh
Town Plan 2015*



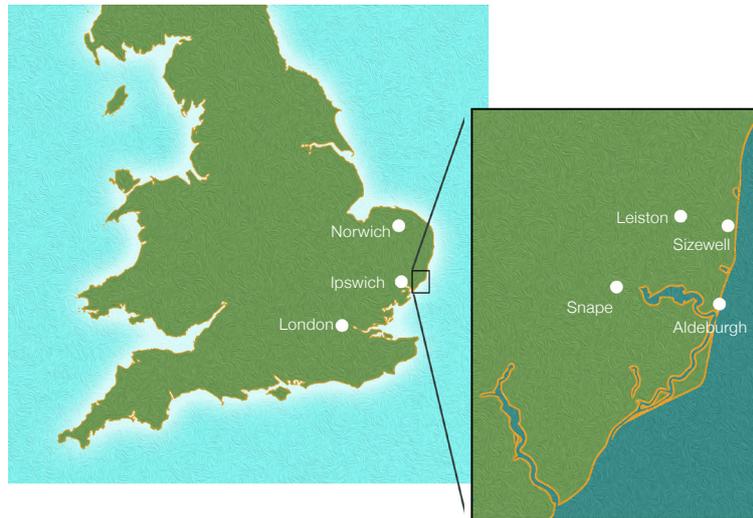
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Introduction:

Aldeburgh is a small town situated on the Suffolk Coast between Lowestoft and Felixstowe of around 2,700 inhabitants, roughly 2 miles south of Sizewell B, and principally accessed by one single carriageway 'A' road.

The town and surrounding area lie within the Suffolk Coast and Heaths AONB which contains many areas of special interest (e.g. the AONB itself, RAMSAR, SSSIs), is constrained by marshland to the north and the River Alde (RAMSAR, SSSI site 682) to the south.



It is a well-known 'destination' town, heavily associated with the Arts, due to targeted policies promoting this by the Local Planning Authority.

The demise of traditional livelihoods such as fishing and brick making means that the town's viability almost entirely depends on tourism and leisure, with this prosperity attracting an economic uplift to surrounding villages.

While approximately 50% of the properties in Aldeburgh are second or holiday homes, the town has worked hard to improve the year-round tourist offering, with the population regularly swelling from under 3,000 to well over 15,000 at weekends and peak times.

The town is renowned for having a strong international presence in Arts and Music. Various events now attract visitors throughout the year, with documentary, poetry and literary festivals, a variety of musical events, High Tide and the Aldeburgh Festival.



It is known as the home of Benjamin Britten and Elizabeth Garrett Anderson and E M Forster and Susan Hill have cited the area as inspirational.

Aldeburgh has an attractive shingle beach and the town is set within a remarkably unspoilt area, surrounded by protected environmental sites.

Where it is considered that Aldeburgh Town Council (ATC) is unable to give a fully quantifiable response due to insufficient knowledge, where appropriate, a considered opinion will be given. In addition, it is important it is recognised that information and opinions now offered, will be out of date by the time this project becomes live are not absolute or restrict further input.

In general ATC will confine its answers to those areas specifically impacting on the town of Aldeburgh; where some issues may also affect the surrounding area, some are peculiar to the town.

While we wish to support other areas, villages, Parishes, with specific demands and needs, these will not be covered in our detailed feedback but may form additional supporting material where relevant.

The views of Aldeburgh Town Councillors, residents and organisations within the town are encompassed within this response, the result of a lengthy consultation with the community (See Appendix 1). This response was ratified at a Council Meeting on March 11th 2019.

The following is our response to the Scottish Power Renewables EA1 and EA2 Phase 4 Consultation.

Executive Summary

- **ATC believes the proposal by SPR to utilise roads in Aldeburgh for HGV movements would have a serious impact on the lives of residents and visitors and would have a major detrimental effect on the town's economy. ATC will demand substantial mitigation measures if the current road proposals for Aldeburgh are adopted.**
- **ATC believes the current SPR proposals have failed to recognise the negative impact on the town's tourist trade.**
- **ATC believes the development would cause significant harm to the Area of Outstanding Natural Beauty and damage the local environment for many years.**
- **ATC believes the SPR proposals do not pay sufficient regard to the cumulative impact of other National Strategic Infrastructure Projects planned for this area.**

A developed version of this summary is reproduced in this response.



Overview:

In both the Phase 3 and 3.5 Consultations, ATC declared its support for renewable energy solutions to future power requirements.

In both responses, ATC said, unequivocally, that SPR proposals were too high a price to pay for cheaper electricity.

ATC sees no reason to alter that position in respect of the Phase 4 Consultation.

Despite widespread and continuing criticism from local authorities, environmental agencies, business and tourist organisations, SPR seems determined to pursue its plans, irrespective of the long-term damage to this area's outstanding beauty and economy.

ATC understands the driver for the location of onshore infrastructure and cable runs is the specific connection offered by National Grid. Although this has been subject to a Connections and Infrastructure Note (CION) assessment, we believe the negative impact on this area has not been accurately assessed.

ATC believes there are other connection points in the UK and that National Grid should utilise these rather than the present proposal.

Although the sea bed off Aldeburgh, Thorpeness and Sizewell is considered suitable for the erection of wind turbines, the immediate coastline and surrounding areas are not, in the opinion of ATC and others, appropriate sites for landfall or sub station infrastructure.

It is ATC's view that the proposal to bring cables ashore at Thorpeness would have a detrimental impact on the entire local economy and the well-being of residents and visitors.

