

From: [REDACTED]
To: [East Anglia ONE North; East Anglia Two](#)
Cc: [Williams, Emre](#)
Subject: Re: East Anglia One North and East Anglia Two
Date: 02 November 2020 22:27:55
Attachments: [The-Energy-Coast-BVA-BDRC-Executive-Summary-2019.pdf](#)
[Suffolk 1.25000 \(Woodbridge to Yoxford\) development overlay A3\[50945\]240119.pdf](#)
[ATC written submission following OFHs.docx](#)

Dear Planning Inspectorate

We hope this finds you and colleagues remaining well.

Please find attached additional submission following our verbal presentation at the Open Floor Hearings and documents referred to within this.

We would request regarding visits that the Examination Authority panel members please include the following locations and views from:

All roads included on the attached map Suffolk 1.25000 and specifically the following. Aldeburgh beach/Thorpeness Road car park looking north west and travel along road to Thorpeness and to the site of the landing facility, to understand the tranquillity and rural location.

From Aldeburgh travel along B1122 and turn left into Aldringham on B1069

From Aldeburgh travel along A1094 North to junction with Knodishall Road B1069 and travel to Leiston and via B1122 onto Yoxford junction with A12 (north and south)

From Aldeburgh travel along A1094 noting view to the right of Friston Church, to junction with Friday Street (note this road and junction has been the site of several accidents and fatal crashes).

From Aldeburgh travel to junction with Friston Road B1121 and travel through Friston to Sternfield and along to Saxmundham (train station and access to A12 & west to Framlingham).

Our residents and visitors travel along these roads to access places of work, education and recreation, to the train station and shops at Saxmundham, the Leisure Centre & shops in Leiston, access RSPB Minsmere, the A12 and A1120 and we would be prepared to give more precise details on a map which have been sent hard copy to you.

Kindest regards and many thanks for your attention to this matter.

Cllr Marianne Fellowes

Aldeburgh Town Council

Information provided by Cllr Marianne Fellowes, on behalf of Aldeburgh Town Council as requested following the Open Floor Hearings, EA1N and EA2.

References below are from EN1 National Policy Statement for Energy Infrastructure

Sites of Special Scientific Interest (SSSIs)

5.3.10 Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given **a high degree of protection**. All National Nature Reserves are notified as SSSIs.

5.3.11 Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), **development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs.**

*Note: the benefits do not clearly outweigh the impacts at this site, as the projects EA1N and EA2 could transfer energy to the coast in a different area or using a different model.

Loss of woodland

5.3.14 Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC **should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat.** Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided.

*Note the benefits of the development, in this location do not outweigh the loss of woodland habitat. Grove Wood is designated as 'ancient' on Natural England's Ancient Woodland inventory.

Impact on Coastal communities

5.5.1 The Government's aim is to ensure that our coastal communities continue to prosper and adapt to coastal change. This means planning should: ● ensure that policies and decisions in coastal areas are based on an understanding of coastal change over time; ● prevent new development from being put at risk from coastal change by (i) **avoiding inappropriate development in areas that are vulnerable to coastal change** or any development that adds to the impacts of physical changes to the coast, and (ii) directing development away from areas vulnerable to coastal change; ● **ensure that the risk to development which is, exceptionally, necessary in coastal change areas because it requires a coastal location and provides substantial economic and social benefits to communities, is managed over its planned lifetime;** and ● ensure that plans are in place to secure the long term sustainability of coastal areas.

*Note: the landing facility at Thorpeness is in an area of cliff which is vulnerable to coastal change. There is no economic and social benefit to the local communities what so ever. A small % of jobs

during construction could be local which is up to 60mins travel time away, there are no long term/permanent jobs. There is no social benefit and in fact there will be economic and social detriment. The development is not 'exceptionally necessary' as other locations exist which could provide a connection to the National Grid.

Heritage and Historic assets

5.8.14 There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.

*Note: The application proposal impacts several listed buildings which should be protected with the presumption in favour of conservation.

Development proposed within nationally designated landscapes

5.9.9 National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.

5.9.10 Nevertheless, the IPC may grant development consent in these areas in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of: ● the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy; ● the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.4; and ● any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.9.11 The IPC should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary

Developments outside nationally designated areas which might affect them

5.9.12 The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.

*Note: The proposals will have a negative impact both in and adjacent to the AONB.

