

Planning Inspectorate Ex Authority for EA1N and EA2, response by Aldeburgh Town Council

Actions arising from the ISHs7 held virtually on 17 February 2021

Aldeburgh Town Council welcomes the additional information requests regarding Hundred wood, and remains concerned about the negative impact on habitat and health & wellbeing.

With regard to bats, badgers and birds ATC is horrified by the Applicants view and approach towards these protected and/or vital species. We specifically draw the Ex Authority's attention to quotes from the Applicant who said if a badger sett was found in the way of a cable route then destruction would be requested, and that the project could not be held up if bird mitigation was not in place. ATC believes that there is inadequate information following failed surveys (wrong location, time or year or attention to information provided by local residents as to actual use) and actions which are being left to be determined post approval pre-construction. As such the level of harm and required mitigation which should be considered accurately as part of the examination, is underestimated.

Actions arising from the ISHs8 held virtually on 18 February 2021

Contrary to our previous verbal statement that we had no issues in principle about the array, on reflection Aldeburgh Town Council is concerned about the impact of the array on both the special characteristics of the AONB and the visual impact. We disagree with the Applicant that this is negligible. As an example the Applicant argued that the array would only be visible on 33% of days, and that these were unlikely to be all in the summer months. However, we would content that individuals would be more likely to visit and want to enjoy an uninterrupted vista on clear days, so their choices are not just to visit in the summer months, in fact some residents walk daily along the promenade in Aldeburgh...so rather than a percentage of 33% it could actually be 100% of all the days a person visits that their view is interrupted and spoilt. There are also many views currently enjoyed from height such as The Terrace. We also support the concerns raised by Natural England and await further information at deadline 7.

Actions arising from the ISHs9 held virtually on 19 February 2021

1. We believe that the Norfolk Vanguard High Court decision (18 February 2021) provides helpful direction regarding the weight that should be placed on the significant harm caused by the proposed projects and that the strong endorsement of offshore wind electricity generation in NPS EN-1 and NPS EN-3 should not mean that, on balance, the benefits of a proposed development should outweigh its adverse impacts, and even harm which is just localised (within 1.2km) or temporary should not be acceptable, if it cannot be adequately mitigated or fully compensated.

The decision also clarifies that in situations where there is insufficient information of the potential cumulative impact of other projects (such as in the case of EA1N and EA2 those that have been offered grid connection agreements in the same area, or may do so in the future should EA1N and EA2 be consented) this should not mean that it is disregarded.

We would request that PINS urgently reviews this document and considers what actions would now be appropriate.

2. Regarding changes to dDCOs currently under discussion/preparation ATC would like to propose that MOUs are not used for mitigation or compensation, or any benefits - as although the Applicant indicates these could be more flexible, they are also not enforceable.

ATC is also concerned that the new requirement providing that the National Grid Substation cannot proceed if the Offshore Wind Farms are not implemented does not go far enough, in that the assumption is also that if EA1N and EA2 are consented that the National Grid Substation although the current applications include very little detail or information, is also consented. ATC is not content that National Grid had been in any way accountable in this process, through their lack of attendance and engagement there is no transparency. It is not acceptable to leave for example; all details of design and mitigation to post consent, pre-construction. ATC would also like to be informed as to the total capacity of the National Grid Substation and for a list of all projects that have or will be offered connections to be made public and considered within this examination. On March 1st National Grid Interconnectors Ltd will be updating local Parish/Town councils with their plans, however they have indicated that their assumption is the same connection as EA1N and EA2, with a similar area of landfall and cable run and a further substation within 5km of the National Grid substation. Please see attached document to assist.

3. ATC does not agree that protective provisions for Sizewell B & C Nuclear Operations are sufficient, and that these should include reference to and consideration of both the Detailed Emergency Planning Zone and Extended Emergency Planning zone, and the impact traffic and transport issues of EA1N and EA2 may have on roads within these.
4. Same comment as above for Sizewell A Decommissioning. ATC urges that discussion are accelerated and include public consultation to understand behaviour and not just traffic modelling.
5. Obligations and Agreements: ATC can confirm that there has been no engagement with town and parish Councils, (or any other community representatives or individuals directly affected) by East Suffolk Council regarding the content of any obligations, agreements or MoUs. We do not support East Suffolk's statement to PINS that that the amount and use of compensation is agreed. We believe that they have grossly underestimated the level of mitigation and compensation required, as the proposed projects EA1N and EA2 will render the community of Friston, and areas

around cable runs and landfall, uninhabitable requiring potential total relocation of individuals and existing community infrastructure, and creation of alternative and enhanced habitat and green space to AONB quality, as well as significant payments to recompense for distress and inconvenience. Also the following; (but limited to) additional added value to existing or new local services and community amenities, and traffic mitigation in the area of Friston, Snape, Aldeburgh, Aldringham cum Thorpeness, Sizewell. We would also bring to your urgent attention that the value of the Tourism fund is wholly disproportionate to the potential losses which will be experienced.

9. East Suffolk Council: Other Agreements and Obligations: ATC welcomes the proposed draft Section 111 agreement to be submitted at Deadline 6 and to reviewing and commenting on this. However, we would ask that the Ex Authority support our request to be consulted and to discuss the content of this so that an agreement can be in place and presented to the examination by deadline 8.

10. Grant of Crown consents under s135 of PA2008: ATC would request that the Ex Authority requests that the Crown Estate and MMO review and pay regard to OTNR and BEIS review. Specifically NG's Offshore Coordination Phase 1 report p 19 that states clusters of radial connections will be reduced down to a few coordinated connections by 2030. ATC supports a change in legislation so that each connection ceases to be a matter of private bidding and becomes coordinated with required infrastructure on brown field onshore locations only.

Thank you for consideration of the above comments. We appreciate the opportunity to continue to engage in the examination process for EA1N and EA2, and confirm that we would request to attend the hearings in March. Thank you.