Broader issues will be addressed later, but proposals specifically relating to Aldeburgh - highlighted in the 3.5 Consultation - are still causing great concern to the Town Council, local organisations and residents.

It is the opinion of ATC, that the following issues have still not been adequately addressed by SPR:

Traffic and transportation:

At the 3.5 consultation stage, SPR indicated it would direct vehicles down a number of roads, including the A1094 (Saxmundham Road), to the roundabout at Victoria Road and then left along the B1122 (Leiston Road) towards Aldringham. This was to facilitate the movement of HGVs involved in horizontal directional drilling,

ATC dismissed this plan in its response to the 3.5 consultation and continues to totally reject this proposal, maintaining strong opposition to a ridiculous and ill-considered idea.

A cursory survey of current traffic problems at this pinch point, where the two main approach roads into the town converge, together with substantial local opposition, should have ruled out this option by now.

As ATC has previously highlighted, within the town boundary, the A1094 is substantially narrowed by on-road residential parking, particularly approaching the junction with the B1122. There is already a high level of traffic chaos at this junction caused by vehicles delivering to the two supermarkets adjacent to the roundabout. Buses and emergency service vehicles frequently have great difficulty negotiating parked vehicles (as evidenced in the accompanying photograph on Page 11.) and a new pedestrian crossing is planned which will add to safety concerns.

The B1122, a much narrower road, is similarly afflicted by existing traffic problems (ignored in the SPR swept-curve analysis) and is totally unsuited to the movements of additional HGVs.

ATC cannot understand why this dangerous and fool-hardy option remains on the table.

SPR seems to think that tinkering with the shape of the pavement at the junction of the A1094 and B1122 is going to solve traffic congestion created by HGVs travelling in opposite directions on a roundabout.

The pedestrian crossing by the roundabout provides access to supermarkets, a large car park, the town's Community Centre, the main pedestrian route to the primary school, the Fire Station, recycling units and well-attended fitness and sporting facilities.



In short... the most heavily-used pedestrian and vehicle access route in Aldeburgh.

Add holiday traffic and local delivery vehicles to the mix and you have a recipe for chaos - a situation that could endanger lives and threaten the economic prosperity of the entire area. Far beyond the town boundaries, roads will be heavily congested with construction vehicles, potentially, for both Scottish Power Renewables and Sizewell C projects.

SPR has failed to recognise this major issue and ATC calls on it to formulate a strategy for mitigating public perception that Aldeburgh and the surrounding area is being ruined by large-scale development.

SPR is proposing to construct a haul road for some traffic to their onshore sites. This may ameliorate the impact on Aldeburgh, but it is not clear when the road will be built nor are there any commitments to the level of traffic this would take away from the town. Urgent clarification on this point is required, but it does raise a question:

Why not use the haul road for ALL vehicles and spare Aldeburgh traffic misery?

Despite numerous requests, there is insufficient information relating to the level and type of traffic the Aldeburgh route would be expected to accommodate. ATC understands that a full highways and traffic survey will be submitted by SPR at the Development Consent Order stage - too late in the planning process for any interested party to suggest material alterations.

ATC believes that SPR has not provided sufficient details of the level or type of traffic the Aldeburgh route would be expected to accommodate.

It seems clear from SPR's preliminary investigations into ownership of property near the roundabout that the traffic is likely to be of the type that will require modifications to the route and, therefore, is likely to be extremely heavy in weight terms. It is also not clear for what period and at what volume such traffic should be expected.

SPR has given details of current traffic levels on the A1094 and B1120 - (seven-day traffic surveys both ways broken down by vehicle type).

The SPR traffic surveys show that the current level of large HGV traffic (where large HGV in this context means three-axle vehicles) is low - below 25-35 vehicles per day

(depending on assumptions about weekends and excluding buses) travelling to and from Aldeburgh.

However, the number actually using the Aldeburgh roundabout is likely to be lower for two reasons - the surveys have been sited some distance from Aldeburgh (and therefore inbound or outbound traffic may never reach the roundabout) and also because it is not clear how many of the vehicles recorded in this category are agricultural (which, presumably, would also be unlikely to use the roundabout).

SPR estimates that an additional 55 HGVs per day would be using the roundabout, although it is not clear what proportion of these would be heavy, three-axle lorries.

Without precise figures, the realistic projected impact on Aldeburgh cannot be determined. Nevertheless, the worst case scenario could see a trebling of the number of large HGVs attempting to negotiate the roundabout.

If this was the case, ATC believes the day-to-day lives of residents living close by would be exacerbated by two factors:

- Construction traffic using roads outside normal working hours (e.g. overnight).
- If the traffic was predominantly large, multi-axle articulated lorries, the impact in terms of noise, vibration, and, potentially, danger, would be more significant than would be implied by considering the mere number of additional vehicles.

ATC demands urgent clarification regarding the scheduling plans, vehicle numbers and vehicle types so that the realistic likely impact on Aldeburgh residents of the additional traffic can be properly determined and appropriate responses made.



ATC gives notice it will resist any attempt to utilise roads in the vicinity of the roundabout for SPR construction work. In the event of this impractical scheme receiving development consent, the Town Council will be demanding extensive and expensive mitigation measures.

See Mitigation page 21



Traffic chaos on the B1120, Leiston Road, Aldeburgh - the road SPR want to use for HGVs.

Environment:

SPR is proposing to bring cables ashore north of Thorpeness, with an onshore cable route to Sizewell 9 kms long and up to 32m wide.

