

National Grid Interconnector Holdings Limited
LionLink Multi-Purpose Interconnector project
Scoping Report submitted to the Secretary of State on 6th March 2024

Comments by Friston Parish Council
4th April 2024

Introduction

1. The LionLink project is one of three projects being promoted by the National Grid Group to make connections at the proposed NG connection hub¹ in Friston, which in itself was an NSIP included within the DCO Applications made by Scottish Power Renewables (SPR) for the East Anglia One North (EA1N) and East Anglia Two (EA2) projects. These DCOs were granted on 31st March 2022 but are currently being challenged through the courts.
2. Following the Examination of the EA1N, EA2 and the NG connection hub NSIP, the Examining Authority (ExA) issued its Recommendation Reports on 6 October 2021, one report for each of EA1N and EA2 with the NG connection hub included in each report. References in this document to the ExA report will be to the EA1N report as the reports are identical in all materials respects.
3. It should be noted that during the course of the examinations SPR (presumably on the instructions of National Grid) sought to deny there was any certainty about the prospect of two or more other energy projects connecting at Friston despite the fact that both Nautilus and LionLink had connection offers there and Sea Link (which did not need a connection offer as it is an NGET project) which was proposed to connect there. Further NG largely absented itself from the Examination process despite one of the projects being examined being its own, namely the National Grid connection hub.
4. In Volume 2 of the ExA Report, Chapter 28, “Conclusions on the Case for Development Consent” on page 274, it states at paragraph 28.4.5:-
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.**”***
6. Paragraph 28.4.6 goes on to say:-
“In relation to this conclusion, the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within the existing development site have the potential to affect the proposed flood management solution) to landscape and visual impacts and to impacts on the historic built environment, should these arise from additional development proposals in the future.”

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

¹ Although the proposed National Grid development at Friston is described as a “substation” in reality, and as evidenced by the multiplicity of projects proposed to connect there and the multiple components of this “substation”, it is more accurately described as a “connection hub” or “connection node” a term which National Grid has itself employed when referring to connection infrastructure proposed to connect three projects in Essex.

Friston Parish Council's Position

7. Friston Parish Council (FPC) opposes the onshore elements of the LionLink, Sea Link and Nautilus projects in East Suffolk. It should be noted that these projects do not generate any renewable energy. Further they do not improve energy security for the United Kingdom² or reduce prices for consumers. However without prejudice to this position of opposition, FPC has the following comments on the Scoping Report. Please note that FPC has not had the benefit of expert planning law advice or the advice of relevant technical experts. Accordingly FPC reserves the right should these projects proceed to examination to raise issues in relation to the environmental impacts of these projects which have not been referred to in this report, including without limitation where FPC has misunderstood or not appreciated the potential environmental impacts of the LionLink project. Further FPC relies on its members providing their time voluntarily to consider these projects, a situation which has not been helped by the limited time available to consider the Scoping Report.

The LionLink project

8. It is clear from the LionLink Scoping Report that NG has not considered these substantial adverse effects at Friston and in fact is not giving any consideration to them at all.
9. The LionLink Scoping Report shows a disturbing lack of familiarity with the key determinations set out in the ExA Report. There are notable omissions from this Report, including a complete lack of a plan or any visual information on the connection hub site at Friston contrary to the EIA Regulations. To rely on a short written description of the infrastructure that LionLink proposes to add to the Friston connection hub without acknowledging or demonstrating how the LionLink infrastructure relates to the proposals already made by Scottish Power Renewables (SPR) EA1N & EA2 and Sea Link,(all of which are further advanced in the planning process) is unacceptable.
- 10. The scoping boundary as set out in the onshore figures is incorrect as it bisects the village of Friston. It is illogical only to consider the environmental impacts on half of the village. The scoping boundary should be extended further south/south-west so that the entirety of the village is included.**
11. LionLink has not followed PINS Advice Note 17 which provides for a staged and sequential approach to cumulative effects assessment. In that document Stages 1 and 2 should be undertaken before requesting a Scoping Opinion. Stages 1 and 2 comprise a "long list" and a "short list " of other developments which may have an interaction with the project. These two lists are completely absent from the Scoping Report despite multiple other NSIPs being proposed for the region. NGET's Sea Link project included Sizewell C, SPR, Nautilus, Eurolink (now LionLink) and East Anglia Green in their Scoping Report of November 2022.
12. In FPC's opinion LionLink's Scoping Report is incomplete and these omissions need to be remedied before a scoping opinion can be given.

