

ALDRINGHAM-CUM-THORPE PARISH COUNCIL

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20th March, 2019

Dear Sir / Madam,

EA1N and EA2 Offshore Wind Farms – Phase 4 Consultation under the Statement of Community Consultation

Introduction

Due to National Grid line availability at this point on the coast the communities around Sizewell have suffered a great deal of disruption and distress over many years from a series of Power Generation Projects, including two Nuclear Power Stations, the Greater Gabbard and Galloper wind farms. There appears to be no respite in the disruption to our communities and damage to our landscape with the prospect of East Anglia ONE North, East Anglia TWO Offshore Wind Farms, Sizewell C Nuclear Power Station, National Grid Ventures, Nautilus and Eurolink projects and potential for the expansion of the Greater Gabbard and Galloper wind farms. It is almost certain that the SPR Windfarm construction will run in parallel with EDF's construction of Sizewell C, both in location and in time frame. These combined developments will be concentrated within in a few square miles of what is currently an Area of Outstanding Natural Beauty on the Heritage Coast and continue over many years.

The Parish Council, along with all local communities, feel that they have done enough to support national infrastructure projects. East Anglia ONE North and East Anglia TWO Offshore Wind Farms, followed by the National Grid Nautilus and Eurolink Projects, the possible extensions to the established Galloper and Greater Gabbard installations and the development of Sizewell C Nuclear Power station, will result in our local community facing

continuous disruption for many years to come. It remains our overriding view that large scale industrial developments, such as wind farm substations, are inappropriate for this section of the heritage coast with its naturally flat and wildlife rich habitat.

If these projects are to proceed, and the cables have to come ashore at Sizewell, then the three supporting substations for the East Anglia Wind Farms, and the three required for the Nautilus and Eurolink Projects should all be sited close to the existing energy infrastructure at Sizewell. Preferably adjacent to the existing Greater Gabbard and Galloper installations north of the Sizewell Gap road, and only spilling on to land south of the road into the northern sections of zone 2 and into zone 3 (as identified by SPR) if absolutely necessary. It is essential that disruption and intrusion to local residents of the area, including those at Ivy Cottages, Halfway Cottages and Leiston Common is kept to an absolute minimum.

The area of land take for these substations is extensive, and every effort must continue to reduce the footprint of the installations. More sympathetic positioning of the compounds closer to the Gabbard/Galloper complex and away from the more visible higher ground of Broom Covert is essential if they are to be located in this area. Broom Covert is already identified for reptile mitigation land for Sizewell C and cannot easily be replaced and provides an essential North/South wildlife corridor between Leiston and the existing energy infrastructure of the nuclear power stations and wind farm substations at a point where the AONB is at its narrowest.

Background information - Our plans for Thorpeness

- a. Thorpeness and the surrounding area is a tourist hot spot and work is currently being undertaken through the production of a Neighbourhood Plan to Manage the growing impacts on the parish. We would seek to work with SPR to ensure that the economy of the area is not impacted by work carried out by SPR.
- b. We are currently working with Suffolk Coastal District Council (SCDC) and Orwell Housing and others on a feasibility study for the provision of Affordable Housing on the field to the north of the B1153, which is currently included in the area potentially required by SPR. We would not wish for any actions by SPR to impact on this.
- c. Plans are underway to develop a new Community Centre on the Sports Ground adjacent to the area required by SPR, again we would not wish any works and activities to be carried out by SPR to impact on these proposals.
- d. Plans have been produced to provide additional units at the Almshouses, adjacent to the land required by SPR, again we would not wish any works and activities to be carried out by SPR to impact on these proposals.
- e. A great deal of work has been done with SCDC on the problems of the coastal erosion along the northern section of Thorpeness and the cliffs to the north. This part of the coastline is extremely fragile and is immediately adjacent to the

proposed cable landing compound. Consultation is soon to be carried out with the community on these issues to which SPR should be aware.

Aldringham-cum-Thorpe Parish Council Response

The Parish Council have reviewed the extensive documentation of the Preliminary Environmental Information Report (PEIR) and has, with limited resources, both in money and time, responded as comprehensively as possible. However, given the sheer scale of the issues we have focused our attention on the general issues and those that significantly affect the parish of Aldringham-cum-Thorpe, whilst still addressing to a lesser degree the issues that have particular impact in other areas. Therefore, this response cannot be considered to be complete or indeed to highlight every single issue which is of concern to the communities of Aldringham, Thorpeness and the surrounding areas. However, we fully endorse the joint response from Suffolk County Council and Suffolk Coastal District Council which does address the additional issues.

