

Aldeburgh Town Council's response to Environmental Impact Assessment (EIA) for NG LionLink

We understand that this is not a consultation about the principles of the development but an opportunity to identify local environmental and socio-economic sensitivities and risks need to consider within the scope of the Environmental Impact Assessment (EIA). We would request that the following be taken into account.

Chapter 8 - Biodiversity and Ecology

We would request that as well as the impact of ground surveys, preparation works and actual construction on biodiversity and ecology, that the time for wildlife to return to an area, and for landscaping to be fully mature, is taken into account. We would support the requests of organisations who are the experts in these matters regarding the data which should be collected.

Chapter 9 - Coastal erosion and Geology

ATC does not feel specifically informed to the level needed to comment on these matters beyond highlighting that the Aldeburgh beach (and marsh areas) have changed dramatically. Movement and loss at Thorpeness and Dunwich cliffs (just North of Aldeburgh, and South from the proposed project) are well evidenced. It is uncertain how the coastline to the South of the proposed undersea cables and landing sites may be affected by the offshore and onshore works associated with the project. We would support the submissions from the Marine Management Organisation, Natural England, Suffolk Coasts and Healths Natural Landscapes, RSPB Minsmere and request that full investigations be undertaken. The cumulative impact of several projects in the same area of coastal East Suffolk over a relatively short period of time is a concern. Aldeburgh still has a small fishing industry: impact to these individuals and contribution to the tourism economy should be evaluated.

Chapter 15 - Roads and Traffic

The geography of our area with many rivers, and the North Sea to our east, means that there are no major roads which run North/South parallel to the coast. The arterial roads from the A12 are also predominately B roads. There are only three roads in and out of Aldeburgh with residents and visitors needing to navigate the area which will be subject to impact should LionLink go ahead as currently proposed. This is particular relevance to the tourism routes north to Minsmere, Walberswick and Southwold, and the access to Saxmundham for train links. All the junctions onto the A12 at Yoxford, Saxmundham and Friday Street (Snape) are potentially hazardous, with Friday Street/A1094 listed as an accident site.

There are identified pinch points, and the A12 has not been updated to cope with heavy traffic passing through many villages although some work to bypass may be undertaken as part of the proposals for SZC. The timing of the project indicates a potential overlap with traffic connected to the construction of SZC prior to road mitigations being in place. ATC do not agree that the impact of traffic from LionLink and the cumulative impact is "not significant". Specifically, we would challenge the assertion by the Developer that; "it is anticipated that environmental impacts such as noise and traffic impacts will be relatively minor..." In an area which is quiet, tranquil and an area of National Landscapes (AONB) the background noise and levels of traffic are low which means any increase is significant.

The cumulative impact on pedestrians, cyclists and regular car users, as well as delivery and emergency vehicles has not been assessed as timelines are subject to change. Peak travel on our roads is already at a rate approaching what IEMA guidance determines would be significant for any further increase. Visitors and residents are limited as to which roads they can use if there are already detours in place due to flooding, roadworks or other impacts.

ATC believe that the Rochdale Envelope approach of 'worst case scenario' should be applied if data is not available. It is also not clear whether other projects will be coordinated sequentially in the same areas, or at the same time over different locations. All options should be explored. Further work should be carried out to investigate the impact of local haul roads which will be necessary during construction.

Chapter 16 – Socio-economics, Recreation and Tourism

As you are aware the Tourism industry is vital to the East Suffolk area in general, and specifically an important part of our economy in Aldeburgh. Over the last twenty years significant private and public funding has been spent expanding Aldeburgh into a year-round destination. There is a whole series of activities throughout the year including Documentary Festival, Literary Festival, Poetry Festival, Aldeburgh Music Festival, Art Trail, Carnival & Regatta (Sailing events), Golf/Tennis and other sport tournaments. We do not have a high unemployment rate, so displacement occurs with non-skilled workforce and local businesses may not be able to sustain or find the staff they need. There is potential overlap with outages at Sizewell B power station which occur every 18 months lasting several months, in addition to potential new build by Sizewell C, we are concerned about the availability of rental properties for local residents, and tourism accommodation for our visitors. We need to secure capacity for accommodation or visitors will develop habits of staying elsewhere.

Tourism will also be affected if noise, traffic and construction activity negatively impact on biodiversity and ecology as individuals and families choose to visit Aldeburgh for the peace and tranquillity, and to experience the flora/fauna, and wildlife at the various RSPB reserves and local designated areas. Nature-based tourism and recreation features including access to quiet roads to enable individuals to explore, and enjoy natural surroundings - are vital. Dog walking and recreation to support physical and mental health and well-being is widely acknowledged. The town and surrounding area is also well-known regionally, nationally and internationally for Arts, Music and Heritage. People are dependent on being able to travel across the area unimpeded North to Minsmere, Saxmundham, Halesworth, Dunwich, Reydon, Southwold and South to Snape, Woodbridge, Iken and Orford. Our residents also need to access their work, families, services and appointments, recreation etc. Visitor surveys conducted by Destination Management Organisation found a potential negative impact of at least 17% to 30% in perception of visitors, and future choices. The typical visitor spend profile is also very different to that of a worker taking the same accommodation, and the local economy may face unprecedented negative impacts from an influx of non-visitors. Fishing and direct access to the beach (with swimming even more popular) is also part of our economy and recreational offer, locally.

Chapter 29 - Cumulative and combined effects

ATC notes that this EIA Scoping Report has been prepared on the basis that LionLink is a stand-alone project, although it also references the possibility of co-ordinating with other projects (Sealink, Nautilus and/or EAN1/EA2) and the proposed construction of a sub-station at Friston and potentially the co-location of convertor stations. As such ATC would also request that the cumulative and combined environmental and socio-economic sensitivities are robustly taken into account. Especially as there is to be an overlap peak of approximately 6 years or more across a very small geographic area.

In conclusion we understand the EIA will also identify measures to mitigate these sensitivities and risks, however unless they can be effectively identified, it is difficult to assess how they can be mitigated. If they cannot be mitigated, the report should also explore how these will be compensated.

4th April 2024