This work will take place in an Area of Outstanding Natural Beauty and will have a negative impact on the land and seascape. Natural habitats will be destroyed, stunning scenery no longer accessible to the thousands of walkers who enjoy the views and the tranquility.

Underwater topographical features are understood to prevent cables coming ashore at Sizewell. Nor can they come ashore north of the nuclear station because of proposals for Sizewell C and the close proximity to RSPB Minsmere.

ATC believes that SPR should give serious consideration to the use of a 'ring main' which could be used to route cables further south or north, preventing environmental damage to the AONB.

The release of environmentally hazardous substances from sediment or historical offshore dumping, also concerns ATC, together with the possibility of ground and surface water contamination during onshore construction.

SPR believes its proposals would have a minimal impact on marine mammals and birds. ATC can find no evidence to substantiate this statement.

SPR says it is committed to restoring the area post-construction, but its plans are nebulous, to say the least. For example, Page 11, Paragraph 27, EA2-DEVWF NTS gives a clue to the SPR environmental policy:

*"...where an aspect of the development is likely to give rise to significant environmental impacts, mitigation measures are proposed to avoid or reduce impacts to acceptable levels and, if possible, to enhance the environment. **Mitigation will be agreed through on-going consultation with relevant authorities...**"*



ATC believes this is not good enough. Before any development consent is granted, there should be a clearly-defined commitment to replace, as a matter of urgency, habitat, trees and footpaths. Ground restoration work should be contemporaneous with construction.

Suffolk County Council and Suffolk Coastal District Council have jointly produced a response to SPR proposals which challenges many environmental aspects of the energy provider's proposals.

The report highlights one particular concern:

...“EA2 will have significant seascape, landscape and visual effects on the character of some inshore seascape and coastal edge landscape at the local and regional scale.

“It is a fact that these areas are a part of a nationally designated landscape (AONB), much valued by local residents and visitors who have a key contribution in the local economy, that give the Councils such cause for concern.

“These concerns encompass impacts on scenic quality as far as it affects a clear and recognizable sense of place, a sense of remoteness on key sections of the coast, a relative lack of human intervention looking out to sea, and possible effects on a sense of tranquility...”

Throughout their considerable schedule of proposals, SPR has addressed issues such as ground condition and contamination, air quality, water resources and flood risk, noise and vibration, traffic and transport and tourism with the following phrase:

“...cumulative impacts were assessed as not being significant...”

ATC challenges this assertion. ATC believes that SPR's commitment to the environment and the protection of the AONB is, at best, luke warm.

There is further evidence of SPR's scant regard for environmental matters: SPR proposes to install a cable crossing on the B1122, close to a Grade II listed building, currently housing a care home. In its schedule, SPR states:

"...the only significant operational effects of the onshore cable route will be at Aldringham Court Nursing Home due to the removal of woodland. The significant impacts will be mitigated through the establishment of heathland habitat and the partial reinstatement of woodland at the end of construction."

The joint councils' report offers an insight into SPR's environmental commitment:

".. During the Phase 3.5 consultation, the impact of the cable route on the setting of Aldringham Court was highlighted and a full assessment was required.

" SPR has still not undertaken this."

ATC also questions whether the visual impact of 300m-high turbines at East Anglia 2 is in accordance with AONB development criteria. ATC understands that applications for wind farms off the coast of Dorset and the Isle of Wight were refused because of the visual impact of turbines on an AONB coastline.

ATC is also concerned about the impact of offshore construction work on fish stocks and the detrimental effects this might have on the local small, commercial fishing industry. This is coupled with concerns of possible disruption to fishing caused by underwater cable laying and sediment disturbance.



Tourism:

It is inevitable that if SPR plans are implemented in full, they will have a major impact on tourism in this area.

Aldeburgh is virtually entirely dependent on people visiting the town throughout the year. Most traditional industries have disappeared and tourism is now the principal income source for most businesses.

The tourist trade alone in this part of East Anglia is worth in excess of £200 million a year and supports thousands of jobs. In addition, visitors and holidaymakers attracted to this area contribute many millions more in taxes to the Treasury.

Suffolk Coastal District Council Suffolk County Council jointly commissioned a report into the likely economic impact of the proposals to construct Sizewell C.

The report's conclusions could equally apply to the potential consequences of Scottish Power Renewables plans.

The report recognised there would be an economic boost, but also identified a threat to the tourism trade:

“.....any discouragement of visitors from the local area will have a negative economic impact. A 1% drop in visitor numbers would mean a loss of £6 million of local economic impact per year, and a 5% drop in visitor numbers would mean a loss of £30 million per year.”

People visit Aldeburgh and the surrounding area to enjoy the unspoilt beauty of the coast, the tranquility and stunning visual landscapes. In the absence of a reliable public transport system to this remote area, the motor car is their principal method of travel.

The route into Aldeburgh from the South is principally the A1094 and from the North the B1122 - the two roads that SPR wants to utilise for HGV movements.

During busy summer holiday months, Bank Holidays and practically every weekend, holiday makers, holiday home owners and day-trippers stream into Aldeburgh. Most come by car, some tow caravans, some drive motorhomes, others large SUVs. At peak periods, there is already a significant traffic problem.

Add HGVs to the mix, and you have a recipe for gridlock, frustration and a perception that Aldeburgh is NOT the place to visit.

In short, irreparable damage to the town's vital tourist economy.

ATC might have expected a detailed response from SPR to this pressing issue. Instead, this is what the energy supplier believes:

"...No significant tourism and recreation impacts were predicted as a result of the proposed East Anglia 2 project. Tourism and recreation receptors would experience minimal visual impacts and only temporary physical obstruction, noise and traffic impacts."

