

**Dear Planning Inspectorate,**

**Snape Parish Council submits the below written representations (EN 010077/78) Ref 20023749/50**

### **1. Consultation**

1.2 We have raised our concerns from October 2018 onwards both about the projects' potential impact on Snape and the area and also the lack of consultation with the village over an extended period. Those concerns remain unaddressed in our view. We note the responses in the DCO to our written representations (P192- 205) are generic and a repetition of previous statements which we would say do not address the specific concerns we have repeatedly raised.

1.3 As a village we had the opportunity to meet with SPR staff on two occasions. We had requested meetings with SPR and SCC to discuss the project and specifically traffic management through the spring and summer of 2018. Whilst SCC were available for nearly all the offered dates SPR were unavailable for all until November 2018 when a short briefing to the PC was arranged. At that meeting we requested a wider public meeting given the potential impact on the village of the projects. It was agreed that an extraordinary Snape Parish Council would be held in March 2019 at which SPR could outline their plans and, as importantly, hear and respond to the concerns of residents. At the meeting we had an attendance of approximately 70 people.

1.4 The meeting took place over approximately two hours and SPR expressed their thanks for the opportunity to speak and listen and also for the manner in which the meeting was run. Senior SPR staff who attended accepted that a number of important issues had been raised which needed to be addressed. Specifically it was accepted there had been no real assessment of the impact of traffic at the junction of the A1094 and B1069. At that meeting the issue of the cumulative impact of both SPR and EDF projects was raised repeatedly as was the site selection by National Grid and their absence from any public dialogue. In the DCO response to our relevant representations the PC notes the PC meeting with SPR is described as a "briefing" (P195). We asked for and understood the meeting to be a consultation which allowed the applicants to outline the project and offered them the opportunity to listen to our concerns and where possible address them.

1.5 The PC did not feel that consultation has been either adequate or fair given the potential impacts and the quality of the information, research and calculation contained within the DCO and the responses to our relevant representations and prior written submissions. There is probably support for renewable energy generally in the village but the location of the site, potential impact on the environment and road network, levels of noise and air pollution, lack of consideration of the direct impact of the project on the village of Snape generally, and specifically around traffic, undermine the proposals as outlined in the DCO.

**1.6 We would encourage a site visit to the junction.**

### **2. Environmental**

2.1 The opposition to the proposals to build the substation are based on the impact the construction will have visually and environmentally in and adjacent to an AONB and to what are small rural roads and conurbations.

2.2 The PC also noted the recent formal recording of the concerns of both Suffolk County Council and East Suffolk Council to the proposals in terms of the overall impact in an AONB and the lack of detail contained in various sections of the DCO document. That lack of detail remains a concern

shared by Snape PC given the length of time that has been available to SPR to construct and research the proposed development.

### **3. Transport**

3.1 In the view of the PC the DCO remains a deeply unsatisfactory document. Principally, in the view of the PC, it does not reflect the detailed research that we had expected from our meetings, feedback and submissions; and the specific DCO responses to our written representations leave the issues unaddressed. The PC noted at the time, in 2019, that Snape was not named in the Stage 4 consultation but was erroneously referred to as the “village of Church Common”, which does not exist. There was no assessment of the impact of additional traffic at the junction of the B1069 with the A1094 in the village of Snape in Chapter 26 covering traffic issues, despite the junction being flagged as a “collision cluster” it was not recorded as a “sensitive junction”. There are references to the B1069 but that related to another separate section of the road some miles away. SPR staff accepted at the PC meeting that this was a significant oversight and that work would be necessary. Concerns about that junction had already been raised with SCC Highways given the existing substantial and frequent long tail backs of traffic into the village and consequential impact on unclassified surrounding roads, of which SPR were apparently unaware. Given that as a village we have attempted to raise the issue with both SPR and SCC this was a serious concern to the PC. Mitigation may be possible as one of the suggestions was the potential for a roundabout at the junction but any work to reduce the impact of large amounts of queuing traffic through the village would have to be fully researched and analysed, if the project does proceed, both in terms of traffic delays as well as air and noise pollution. The DCO response to our relevant representations simply repeats the argument that the traffic assessment methodology was agreed with SCC and Highways England but does not address our substantive point about the particular nature of the junction which it was agreed in March 2019 need to be addressed and appears outstanding (P200 applicants responses to relevant representations).