Projects being promoted by National Grid Group

13. NG held a Statutory Consultation for its Sea Link project in autumn 2022 and simultaneously submitted its Scoping Report to the Secretary of State, to which FPC responded on 22nd November 2022. Sea

² An improvement to energy security does not bear examination since these interconnectors do not generate electricity therefore the UK would be dependent on other countries providing energy which is unlikely in circumstances where energy supply is limited. See also comment on policy below.

Link is proposed to connect at the Friston NG connection hub and an NSIP Application to the Planning Inspectorate is expected in the autumn of 2024 or early 2025.

14. A non-Statutory Consultation was held for the NG Nautilus project to connect at Friston in October 2021. No Scoping Report for this project has yet been submitted but there were meetings held at the Planning Inspectorate in June 2022 to discuss onshore co-ordination of these projects. FPC notes the intention in this Meeting Note for Sea Link, Nautilus and Eurolink (now LionLink) to connect to the proposed NG connection hub at Friston.

[https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020026/EN020026-Advice-00005-1-220620%20SEA%20Link%20Nautilus%20Interconnector%20project%20update%20meeting%20note%20\(Final\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020026/EN020026-Advice-00005-1-220620%20SEA%20Link%20Nautilus%20Interconnector%20project%20update%20meeting%20note%20(Final).pdf)

15. NG LionLink also held its Non- Statutory Consultation concurrently with Sea Link in the autumn of 2022 and has now submitted its Scoping Report. Its Statutory Consultation is expected early in 2025 with an NSIP application being made late 2025 into 2026. However the Scoping Report refers to the scheme commencing in 2026 with a 4 year construction period.
16. East Anglia Green, now known as Norwich to Tilbury, submitted its Scoping Report in November 2022 and is anticipated to make a DCO Application in Quarter 3 2024. This is National Grid's controversial plan for pylons from Norwich to Tilbury, which has implications for East Suffolk – see following paragraph.
17. Meanwhile National Grid ESO has very recently published its East Anglia Study which raises the prospect of more onshore infrastructure at Friston, such as an additional pylon line. Further it and contemplates Sea Link 2 (sometimes known as SCD3). Other interconnectors such as Tarchon are also a possibility.
18. All these NSIPs are placing an overwhelming burden on the local community, not only due to the serious impacts of the development on the quality of life of residents, but also on the sheer amount of documents and processes to which a response is needed from the local community.
19. The Planning Inspectorate made the following comment on 20 June 2022:

“The Inspectorate responded that considering the amount of consultation in the East Anglia region, the Applicant should be aware of what procedures can be taken forward in a combined manner to minimise resourcing pressures. Also, ensuring that parties understand the differences between projects, as well as the timelines between them is crucial for a successful consultation”.
20. National Grid has made no attempt to follow this advice from PINs. As can be seen from the projects referred to above, National Grid is pursuing a separate application process for each of its projects with the prospect of more to come. This is exacerbating an already unfair process, given the mismatch in resources between developers and the community, and is oppressive. It is as if National Grid is deliberately pursuing an application strategy designed to wear down the community and further damage its mental well-being.