ATC believes this to be an arrogant and complacent response and calls for detailed measures to protect the town's tourist economy.



Social-Economic effects:

SPR predicts that during the onshore construction of EA2 and EAN1, peak employment locally is estimated to be 300 staff a day. It also suggests there will be significant employment impacts and no significant adverse impacts.

ATC can think of one adverse impact.

According to SPR, 30 percent of workers will be drawn from the local community - which leaves a substantial number of people looking for accommodation and SPR has no accommodation strategy.

In response to a question from an ATC representative about its accommodation strategy during the construction process, a SPR spokesman replied:

"..... currently there are no plans for one within the East Anglia ONE North and TWO proposals. East Anglia ONE, currently under construction also does not have an accommodation strategy. However, we encourage staff and contractors to stay locally to the project, with accommodation sought across a range of hotels, B&Bs and rented accommodation."

ATC regards this view as short-sighted, particularly as Sizewell C construction workers will also be looking for somewhere to stay in the town.

Once the infrastructure has been built, there is no evidence of any long-term employment benefits to the immediate area. Workers with skills gained on this project will simply migrate to the next.

The duration of the SPR project is relatively short, so that local business involvement in the supply chain would seem to be limited, which adds to the view that very little will be gained economically in this area and quite a lot will be lost.

Cumulative impacts:

One of the areas of greatest concern to ATC is the cumulative impact of two concurrent Nationally Strategic Infrastructure Projects within a few miles of the town. The combined effect of these projects on Aldeburgh and the immediate area could, without the right management, be devastating.

ATC is at a loss to know why these Government-inspired projects are being independently undertaken by EDF Energy and Scottish Power Renewables.

It is particularly imperative that if both projects receive development consent, they should be required to work together to minimise the environmental and economic impact on this area; should EDF Energy's project alone obtain consent, the effects could be equally damaging.

A collaborative approach would prevent unnecessary HGV movements throughout the area, would ensure that the fragile, coastal landscape was untouched and that all new, intrusive building and development work was confined to an existing industrialised zone.

In a letter to Government Minister, including the Secretary of State for Business, Energy and Industrial Strategy, The Aldeburgh Society wrote:

"...there is an urgent need for central government to exercise policy oversight over the decisions being made by the National Grid, EDF Energy and Scottish Power. There is no real evidence of joined-up thinking by these companies and National Grid concerning the major combined threat which their proposals make to a fragile coastal and predominantly rural area that is supposed to be subject to high level landscape protection.

"The Aldeburgh Society therefore calls upon the Government to examine the development of the East Suffolk energy hub in a holistic way, in consultation with the County and District Councils, and to do this in a clear and transparent process in which all local interest groups can engage constructively."



A view fully supported by ATC.

ATC finds it incomprehensible that the present Sizewell site or alternative brownfield sites much further afield cannot accommodate the onshore infrastructure related to SPR turbines and other projects. More inventive thinking is required.

The urban and industrialised sprawl created by an uncoordinated approach to infrastructure planning will blight this region for generations and bring ruin to our tourist trade, the local economy generally and the environment.

There is a prevailing view in Aldeburgh and the immediate locality that the benefits of the wind farm boom will accrue to other places, while this area picks up the bill.

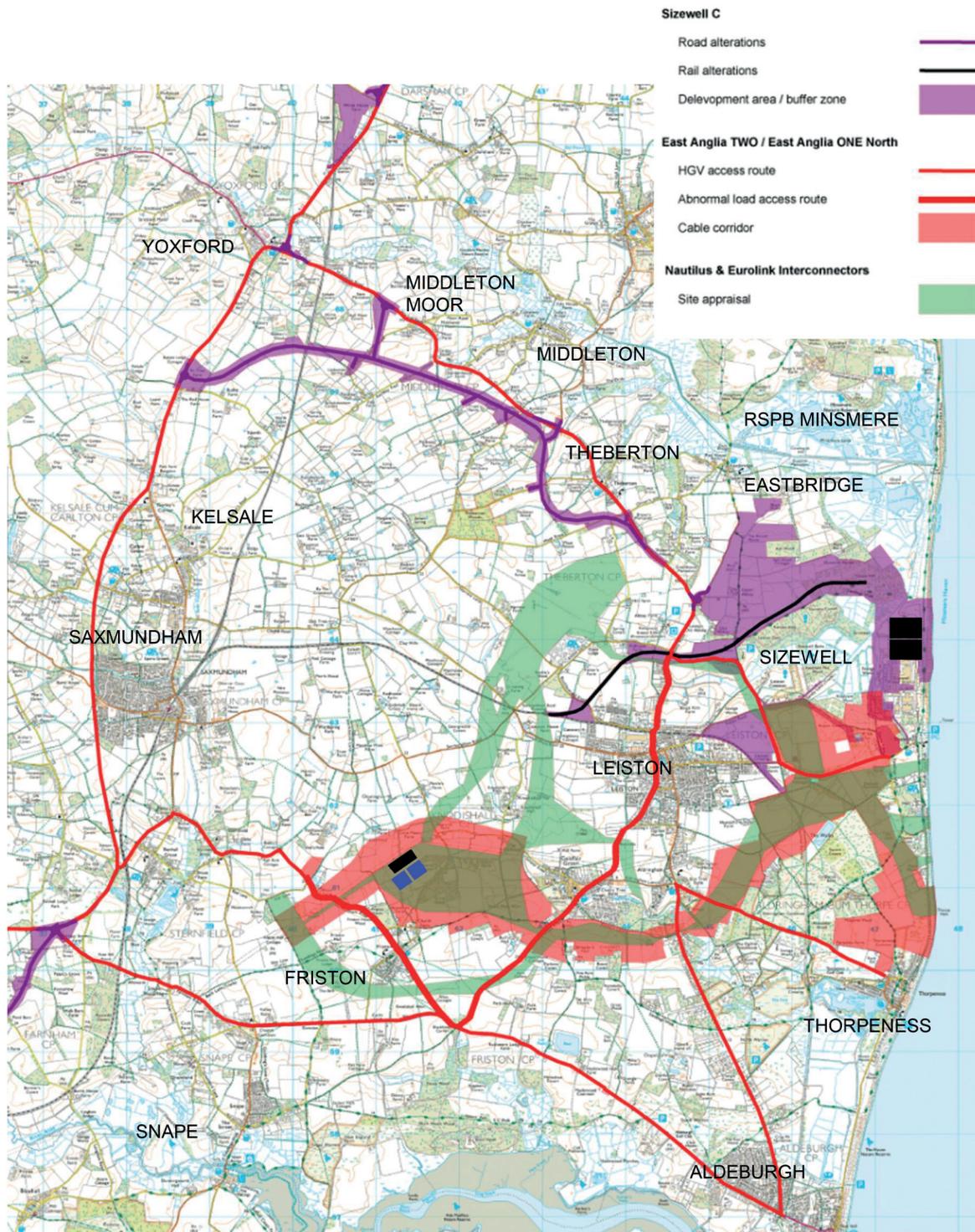
This leads ATC into believing that SPR is being compelled to build onshore structures to suit the needs and demands of others, rather than the public good.

