



Dear Secretary of State,

Snape Parish Council submits the below comments for your information and consideration with regard to the DCO for Scottish Power Renewables (SPR) development of an offshore wind farm and substation (EN 010077/78) Ref 20023749/50.

1. Consultation

1.1 We have raised our concerns from October 2018 to the present day 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 and through the Planning Inspectorate hearings to our representations are generic and a repetition of previous statements which we would say do not address the specific concerns we have repeatedly raised.

1.2 As a village we had the opportunity to meet with SPR staff on two occasions. We had requested meetings with SPR and Suffolk County Council (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.

1.3 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 SZC projects was raised repeatedly as was the site selection by National Grid and in particular their absence from any public dialogue. More recently (October 2021) National Grid Ventures (NGV) has begun what is described as a pre planning consultation process for the Nautilus interconnector project for which they plan to use the SPR site for connection to the grid if permitted. This will compound the issues of cumulative impact and specifically all of the traffic and transport issues. As you are aware there are other similar interconnector projects being planned.

1.4 The PC remains of the view that consultation has been neither adequate nor fair given the potential impacts and the quality of the information, research and calculation contained within the DCO and evidence presented to the Planning Inspectorate, and the responses to our relevant representations and 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 and hearings.

2. Environmental

2.1 The opposition to the proposals to build the substation are also 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 continuing concerns of SCC 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 of the consultation and hearing process 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, submissions and planning inspectorate process. The specific DCO responses to our written representations leave issues unaddressed. The PC noted 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 of the DCO 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 by the PC with SCC Highways given the existing substantial and frequent long tail backs of traffic into the village and consequential impact on unclassified surrounding roads. SPR were apparently unaware. Given that as a village we have attempted to raise the issue with both SPR and SCC this remains a serious concern to the PC. Those issues in our view remain almost entirely unaddressed 3 years later.

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 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 by SPR 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 can 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

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 NGV Nautilus project) 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 throughout the hearings 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 length of the consultation and planning process and the consistency of our PC and others raising the issue it is concerning that any form of meaningful Community Impact Assessment has not been provided in our view.

5. Conclusion

5.1 The PC has 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 and hearings 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. Snape PC would therefore support what has been referred to within the hearings as a “split decision”: that is the permitting of the off shore development and withholding on shore permissions until all the options that have been raised over a number of years have been fully considered, in terms of viability (which we understand falls within the BEIS review) and needs to include consideration of a comprehensive offshore transmission network (OTN).

Tim Beach

Snape PC