

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





Contents:

Introduction

Overview

Traffic and transportation

Environment

Tourism

Socio-economics

Cumulative impact

Consultation process

Conclusions

Appendix 1:

Suffolk Coast and Heaths AONB response

Appendix 2:

Joint report by Suffolk County Council and Suffolk Coastal District Council on the impact of SPR proposals.

Appendix 3: Community Engagement

Appendix 4: Aldeburgh Society response.



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 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 by environmental sites.

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.

Where it is considered that we are unable to give a fully quantifiable response due to insufficient knowledge, where appropriate we will give a considered opinion. In addition, it is important that it is recognised that information and opinions now given, will be out of date by the time this project becomes live.

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



Overview:

In both the Phase 3 and 3.5 Consultations, Aldeburgh Town Council (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 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 seem determined to pursue its plans, irrespective of the long-term damage to this area's outstanding beauty and economy.

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) 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.

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 town.



Additionally, there seems no rationale behind a proposal that sends HGVs on an unnecessarily long and dog-legged route via Aldeburgh to Leiston and Thorpeness, when Blackheath Corner could provide a more direct access to its development sites.

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 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.

(Traffic survey analysis - See Appendix 1)



Congestion on B112

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.

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 propose 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.

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 want 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 predict that during the onshore construction of EA2, 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 60 percent 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.



Cumulative impacts:

ATC believes that the despoliation of this part of the East Coast could be minimised if the large infrastructure projects planned for this part of East Anglia were compelled to work together.

The Secretary of State for Business, Energy and Industrial Strategy should start meaningful conversations with all parties to ensure maximum co-operation and coordination.

This 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.

ATC, and others, believe the lack of a coordinated approach between large infrastructure projects will cause long-term damage to the local environment and the economy of the region and calls on the Government to intervene to prevent this catastrophe.

We find 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.

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 and the environment.

ATC cannot understand why more inventive thinking has not been employed in the siting of SPR infrastructure.

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.

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 suggests 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.

SPR might have won the right to build wind turbines offshore at Aldeburgh 10 years ago, but, as yet, it has not produced a cogent, coherent and co-ordinated plan to bring electricity ashore without short and potentially long-term damage to the environment.

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 an average reader 12.5 weeks to wade through. Many residents gave up under the sheer weight of technical information.

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 say 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.