

SUFFOLK ENERGY ACTION SOLUTIONS

response to

NATIONAL GRID LIONLINK LTD's

EIA SCOPING REPORT

March 2024

INTRODUCTION

Suffolk Energy Action Solutions (SEAS), is a Community Group representing thousands of supporters who live along the Suffolk Heritage Coast. Established in July 2019, our mission is to represent the views of local communities who live in the coastal tourist towns and villages of Southwold, Walberswick, Thorpeness, Aldeburgh, stretching in land to Friston, Saxmundham, Woodbridge, Wickham Market, Framlingham, Wenhaston, Halesworth and more, namely the Suffolk Heritage Coast.

As there is a cheaper, better and quicker alternative, SEAS has promoted offshore solutions and landfall at existing brownfield sites close to demand for all major energy infrastructure hubs, benchmarking offshore developments in Belgium, Netherlands, Denmark, Germany and other countries where offshore wind farms are being constructed along with offshore platforms, artificial islands and major energy infrastructure hubs at existing brownfield sites close to shoreline, such as Rotterdam and Zeebrugge. Holistic planning has been the dominant model for these other North Sea countries where environmental and socio-economic criteria have influenced the spatial plans for siting energy hubs and landfall locations.

Over the last four years SEAS has submitted more than 20 detailed proposals to the relevant Committees established including the “Flexible Offshore Grid Review” and was asked to answer questions at the House of Commons Select Committee Hearings on 17 November 2023.

EXECUTIVE SUMMARY

SEAS has observed that National Grid LionLink's EIA scoping report has been submitted to the Planning Inspectors and have the following observations and comments:

The EIA Scoping Report is rushed, based on flawed assumptions, utilises inadequate methodology, and reaches conclusions that minimise the impact of a massively destructive scheme. All of which stems from a decision made seven years ago, that the Friston substation is the necessary linchpin on which the entire scheme depends, and from the assumption that minimising cost is of greater importance than the long-term well-being of Suffolk, or for the Nation and future generations.

SEAS has focused on generic areas of concern regarding the content and omissions of the Scoping Document and raise questions more broadly that relate to the overall context. We are taking into account the potential systemic and cumulative impact of LionLink and other construction projects, up to 7 potentially, for the area as a whole.

We are entirely supportive and in agreement with the more specific input that is being given by Town and Parish Councils and local impacted community groups, who will be conducting their own assessments which we endorse.

The areas we are addressing in this document are:

- 1) Roads and Traffic – EAI Chapter 15
- 2) Tourism and Business – EIA Chapter 16
- 3) Coastal Erosion and Geology – EIA Chapter 9
- 4) Biodiversity and Ecology – EIA Chapter 8

taking into account the cumulative impact of up to 7 energy projects, all of which SEAS has responded to in consultations and DCO hearings:

- 1) National Grid Friston Substation – National Grid
- 2) East Anglia One North – Scottish Power/Iberdrola
- 3) East Anglia Two – Scottish Power/Iberdrola
- 4) SeaLink – National Grid
- 5) LionLink – National Grid
- 6) Nautilus – National Grid
- 7) Sizewell C - EDF

There have also been enquiries to Local Landowners from Battery Storage and Solar Farm developers.

1) ROADS and TRAFFIC – EIA Chapter 15

These are pointers relating to Traffic Flows/ Road Infrastructure common issues.

1.1 The geography of the region is against these plans

This is a particular issue of huge importance for all villages and towns from Woodbridge to north of Wangford along the A12 and inland around Wenhaston and for the Suffolk Heritage Coast, in particular.

The geography of the Suffolk Coast and Heaths is central to an understanding of the road infrastructure. This region is blessed with many rivers and river estuaries: the Blyth, the Fromus, the Hundred, the Alde, the Butley, the Ore, the Deben, the Orwell and more. The arterial routes from the A12 to the coast are therefore limited in number, due to the estuaries and there are no long connecting roads which run in parallel with the shoreline closer to the coast than the A12, for that reason.

Many of the roads are in fact rural lanes, B roads with narrow space for passing vehicles and numerous pinch points. They were not designed for heavy industrialisation, but for rural life and a slower pace, ideal for scenic touring and cycling.

1.2. Cumulative Impact is against these plans

Whilst building materials for Sizewell C will be brought in by boat and rail as well as by road, and possibly for converter stations at Saxmundham there is the possibility of rail, the sheer scale of these projects necessitates hundreds of lorries each day.