Furthermore, ATC believes there is insufficient information to accurately assess and comment on the negative impact of the concurrent Nationally Important Infrastructure Projects planned for this area - Sizewell C, EA2 and EA1N.

ATC takes issue with statements by Scottish Power Renewables that the cumulative effect of three NSIPs are “ not significant in environmental assessments terms.”

All three proposed plans will have a catastrophic effect on the environment and the tourist-based economy of Aldeburgh and the neighbouring communities, as illustrated in the map on Page 20.

The map below is intended to indicate the cumulative impact on this area of the following infrastructure projects: Sizewell C, EA2, EA1N and the Nautilus and Eurolink Interconnectors.



Adapted from original courtesy of SASES (Substation Action Save East Suffolk)



Mitigation measures:

It is the considered opinion of ATC that it is wholly possible this project may fail to gain approval due to a variety of issues associated with insufficient public engagement, without giving reasonable notice and consideration to those affected by this NSIP and the associated dearth of information throughout.

In consideration of the potential reputational damage already caused to the town by the potential of this under-researched and ill-conceived NSIP, ATC will request compensation for positive PR in advance of work commencing and during the construction process.

In the event that permission to proceed is given, ATC requests consideration of the following as a bare minimum.

- Traffic calming measures should be introduced on the Aldeburgh stretch of the Saxmundham Road (A1094). These measures should not prevent access for legally-permitted vehicles and should be carefully managed. Considerable upfront funding for a nationally-recognised consultant will be needed to enable the best solution not just for the town but the NSIP instigator.
- Narrow speed cushions (under 1300mm), build-outs and chicanes, where traffic has to give way to oncoming vehicles, may well be required.
- Automatic Number Plate Recognition cameras to be installed at the town boundaries on the A1094 and the B1122.
- Regularly placed, curb to curb flat-topped crossing plates would slow traffic yet allow access for emergency vehicles. Placed at 200m / 300m intervals from the brow of the hill after the Golf Club, they would prevent speeding of both HGVs and other road users into the town.
- If alterations are made to the road / pavement system considered detrimental to the town, compensation additional to the compulsory purchase finance, plus high quality reinstatement at the earliest opportunity

will be required. ATC would request engagement, input and transparency concerning all changes as a matter of course.

- Houses and buildings affected by HGV movements should be provided with unlimited free electricity for the life of the project, double glazing and additional insulation to an exceptional level.

ATC has commissioned a speed survey on the A1094 and B1122, the results of which will be available shortly. The need to encourage a reduction in traffic speed approaching the town, as well as within, is illustrated by the many accidents, with multiple road closures as a result.

It is entirely possible that loss of life may occur, should accidents caused by increased road usage by HGVs impede or prevent access to emergency vehicles.



The role of The Crown Estate:

ATC feels The Crown Estate should take a more holistic approach when negotiating new leasing arrangements, particularly when the planned developments could have a major impact on the environment and regional economies.

ATC, and countless other organisations, regard the current SPR proposals as deeply flawed with insufficient information available at virtually every stage in the consultation process. SPR's lack of understanding and knowledge of the area has led to impractical and impossible solutions.

The following Crown Estate Stewardship statement is unequivocal:

“Stewardship is deeply ingrained in our culture; because of our history and because of our heritage, we act at all times as good stewards of the properties we manage. We strive for the best standards of management: in our parkland and gardens; in our farmland and our forestry; in the marine environment; and in our buildings and streetscapes. So our commercial approach is supported by a clear recognition of our stewardship responsibilities.” - The Crown Estate.

ATC believes The Crown Estate failed to live up to its stewardship responsibilities when they signed away the seabed.

It is essential at this stage in the planning process that The Crown Estate grants an extension to the lease period to give SPR sufficient time to find better and more acceptable solutions to their ill-conceived plans.

