

Saxmundham Town Council

Response to National Grid LionLink Limited EIA Scoping Report: EN020033

Introduction

It is noted that to meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017, Nationally Significant Infrastructure Projects which are likely to have a significant effect on the environment are required to undertake an Environmental Impact Assessment and to provide an Environmental Statement ('ES') to accompany an application for a Development Consent Order. The ES sets out the potential impacts and likely significant effects of the proposed development on the environment. To inform the scope and level of detail of the information to be provided with the ES, National Grid LionLink Limited ('the Applicant') has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, under the EIA Regulations.

We further note that the Planning Inspectorate has identified Saxmundham Town Council as a consultation body therefore the following represents its views. The Town Council requests the Planning Inspectorate to consider this submission before adopting its Scoping Opinion for information to be included in the ES.

Issues of Concern

Whilst our comments are based on the part of the development that directly affects our community, namely, the Converter Station, we have also highlighted general development issues that we consider should be addressed.

We have endeavoured to address the issues in order of the Scoping Report – Volume 1 Main Text¹ but due to our significant concerns regarding the cumulative effects, we note the following:

Chapter 29 - Cumulative Effects and Intra Project Effects of the Project

Saxmundham Town Council is concerned that the Applicant has generally not identified cumulative effects at this stage. This, in our opinion, devalues all observations made in the entire procedure. Saxmundham and the surrounding area, as the Applicant is acutely aware, faces immense disruption from numerous Nationally Significant Infrastructure Projects ('NSIPs') in our area including:

- Sizewell C nuclear power station and associated development including roadworks to the A12;

¹ [EN020033-000046-LION - Scoping Report - Main Text.pdf \(planninginspectorate.gov.uk\)](#)

- East Anglian One North and East Anglian 2 sub station in the neighbouring parish of Friston;
- National Grid Group’s Nautilus Interconnector;
- National Grid Electricity Transmission’s SeaLink that also proposes to build a Converter Station at Saxmundham;
- SSE Renewables North Falls and Five Estuaries offshore wind farms;
- East Anglia Green – Norwich to Tilbury electricity transmission line.

Outside NSIPs, major work is planned to develop land on the other side of Saxmundham to create a South Saxmundham Garden Neighbourhood (‘SSGN’). An employment/service area is proposed to the west of the A12 and circa 800 new homes to the east of the A12. The first part of the scheme, the employment/service area, involves construction of a new roundabout, spur roads, and two pedestrian crossings on the A12. This is due to be submitted for planning consent in the second quarter of 2024, with commencement in 2025 and completion in 2027. The housing development is forecasted to commence 2026/2027. Planning permission has not been sought yet, albeit the allocated development land is in East Suffolk Council Local Plan and Saxmundham Town Council are actively working with the developers in the master planning of the scheme.

As a consequence of the Applicant’s lack of assessment of cumulative effects, their assessment of Zones of Influence (‘Zol’) is also very ambiguous, as the zones do not take into consideration the effect of LionLink in tandem with all NSIPs proposed for the area. Therefore, Saxmundham Town Council can only comment taking into consideration the paucity of information provided by the Applicant as follows.

Zones of Influence for Onshore Environmental Topics²

Noise and Vibration

The Applicant states the Zol in the construction phase to be 300m from the order limits. Considering the noise and vibration impacts of other concurrently running projects, namely the proposed SeaLink, Sizewell C and SSGN, this maximum Zol should be reviewed.

Air Quality

The Zol is stated as 350m from the order limits. This should be reviewed as it is possible that two Converter Stations, for LionLink and SeaLink, could be constructed consecutively. The prevailing wind on fine warm afternoons is from the east, when offshore winds become predominant, and transmit dust further into the urban settlement of Saxmundham.

² Table 29-6

Health and Wellbeing

The Zol in the construction phase is 250m from the order limits. The potential for multiple developments in the area, together with the proximity of housing, renders this limit too low. This will be aggravated by increased construction traffic and the potential for a haul road that skirts the north-east and east of the town.