The chronology of these projects is such that at least two National Grid or ScottishPower projects will be in process at the same time as SZC. SZC will increase the impacts on the road system in a dramatic way. At Hinkley Point HGVs along the principal arterial road to the site rose from 470 HGVs per day in 2014 to 900 in 2018. In 2019 there were two HGVs passing every minute on rural roads close to the site. At least 700 HGVs are estimated for SZC and another 700 HGVs for the wind energy projects. In addition, there are coaches bussing in workers and trades working on these projects.

This is an inconvenient truth for the developers and there has been a good deal of obfuscation relating to the timetables of these schemes and as a consequence the

cumulative impact has not been fully considered either by National Grid's LionLink or SeaLink.

1.3. Rose-tinted view by the developers

Reading LionLink's Scoping Document, a reader who is ignorant of the geography and the importance of tourism to this region may be forgiven for thinking that this is an easy access scheme, with very few issues and minimal disruption.

To quote: "the Operation - *"it is anticipated that environmental impacts such as noise and traffic impacts will be relatively minor..."* Beyond about 250 metres sound propagation is heavily influenced by topography, surface "roughness" atmospheric temperature gradients and wind shear. Simple statements like a '1000 m buffer' is OK to eliminate operational noise impacts are not acceptable. NG have failed to provide any numerical data to support this assertion. It is well known that transformer "hum" can travel considerable distance. Switchgear is also known to wake people at night when sounds travel even further distances.

The rosy picture presented is very far from the reality.

The noises from construction sites travel extensively across the flat landscapes of Suffolk coast. The idea that a buffer of 300 metres is sufficient to prevent noise nuisance from construction work on a development of this size is preposterous when in nearby villages a tractor ploughing can be heard at 500 metres. Also, the proposed converter station is in an area of clay and wet sand substrata. If drop hammer or vibration hammers are used, vibration displacements may be felt at nearest residential properties.

The following villages and towns would be affected by National Grid's plans:

Southwold, Reydon, Walberswick, Friston, Coldfair Green, Aldringham, Knodishall, Saxmundham, East Green, Theberton, Middleton, Westleton, Darsham, Blythburgh, Wenhaston, Sotherton Corner, Uggeshall, Frostenden Corner, Barnaby Green, Wangford, Southwold Pier, Aldeburgh, Snape, Kelsale-cum-Carlton, Sternfield, Benhall, Wickham Market, Woodbridge, and more.

1.4. Traffic gridlock and dangerous peak times

In Chapter 15.7.8 National Grid examines Magnitude.

“Pedestrians”

“Effects are only likely to be realised when the total two-way traffic on the carriageway exceeds 1,400 vehicles per hour.” (1993 IEMA guidance).

In fact, for the ScottishPower Examinations traffic flow data was monitored for one of the main arterial routes to Aldeburgh and at peak times on peak tourism days the number of vehicles was already up at 1,200 vehicles per hour, close to the threshold.

For flourishing tourism destinations such as Southwold, Walberswick and Aldeburgh which are dependent on these single arterial routes, it is not only unacceptable but clearly dangerous to allow the traffic to increase any further at peak times.

Pedestrians will not be able to cross these roads, cyclists will fear to cycle across, emergency services will be further delayed.

National Grid has to face up to the considerable risk and danger associated with these plans for a deeply rural environment and interconnected group of communities and web of wildlife.

It is high time to reconsider the use of existing brownfield, pre-industrialised sites closer to London and demand, places with far easier road access and far fewer tourists.

1.5. Traffic flow monitoring: peak times

A task force of PC members and community leaders is being set up to establish a credited system for monitoring the traffic at peak times during peak tourism seasons in particular and continuously in order to collate baseline data at peak times and to examine the question: how will these main arterial routes be able to handle more traffic at peak times without endangering local members of the community, visitors and tourists as well as emergency services? What is the peak time? How many vehicles are passing a hot spot at a peak time? What type of vehicles?

Data points are yet to be agreed but will include:

A12: Woodbridge; Melton; Wickham Market; Marlesford; Friday Street; Benhall; Kelsale; Saxmundham; Yoxford; Blythburgh; Walberswick Junction; Southwold Junction; Wangford/Reydon Junction.

B1069 Melton Cross Road/Snape

A1078 Bridge over A12 at Wickham Market

A1094 / B1069 Snape Church

A1094 / B1096 Blackheath Corner

B1122 Middleton Moor

A1095 Reydon

B1387 Walberswick

There may be others, but guidance on key data collection points should be sought from SCC/ESC. The task force would seek to gain support from SCC for this initiative and to ensure that SCC would acknowledge the validity of the data in any future DCO.

This baseline data will inform all projects including the LionLink ES document.

1.6. Direct correlation between traffic issues and decline in numbers of visitors

SCC has confirmed in a recent meeting with SEAS and SASES that they have observed from previous traffic monitoring on the A12 and associated routes how gridlocked traffic can deter tourists from coming on future day trips. The outcome from gridlocked roads is a bunch of frustrated drivers who can precipitate dangerous situations on the roads.