Site selection

21. No alternative site selection has taken place with regard to the Friston connection hub site contrary to policy.

Scheme Description

22. As stated previously there is no visual representation or plan of the infrastructure proposed for the project at Friston. The figures provide no assistance. Two different scenarios for building out the project are briefly summarised in the text, but it is impossible to determine the different impacts these options would have on the landscape or the practical issues posed regarding overall landtake, drainage, ponds, mitigation planting etc. Both options require an extension of the boundary of the site, one requires relocation of the access road.
23. Further it should be noted that the proposals for the National Grid connection hub at Friston are different for each of the SPR and Sea Link developments. As a result the substance of the infrastructure required for the National Grid connection hub is very confused.
24. Under the second scenario the permanent footprint is stated to be up to 3 hectares yet the consent for the National Grid connection hub (included in the EA1N and EA2 DCOs) states that the footprint (for a GIS substation) will not exceed 1.68 hectares. Given this connection hub can accommodate EA1N, EA2 and Nautilus this increase in landtake is disproportionate. Given the absence of a proper plan it is unclear whether that amount of land is available, not least as no account has been taken of the land required for potential mitigation. The scheme description is inadequate and confused so far as the National Grid connection hub at Friston is concerned..
25. Also under the second scenario the project is said to require an additional 8 associated buildings of up to 5M each, but no further details are offered on type or location. Similarly this option would require a new permanent access road, but again no plan is provided to show its location.
26. There is no option given for Sea Link to construct the connection hub first although that project is further ahead in the planning process. If that were to take place, then a different and far more complicated scenario would arise with overwhelming impacts. **The development of all energy projects at Friston should be examined as one integrated project to allow for all impacts to be properly addressed and assessed.**
27. FPC is aware that gas Insulated substations use SF6 gases (greenhouse gasses) and that currently there is no completely “clean” alternative. No mention is made anywhere in the Scoping Report of this issue, which is of great concern to FPC.
28. FPC is also concerned about the location of the converter station on the outskirts of Saxmundham. This area is crossed by Public Rights of Way which link Friston directly to Saxmundham, and which are most likely lost to the development. LionLink proposes 5 main buildings, of which two will be up to 26M high with a control building of up to 15M high. The proposed land-take is 6 hectares, which it is assumed is for the LionLink project only. The proposal however is for there to be a total of 3 converter stations on the site which would therefore require 18 hectares (44.5 acres). This would be equivalent to 30 football pitches. The site is on elevated land and with the buildings 26M high, and they are likely to be seen over a wide area. It is therefore essential that proper plans and visualisations from multiple and distant locations are provided, along with proposals for landscaping and the re-location of PRowS
29. The HVAC cables linking the three converter stations to the Friston connection hub require 26 ducts in 6 trenches with a working width of 112M. The sequence of construction for the projects is uncertain but it cannot be said that the effects of this will be temporary or insignificant. The installation of the cables will inevitably involve the removal of trees and hedgerows across this wide swathe of land.

30. The project also involves the installation of up to 8 permanent link pillars of 1.3M high along the route of each cable. This will leave a permanent industrial mark on the landscape and must be taken into consideration.
31. The Sea Link project also involves bringing DC cables from its landfall at Aldeburgh to the converter station at Saxmundham. This will create yet more disruption to land north of the Friston connection hub.
32. The description of the construction of the Friston connection hub requires earthworks for re-profiling of the land to accommodate the connection hub. This is a permanent effect and should not be limited to the temporary effects of construction.
33. The operation and maintenance of the Friston connection hub is said to involve one or two persons per week on a regular basis, but that 5-10 persons would be necessary on site for two months every 5 years. However the Report does not consider the cumulative effect of the operation and maintenance of all projects including EA1N, EA2, Sea Link and Nautilus and their converter stations. Therefore the effect cannot be considered as Negligible.

Policy

Cumulative Impact

34. A fundamental feature of this development is that it is one of a large number of energy projects in the same small rural area. Such an approach is unprecedented and is placing an unreasonable burden on a small rural community and its environment.
35. Further National Grid has not sought consent for its connection hub but rather for a “substation” as an incidental part of other developments. This was the approach adopted for Scottish Power’s EA1N and EA2 projects despite the fact it was known that the so-called “substation” was to be a connection hub, connection offers having been made for LionLink (then called Eurolink) and Nautilus and Sea Link (then called SCD1) being proposed. The legitimacy of such an approach should be questioned.
36. Therefore it is either inexplicable (or perhaps telling) that National Grid has not referred to cumulative impacts at all in the policy section of its scoping report. The only reference appears to be buried at the end of Appendix 4B where there is a reference to Schedule 4 paragraph 5(e) of the Environmental Impact Assessment (EIA) Regulations. This states that there should be:

“A description of the likely significant effects of the development on the environment resulting from....