Historic Environment

During the construction phase, the Zol is just 1km from the order limits. There are numerous old buildings, and a Conservation Area in Saxmundham's town centre, and in our neighbouring parishes Kelsale-cum-Carlton and Benhall and Sternfield. Increased HGV traffic in these locations has the potential to cause damage by vibration. Moreover, during the operational stage the Converter Station could be visible from the higher part of Saxmundham and blight the views including one from Albion Street across the town to Church Hill, a significant view identified in the Saxmundham Neighbourhood Plan.³

Socio Economics

The increased traffic during the proposed construction would likely create delays for pedestrians, cyclists, motorists and bus users. This would be aggravated by the cumulative effects of other major developments. This renders the 500m Zol from the order limits not sufficient. In many cases, Saxmundham, which serves as a shopping hub with two major supermarkets, may be avoided thus creating problems for smaller independent shops, the weekly and monthly markets and other visitor attractions.

Other Potential Developments⁴

It is noted that the preliminary 'long list' of potential other developments and/or approved developments will be identified through a desk-based review within the greatest Zol for each topic of the proposed scheme. It is presumed that the employment/services area of the proposed SSGN will be included within this assessment.

Other Minor Developments⁵

It is noted that the minor developments may give rise to a cumulative effect due to their proximity to the proposed scheme and therefore minor developments will be included in the 'long list' where they are located within 200m of the boundary defined by design development as presented in the Preliminary Environmental

³ Saxmundham Neighbourhood Plan [Saxmundham neighbourhood plan » East Suffolk Council](#)

⁴ Paragraph 29.3.23

⁵ Paragraph 29.3.26

Impact Assessment ('PEIA'). Saxmundham Town Council would strongly urge, that due to the burden of proposed NSIPs in the area, the ZOI boundary should be extended outwards from 200m to take into consideration the associated traffic increase and include developments that border the A12 up to 5km.

Colocation⁶

Saxmundham Town Council contends that colocation should not be the only aim but extended to coordination which is vital to prevent wasted resources in duplicated work in responding to a plethora of NSIP consultations. The burden on Town, District and County Councils is unacceptable. Suffolk County Council have threatened to oppose LionLink development if it does not demonstrate meaningful coordination. Whilst there are clear differences between LionLink and SeaLink in terms of landfall and DC cabling routes, they are almost certain to be identical in terms of Converter Station sites and AC cabling routes.

Moreover, any proposed multiple converter stations should be co-designed and therefore of similar and corresponding design sympathetic to the environment and landscape. Multiple developers should also seek to co-share ancillary and administration buildings and lay down areas where possible.

Chapter 2 - The Proposed Scheme Description

Proposed Converter Station⁷

Saxmundham Town Council finds it extraordinary that major electrical infrastructure projects are not coordinated, yet the LionLink proposal also mentions the potential to coordinate with the proposed SeaLink and Nautilus projects. We contend that there does not appear to be any coordination, just the potential to co-locate. As such, we would request a moratorium on any development until the multiple National Grid companies visibly demonstrate coordination.

Chapter 3 - Assessment of Alternatives

Appraisal of Converter Station Options and Preferred Option Identification⁸

The Applicant states that the Saxmundham site was identified as 'the best performing having the potential to be viewed as an extension to the existing settlement of Saxmundham and benefitting from some existing screening from existing woodland and field boundaries'.

⁶ Paragraph 29.5

⁷ Paragraph 2.3.24

⁸ Paragraph 3.5.13

Saxmundham Town Council disputes the assertion that the LionLink, or indeed SeaLink Converter Stations would 'be viewed as an extension to the existing settlement of Saxmundham'. If the current Converter Station proposals proceed, the whole character and landscape of our town will change forever. As per Saxmundham Town Council's response to the SeaLink Statutory Consultation: 'We risk facing a giant set of industrial structures that will overshadow and dominate our town. But whereas in previous industrial revolutions, new industry has brought jobs and prosperity to the towns affected, we know that this will not be the case here. We will have all the impacts of random, unplanned industrialisation but without any of the economic benefits accruing to us. Our town faces a fundamental, externally imposed overturning of its character and heritage.'⁹ This statement applies equally to the LionLink and SeaLink proposals.