The Crown Estate could also play a pivotal role in ensuring the two NSIPs planned for this area work concurrently to minimise the environmental impact of the projects.

Additionally, more offshore leasing arrangements could be considered in Round Four of The Crown Estate's consultation process within the 10-year cycle.

If additional projects are permitted, an exemplar template plan at this stage is vital, to ensure that onshore developments are an integral component of the offshore leasing arrangements, thus enabling The Crown Estate to adhere to “ a clear recognition of stewardship principles.”



Consultation process:

ATC is still at a loss to know why, when planning for this proposal started in 2010, SPR are trying to cram this crucial phase of their development plans into a matter of months.

There was a distinct lack of detail in the 3.5 consultation document, particularly in respect of traffic and transport improvement works, alternative sites for onshore developments, environmental impact studies, the effect of SPR proposals on the regional tourist industry and legacy planning.

Those issues have still not been addressed.

ATC believes it is inconceivable that all these concerns will be adequately addressed within the present consultation period and calls for an extension to the planning process to enable SPR to engage with local communities to resolve the many outstanding issues which appear to have been brushed aside.

The consultation process would have been more transparent to the general public if SPR had not submitted 40 volumes of information to digest. ATC estimates this would have taken a normal reader 12.5 weeks to wade through.

SPR perhaps should have taken note of the following legal judgment:

“If the public are being consulted then the consultation document must be available to all, in a language which is simple and clear and not bedevilled with jargon”

- *Bard v Secretary of State for Communities and Local Government* [2009] EWHC 308 (Admin).

Never mind the quality, feel the width seems to be the motto of SPR.

Conclusions:

In the opinion of Aldeburgh Town Council, SPR has failed to make a convincing case for the proposals as outlined. In key areas, plans are vague or non-existent and, at this late stage in the consultation process, this is extremely disappointing.

Despite widespread and continuing criticism, there is still no sign of a coordinated approach to the infrastructure projects planned for this area and ATC now demands Government intervention to prevent the ad hoc industrialisation of a wild and beautiful landscape, loved and visited by millions. Large infrastructure projects are essentially Government-backed and ATC believes the Government should play a major role in financing and controlling them. Projects of this nature should not be left to the self-interests of the individual companies involved.

ATC is deeply concerned about the negative environmental impact on this Area of Outstanding Natural Beauty. The highest level of protection is afforded to AONBs and we would like to see more evidence of that within the SPR proposals.

ATC believes that in its haste to adhere to an unrealistic consultation timetable, SPR may use statutory powers to ride roughshod over established procedures. This will be resisted at all costs by ATC, which believes firmly in due process being observed.

SPR says the consultation period cannot be extended. ATC continues to contest that view, particularly as this process started 10 years ago, with the bulk of the important decision-making now being squeezed into a two-year period. We insist that more time is given to fully consider the impact of proposals which seem to be formulated on a short-term basis rather than as part of a coherent strategy.

ATC has one final thought...if SPR had considered its plans in greater detail and with sensitivity, it would not have pitched neighbouring communities against each other. Aldeburgh takes no pleasure in seeing proposals which will have a devastating effect on Thorpeness and Friston and fully supports opposition to SPR's plans which would bring ruin to the entire area.



Appendix 1

Community Engagement

In order to better inform this response, ATC consulted widely throughout the community. Residents, visitors and organisations in the town were encouraged to express their views on both EDF Energy proposals and those of Scottish Power Renewables.

The consultation process for both major energy projects ran concurrently, with the response deadlines virtually identical. For many local respondents, the issues causing greatest concern were common to both Sizewell C and SPR.

ATC raised public awareness of the consultations by a number of means:

- ATC website highlighting links to both consultations.
- Large banner at the entrance to the town drawing attention to the consultation process.
- Annual Town Meeting on March 11, attended by more than 60 residents, County and District Councillors and representatives from Suffolk County Council and Suffolk Coastal District Council planning departments.
- Articles in both local magazines.
- Posters in notice boards and in prominent positions throughout the town.

In addition, members of the ATC Working Group on Infrastructure Projects visited organisations in the town to seek their views.

For example, a meeting with Aldeburgh Youth Club, 27 young people (10 to 16 years old) expressed a number of concerns, principally about the local fishing industry, the environment, the impact on wildlife of both projects and the potential increase in traffic levels. Of the six adult helpers, all but one were concerned about traffic and damage to the environment.

Town Councillors attended Public Information Sessions and members of the ATC Working Group established contacts with local organisations opposed to both the Sizewell C development and SPR proposals.

In response to requests from ATC, a large number of residents emailed their views on both Sizewell C and SPR proposals. For the purposes of this response, only those views pertinent to Scottish Power Renewables have been included, with a small selection included in this document.

ATC received more than 50 email responses directly relating to SPR. None supported SPR plans and all were highly-critical.

Views expressed in the following letter, from the Rev Mark Lowther, Vicar of St Peter and St Paul Parish Church, Aldeburgh, represent the opinions of the majority of residents and organisations who have contacted ATC:

"I write as the Church of England Parish Priest of four Suffolk coastal parishes, all of which will be affected by the current planned energy projects around Sizewell and the nearby villages.

"My direct concern is for people and the effect that the current proposals will have on them and their daily lives.

"One of the matters that people most often mention to me is that there seems to be no-one in overall control of what is being proposed locally.

