From: <u>Katherine Mackie</u>

To: East Anglia ONE North; East Anglia Two; Williams, Emre

Cc:

**Subject:** Aldeburgh Society Written submission 3

Date: 15 December 2020 13:30:54
Attachments: Third AS memo SPR.docx

Please ignore my previous email.

Dear Rynd Smith and Colleagues

In accordance with the procedures under your Rule 8 Letter regarding deadline 3, we attach a second Written Representation on behalf of the Aldeburgh Society.

With thanks for your attention and kind regards

Katherine Mackie, Chair

Paul Bongers de Rath, Secretary

Aldeburgh Society

Katherine Mackie

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All the best Katherine

## PLANNING INSPECTORATE EXAMINATION OF DCO APPLICATIONS BY SCOTTTISH POWER RENEWABLES RE EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO OFFSHORE WINDFARMS

## THIRD WRITTEN REPRESENTATION ON BEHALF OF THE ALDEBURGH SOCIETY

## 15 December 2020

The Aldeburgh Society maintains its total opposition to SPR's onshore development proposals, on account of the unsuitability of the Friston location and the potential irreversible damage to the economic and social wellbeing of our town and its environs.

We wish to draw attention to the cumulative impact of SPR's plans and those of Sizewell C and reiterate that it is unacceptable that the present Examination is proceeding with relatively little attention to the DCO application for the Sizewell C nuclear power station.

In this our third written representation we call on the Inspectorate to note the following:

- 1. General Traffic issues: The Applicants' own view set out in paragraph 113 of its Deadline 2 Submission EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) Version 001- 17th November 2020 is that "...the traffic flows for the Sizewell Projects are considerably higher than those of the Projects. Utilising the Applications' assessment framework, this large difference in traffic flows results in potentially significant cumulative impacts which are without exception triggered by the traffic demand from the Sizewell Projects." The Applicants however go on to conclude in para 114 "that the Projects' traffic demand would not contribute to significant cumulative impacts with the Sizewell Projects" on their own assessment of the traffic. We cannot follow this logic and suggest the Examining Authority must further probe these assertions.
- 2. **HGV movements:** Further clarification is still needed about the Applicants' actual proposals for managing HGV movements for the onshore construction sites as regards the way they would impact upon Aldeburgh.

Looking at Chapter 26, table 26.4 and table 26.22 of the Environmental Statement in both applications, the intentions regarding the roads in the vicinity of Aldeburgh appear to be as follows: -

- the A1094 from the A12 is one of the two approved access roads from the A12.
- the B1121 from the A1094 to Friston and Saxmundham is not to be used.
- the southern part of the B1169 from the A1094 towards Knodishall and Leiston may be used to join a temporary haul road.
- the unclassified road from Aldeburgh to Thorpeness is not to be used.
- a small number of abnormal indivisible loads with pilot vehicles may travel via the Aldeburgh roundabout and the B1122 towards Leiston.

If our understanding above is correct, then although there may be traffic delays affecting the A1094, there should be no routine HGV movements via Aldeburgh. Yet, the Applicants' 'Development of our Plans' document of August 2019 stated that, following the decision not to use the Thorpeness Road for HGV traffic to the landfall area, this would mean 'a significant reduction in the number of HGVs using the Aldeburgh roundabout and Leiston Road. The total daily two-way HGV movements (i.e., arrivals and departures) are therefore reduced from 55 HGV to 10 HGVs at the peak period'.

There appears to be no explanation in the application documents of the reason for any HGVs other than the abnormal loads to pass through Aldeburgh. While the exact timing and origin of HGV movements cannot be fully predicted this far in advance, there does need to be total clarity about the roads which they would, or would not be, allowed to use.

**3.** Emergency Incident Response Plan and Emergency Evacuation Plan: We also draw your attention to the concluding paragraph of EDF Nuclear Energy Generation Ltd (PDF, 2 MB) Deadline 2 Submission - Deadline Response to the effect that they need to be added as a consultee in the drafting of the Emergency Incident Response Plan to be submitted under Requirement 33 of the Draft DCO.

In addition we ask you to note that the Substation Action Save East Suffolk **(SASES)** Deadline 2 Submission - Comments on Statement of Common Ground with Office of Nuclear Regulation concludes as follows:

"SASES wishes to highlight that the arrangements for project compliance with the Sizewell Emergency Evacuation Plan have NOT been agreed with the relevant authority, and that this is a critical issue of great concern to the community, as described in SASES relevant WR. It is essential that agreement on this topic is reached prior to ExAs consideration as to consent for the projects."

We endorse these views which bring home how critically important it is for these projects to be assessed together.

Once again may we stress that this special area of East Suffolk, protected as it is by designation as an Area of Outstanding Natural Beauty, is facing the seismic trauma of cumulative damage by a string of energy projects which would be too hard for it to bear.