Over 90% of all tourists to Suffolk Coast and Heaths are day visitors.

These visitors want easy access and relaxing, not stressful journeys for day trips.

There is a significant risk to the tourism sector if there is any doubt about the journey and ease of access.

Perceptions further magnify the problem.

SEAS believe that National Grid has carried out very little traffic flow research thus far. The PCs and TCs will be most concerned to interrogate these plans more fully to understand how intensive industrialisation can co-exist with one of Britain's unique Nature based tourism success stories.

There is an inherent conflict and contradiction here between intensive industrialisation and Nature. This contradiction can no longer be ignored.

2) TOURISM and BUSINESS – EIA Chapter 16

SEAS has listed here the Tourism/Business sector questions for an ES to interrogate fully.

2.1 Background

The Suffolk Heritage Coast Economy is dependent on a thriving tourism sector.

The East Suffolk Economy is like a patchwork quilt. It enjoys a contrasting mix of thriving micro economies. Felixstowe is developing its successful Port and related services with an ambitious programme for its Freeport Concept. Lowestoft will benefit from its geographic situation becoming a Centre of excellence for Renewables including R&D partnering with Universities in Cambridge, UEA and Ipswich to develop new energy sources including wind, tidal, algae, secondary crops.

The Suffolk Heritage Coast is a thriving Nature based tourism destination economy with a high-quality offer in every sense: some of the world's greatest bird sanctuaries including Minsmere and North Warren, the proposed UNESCO East Atlantic Flyway, the protected Sandlings - a rare wetlands and lowland heathland, RAMSAR, SPA, SPC, SSSI, National Landscapes and trails and paths dating back to medieval times. A plethora of rivers and their estuaries rich in biodiversity offer extraordinary opportunities to enjoy river walks and bird watching.

There are rich archaeological assets such as Bronze Age burial grounds, and evidence of Iron Age and Roman settlements, plus Anglo-Saxon high-status settlements as evidenced by the local place names, the ship burial at Snape and the fine artefacts found in burial mounds in Aldringham in 19th century excavations, an important mediaeval harbour at the

mouth of the River Hundred that formed part of the defences of the Eastern seaboard, and archaeologists believe that there are many yet to be discovered, especially within the ancient woods like Great Wood, which have remained untouched for centuries.

The region benefits directly from visitor and resident revenues and also indirectly from related services.

East Suffolk enjoys over 60million day visits a year. Easy access to tourism destinations is essential.

Any reliable cost benefit analysis (CBA) exploring the costs and the benefits would factor in tourism losses or gains. The developer has thus far, failed to do this at the time of the ScottishPower National Grid substations application in 2019/20 and SeaLink most recently. A CBA which looks superficially at the comparative costs between pylons and offshore cables is not a true CBA.

The loss of livelihoods and revenues has to be incorporated into the evaluation. And this should also take account of the negative impact on the Agricultural Industry in the region and the resulting effect on National Food Security.

2.2 LionLink preliminary EIA assumptions.

SEAS believes that the EIA is flawed from the outset, and any further work needs to take into account the true importance of tourism to this particular region.

LionLink non-statutory consultation asserts:

“It is not anticipated that the construction of the proposed onshore scheme would result in a significant effect on tourism in East Suffolk as a whole”.

This assertion is fundamentally erroneous.

At the recent Suffolk County Council debate on energy infrastructure in coastal Suffolk, there were a number of speakers from a range of political parties who expressed huge concern relating to the onslaught of energy schemes being planned for Friston/ Saxmundham and related landfalls at Aldeburgh North Warren, Walberswick and Southwold Reydon.

These concerns should have been expressed in 2019/2020 at the outset of discussions with National Grid and ScottishPower.

One particular quote from last week's SCC debate chimed with community representatives.

"Be careful you don't kill the golden goose", warned Cllr Christopher Hudson.

The golden goose in this context, is tourism and related hospitality, food and drink sectors. Tourism is at the heart of this region. It is the mainstay. To quote Simon Loftus OBE, retired now but who was Director and Chair of Adnams of Southwold:

"I know only too well how vital tourism is to pubs, hotels and restaurants, local breweries and distilleries and to all the many industries which operate in symbiotic ways with these enterprises - local builders and handymen, farmers and food suppliers, longshore fishing, newsagents, clothes shops, cycling, sailing, ornithology, Britten Pears Arts, cinemas, etc - in fact pretty well every aspect of economic life in the region is dependent on one way or another on tourism. "

National Grid Ventures (NGV) LionLink's initial assessment is based on wrong assumptions which need to be corrected before going to any further stage.