(e)the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;”

37. Further National Grid has ignored the numerous references to assessing cumulative impact in EN-1 and other policy statements.
38. This indicates that National Grid has not given sufficient thought or emphasis to cumulative effects despite the comments of the ExA in the EA1N and EA2 examinations as referred to above. This must be corrected.

Energy Security

39. In its commentary on EN1 National Grid states “Paragraphs 3.3.32 to 3.3.33 focus on the role that interconnectors play in facilitating a secure, low carbon electricity system at low cost and recognises that there are benefits of increasing levels of interconnection.” National Grid then refers to Paragraph 3.3.34 to confirm that setting out this extract:

“Interconnection provides access to a diverse pool of generation, enabling the import of cheaper electricity, while also providing a route for electricity export. Interconnectors provide the system with additional flexibility, reducing the curtailment of renewable energy, and can also provide a range of ancillary services, such as voltage and black start services.”

It should be noted that there is in fact no reference to energy security in this extract as one of the benefits of interconnectors.

Air Quality

40. The Report states that the Friston connection hub is located approximately **500M** from the closest human receptor. This is completely untrue. The relevant OS map shows Little Moor Farm (Listed Grade II) to be **250M** from the connection hub. There will also be human receptors on the many close by public rights of way in the area. Statements like this render the Scoping Report unreliable and must be challenged. With regard to air quality it is essential that all aspects of Traffic and Transport relating to the multiple projects in the area are properly cumulatively assessed.

Agriculture and Soils

41. The Friston connection hub site is on Grade 2 and Grade 3a Agricultural Land. The creation of a large energy hub at this location leads to permanent loss of Best and Most Versatile agricultural land. The loss of agricultural land at Friston is proposed to be scoped out of the EIA and this is unacceptable as the loss is of significance. The Scoping Report has assessed Grade 2 and 3a land as of medium value/sensitivity and deserves proper consideration.
42. Figure 7.2 shows the Friston connection hub site to be of a soil type described as “*Imperfectly or poorly drained, fine loamy and clayey over clay*”. The note on Figure 7.2 confirms the likely Agricultural Land Classification as Grade 2/3a. As has been shown during the EA1N and EA2 examinations this soil structure has a very significant adverse impact on drainage and flooding in the area. The infiltration tests undertaken in 2021 by SPR were inconclusive and are yet to be repeated.
43. The above facts support the high value of the agricultural land to the north of Friston and demonstrate the unsuitability of the area for industrial development such as LionLink and the National Grid connection hub with the proposed multiplicity of projects.

Ecology and Biodiversity

44. FPC notes that Grove Wood is classified as irreplaceable habitat and there should be a buffer of at least 15M or preferably 50M between this woodland and the development. In the absence of any plan, this cannot be ascertained. This woodland and the connection hub site itself have roosting bats, badgers, hares and a wide variety of birdlife, including skylarks which are ground nesting birds. FPC notes that hares and hedgehogs, which are found widely in the area, are Species of Principal Importance.

Health and Wellbeing

45. FPC is pleased that LionLink has taken note from its consultation of the concerns of residents over their quality of life and mental and physical health. The fatigue and stress on the community related to repeated consultations and other aspects of the DCOs from multiple energy projects over the past 6 years cannot be understated. This is before any construction has started and the cumulative effects of the construction of multiple energy projects in conjunction with the building of Sizewell C is widely felt as unbearable. People feel trapped and unable to relocate due to loss of value in their properties and the reduced ability to sell. All these matters must be properly considered and full compensation received for every resident of Friston.
46. Other worries relate to the danger of the connection hub catching fire and the use of SF6 gasses which must also receive proper consideration and also cumulatively with other projects.
47. Air quality, noise, visual amenity and lighting would also impact on wellbeing and quality of life. As will the closure of PRowS which affect severance of communities, exercise and access to green space. These matters must be fully scoped in.
48. FPC asks for direct engagement with NG over the progress of this project and that such consultation is not limited to Suffolk County Council and East Suffolk Council.