“Actions can be considered harmful to AONB if it results in the loss of, or material harm to any of the components of character that combine to form the area’s natural beauty and/or its constraints, achievement of AONB Management Plan objectives.”

Visual impact

5.9.18 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.

*Note: The difficulty with EN1 is that it does not include visual impact of all the onshore infrastructure as the policy is out of date and overdue for review, however the implication is clear. Consideration must be that the project can be delivered elsewhere without the same disbenefit.

Loss of green space, footpaths and walking areas

5.10.2 The Government’s policy is to ensure there is adequate provision of high-quality open space (including green infrastructure) and sports and recreation facilities to meet the needs of local communities. Open spaces, sports and recreational facilities all help to underpin people’s quality of life and have a vital role to play in promoting healthy living. Green infrastructure in particular will also play an increasingly important role in mitigating or adapting to the impacts of climate change.

5.10.24 Rights of way, National Trails and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders

*Note: These applications will remove large section of the open green space in the hamlet of Friston which is used for walking, tranquil recreation and healthy well-being. 26 public Rights of Way will be temporarily stopped up or diverted and 2 will be lost permanently. After construction those reinstated will still be negatively impacted by noise and light pollution due to their proximity to the proposed development. Industrialising large areas of agricultural land will also have a negative impact on climate change/CO2 whereas other potential sites including previously brown field are available.

Noise and vibration

5.11.1 Excessive noise can have wide-ranging impacts on the quality of human life, health (for example owing to annoyance or sleep disturbance) and use and enjoyment of areas of value such as quiet places and areas with high landscape quality. The Government’s policy on noise is set out in the Noise Policy Statement for England. It promotes good health and good quality of life through effective noise management. Similar considerations apply to vibration, which can also cause damage to buildings. In this section, in line with current legislation, references to “noise” below apply equally to assessment of impacts of vibration.

5.11.2 Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise effects of the proposed development on ecological receptors should be assessed by the IPC in accordance with the Biodiversity and Geological Conservation section of this NPS.

Considerations should include:

- the characteristics of the existing noise environment;
- a prediction of how the noise environment will change with the proposed development;
- in the shorter term such as during the construction period;
- in the longer term during the operating life of the infrastructure;
- at particular times of the day, evening and night as appropriate.

*Note: the base noise level before these applications are proposed is extremely quiet compare to the choice of a more industrialized location, so therefore the negative impact and harm is greater.

Socio economics

5.12.2 Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.2).

5.12.3 This assessment should consider all relevant socio-economic impacts, which may include: ● the creation of jobs and training opportunities; ● the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities;

● effects on tourism; ● the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and ● cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.

*Notes: See also impact on Tourism outlined in report by the Destination Management Organisation. “The Energy Coast” attached. The applicant has confirmed only 36% of the 249 jobs would be local which is up to 60mins travel. 64% of the workforce would be travelling or taking up vital accommodation. The population of Friston is only 344 currently.

Cummulative impact

The attached map indicates some of the 7 proposed energy projects. You will see how this very small geographic area and the surrounding communities will be overwhelmingly negatively impacted.

If EA1N and EA2 are approved the following 6 energy projects will also be applied for and likely to be approved for the same area (new substations for each within 5km of Friston with new cable runs and landing facilities for each project).

Proposed projects in addition to EA1N and EA2 are:

- Nautilus – interconnector to/from Belgium (despite Nemo being commissioned in 2019 to/from Belgium)
- Eurolink – interconnector to/from Holland
- Five Estuaries (previously known as Galloper extension)
- North Falls (previously known as Great Gabbard extension)

- SCD1 – connector to/from Kent
- SCD2 – connector to/from Sellindge

And also Sizewell C twin nuclear power station

We would also request that you research and seriously consider the impact on the Fishing industry at Aldeburgh and Sizewell.

We have not commented on impact on wildlife and habitats and believe you will receive this information from relevant representations.

We support all relevant representations from:

SASES

SEAS

Friston Parish Council

Snape Parish Council

East Coast Energy Alliance

Historic England

Natural England

RSPB Minsmere

Suffolk Coast Destination Management Organisation

Suffolk Coast and Heath AONB Partnership

Suffolk Preservation Society

Suffolk Wildlife Trust

The Woodland Trust

*Note – throughout the application the applicant says the impact is minimal.