2.3. The statistics on which the LionLink report is based take no account of the services related to tourism and the visitor market.

2.4 LionLink states that 24% employment is related to tourism for Suffolk Heritage Coast. In fact, the reality is closer to 50% if one factors in hospitality services and support services. The numbers should include those who live further afield but who work in this golden triangle of Southwold, Walberswick, Dunwich, Thorpeness, Aldeburgh coast and going back in land to Saxmundham, Wickham Market and Halesworth.

2.5 The Destination Management Organisation (DMO) in September 2019 presented the findings from a quantitative study carried out by an independent market research company BVA - BDRC who concluded that visitors would be turned away from this region because it would no longer be attractive.

The same report confirmed other attitudinal reports showing that tourists come here for the fundamentals of "*Outstanding Natural Beauty*", rural peace, wildlife havens, interlinked footpaths and reserves, and places of quite exceptional character and charm such as Southwold, Walberswick, Aldeburgh and Thorpeness: all of which are threatened by the schemes proposed by National Grid.

2.6 17% of tourists will choose to go elsewhere and that percentage rises to around 30% for the epicentre of these schemes.

2.7 Over a period of 10 to 15 years of construction for these projects of which LionLink is but one of possibly seven or eight, the tourism sector will reverse into decline and like a house of cards, businesses will fail and job losses will result.

2.8 Using the statistics provided by the DMO for revenue value, the latest estimate for loss to this region is circa £1 billion over 12 to 15 years. This may be an optimistic forecast and once we have the next DMO perceptions and attitudes study due to be carried out later this year, we will need to update that figure because in 2019 only SZC and Scottish Power substations were factored in. There was no knowledge of the other projects in the public domain at that time.

2.9 According to the East Suffolk Council plan, the key drivers for this microeconomy are:

- high quality visitor assets
- the natural environment
- online economy
- cultural events (Britten Pears Arts; Latitude Festival; Folk East; book, documentary, poetry, food & drink, other music festivals)
- heritage assets

Some of the economic issues include:

- low skilled workforce
- low wages
- seasonal work

These energy schemes offer no significant permanent jobs.

Suffolk Coast is being asked to be a through road for electricity transmission.

2.10 Adverse impacts quantification

Whilst these adverse impacts have not already occurred, the perceptions studies will inform forecasts. Traffic flow data will also inform the possible correlation between heavy traffic gridlock and lower numbers of day visitors.

National Grid Ventures (NGV) states in 16.8.2.

“Professional judgment based on experience of similar linear schemes has been used where required to inform the scope of the assessment “.

Desk research is used as the main source of information.

NGV states that

“...there may be the potential for impacts on tourism destinations in the area, where there are clusters of individual visitor attractions that could experience effects...”

As a hypothetical example of a cluster, let's take visitor numbers to Aldeburgh for a day visit to the Moot Hall Museum, the RNLi, lunch at a restaurant in the town, a little impulse shopping, and a later visit to Thorpeness for a walk along the beach.

Or, a day visit to Southwold, a swim in the sea, followed by a visit to the pier, followed by lunch at a restaurant or cafe, a little impulse shopping and a visit to Walberswick in the afternoon.

Or, a concert tour to Snape Maltings in the afternoon after a visit to Aldeburgh for lunch and a stroll.

We believe these day visits are seriously threatened during 12 years of construction.

We disagree with many of the assumptions.

2.11 Another example is related to “*Operation*”. Community facilities and open space:

“...it is anticipated that environmental impacts such as noise and traffic impacts will be RELATIVELY MINOR”.

To say ‘relatively minor’ is an extreme lack of knowledge - See the notes on Noise in section 1. Road and Traffic.

We challenge the baseline accepted methodology. We are assessing a unique situation here.

There is no precedent in the UK for such a large energy hub to be situated adjacent to a flourishing tourism destination. No developer can honestly state that there is no significant risk. A volcano erupting on an island dependent on tourism is catastrophic. We believe this is the equivalent of a volcano erupting on the Suffolk Coast, yet developers try not to notice Aldeburgh in their rationale and downplay the adverse impacts. This is disingenuous and it's time National Grid stopped evading one of the crucial issues: don't build massive energy hubs next to tourism destinations in areas of outstanding beauty and national landscapes.

If there is no precedent, it is best to use attitudinal surveys to map the responses over time. In addition, there are opportunities to run different scenarios exploring the impacts and consequences of lengthy construction over 12 to 15 years taking into account the cumulative impact of a series of energy schemes.