"Separate schemes by Scottish Power Renewables (two onshore substations), National Grid and National Grid Ventures (one onshore substation and the termination of the 'Nautilus' and 'Eurolink' interconnectors) and, of course, Sizewell C mean that drawing information together about the total impact on local people and their lives is very difficult.

"And then when someone discovers on the Internet that both the Greater Gabbard and Galloper wind farms are being investigated for the possibility



of substantial extensions (no local consultation has ever been mentioned), you can understand why people might be worried.

“Local residents are not simply being NIMBYs. They have much more than their own personal interest to defend. This area has a very sensitive infrastructure.

“Much of the local employment is based around tourism and that is severely threatened by the current proposals, which, in the long term, offer few employment benefits for local people in return.

“Many people are already forced to travel considerable distances in order to find employment and it is the roads over which they travel daily that will be hugely affected during construction processes which will last many years.

“The consultation processes have all been about individual projects, not the cumulative effect of them all. The left hand often doesn't seem to know what the right hand is doing.

“The construction of SPR's substations, the National Grid substation and Sizewell C will add an enormous amount of traffic to local roads.

“The roads in Aldeburgh along which HGVs might access the SPR construction sites look straightforward routes but they are, in fact, used for parking by local residents who have no other place to keep a vehicle.

“Anyone who has seen the hourly bus trying to thread its way along the road will realise that the proposed routing of HGVs is absurd. Once again it is ordinary people, going about their ordinary lives who will suffer.

“Underpinning local people's concerns, is the knowledge that ‘it doesn't have to be like this.’ Brownfield sites either are, or should have been, available. Planning for all of these schemes needs to be integrated in a much more thorough way than seems to be the case at present.

"As a priest I am called to 'shepherd' the people of the parishes over which I have oversight. At present those people are angry, worried (frightened sometimes) and confused.

"They need reassurance that there are people in the places where decisions are taken that have their best interests at heart. I would welcome that reassurance from anyone able to give it."

*The Revd Mark Lowther,
Rector,
The Alde Sandlings Benefice.*

A resident of the town highlighted a number of issues:

"Why is the B1094 being used at all when B1069 is a more direct route? SPR told me it was to spread the load - an answer that makes no sense.

"Part of the pavement by the roundabout SPR want to modify is used by secondary school pupils making their way to the bus stop on Leiston Road and by mothers taking children to the Primary School.

"Aldringham Court Nursing Home will be badly affected by SPR developments there. At the moment, it is a haven of peace and quiet but would suffer massive noise and disruption, particularly as SPR plan to take away a large part of the Home's garden."

A second resident, while supporting the principle of renewable energy, was disparaging about SPR's current plans:

"We are strong supporters of wind as a means of generating the country's future demand for electricity and we have no objection, in principle, to the development of a limited number of wind farms in the North Sea provided they are at least 30km offshore.

"But we object strenuously to landfall being made in an AONB and we assume that, ultimately, this proposal is being made on grounds of lowest cost to the producers.



“The case for any resulting benefit in cost to end consumers has not been made nor matched against the detriment to the local resident and business communities through loss of the amenity on which they are economically dependent.

“It appears that SPR originally planned to make landfall at Bawdsey and connect with the Bawdsey-Bramfield pipeline. Why has this been abandoned and why should it not still be revisited? Additional cost is an inadequate response.

“The cumulative effect of these proposals has not been evaluated. This is relevant in both traffic planning terms and also the image of the area. It would result in extreme industrial overdevelopment.

“It is understood that, should the developments go ahead, they may not be built simultaneously, thus doubling the period of maximum disruption. This is unacceptable.

“The proposed routes for construction traffic have been very poorly considered. The use of the A1094 down to the Aldeburgh roundabout would be thoroughly dangerous to pedestrians as well as causing immense congestion .

“We feel that SPR have done a very poor job in consulting with the local area throughout this process. In particular, their failures in scoping and discrepancies in RAG methodology at the early stages resulted in unfair and inconsistent onshore site appraisal.

“We consider that they, National Grid and EDF need to work much more closely together to convince the local population that their views have been fully considered and alternatives evaluated.”

A resident was concerned about the damage to the image of holiday destinations such as Aldeburgh and Thorpeness:

“Significant HGV movements are planned along the Saxmundham and Leiston Roads, using the totally unsuitable roundabout next to The Railway pub. Further HGV movements will travel down to Thorpeness and across the back of the fields behind Thorpeness beach.

“These works will have a significant impact on the reputations of Friston, Aldeburgh and Thorpeness’ as tourist destinations, based on their beauty and tranquillity. After only a few months of construction work, the Aldeburgh, Friston and Thorpeness’ image as family holiday destinations will be shattered and they will slide into the sorry state that so many coastal towns and villages find themselves in.

“Holding the consultations for Sizewell C and the Scottish Power Renewables construction projects at the same time has been extremely unhelpful. This has either been very badly managed or is designed to deliberately confuse residents.”

All letters and emails sent to Aldeburgh Town Council have been forwarded to Scottish Power Renewables.



Appendix 2

Supplementary Responses

The following responses from organisations in Aldeburgh have been submitted to Scottish Power Renewables. ATC requires SPR to read these responses in conjunction with that of Aldeburgh Town Council, which fully endorses the views expressed.

THE ALDEBURGH SOCIETY:

The Aldeburgh Society's response to Phase 4 / Section 42 Consultation on Draft Environmental Statement – East Anglia Two and One North Offshore Wind Farm.

The Aldeburgh Society, as a civic society, repeat our view that while we recognise the potential benefits of offshore electricity generation in the North Sea, we cannot understand why the energy generated by the various windfarms cannot be brought ashore in a single location nearer to existing development as was originally envisaged.