Historic Environment

49. The Report states that the Suffolk Historic Environment Record shows no heritage assets recorded at the proposed Friston connection hub Site. However Footpath 6 (known as the Pilgrim's Way) is an ancient route which runs directly north from opposite Friston Church, and is a non-designated Heritage Asset which should be properly considered as it will be lost in perpetuity by the building of the connection hub.
50. In the absence of a plan for the proposed Friston connection hub Site, it is not possible to see the relationship with the six Listed Buildings closely surrounding the site. The setting of these Listed Buildings must be considered as they are material decision-making factors. The ExA's Report of the SPR examinations makes the following comment in relation to Little Moor Farm: "*The ExA consider the harm in a range of low-medium-high within less than substantial harm, high harm would be caused*"
51. The Church of St Mary is located very close to the southern boundary of the connection hub site. It is Listed Grade 2* and there is a War Memorial which is separately Listed within the Churchyard.
52. Friston post mill is located within the village and is "*judged to be one of the foremost remaining post mills in the world*" – Historic England. Impacts, including the setting, on this grade II* listed structure must be assessed. The Mill is known to be the tallest Post Mill in the UK at 15.4M and is a prominent landmark in the area. By comparison the proposed Friston substation is described as 16M high and the converter stations 27M high.

Hydrology, Hydrogeology and Drainage

53. This topic is of extreme concern to the village of Friston, which already has a history of flooding, particularly surface water flooding. LionLink's Report has acknowledged this flooding but describes it as "anecdotal". This is far from the case as there is much evidence of flooding, including photographic evidence for a number of years and a report commissioned by SCC "The Friston Surface Water Management Plan (BMT)" published in May 2020.

54. NG have not included a map showing surface water flood risk in Friston (although a fluvial flood map is included), despite this being readily available on the Environment Agency website. This map shows a high risk of surface water flooding on parts of the proposed Friston connection hub site. FPC do however note that Table 12-A-1 from the Appendices shows Friston connection hub Flood Risk Baseline as HIGH for Surface Water flooding. The surface water flood map for Friston, including the connection hub site, must be included in the EIA.
55. Rainfall in recent years has become more intense and flood events in Friston have become more frequent. There have been numerous flood events this winter of which records have been made. This can be expected to continue into the future due to climate change. The rainfall data supplied by NG in the Scoping Report only covers the period 1991 to 2020 and is taken from Lowestoft, Scole and Levington, none of which locations are close to Friston. Rainfall levels can vary significantly between local areas. Proper verified records of rainfall and flooding in Friston itself should form part of the preparation for the EIA and be scrutinised.
56. The Scoping Report is wrong in its statement that *“The Friston Substation Site is not located within a delineated river or transitional water body catchment. It is approximately 400M from the nearest water body catchment, which is the Hundred River water body catchment.”* The authors of this Scoping Report appear to have missed the fact that the watercourse through Friston is designated as a Main River by the Environment Agency and has its own catchment area. This watercourse is not named in the Scoping Report’s list of Surface Water Bodies and Watercourses listed on Tables 12.3 and 12.4, which is a grave omission and needs to be rectified.
57. The Friston Watercourse has its own catchment area which includes the connection hub Site. This is very pertinent to the flood risk in Friston and NG must rectify this.
58. FPC do not accept the Scoping Report’s submission that *“The surface water flooding issues at Friston are not considered to impact the feasibility of using the proposed location for the substation”*. This is entirely unproven.
59. There are further errors in Table 12.7 (Scope of Assessment) including the omission of the Friston watercourse as a Main River and the conclusion that there are no receptors within the study area of the Friston connection hub. Effectively the Friston Watercourse has been scoped out of assessment which is unacceptable. Minor ordinary watercourses are also scoped out, which they should not be as there are several drainage ditches across the connection hub site which are intrinsic to the drainage of the area. All watercourses in Friston must be scoped in.
60. Paragraph 12.7.30 states that *“The FRA will need to demonstrate the application of the Sequential Test. It is assumed that the proposed Onshore Scheme would be classed as ‘essential infrastructure under the vulnerability classification It is expected that the FRA will also need to satisfy the Exception Test”*. The policy basis for this statement is unclear and needs to be justified.
61. In Table 12-9 ‘Magnitude of impact,’ High, Medium and Low Flood Risk is defined as *“In the absence of modelling this will be assigned based on engineering judgement, applying a precautionary principle”*. It is totally unsatisfactory to leave such an important impact to a matter of judgement by the developer. There must be clear evidence on such an important topic given the impact of flooding at Friston is high requiring the greatest care in assessment. The ExA in the SPR DCOs having found Friston had a high flood risk made the following comment:

“the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within the existing development site have the potential to affect the proposed flood management solution) to landscape and visual impacts and to impacts on the historic environment, should these arise from additional development proposals in the future.”