2.12 The specific questions for the EIA to answer include:

- 2.12.1. Average spend per day per tourism visitor to Aldeburgh/ Southwold compared with spend per National Grid worker including impulse purchasing
- 2.12.2. Likely percentage drop in tourism visitor numbers over 10 to 15 years
- 2.12.3. Evaluate adverse impacts across a range of percentages, including -20%, -30%, -40%, -50%, -60%.
- 2.12.4. How many years to recover?
- 2.12.5. Impacts on jobs and lost revenues
- 2.12.6. If the golden goose is killed, what other businesses will fold? Will East Suffolk become a shadow of its former self?
- 2.12.7. How many transactions and investments postponed or cancelled?
- 2.12.8. What drop in property prices and land values?
- 2.12.9. What level of social unrest?
- 2.12.10. Loss of iconic events, festivals and concerts
- 2.12.11. Agricultural land loss and threat to National Food security

The DMO 2024 attitudinal survey will take place later this year and we can then track the trends to understand what adverse impacts have already taken place and what pointers to the future trends?

SCC and NGV discuss job gains in their reports. Now it is time they explored job losses and business closures.

3) COASTAL EROSION and GEOLOGY – EIA Chapter 9

3.1 Coastal considerations

Overall: This scoping report focuses on impact on land and at sea but barely pays any attention to the fragile link between the two, the shoreline through which land fall has to be made.

Landfall: Condition of coastal fringe. The factors to be addressed in any scoping document relation to landfall of power cables to be considered are: -

- The Suffolk coast is a very dynamic and fragile and rapidly eroding coast.
- Longshore drift of sediment, renews extends coastal strips or denudes others.
- The coastline moves back on average one metre a year, but not smoothly, depends on sea storms, rainfall, sediment travelling and manmade factors causing the cliffs to fall in.
- Massive shingle movements in storms within a space of a few hours, up and down the shore and inshore and out to sea.
- The coast has developed over centuries, often one major storm event / several storm events in quick succession event complete over turning what is there. Looking at 10 even 30-year periods gives no clue as to what may happen next.
- Buried cables, thought to be soundly buried, can be exposed in big storms- eg telegraph cable north of Thorpeness.
- Sizewell Banks - over many years can be seen to move considerably, not a stable protection for the shoreline.

3.2 (Chapter 2) The proposed scheme description

EIA Chapter 2, 2.3.86: Any landfall proposals along the Suffolk coast need to take account of the factors listed above in 3.1

In EIA 2.3.91 and Insert 2-2, Schematic of horizontal directional drilling at landfall, shows that the HDD will be approaching the coast close to the vulnerable tide level changes. Data elsewhere in the EIA Scoping Report recognises that soft sands and the very new Quaternary sediment (not rocks) go down to levels of 20m, then 50 metres respectively.

Scoping needs to include assessing any impact of those sediments being disturbed and affecting the shoreline.

3.2.1. Deep digging HDD under the shingle - considerations to be taken into account

--- into what rock? Coralline crag is nothing more than a weak conglomeration of shells so very brittle (best description of its consistency is like a ginger biscuit, prone to breaking into small pieces in sea storms, of which we see evidence on the beach), Red Crag is not firm either. Norwich Crag often simply bands of gravel or sand and occasional lenses of clay (crag is a Victorian term for a sedimentary layer, in no way does it mean it is a rock)

---where HDD has to come to the surface, (we are told every kilometre), consider what damage to the soft layers it comes up through, causing collapse or flooding of soft areas

---- consider the number of cables per onshore landing- if say four, each a metre in diameter, even half a metre, per onshore landfall, consider cumulative impact of vibration on surrounding weak rock or soft layers, and cumulative impact of one, yet along several, project landfalls

The Suffolk coastline - in geological terms newly accumulated ground, soft, very mixed materials, no consolidation, Quaternary Period. No solid rock until reach depths to Upper Middle and Lower Chalk, yet it seems all energy projects envisage only HDD at about 10m depth offshore to onshore.

There is a need to consider damage to vulnerable shore line leading to potential increase in rate of progression of already massive erosion inland.

3.3 (Chapter 9). Geology and Contamination

The scoping area for the EIA is set at 250m either side of the project outline. For the coastline running either side of the landfall point this will be inadequate. The assumption seems to be that geology does not move but the shoreline is a continuously moving zone and substantial changes such as cliff fall then speed up other changes in sediment flow and wave action movements causing erosion of new areas.

The Suffolk coast is a continuous interacting shoreline: the impact of works on the shoreline at Walberswick or Southwold/Reydon could well occur kilometres not metres far further south (a good third of Orfordness was built up directly as a result of the erosion of Dunwich). Changes in shoreline profile affecting sediment transport could affect the Sizewell Banks, the landfalls of other power projects, all within a few kilometres of each other and the LionLink project on this fragile coast, and as far south as Aldeburgh Town - largely protected by concrete wall installed some 70 years ago and where more coastal erosion or removal of longshore sand and gravel caused by new erosion patterns, could impact on the town's flood defences.