We object to the piecemeal approach to energy infrastructure development being adopted by Scottish Power Renewables and EDF who are consulting at this very same time on the Sizewell C and D nuclear power stations. The effect of both projects going ahead together would result in up to 12 years of major construction work on our heritage coast in the AONB.

This is clearly unacceptable and we have called on central government to examine the development of the East Suffolk energy hub in a holistic way in consultation with the local councils.

In relation to this Scottish Power Renewables consultation we reiterate that the Society remains opposed to the proposals particularly as they relate to Traffic and Transport issues.

In particular:

We object most strenuously to the proposed transport routes for the construction traffic

associated with these projects. The plan to route HGVs used in the construction of the landfall site at Thorpeness from the A12 down the A1094 to Aldeburgh and up the B1122 to the B1353 and to Thorpeness makes no sense and is clearly unacceptable.

The current proposals involve up to 110 HGV movements a day coming into Aldeburgh down the Saxmundham Road and turning at the Tesco roundabout to take the Leiston Road. SPR claim that the route is wide enough to allow two way HGV traffic. This is not credible.

The roundabout is already a pinch point, always congested and used by schoolchildren on their way to and from Aldeburgh primary school, residents going to the two supermarkets and the pub as well as those using the Jubilee Path. This area is already the most heavily-used pedestrian and vehicle access route in the town.

If the Saxmundham Road were to be blocked by construction traffic, Aldeburgh residents would be denied access to transport to Ipswich Hospital and there would be no access to Aldeburgh Hospital and the Garrett House nursing home. This attack on the safety of Aldeburgh residents cannot be allowed.

The proposed A1094/B1122 route would require substantial reconstruction of the approach roads to and fro the roundabout which would bring chaos to the town causing wholesale disruption, pollution and adversely affect the town's key tourist industry.

Thought must be given to accessing the landfall site by sea and/or (if Thorpeness has to be the landfall site) using the Sizewell Gap Road once the eastern section of the cable corridor haul road is constructed (as stated in your Traffic and Transport Factsheet.)

The Society remains very concerned that whichever site (Friston or Sizewell) is chosen the land-based substations will have a substantial impact on the natural environment in that they will consist of three large tall buildings including one to be constructed by National Grid.

Buildings of this type should not be built in an AONB and the NPPF states that development in an AONB should only take place in exceptional circumstances.



We note that the substations for EA1 (South) are being placed many miles inland. Ideally the substations should be sited on brownfield sites well away from villages and well screened. We repeat that we do however think the Sizewell site is superior to the Friston site in terms of its impact on the local environment provided that its impact is minimised in terms of screening and height.

Finally, we cannot emphasise strongly enough how imperative it is for a comprehensive strategy for all energy projects to be adopted to stop each development being considered in this piecemeal way. The combined projects are likely to have a considerable adverse impact on the communities, environment and businesses in the area and on Aldeburgh in particular.

ALDEBURGH BUSINESS ASSOCIATION:

The majority of members felt significant concerns about the damage construction work in the local area would do to the Aldeburgh brand. The East Suffolk Tourism strategy states that visitors are attracted to the area by the character, culture, food, clean beaches and spectacular coastline, the outstanding countryside and wildlife of the area and that tourism brought £590m to the area and accounted for 13% of all employment in 2015.

Many of the ABA businesses depend on tourism. With high volumes of traffic/HGVs using Aldeburgh and Thorpeness roads, members agreed that the high-end tourism that the town depends on would be put off by lengthy delays (particularly at the roundabout junction between Saxmundham Road and Leiston Road) and go elsewhere. Visitors are likely to use social media to tell their friends that the tranquillity they come for has been disturbed.

Most of the shops and restaurants in the High Street depend on tourism, if visitors stop coming the High Street would suffer. One shop owner said: "Increased traffic will deter our visitors and have a detrimental effect on our business."

Many of the staff in the hotels, shops and restaurants rent locally and are on modest wages. SPR anticipate 300 workers looking for beds every night - squeezing out local staff.

With a cable route 32m wide SPR accepts in its document that this will have 'significant environmental impacts'. The business association feels that the impact of ugly and extensive construction work on tourism will also be significant.

Everyone agreed that having the EDF and Scottish Power consultations running at the same time was confusing and unhelpful for businesses, residents and visitors.

ATC fully endorses the responses of the following organisations:

SUFFOLK COAST AND HEATHS AREA OF OUTSTANDING NATURAL BEAUTY:

www.suffolkcoastandheaths.org/

SUFFOLK PRESERVATION SOCIETY:

www.suffolksociety.org/suffolk-coastal

SUFFOLK COUNTY COUNCIL/SUFFOLK COASTAL DISTRICT COUNCIL:

[www.committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(12-03-2019\),%20The%20Cabinet](http://www.committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(12-03-2019),%20The%20Cabinet)

To be considered post-response deadline:

EAST SUFFOLK DESTINATION MANAGEMENT ORGANISATION:

The DMO is currently conducting a major survey of businesses, residents and visitors to East Suffolk, recording views on the proposed infrastructure projects involving EDF Energy and SPR. The results of that survey will not be released until after April 4 2019, too late to be included in this response. However, ATC gives notice that it will be submitting to SPR a separate Appendix based on the findings of the DMO after April 4.



Aldeburgh Town Council

Contact Aldeburgh Town Council by either writing to the Town Clerk at;

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Email – info@aldeburghtowncouncil.co.uk

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