Aldringham-cum-Thorpe Parish Council will continue to work with SPR, raising additional issues as necessary, refine those identified and seek to find satisfactory resolutions.

Regardless of the location of the substations, the landfall for the offshore cables is indicated to be just to the north of Thorpeness, with the cable routes passing through the AONB and the coastal sandlings. This will have a significant impact on the parish. The responses below have been presented in the order of the PEIR.

Coastal Processes

The landfall location is situated at a point on the coast with a very fragile cliff frontage. Therefore, it is essential that the cable ducts and the transition bays associated with the joining of the onshore and offshore cables are installed with a suitable setback distance to allow for natural coastal erosion. The proposed cable ducts from the transition bays out to sea must be of sufficient depth so that the vibration caused by the HDD drilling and work associated with their installation and with subsequent operation do not affect the fragile cliffs.

Ground Conditions and Contamination

The majority of the onshore cable route is located in agricultural land. However, a number of sensitive areas are crossed, including the River Hundred Special Landscape Area (SLA). It is essential that contamination leaks and spills during construction are controlled in such a way as not to create any damage to the local environment.

Air Quality

The light top soil which is predominant in this area is often subject to wind entrainment when exposed, which will be the case at the landfall location, along the cable route and the substation sites. This presents a risk to both residential and ecological receptors. SPR must demonstrate they have an adequate strategy in place to prevent this occurrence.

Water Resources and Flooding

Cable installation across the River Hundred Special Landscape Area (SLA) and other sensitive areas which are prone to flooding not only pose a threat of flooding the installation works but present a challenge in maintaining the function of the river floodplain to prevent flooding in downstream areas. Therefore, SPR will need to take this into consideration when designing appropriate flood mitigation measures.

Land Use

All land used by SPR including the cable landfall site, the onshore cable route and the site of the substations should be restricted to agricultural land. Where this is not possible mitigation land should be purchased by SPR, rewilded and gifted to the community, giving long term benefit, and an overall improvement to the AONB and the surrounding area. This will go some way to compensate for the destruction and impacts on our beautiful and precious landscape.

The cable landfall site requires a significant area of land within the AONB to carry out major works. This will require a large amount of manpower, plant and materials. We require assurance from SPR that this area will be kept to a minimum and not impact on the SSSI (Thorpeness Common), the fragile coastal margin or the extensive footpath network in this area. It is therefore essential that we have a continuing dialog to understand what is actually proposed for this location and how the impacts of the work will be mitigated to an acceptable level.

As previously mentioned, the field adjacent to the B1353 Thorpe road between the Thorpeness Almshouses and The Sports Ground is particularly important to our future plans, and is currently being shown as required for access to the landfall site. Therefore, it is essential that any access road for the construction period and longer term to the transition pits is provided in such a way that it does not compromise the future plans for the village.

Of particular concern is where the Cable Corridor Route crosses the B1122 Aldeburgh Road. This wooded area provides a significant wildlife corridor across the B1122 which is extensively affected by ribbon development along most of its length. Therefore, significant consideration needs to be given to how the impacts of the works in this area can be mitigated.

Onshore Ecology

The cable landfall site is adjacent to the Thorpeness Common SSSI and the cable route borders the Sandlings SPA, crosses the river hundred SLA and travels through the wooded area adjacent Aldringham Court and along Fitches lane. All are important habitat for several species of protected birds and rare wildlife including nightingales, nightjars, turtle doves, woodlarks, marsh harriers and glow-worms. We are very concerned that the loss of habitat and significant disturbance to habitat during the construction will have a devastating impact to our protected and rare species. We would like to see a level of mitigation that will ensure that these birds are able to remain within these areas.

There is an “Area Tree Preservation Order” protecting trees on the entire area of land surrounding Aldringham Court (the original garden of the house), through which SPR have a requirement to route the cable corridor. There are also several areas on the B1122 where hedgerow appears to be marked from removal or reduction. We strongly object to any unnecessary destruction of trees and hedgerows. If there is appropriate justification for the reduction or removal of some trees or hedgerows we would expect to see the appropriate tree, hedgerow, bird nesting and wildlife surveys completed prior to any proposals being progressed and appropriate mitigation measures applied or at least agreed before any work commences.

Archaeology and Cultural Heritage

The cable route will require the removal of a section of woodland which forms part of the setting of Aldringham Court, a significant and important Grade II property. SPR has stated that the cable width could be reduced (minimum 16.1m for one project) through this section. The grounds are part of the architect’s original designs for the house and therefore still have an important role in understanding the architect’s design. The loss of part of the original garden would fundamentally alter this setting as it was part of the original design, resulting in harm to the significance of the listed building. There is very limited scope to mitigate this harm.