4) ECOLOGY & BIODIVERSITY – EIA Chapter 8

4.1 Expectations of Experts

As you would expect with an area that is densely covered with wildlife reserves and protected habitats, specialist local groups already exist within the redline boundary landfall, cable and convertor stations Walberswick, Southwold/Reydon and Saxmundham communities including qualified ecologists and locally based wildlife and biodiversity specialists. We will be recruiting additional expertise as necessary to build on this base and in anticipation of further projects being developed.

Whilst we respect Arup, your chosen consultancy, and the range of qualifications held by your team (Appendix 1 A - Table 1 A 1), we are concerned about the objectivity and impartiality of paid consultants and associates. We would, therefore, wish to enable the experts from each specific party to exchange and challenge key and contradictory data collected in the surveying and assessment process. We understand that Arup is comfortable with “constructive challenge”.

4.2 Consultation and Engagement

So far, we consider that the consultation and engagement process has been flawed and lacks credibility in both style and approach. No comparative options presented beyond this area, including brownfields sites and offshore grids, is not a basis for any meaningful consultation. This is evidenced by so much of what has been said not being evidentially taken into account or referenced in any way in the reporting back process. This report gives

the main themes 8.2.2 that emerged in the Non-Statutory Consultations but these are far from the full picture. You are proceeding with this project with feedback from a high majority of consultees saying “No” to your proposals particularly in the context of Ecology and Biodiversity. It seems that you place a very low value on Suffolk’s globally recognized Heritage coast and the loss of amenity to the public who visit.

The ongoing scope of the engagement process outlined in 8.2.1 names (given in 8.2.7) only 6 consultees that are statutory bodies. We consider this inadequate for the purposes of such a complex Ecology and Biodiversity assessment and imbalanced against our case. It misses out on the knowledge on the ground that local people hold on species and habitats. Significant data will be missed by qualified people undertaking desk research or time limited field visits.

The following are stakeholders who are not considered ‘statutory stakeholders’ but we feel must continue to be fully consulted, to ensure continuity and reliability of data. Please include those you have listed in your report, town and parish councils – some of whom have their own ecology groups and other local community groups including SASES (Substation Action Save East Suffolk), SOS (Save our Sandlings), RAID (Reydon Against Imminent Destruction), WALL (Walberswick Against Lion Link), SAND (Saxmundham Against Needless Destruction), SEAS (Suffolk Energy Action Solutions)

Your list of involved Town and Parish Councils has missed the following: Saxmundham, Snape, Knodishall, Aldringham, Benhall, and Sternfield.

4.3 (Chapter 8.2.3) refers to your dealings with Natural England so far anticipating that Natural England will provide detailed advice through the DAS in relation to surveys.

We believe, from experience, that Natural England are simply not resourced to provide more than the bare minimum input to the planning process. Therefore, even more important to have local statutory stakeholders.

4.4 (Chapter 8.2.4) You say further engagement with Suffolk Coast Electricity Cable Ecology group is planned but again will be high level and needs to be combined with the above necessary consultation with local groups on the ground.

4.5 (Chapter 8.3 Baseline conditions – Study area and surveying

The detailed statutory nature conservation designations of international and national importance and listing of all other protected sites 8.3.3 to 8.3.18 raises some important questions. Overall, why there has been no attempt to present clear cost benefit analysis of alternative sites that constitute brownfields areas for development.

4.6 There is very little of the area that is not protected in some way. As you have recorded in your report, the whole area has Government backing to win UNESCO World Heritage Status. There is still very limited local or visitor understanding of why this area was chosen at all for such a major construction project. It suggests that the need to construct such major infrastructure near pylons has completely overridden any real consideration for our national and international conservation recognition.

4.7 As you are also aware from your scoping process the whole area is a patchwork of protected areas including 16 Statutory designated sites of international value, 18 statutory designated sites of national value, 10 AWI sites and irreplaceable habitats, 57 CWS non statutory sites and many other notable habitats. Also, we have major bird sanctuaries, the Eastern Flyway etc – so there needs to be a clear timetable/calendar of how and when you will be conducting surveys given the wide range of different breeding and migrating timescales. In addition, as the project is rolled out, how will the continuous process of habitat clearance and trench cutting and drilling will be sequentially timed and stopped, if necessary, at specific points to minimise disturbance.

