

Aldeburgh Town Council's response to SeaLink statutory consultation

Aldeburgh Town Council's interest in the SeaLink project is as a landowner, and representative body for our residents, visitors, businesses, groups and organisations. ATC is supportive of wind generated renewable energy however it remains strongly opposed to these proposals to provide a network upgrade via an interconnector to/from Kent.

We remain opposed to the proposed locations for each the onshore infrastructure believing that other solutions exist where the energy generated off our coast would be connected out at sea and/or use made of UK brownfield sites closer to where the power is needed. These options are more sustainable and would avoid highly damaging impacts. We also do not support co-location here of up to three projects due to potential increased frequency and/or magnitude of harm.

ATC request an immediate pause and urgent review be undertaken of this project, along with all other proposed energy projects and consented energy NSIP (Nationally Strategic Infrastructure Projects) DCOs (Development Consent Orders).

Specifically

- The cumulative impact with other projects (both energy and general construction) has not been fully considered.
- This is a rural area, and 'the Heritage Coast' where our economy is dependent on year-round tourism which would be negatively impacted by noise, dust, vibration & light pollution. In the PIER these have been rated as 'not significant' which we contest.
- The very limited road infrastructure in and out of the area does not have the capacity/ suitability for the volumes of heavy vehicles needed to support the construction elements. The area is constrained to the east by the North sea and the South by the River Alde.
- The route from out at sea to the Landfall is proposed to pass under the RSPB reserve North Warren (this SSSI/AONB land – now renamed 'Suffolk and Essex Coast & Heaths National Landscape between Aldeburgh & Thorpeness which should receive the highest protection.
- The method proposed for drilling under the marshland at North Warren is not fully costed or technologically proven to be possible here and we believe other potential (and brown field) sites without protected marshland have not been fully evaluated.
- If there is no capacity to take the energy onto the high voltage grid, the power from other projects (such as windfarms and the Sizewell Group) should not be sent to and then from the proposed substation at Friston and then out to Kent via SeaLink or to Suffolk from Kent. The original NG offer to connect here should be rejected along with the current plans (approved but subject to JR) to construct a substation at Friston.
- There will not be the accommodation available for workers, and rat running/parking will destroy adjacent villages.
- This project is ill-conceived and misguided when other solutions exist where the energy generated off our coast can be connected out at sea to other countries in EU or to areas of the UK where the power is most needed.

Background

Aldeburgh is a small town situated on the Suffolk Heritage Coast between Lowestoft and Felixstowe, accessed by one single carriageway road the A12. The town and surrounding area lie within the Suffolk Coast and Heaths AONB (now known as Suffolk and Essex Coast & Heaths National Landscapes) with other areas of special interest (RAMSAR, SSSIs) and is constrained by RSPB owned and maintained marshland to the north and the River Alde (RAMSAR, SSI site 692) to the south and the North Sea to the east. There are only three minor 'B' roads into/out of the town from the direction of Thorpeness, Aldringham/Leiston, and Knodishall/Snape/Friston.

Over many years it has developed into a well-known, all-year-round 'destination' town, heavily associated with the arts, music, historic and cultural heritage of the area, and its economy relies on tourism, leisure and retail following the demise of the traditional fishing, boatbuilding and brickmaking industries. This economic uplift also benefits the surrounding villages and towns and provides extensive employment.

The town attracts many day and longer-stay visitors through the year and its regular population of just over 3,000 regularly increases to well over 15,000. Recent footfall reports by East Suffolk Council state over 1M visits per year.

The town has recently gained another hotel/restaurant to add to the existing provision of three large hotels and several restaurants, cafes, bed and breakfast, Airbnb and thriving holiday let businesses. There are many major festivals (documentary, literary, poetry, theatre) throughout the year, as well as the internationally important Aldeburgh Festival now at nearby Snape Maltings.

Aldeburgh is known as the home of British composer Benjamin Britten, Britain's first female doctor and mayor Elizabeth Garrett Anderson. EM Forster, Susan Hill, Laurens van de Post and many other famous authors have written of the inspiration of the town. Facilities include a Community Hospital, GP surgery, Lifeboat & Coastguard service, Fire Brigade house, Library, Primary school, two award-winning Golf courses, two yacht/sailing clubs, several community halls and entertainment/performance spaces, and a vibrant High Street, with an independent Cinema, bookshops, pharmacy, and variety of retail outlets (boutique & chain).

Aldeburgh has a long, attractive but narrow shingle beach, with a Martello tower and a range of protected and unique flora and fauna. It also has the Garrett Anderson Era conservation area, with many important architectural buildings, the church of St Peter & St Paul, the Church of our Lady & St Peter, a Baptist Chapel, and a Grade I Moot Hall once the seat of local government, which is still used for council meetings and now hosts the town's museum. Public amenities include two large sports fields, two children's play areas, a large area of allotments, tennis courts and bowls pitches.

Further evidence of specific concerns

NGV claim this project will enable the UK to meet zero carbon targets, yet driver appears to be cost and the failure of investment into the existing grid to enable the excess energy to be created off the east coast to be transmitted to where it is needed in the South of England.