ATC believe in assessing the magnitude of harm that minimal is where the probability and magnitude of harm or discomfort anticipated in the proposed application is “not greater, in and of themselves, than those ordinarily encountered in daily lives of the general population.”

The above comments are in addition to our verbal submissions, and previous written representations.


Sizewell C

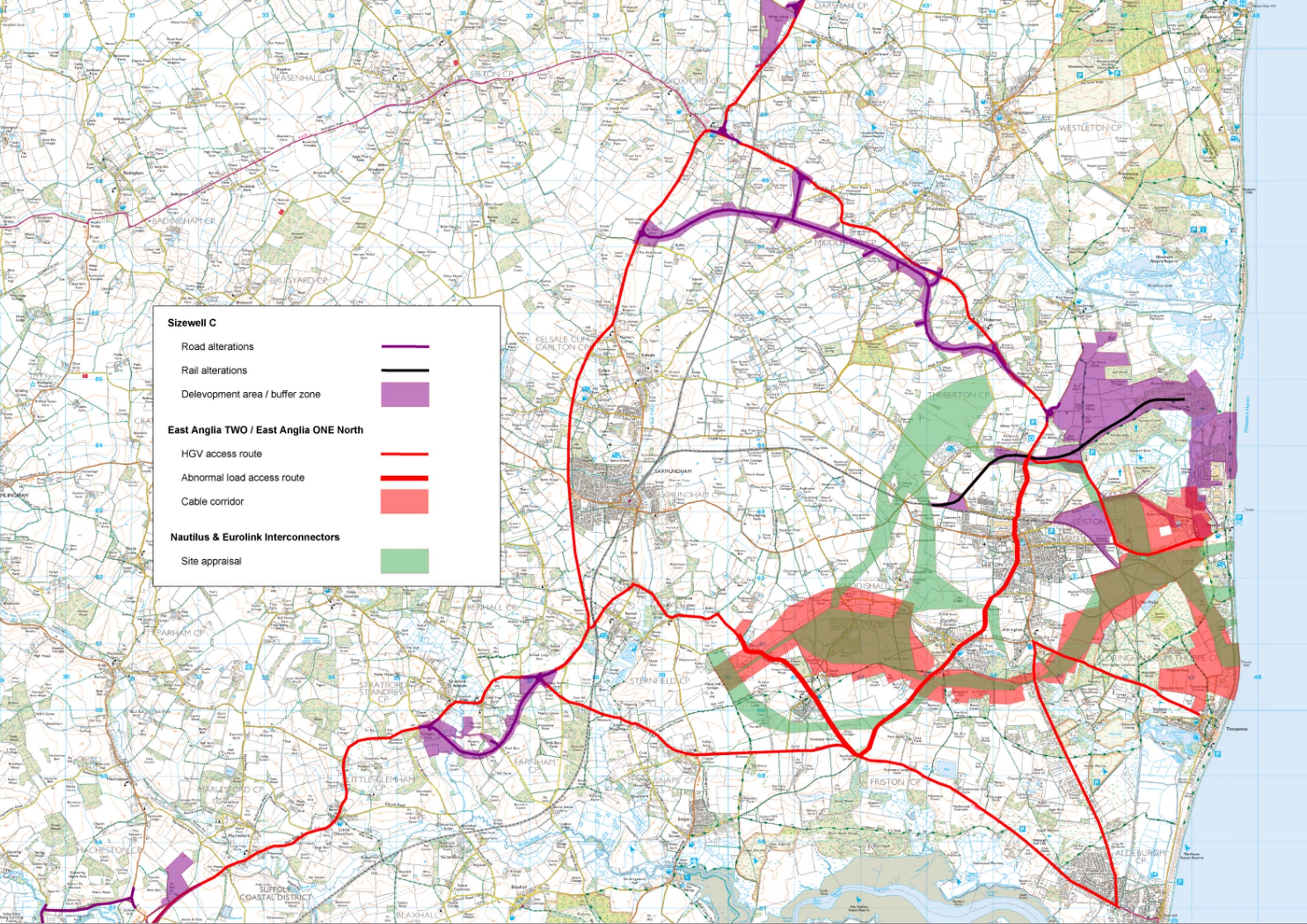
- Road alterations 
- Rail alterations 
- Development area / buffer zone 