4.8 We know that ScottishPower Renewables surveying undertaken at Friston caused displaced badger setts and led to badgers moving from Friston to Aldeburgh golf course causing significant damage there, and to nearby sweetcorn fields and residential areas – verges and gardens across a wide radius of Aldeburgh itself. We have also had problems in the pre-work stages of Sizewell C land clearance displacing the deer population leading to a number of fatal incidents on the Sizewell Road. The most recent displacement was Sizewell C cutting down hedgerows and oak trees in the nesting season where red listed nightingales have bred for a number of years.

4.9 How will your surveyor's evidence many of the protected species in their desk studies and short survey visits and how will this data be recorded and correlated with other National and Specialist databases? We are challenging the tendency for desk studies or short survey visits to be completed without sightings and concluding that there is no

evidence when the presence of a specific species has been well documented as an inhabitant in that area over a considerable period of time.

4.10 Baseline studies exist also from the surveys completed by and for the Sizewell C and EA1N and EA2 enquiries, and by their counter studies presented by community groups. Many species are absent from those HRAs outside the protected areas (glow worm, slow worm, snakes, turtle dove, for instance) and the risks posed by relying on opportunistic observations in national databases are known; equally, transects carried out at inappropriate times of year and by inadequately qualified surveyors were brought up both by community groups and Natural England during the enquiries. Since Suffolk contains one of the remaining nationally important populations of nightingale, turtle dove, wood lark and spotted flycatcher, and since the many, repeated and long-lived energy projects planned for connection at Friston will repeatedly harm this wildlife stronghold, local extinctions are likely to become major extinction events.

4.11 (Chapter 8.3.109/110) Future Baseline

How can there be an expectation that “the current land use would remain relatively consistent and would continue to be managed in a similar way, with the value of ecological features present not expected to change significantly by the end of the construction period”?

Natural England warned in submission to ExA in previous NSIPs (EAN1 and EA2) that agricultural land and hedgerows are vital to the survival of dwindling agrarian species like skylark, lapwing, redshank; in addition the loss and harm to woodland, trees, vertebrates and invertebrates caused by air pollution, light pollution, noise and vibration, water disturbance, and repeated carbon release (contributing to climate change) during construction (Table 29.1), plus long-term cumulative adverse effects from EMR, means that the area which is currently a sanctuary will be altered forever. These should be classed as major (national and international) residual effects.

4.12 Indeed, the Examining Authority (ExA) of EA1N and EA2 concluded and recommended to the Secretary of State that the biodiversity and character of the area is at great risk from those projects and that if other projects were proposed (as they were only appearing in the public domain at the end of the enquiry), the utmost care would be needed to avoid crisis.

Extracts from ExA’s recommendation to the Secretary of State:

28.4.4. “... *The local harm that the ExA has identified is substantial and should not be under-estimated in effect. ...*”

28.4.5.” *...the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location. This ExA does not seek to fetter the discretion of future decision-makers about additional development proposals at this location. However, it can and does set out a strong view that the most substantial and innovative attention to siting, scale, appearance and the mitigation of adverse effects within design processes would be required if anything but immaterial additional development were to be proposed in this location.*”

Source: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-009800-EA1N-Recommendation%20Report-Vol2_Ch18-31%20COMPLETED.pdf

National Grid LionLink proposals represent a form of Ecocide. Nothing will return to “a similar way”! There will be extinctions and significant damage to land, habitats and the overall economy as well as the ecology and biodiversity of the area. It is currently visited for the ecological richness and peaceful observation of nature as well as the overall beauty of large swathes of unspoiled countryside.

4.13 (Chapter 8.4) Potential Sources and Impacts

4.14 Construction (Chapter 8.4.2) The construction period will create a range of problems from traffic and access issues which knock on to environmental damage being caused.

TABLE 29.1 lists air pollution, light pollution, noise and vibration, water disturbance, but does not qualify or quantify the effects for even this one project; carbon release (contributing to climate change) during construction, plus long-term cumulative adverse effects from Electromagnetic Resonance (EMR) are not considered at all.

4.15 Long term and cumulative operational damage

Marine Electro Magnetic Fields (EMF) is represented well with further research and study to be completed.

However, onshore EMF is skimmed over with a couple of very unsatisfactory mentions:

4.15.1 Chapter 7.4.4 states that Electro Magnetic Fields (EMF) “*are not expected to result in impacts to agricultural land and as such are not considered any further in this chapter*”. It is known and recorded that cable corridors can have up to a 50% reduction in crop yield year on year and that some watercourses have been altered.

4.15.2 Chapter 10.4.3 starkly states that EMF “*generated by electrical equipment such as underground cables and sub-stations are potentially harmful to health.*” There is no further mention of studies or mitigation which is extremely worrying to the residents of Friston, Knodishall, Sternfield and Saxmundham where a combination of up to 6 project’s HVDC and HVAC cables are proposed to cross and weave their way from Landfall to Converter Stations to NG Substation and back out to Landfall. This is totally unacceptable and needs researched for inclusion in the ES and the Planning Inspectorate DCO hearing.