62. The LionLink Scoping Report is not following this advice in leaving flooding impacts to a matter of judgement.

Landscape and Visual

63. There is little information in this chapter and in the absence of any plans or visual information about the connection hub and converter station sites, FPC reserves its position until these are provided.
64. Of particular concern to FPC will be the assumed growth rate of new planting and the length of the maintenance and replacement period. In this area, trees are very difficult to establish and have slow growth rates in large part due to increasingly very dry summers and increasingly wet winters.

Noise and Vibration

65. Paragraph 14.3.14 states *“The Noise and Vibration chapter within the PEI Report and ES will consider changes in the sound environment that would exist in the absence of the proposed Onshore Scheme. The future baseline will also take into account any developments that are likely to be present in the future baseline.*
66. Paragraph 14.3.15 goes on to say *“The future baseline of the proposed Onshore Scheme has the potential to change as a result of the construction and operation of nearby local developments. The noise and vibration assessment will use a future baseline of 2028 to align with the future baseline traffic year.*
67. The background sound level in Friston, and in particular the connection hub site, is very low as to be indiscernible to normal sound monitors. The agreed maximum sound limit for the connection hub site in the SPR DCOs is 31 DB and there should be no reason for the cumulative sound level of all proposed development to exceed this. FPC considers noise creep to be totally unacceptable.
68. Any temporary increase in noise due to traffic or construction of other projects cannot be taken into account when assessing background noise. For example there is a reference to the railway line which runs between Saxmundham in the west to Leiston in the east. This line is currently unused and will only be used for the purposes of the construction of Sizewell C whereupon it is understood such use will cease therefore it should form no part of the baseline.

Traffic and Transport

69. FPC is extremely concerned about the cumulative increase in traffic due to the numerous energy projects proposed in the area. This is a rural area with a network of small narrow lanes. It is vital that a proper cumulative assessment of traffic including all other projects is carried out given the likelihood of overlapping construction periods
70. Paragraph 15.3.7 names road links, key junctions and walking/cycling routes within the vicinity of the Onshore Scoping Boundary. One of the road links listed is Grove Road which is a two-way single track road, which is designated as a Quiet Lane. NO traffic associated with the Project should use this road for any purpose whatsoever.