We are extremely concerned that a full assessment in relation to archaeology and heritage assets that could be affected by this project has not occurred at this stage. At present, there are significant concerns in relation to the impact of the developments on archaeology and in relation to the ability to successfully mitigate the harm to the heritage assets caused by the projects.

Noise and Vibration

The noise and vibration generated at the Landfall construction site, activities along the entire length of the cable route and construction of the substations, together with the additional HGV and other traffic that will be required to support this development will have a massive impact on this rural community. There is no indication of how these significant impacts will be satisfactorily mitigated.

Light Pollution

Aldringham-cum-Thorpe PC are concerned that 24-hour lighting is proposed at the Landfall site and at the Elm Tree Farm Construction Compound as well as other locations, for security purposes. It is also anticipated that with extended day working for the winter months lighting will be required for safe working, supported by diesel generators, in all working areas including the landfall site, the cable route and the substations.

It is essential that appropriate lighting arrangements are put in place to minimize light pollution and further restrictions applied to evening working.

Traffic and Transport

Wherever the substations are located there will be a requirement to service the project with HGVs and other associated vehicles. We are concerned by the potential disruption that will be caused to current road users, businesses and the tourist industry, by the increase in traffic on our already busy roads, particularly at peak times when we already experience a significant increase with holiday traffic.

We recognise that whilst taking a sympathetic approach to the cable route at the crossing point of the B1122, it is also desirable to balance this with the requirement to ensure minimum traffic disruption through the village of Aldringham. Therefore, further dialog is required on this issue.

Proposals intimate changes to B1122 / B1353 junction. The two adjacent bus stops are used by school children, who have to cross the B1122 at this point. Any alterations of this junction and the access to Elm Tree farm which is proposed as a compound area should, as a minimum, maintain or improve pedestrian safety. The common land to the south east of the junction should not be impacted as part of any road improvements.

The instigation of a construction / staging compound at Elm Tree Farm to assist with traffic flow along the B1353 seeks to control the timing of traffic movements, but it does not address the concerns that the B1353 from Aldringham cross roads to Thorpeness is a particularly narrow road and is extensively used by cyclists and some pedestrians who already use this road at some risk. There is a particularly bad section at the old Thorpe crossing where the road is badly aligned and where golfers have to cross the road. This has been the location of a number of accidents. The size of the and number of additional HGVs in relation to the width of the road is of great concern. The only affective way to mitigate these issues is to provide a footpath/cycle route alongside the road from Aldringham to Thorpeness, together with a small realignment of the road at Thorpeness crossing.

The location of the site access point from Thorpe Road to the cable landfall site is of great concern as this is a very narrow stretch of road which is bounded by high hedges just as it enters the village. We ask that SPR work with the Parish Council to find an appropriate solution for all the users (see section 1 above) who require access at this point.

With the increase in the traffic, particularly HGVs, using these roads, we are concerned that the degradation which is already evident along the B1353 is not made worse and that the additional maintenance required will be supported by SPR.

Although the B1353 Aldringham Lane to the west of Aldringham crossroads has not been included as a designated route it is essential that safeguards are put in place to prevent its use. This lane is already a concern for residents owing to its use by numerous large agricultural vehicles and increasing commercial traffic that already cause many problems, made worse with the increasing traffic flow we are seeing from new housing in Leiston, which will be again be increased by the 40 new houses proposed for Aldringham.

SPR has a strategy to direct certain HGV and Construction traffic along the length of cable

corridor via a haul road that would extend from Friston to Thorpeness. No data has been supplied on the nature, scale, volumes and timings of such traffic along the main haul road. The impact on homes close to the haul road is of great concern to residents whose homes are close by, particularly at the crossing point on the B1122.

Human Health

Aldringham-cum-Thorpe is a rural area with low traffic density, low noise levels and low light pollution, into which people have moved to retire and enjoy the peaceful countryside. Over 35% of the population are over 65. These proposals will severely impact their quality of life for many years, with the effects of noise greater on the elderly and those who are at home most of the day. SPR assessments must correctly reflect the rural environment and mitigate the impacts on human health and wellbeing accordingly.

The cable corridor runs adjacent to Aldringham Court which is a Care Home offering up to 45 residents a quiet, peaceful location within a caring community. These projects could significantly disrupt this environment, and every possible action should be taken to adequately mitigate anything that could impact the most vulnerable people in our community.

The landfall site is extremely close to the northern edge of Thorpeness where the Almshouses provide homes for infirm and elderly residents. Wardens to the east of the site also provide support to needy and elderly individuals, and the location of the landfall site access road has been identified as a possible exception site to accommodate affordable housing for the village. All of these vulnerable individuals will find the disruption and impacts particularly hard to bear over an extended period of time.