4.15.3 Ecology and Biodiversity has no mention of EMF at all.

There is enough evidence and significant, validated database research to indicate EMF causes damage to species at ecosystem and biosphere levels across all taxa.

We recognize that for one project you may not consider this of great significance, although the density of wildlife in both Walberswick and Southwold and the SSSI’s and RAMSAR south of these proposed landfall areas might indicate otherwise. With up to 6 projects coming on line in one internationally significant area there needs to be some independent assessment of the impact.

4.15.4 Studies exist relating to trench cabling, underground drilled cabling, trench watercourse cable crossings and emissions from other Grid components. We are warned that about 15% of all UK wildlife is under threat from extinction. Adding in the effects of additional EMF can lead to complex, endogenous reactions, largely unseen but contributing to the risk of local extinction. It is clear from numerous studies there are sensitivities to exogenous EMF from flora and fauna and the diverse wildlife within the Suffolk Coastal areas if exposed to even low-level anthropogenic EMF can lead to myriad adverse and

synergistic effects relating to orientation and migration, food finding, mating, nesting and den building, territorial maintenance and defense plus have an overall impact on vitality, longevity and survival.

What will be done by NGV to guarantee protection from the known effects of the rising background levels of anthropogenic non-ionizing EMF? This is another source and form of pollution and something that the protection orders around AONB, SSSI and other protection orders are there to prevent. Given the presence of many of the Red Listers present in the scoped area, it will be important to keep the International Union for Conservation of Nature informed of the threat this represents.

We will not accept any claims of low frequency EMF in defense. It is known that the strength of EMF is proportional to the amount of megawattage passing through the power lines. There must be a true statement of electrical output capacity given, along with length of electrical cabling across all areas, trench depths, watercourse cable crossing locations and your assessment of EMF impact prior to any Planning Inspectorate Hearing.

4.16 (Chapter 8.4.3) Operation

This section in the Scoping report is unacceptably short. You must have some data from previous projects.

There is no mention of an on-the-ground operations management team which could actively supervise individual stages and minimise their effects on biodiversity. No management means no protection. A repeat of the ecological damage of the river Wensum despite trenchless crossing techniques, or the wholesale loss of woods, hedgerow and habitat currently happening at Sizewell C (EDF) shows the absolute necessity of intervention and supervision on the ground.

4.17 (Chapter 8.5) Design and Control Measures

The area to highlight here are main watercourses, rivers, ponds etc. Appendices show flood risk as particularly high in the Scoping area and recent history linked to climate change indicates that this is an area of greatest concern both to any construction undertaken but also the knock-on effects on the surrounding habitats and wildlife dependent on the water courses and corridors. More work must be done on this issue to include the assessment of the ground water table, which is close to the surface. Aquifers are at risk from contamination of drilling and trenching.

4.18 (chapter 8.7.21) Biodiversity Net Gain (BNG)

With the prospect of up to 6 NSIP energy projects being built continuously within 5sq miles for 10 to 12 years it is extremely doubtful that each, if any, of these projects will be able to reach its obligatory biodiversity net gain goals. Developers must go beyond merely not harming nature and instead demonstrate their actions will increase biodiversity by 10%. This will mean that these energy projects will have to go out with their footprint to purchase agricultural land, which depletes our food security and releases previously sequestered carbon, or use other designated protected sites outside the Suffolk Coast for enhancement, leaving behind an already hugely established biodiverse area to be destroyed and industrialised. Even then BNG does not always work. A recent example caused by current energy developers EDF is on a local marshland, was meant to be enhanced for BNG, but in doing so the developer has built a huge haul road on a flood plain, alongside a river, severing the wildlife connective corridor.

There is no amount of BNG that will excuse the industrialisation of Suffolk Coastal and it is up to National Grid to prove otherwise.

National Grid need to set out their BNG plans and guarantee that their promises are kept well into the future.

4.19 (Chapter 8.8) Assessment Methodology

The working assumptions made in this document leave a great deal to be desired as they are based on desk-based assessments. The choice of site (Friston) in the first place reflects the flawed, desk-based methodology in that it displays ignorance of the importance of the area for rare habitat and species and offers no means of mitigation because it cannot.

CONCLUSION

As mentioned at the beginning, this EIA Scoping Report is rushed resulting in many issues that need to be addressed by LionLink prior to advancement to a planning application and we recommend that the Planning Inspectorate do not accept it in its present state.

Suffolk Energy Actions Solutions

4 April 2024