We do not understand why Central Government and NG would now advocate that SeaLink and up to two other projects should coordination here rather than onto brownfield sites or via an off-shore grid system? The level of destruction and damage to our tourism industry, environment/wildlife is too high a price to pay, especially with brown field sites available. We understand that supply chain issues (including for HV cables and HV circuit breakers) mean that some target deadlines would not be met if an off-shore grid connection was progressed, but believe this would be of more significant benefit as it would enable other projects to connect and target for 2030 still to be met.

The assumption to connect to a substation in the 'Leiston area; or 'Friston' is flawed. This is still subject to JR and was consented only on the basis of SPR EA1N and EA2, the cumulative impact of additional projects was not included. There are issues outstanding with this project including flood risk which has increased recently. ATC wish to challenge how NG ESO can make a connection point offer to another part of NG NGV when the truth is overhead powerlines cannot take the capacity generated (due to lack of ongoing investment and planning by NGET) and an additional interconnector is now needed to take the power back out to sea and down south to Kent/London (SeaLink). Surely this proves it is a false offer, and should have been rejected. When the appraisal was completed the extent of the problems with pylons was not understood. We would request you reconsider this project as it is not deliverable as originally planned (to connect to the KV lines)

Claims that this project will be good value for consumers is false. It will not be financially viable because of the high level of compensation and mitigation required to resolve the harm caused. During the consultation stages local people have already suffered blight on their house value, and stress from approaches from the developer even before the DCO stage. Research indicates that other business development in the area has halted also as a result just due to speculation.

Reputational damage to the area from traffic congestion and increased movements, light pollution, dust, noise, vibration and disruption to wildlife will be significantly damaging, especially set against our benchmark our dark skies, quiet lanes and extremely peaceful tranquillity. Proposed drilling and trenching would lead to closures of footpaths heavily used by tourists and residents year-round, and you are unable to confirm the technical feasibility of detailed methods so the level of harm is also unknown/uncertain.

Quality of consultation

Town and Parish councils are not provided with any additional resources to study and respond to consultations or to engage in the NSIP process, however we have done so because this is so important. Our experience of the consultation was that it was inadequate at best and deliberately vague at worst. Documentation and webinars lacked detail, (how drilling will be possible under fragile marshes for long lengths where HDD may not be possible and the public exhibition days which were attended by record numbers included inaccurate maps (historic features and listed buildings missing) and misleading information

(not being honest about the total hectares required or location of the SSSI/AONB) and were sadly staffed by individuals who were not always able to answer questions. Consultations should be hosted not by Developers but by independent bodies.

Stating you have listened to our feedback at previous stages and then to carry on with the same plans you put forward in previous stages is disingenuous. The level of trust that our community has in the potential development and the developer is extremely low, because you have not demonstrated real regard to our concerns or to the protected internationally important habitats, or our impacted community. The PEIR states impacts are “not significant” and this is false, considering the background levels and thresholds of harm.

ATC objects to your consultation feedback form. Asking respondents to answer general statements is not effective consultation and is misleading. Of course, everyone will say they agree that delivering net zero should be a priority, and that the UK needs to improve its energy security, and we should keep energy prices down - but this project specifically in these locations will not be the only way to achieve this. We believe you are attempting to gain support for the project falsely.

ATC is very concerned that you have introduced the idea of potential co-location which does not reduce footprint and only coordinates potential siting or timelines. This would mean either more disruption to the same area over a longer time frame or of a greater magnitude for a shorter time frame, which neither is preferred. It is natural that respondents would favour some co-location and will answer this question without understanding the negative impact this will have. This is misleading, unfair, divisive and harms community cohesion. We are aware of the OCSS proposal to co-located the Northfalls and Five Estuaries wind-farm projects here with SeaLink which we reject.

There was no information on benefits to communities, residents or visitors for hosting onshore infrastructure, in addition to the cost of mitigation/compensation.

Conclusion

We respectfully request that NGV consider a much broader and more creative approach to landfall sites, cable runs, convertor sites and sub-station construction than its current set of proposals, which all fall within and/or threaten green field, AONB, SSSI protected reserve locations. Either brown field or offshore connector stations should be used along with an offshore grid option.

We understand the you do not like to choose brownfield sites as they are often more constrained by structures which causes additional cost and time delays - but we would encourage you to look at the wider longer-term gains if you did locate onto a brown field site further north or south, and/or developed offshore hub/grid options. ATC believes that NGV has not properly considered alternative sites away from the Suffolk coast.

Building large-scale industrial buildings in rural villages/hamlets should be avoided. Many millions of public and private investments have created this as a year-round ‘destination’ and protected its wildlife, dark skies and tranquillity. The Suffolk Heritage coast is a unique and delicate coastal environment, with a truly special biodiversity that justifies the highest levels of protection in planning legislation. Only in exceptional circumstances should an area with internationally important protected designations be used, and this is not justified.