The cable route lies immediately adjacent to properties in Fitches Lane and at the entrance to Gipsy Lane, with the potential to severely disrupt the lives of the people who live there. Adequate mitigation must be put in place to ensure that there is minimum disruption and impact from the work that is carried out and their lives are not blighted by this project.

Landscape and Visual Impact

The impact of the onshore infrastructures will have a significant effect on the visual landscape. Aldringham-cum-Thorpe Parish Council expect the applicant to treat this as an exemplar project and apply more creative mitigation strategies to minimise the impacts on this special environment.

The cable route south of Aldringham Court, where it is required to remove many trees which cannot be replanted, is of great concern. Aldringham-cum-Thorpe Parish Council wish to see an appropriate landscape plan which, when implemented, will adequately compensate for the loss of this habitat.

It is inevitable that many hedges and other landscape features will be removed or damaged as part of the overall works to be carried out. Aldringham-cum-Thorpe Parish Council wish to see full reinstatement where possible, and compensation where it is not possible.

Tourism, Recreation and Socio-Economics

This part of the coast has a high number of visitors and the local tourist industry makes an essential contribution to maintaining a viable local economy to which Thorpeness in particular is heavily reliant. Therefore, it is important that disruption to visitors is kept to an absolute minimum and they are not discouraged from visiting the area. It is also essential that access to the coastal strip and the numerous footpaths across this part of the AONB and beyond are kept open and available to both residents and tourists who make extensive use of them.

Mitigation and Legacy

Because of the sensitive nature of this coast, significant mitigations should be applied to all of the onshore works and facilities. These mitigations should include minimising the height of any installations, adopting appropriate colour schemes, providing adequate screening and noise reduction measures as well as reducing the building footprints to an absolute minimum. Once these substations have been completed the areas within the compounds should be maintained in such a way as to encourage biodiversity and as far as possible provide a positive contribution to the long-term viability of the area.

Aldringham-cum-Thorpe Parish Council accept that, as identified by the applicant, the fundamental change arising from the proposed combined windfarm developments and especially of EA2 on sea views from key coastal viewpoints is significantly harmful and should therefore be considered alongside the mitigation and compensation for the onshore elements.

The EA1N and EA2 Offshore Wind Farm projects are going to create considerable disruption to all the local communities over a significant period of time. Our communities demand to be adequately compensated for this disruption, with the provision of substantial mitigation and compensation measures, which SPR have still to show a willingness to facilitate.

It is essential that complete and affective restoration of the landfall site and the cable route is carried out to a standard that is appropriate for the AONB and where possible, the areas of natural sandling vegetation should be enhanced and extended to improve the long-term viability of the area.

Although many of the mitigation measures identified above, if conceived and delivered in an appropriate way, have the potential to deliver long term benefit they should not be considered on their own as sufficient to provide the level of compensation required. We expect a substantial legacy in the form of improvements to infrastructure, community assets, road safety and coastal defences for example, that will make a significant contribution to the sustainability of our local communities, and are of a sufficient substance and quality to ensure that residents, business and visitors can continue to enjoy the standard of wellbeing and prosperity that they do today, and they are not impacted or disadvantaged by any of the undertakings of SPR.

It would be advantages to all if amelioration measures, such as road improvements, community assets, etc. which are considered as compensation for the affected communities, were to be conceived and delivered in a holistically way. If all the energy delivery projects which have an impact on this area worked together this would enable maximum benefit to be delivered with minimum disruption.

Future Strategies and Policies

Although Aldringham-cum-Thorpe PC is supportive of the principle of offshore wind development, both in terms of seeking to reduce carbon emissions and creating sustainable economic growth in Suffolk. However, unless its implementation can be achieved without significant damage to the environment, residents and tourist economy of Suffolk, it will destroy or change for ever the very things that the introduction of green energy is seeking to protect.

The beneficial conditions of the North Sea off the coast of Suffolk would suggest that even more wind farms will be created in coming years. Unless a strategic plan is put in place to support the continuing need to connect these wind farms to the National Grid local communities and habitat will suffer repeated disruption, destroying the peace and quiet of our heritage coast.

Cumulative Issues

Further consideration should also be given to adopting a holistic approach to all of the energy delivery projects that are proposed for this area, including East Anglia One North and East Anglia Two Windfarms, Nautilus and Eurolink interconnectors, Sizewell C Nuclear Power Station and the possible extensions to the Greater Gabbard and Galloper Windfarms. If this is not achieved this area will suffer a series of similar consultations with even more restrictions on land availability.

Yours faithfully

Eric Atkinson
Chairman