71. Traffic associated with the Project will also affect roads outside the scoping boundary, in particular the A12. This needs consideration.
72. Of the key junctions, there are notable omissions, being: the junction of the A12 and the A1094; the junction at Snape of the A1094 and the B1069. Both are dangerous junctions already nearing capacity and require assessment.
73. Friston has a highly valued footpath network popular with residents and visitors alike. FPC wishes to see a full assessment of these paths undertaken by NG
74. Table 15.2 shows increased congestion and increased journey times relating to Abnormal Loads to be scoped out of assessment. This is unacceptable as delivery to both the connection hub and converter station sites involves the use of local roads. The effects of the delivery of abnormal loads must be scoped in to the Assessment.
75. The Scoping Report proposes GPS tracking for HGVs but not for LGVs. The movements of LGVs must be restricted to main access routes and not be allowed to “rat run” through villages and minor roads.
76. The Report proposes to assess Impacts on 2028 Future Development to take account of committed development and transport schemes. Cumulative impact of traffic relating to all energy projects must be assessed and not merely traffic relating solely to the LionLink project. FPC notes Rule 1 where traffic flows on highway links will increase by more than 30% and this figure must be assessed cumulatively. Likewise Rule 2 applies to highways of high sensitivity where there is a threshold of 10%.
77. FPC also notes IEMA guidelines on defining sensitive receptor locations as follows: people at home; people at work; sensitive or vulnerable groups, hospitals, places of worship; schools; retail areas; recreational areas; tourist attractions; collision clusters/routes with road safety concerns and junctions and highway links at or over capacity; historic buildings. All of these sensitive receptors are present in the local area and must be properly assessed.
78. Table 15.3 attempts to assess this sensitivity but is based on the number of sensitive users present without any definition of the extent of the area being assessed. This is totally arbitrary. For example, Medium Sensitivity is defined as “*Many residential properties with direct frontage to highway link being used as construction route*”. What is meant by “many” and over what distance? Low Sensitivity is defined “*Few residential properties with direct frontage to highway link or Workplaces with direct frontage to highway link.*” This definition of Sensitivity is loaded in favour of the developer to assign a low level of sensitivity. This is unacceptable in a quiet rural area.
79. Table 15.6 categorises the overall magnitude of impact of a highway link or junction. Again the levels are loaded in favour of the developer. For example to achieve a high impact on driver delay due to congestion, there would need to be an increase in traffic of 90% and above. An increase of 30% is considered negligible. This is unacceptable and all the figures require substantial revision downwards.
80. Paragraph 15.7.42 states that all Traffic and Transport effects associated with the construction onshore would be temporary effects and that professional judgement will be used on the duration of these effects. As far as the local community is concerned the prospect of traffic impacts cumulatively with other projects will not be perceived as temporary and will require full and proper assessment.

Socio Economics, Recreation and Tourism

81. FPC notes the main themes raised in the Non-Statutory Consultations, which are reported at paragraph 16.2.2. FPC then notes at paragraph 16.3.3 that a 500M buffer outside the Onshore Scoping Boundary is to be used for the majority of the effects. This clearly cannot be applied to traffic nor should any

assessment be restricted to the LionLink project in isolation. Cumulative impact with all other projects on the visitor economy as well as the economic effects on the local population, who will see a drop in value of their homes and businesses must be assessed.

82. Table 16-5 lists community facilities and open spaces within the local study area. With regard to Friston, the village hall is missing from this list and should be added for assessment.
83. Table 16.6 lists visitor attractions within the local study area. Notably Snape Maltings is missing from this list. Snape Maltings draws visitors nationally and internationally to its famous concert hall plus an extensive retail development which is open 7 days per week year round with the exception of Christmas. The value of Snape Maltings culturally and economically cannot be understated and should be properly assessed, together with traffic impacts.
84. Table 16.7 attempts to list development land in the area. The notable omission here is the South Saxmundham Garden Neighbourhood, which is a proposed development of 800 houses and an employment area close to the converter stations and connection hub site. <https://eastsuffolk.inconsult.uk/localplanfinaldraft2019/viewCompoundDoc?docid=10604948&partid=10614932&pfv=y> This development must be included within the Scoping Report.
85. Table 16.8 is the scope of the assessment. Impacts, both direct and indirect, on residential property have been scoped out. It is not acceptable to only consider community amenity, as there will inevitably be individual properties who suffer worse effects than others. The effect on the value and the saleability of homes should also be assessed.
86. Also scoped out is the potential for impacts on the availability of tourism accommodation in East Suffolk due to use by the construction workforce. The reason given is *"it is expected that the majority of the construction workforce will be sourced locally"*. At Table 16.3 unemployment in East Suffolk is stated to be 2.6% compared to a national average of 3.5%. Further there are skills shortages locally. The LionLink project cannot make an assumption that it will source its workforce locally especially when there are other projects, such as Sizewell C concurrently requiring a huge workforce. The availability of tourist accommodation should be scoped in.
87. Impacts during operation have also been scoped out. Impacts at Friston and Saxmundham will continue to be felt in Friston and Saxmundham. Friston has a number of holiday cottages and a large proportion of second homes, which will be less attractive to visitors and prospective buyers. Impacts during operation should be scoped in.