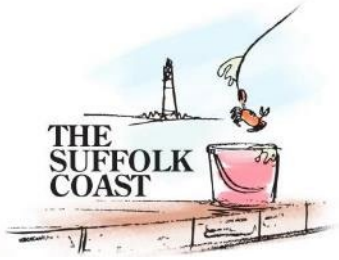
East Anglia TWO / East Anglia ONE North

- HGV access route 
- Abnormal load access route 
- Cable corridor 

Nautilus & Eurolink Interconnectors

- Site appraisal 





The Energy Coast

Implications, impact & opportunities for tourism on the Suffolk Coast

Executive Summary

Max Clapham, Research Director

September 2019



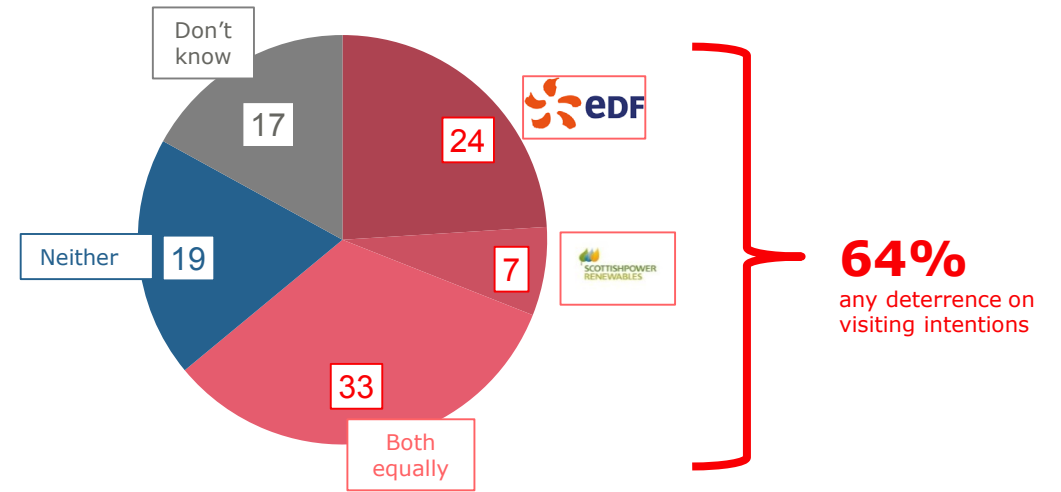
Executive summary (1)

In its current scope, EDF Energy's construction of the Sizewell C nuclear power station and ScottishPower Renewables (SPR) construction of onshore infrastructure connected to proposed new wind farms off the Suffolk Coast will have a significantly negative impact on tourism on The Suffolk Coast and Heaths AONB.

With fewer people prepared to consider visiting during construction of the energy developments, fewer trips will happen. Our analysis indicates this will cost the tourism sector at least £24million per annum*.

- Both developments deter the Suffolk Coasts main regional source market** for days out and holidays from visiting with EDF's Sizewell C considered the most disruptive. (see opposite)

Which of the two proposed developments will have a greater impact on deterring you personally from visiting the Suffolk Coast?



Base (n=1700) All regional market

*Results mapped to Economic Impact of Tourism Suffolk Coast & Heaths AONB -2017 report produced by Destination Research. Above calculation places the weight on feedback only from individuals already familiar with the Suffolk Coast. i.e. they had already been on at least one day out or holiday to the Suffolk Coast AND were "At least somewhat aware of what there is to see and do on the Suffolk Coast" AND were "Aware and knew at least a little about developments at both Sizewell C and SPR" prior to completing the survey. It is based on the cumulative impact of a 9% decline in day visits and 21% decline in holiday visits from this audience. A higher figure of £40 million would have been the calculated loss had all regional respondents been equally weighted

** 1700 regionally representative sample comprising 700 respondents residing in "near regional" market (within 90 minute drive-time) and 1000 residing in "wider regional" market (between 90 – 180 minute drive-time of the Suffolk Coast). Sample more representative of actual market than a nationally representative sample.