3.2 The DCO response to concerns about access to local facilities such as the local Church sited on the A1094 being accessed from a car park by pedestrians across the main road, an existing traffic hazard, does recognise the issue (P197) and offers some mitigation without addressing the underlying issue of increased traffic volumes.

3.3 The traffic flow analysis as outlined in the DCO and at the PC meeting reflected high numbers of traffic movements and a potential high impact along the A1094. It has been suggested throughout that there was potential to mitigate that impact. Given the lack of any research or information relating to the village of Snape itself which will be subject of most, if not all, of the associated traffic movements it is not possible to see how that calculation around the level of impact could have been made legitimately. The PC noted with concern that there remains a complete lack of detailed granular analysis of the potential impact of traffic over peak periods such as holidays or the frequent and long established cultural events at both Snape and Aldeburgh. All the analysis and calculations were based on average traffic movements which given the nature of traffic in the area seemed to ignore the GEART guidance of making calculations based on “site specific” information and circumstances. The PC also noted the assumption that the A1094 was wide enough at all points to allow passing HGVs and that was based on information from SCC. Regular users of the road will attest that on a daily basis at a number of points on that road HGVs and large buses have to slow or stop to avoid collision or damage to mirrors. Snape PC has previously asked SPR to contact local transport and bus companies to provide evidence and we are not aware that this has been done. At the litter pick in September 2019 the remains of approximately 15 wing mirrors were recovered from the A1094 (photo available).

3.4 At the PC meeting in March 2019 and in the written submission that followed the PC offered a means of creating a one way traffic flow in and out of the site which SPR staff said was valid and worth investigation. That work remains outstanding.

3.5 The PC also noted that there was reference to the falling number of road traffic collisions since 2013 and a conclusion drawn that this may reflect a downward trend without any recognition that all recording is almost entirely dependent on police reporting and attendance. Police numbers both nationally and locally have fallen significantly since 2012 onwards; which may well be an alternative explanation for the fall.

#### **4. Cumulative Impact of SPR /Sizewell and related projects**

4.1 The PC remains concerned that despite specifically and from an early stage asking for consideration of the potential cumulative impact of the SPR proposals taken together with the developing Sizewell C plans (now in addition National Grid) for infrastructure developments, that the sections on cumulative impact within the DCO document holds no real detail on the potential impact of concurrent development. It is striking and the PC noted, that there was frequent reference to ongoing work and the need to continue it, but the issue remains unaddressed. The potentially damaging cumulative impact could destroy, or at the very least significantly denude, the vital tourist and farming industries that the area depends on currently for employment. Again given the lead in times and the consistency of our PC and others raising the issue it is concerning that SPR appear unwilling or unable to make any form of meaningful CIA, even at the point of submitting the DCO.

#### **5. Economic Impact**

5.1 The PC has flagged recent research by Research Policy Analysts (RPA) for the Alde and Ore Estuary Partnership which documented a value of circa £100 million per annum of tourism and farming to the immediate area subject to these proposals; which would be at risk for a number of years, possibly permanently. SPR were unaware of the values contained in that research and were therefore not in a position to identify the potential economic impact on the immediate area and could be asked to do that work now.

#### **6. Conclusion**

7.1 The PC sought to engage with the SPR proposals in a constructive manner but given the lack of information and real detail, omissions and arguably flawed analysis the DCO cannot be regarded as putting either the PC or residents of the village in a position to properly understand the full impact of the proposals, nor therefore what meaningful mitigation could be carried out.

Tim Beach

**Snape PC**