Climate Change

88. Paragraphs 27.3.3 to 27.3.8 deal with Greenhouse Gases. There is no mention of the gas to be used within the connection hub building, which would typically contain SF6 gases. SF6 gases are linked to global warming and climate change and need to be properly assessed. To date there are no completely "green gases" which can be used to insulate the connection hub building. This matter requires careful scrutiny.
89. Paragraph 27.4.6 states *"As the construction period is in the short term (2027-2029) climate change is not expected to result in significant changes"*. The effects of climate change are already being experienced and it will be important that up to date information is provided as the project goes through the NSIP process. For example Storm Babet in the autumn of 2023 caused extensive flooding across East Suffolk with Suffolk County Council estimating 60-80 investigations are required compared to 3-4 in a normal year.
<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/storm-babet>

90. FPC notes at paragraph 27.4.6 that during operation increased occurrence of lightning could result in structural damage to infrastructure, power surges and tripping electricity breakers and fires. FPC is very concerned about the potential for fires at the Friston connection hub which is close to the village. The combination of a fire and a wind from a northerly direction (NW,N, NE) direction could result in toxic gases in the village.

Accidents and Disasters

91. Surface water flooding has been scoped out (this should not be scoped out for Friston where the flood risk is recognised as high).

92. Thunderstorms have been scoped out. FPC has raised before the risk of connection hubs and converter stations catching fire. Thunderstorms should be scoped in for electrical installations.

93. Wildfires have been scoped out. Wildfires were a serious problem in East Suffolk during the summer of 2023 and should be scoped in. Summers are increasingly dry.

94. Public demonstrations have been scoped out with the comment: *“The proposed Scheme is located in a rural area and generally stable and whilst there are opposition groups it is unlikely to result in widespread civil unrest”*. This is complacent. The conduct of National Grid in not being transparent about its plans for a major connection hub at Friston, with the multiplicity of other projects this will involve, has resulted in widespread ill feeling and anger. This can only grow once the impacts of construction begin to be felt.

95. Table 28.3 has scoped out a wide range of major hazards including utilities failures, transport accidents, malicious attacks and human error. As above it is complacent to scope out these matters. In particular the existing overhead lines at Friston should not be considered as ‘not vulnerable’ as is suggested in Appendix 28-A.

Cumulative and Combined Effects of the Project³

96. The text at paragraph 29.1.3. refers to a Cumulative Development Boundaries Map at Figure 29.1. However this is predominantly an offshore map and the only onshore information given is an Onshore Zone of Influence extending 10KM from the Scoping Boundary. This is insufficient information and a separate onshore map at a much larger scale should be provided.

97. No Zone of Influence has been established for traffic and this needs to be determined and properly cumulatively assessed.

98. As stated previously, FPC is concerned that no ‘Long List’ or ‘Short List’ relating to cumulative effects has been produced. PINS Advice Note 17 provides for these stages 1 and 2 to be undertaken before requesting a Scoping Opinion. The lack of such lists is unacceptable and a definitive list of all projects and developments must be made available. This current request for a Scoping Opinion is therefore premature.

99. FPC notes that a Zone of Influence for noise and vibration during construction is 300m from the order limits and that during operation the ZoI is 1km from the converter station and connection hub. The ZoI for construction is too low.

The ZoI for Health and Wellbeing is a mere 250M. It is imperative that the health and wellbeing of all residents of Friston is properly assessed.

³ See also comments on Policy above

Conclusion

100. This Scoping Report is inadequate with serious omissions demonstrating a lack of understanding of the Friston area and the impacts of multiple projects.. It seeks to minimise the effects of both the LionLink project itself and also in combination with an as yet unidentified list of other development in the area. It takes no account of the Recommendation Report issued by the Examining Authority with regard to the EA1N and EA2 projects. Indeed some important issues which arose are proposed to be scoped out. The ExA found that the “**utmost**” care should be taken. This Scoping Report does not demonstrate care let alone “utmost care”.
101. FPC has the impression that National Grid considers the DCO process to be a ‘negotiating game’ where NG puts forward an unreasonable position in the Scoping Report and any movement from that is regarded as NG demonstrating how fair and reasonable it is as a developer. This is a waste of time and resources for everyone. It is also particularly unfair to local communities who have limited time and resources, as opposed to NG which has relatively unlimited time and resources, facing an unprecedented number of DCO applications.

END