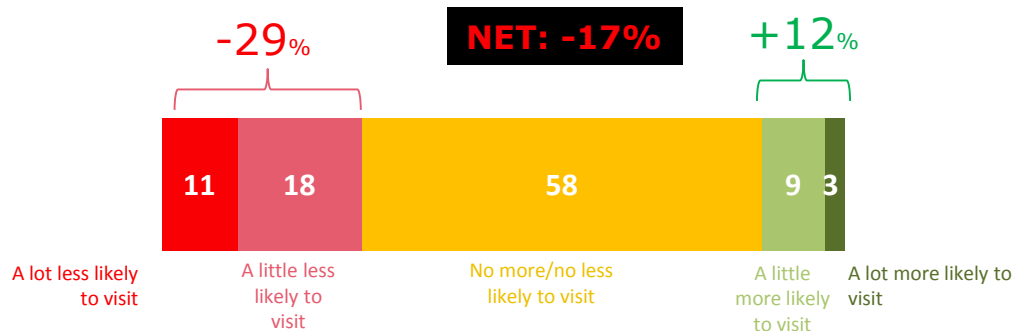
Executive summary (2)

Deterred from visiting

During construction the net: loss of natural landscapes, tranquility, nature and the regions unique charms, are the concerns most likely to deter visitors from the Suffolk Coast.

- However despite being deterred, it is reassuring that the majority of the regional market are unlikely to actually change their broad attitudes towards visiting the Suffolk Coast whilst these developments take place.
- Although outnumbered by those less likely to visit, a small minority of respondents even suggested they would be more likely to visit the Suffolk Coast during this period. (see below)

Now that you are aware of the plans for Sizewell C and the SPR wind turbines with construction of onshore infrastructure, whilst the infrastructure is being built do you think you are more or less likely to visit the Suffolk Coast for days out or a holiday?



Base (n=1700) All regional market

Business pessimism

Clearly the concern for the Suffolk Coast is that it doesn't require much of a downturn in visitor spend to severely impact local businesses and the viability of the local visitor economy.

- Of the businesses that responded to our survey* the majority (58%) expect annual turnover to decrease during the 9-12 year period of construction i.e. the years covering the development phase of Sizewell C and the SPR onshore infrastructure for the wind turbines.
- Of businesses foreseeing a loss in turnover, a majority expect their revenue to fall by at least 20% per annum with nearly a quarter (23%) anticipating annual decreases of more than 50%. Accommodation providers feel particularly vulnerable.
- Projecting our core analysis further we can calculate that at least 400 full time equivalent local jobs** are at risk from the energy developments, all other things being equal.

*113 tourism related businesses operating in the Suffolk DMO completed a complementary business survey at the same time as the market survey. 56% of respondents were accommodation providers.
**Results mapped to Economic Impact of Tourism Suffolk Coast & Heaths AONB -2017 report produced by Destination Research. Above calculation places the weight on feedback only from individuals already familiar with the Suffolk Coast

Executive summary (3)

Evidence supports grounds for economic pessimism, particularly regards the future holiday market

The regional consumer study provides strong grounds for pessimism, as energy developments look set to promote a decline in both the days out and, more acutely, the regional overnight holiday market, during their construction.

- When mapped amongst those most familiar with all that the Suffolk Coast has to offer, consideration for holidays during infrastructure development falls 21%. For days out, consideration declines 9%.
- Even at the conclusion of the construction phase, whilst the regional market is more inclined to visit the Suffolk Coast than during the construction, the uplift is not always significant.



Executive summary (4)



Fears of an East Coast brand dominated by energy

Suffolk competes regionally for domestic coastal tourism with traditionally better-known destinations.

- Unprompted by any stimulus 30% of the regional market still consider visiting a further afield Devon for holiday/days out in the future, whereas 23% consider Suffolk. Consideration to visit rises a lot when the regional market is shown a description of the broader Suffolk Coast visitor offer.

The fear for the Suffolk Coast is that with limited brand salience of their offer currently, the area will become known more for its concentration of energy developments than for its wild and natural beauty. Nature related reasons (*Net: 84%*) are the main motivations for those considering visiting the Suffolk Coast in the future.

- Only 10% of the regional market are encouraged by energy coast branding, nearly half (43%) are put off by it. Businesses feel it will be a much more negative brand development for the area (*86% NET: negative*)

In a battle to win over the hearts and minds of potential visitors, significant investment will need to be made to ensure the Suffolk Coast brand is not dominated by energy and the region does not fall further behind the regional competition.

Executive summary (5)

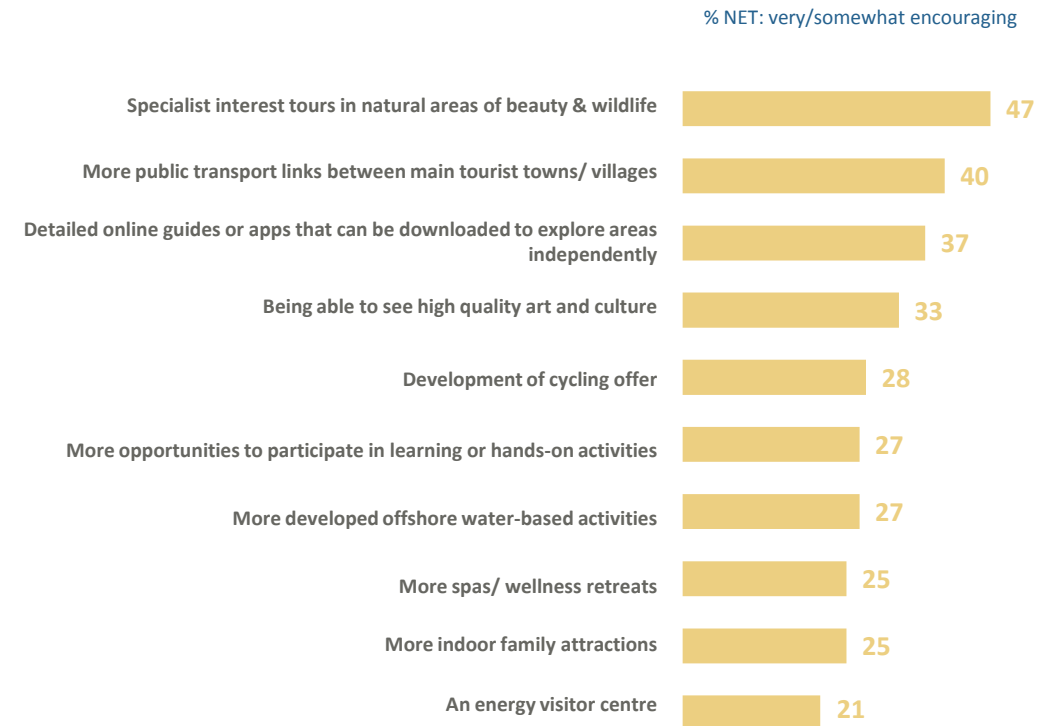
Some opportunities for the Suffolk Coast

Alongside increased marketing of the destinations traditional assets, there exists opportunities for targeted tourism investment to encourage additional visits, despite the energy developments.

- New initiatives generally receive the greatest support from families and pre-family audiences, a lesser tapped audience for the Suffolk Coast but one that could mitigate some of the negative impact. *(see opposite)*



Which, if any, of the following developments would encourage you to visit the Suffolk Coast more often or stay for longer in the future?



Base (n=1700) All regional market

■ All Regional market

Accreditation



BVA BDRC is certified to ISO 20252 and 27001, the recognised international quality standards for market research and information security.

- Adherence to the standard is independently audited once per year.
- Where subcontractors are used by BVA BDRC, they are assessed to ensure any outsourced parts of the research are conducted in adherence to ISO 20252 and 27001.
- All work will be carried out in conformity to these standards, the MRS Code of Conduct, and all relevant legal requirements
- Full methodological details relevant to the project and a full report are available upon request

Statistical Difference

This research was designed to ensure robust sample sizes for analysis. As the online survey is conducted with a sample of the target audience (nationally representative), we cannot be 100% certain that a census of the whole population would yield the same results.

We can be 95% certain that the actual figure (in the population as a whole) falls within a certain range of the survey figure. The percentages within the table represent the error variance.

Example Bases	5 / 95%	20 / 80%	50 / 50%
Total Sample (1,700)	+/- 1.0%	+/- 1.9%	+/- 2.4%
Male (850)	+/- 1.5%	+/- 2.7%	+/- 3.4%
Female (850)	+/- 1.5%	+/- 2.7%	+/- 3.4%
16-24 (187)	+/- 3.1%	+/- 5.7%	+/- 7.2%
25-34 (294)	+/- 2.5%	+/- 4.6%	+/- 5.7%
35-44 (267)	+/- 2.6%	+/- 4.8%	+/- 6.0%
45-54 (309)	+/- 2.4%	+/- 4.5%	+/- 5.6%
55-64 (257)	+/- 2.7%	+/- 4.9%	+/- 6.1%
65+ (387)	+/- 2.2%	+/- 4.0%	+/- 5.0%