Chapter 5 - EIA Approach and Method

Assessment Years¹⁰

We understand that the proposed construction would commence in 2026, and the baseline for potential effects of the scheme is 2024. Saxmundham Town Council agrees with the statement that the baseline for intra and inter-project cumulative effects must be adjusted according to the development of any other major infrastructures. However, we must note that we find the situation that so many energy transmission projects are vying for Converter Stations in Saxmundham very concerning and request coordination between the various NSIPS. This is pertinent to the National Grid companies who contend they are separate companies but are part of the same overarching entity.

Chapter 6 - Air Quality

Saxmundham Town Council is unable to comment to any degree on this chapter as LionLink have not undertaken a cumulative impact assessment, but would make the following observations:

Road Traffic¹¹

The main sources of traffic emissions are noted as the 'A' roads, including the A12 that bypasses Saxmundham. Saxmundham already suffers at times from traffic congestion at the heavily used traffic light controlled at the B1121/B1119 crossroad in its town centre. Therefore, all site traffic must be directed away from this point to prevent congestion and traffic emissions. Should the project proceed:

⁹ NGET – Sea Link Statutory Consultation Saxmundham Town Council Response, December 2023.

¹⁰ Paragraphs 5.4.10 and 5.4.11

¹¹ Paragraph 6.3.11

- We recommend that the Applicant collaborates with Sizewell C Co to use their park and ride facilities to the north at Darsham and to the south at Hatcheson to negate the need to provide workers' car parking and reduce vehicle movements in and around Saxmundham, and to make use of the traffic incident management areas and postal consolidation facilities at both sites.
- We recommend that the Applicant collaborates with Sizewell C Co to use their freight management facility at Seven Hills to reduce the number of HGV and LGV movements in and around Saxmundham.

Chapter 7 - Agriculture and Soils

Proposed Scope of the Assessment¹²

We are disturbed to read that the Applicant has not identified the grade of agricultural land, nor the quantity of land required for the Converter Station site at Saxmundham and the Sub Station site at Friston. The land at the proposed Converter Station site, at Wood Farm, is good quality, clay soil that is well drained and managed by generations of the same farming family. It produces cereal crops without the need for irrigation. We are therefore disappointed that this land, currently used for food production, is being lost for energy transmission.

Chapter 8 - Ecology and Biodiversity

There is scant reference to the proposed Saxmundham Converter Station site in the Scoping Opinion. Therefore, we present our findings submitted to the National Grid Electricity Transmission SeaLink Statutory Consultation:¹³

DEFRA has developed a biodiversity gain statement which sets out the detail of the biodiversity net gain requirement for NSIPs. All terrestrial NSIPs from November 2025 are expected to achieve at least 10% measurable biodiversity net gain for at least 30 years.¹⁴

It should be noted that farmland, whilst not environmentally obviously diverse, plays an important role in the ecological system.¹⁵ There has been a dramatic crash in farmland birds, due to modern intensive

¹² Table 7-2

¹³ NGET – Sea Link Statutory Consultation Saxmundham Town Council Response, December 2023.

¹⁴ Department for Levelling Up, Housing and Communities Nationally Significant Infrastructure: Action Plan For Reforms To The Planning Process – February 2023.

¹⁵ Information sourced from Friends of the Earth for Saxmundham's response to the SeaLink Statutory Consultation.

methods and loss of habitat.¹⁶ Sightings of animals (although not an exhaustive list) in the area include those found in agricultural and river settings:

Skylarks	Badgers	Grass Snakes	Kingfishers	Buzzards	Muntjac
Red Deer	Hedgehogs	Sparrow Hawks	Red Kites	Kestrels	Hedgehogs
Barn Owls	Tawny Owls	Slow Worms	Adders	Field Mice	Bats
Hares	Swifts	Woodpeckers	Foxes	Lapwings	Marsh Harriers
Possibly Water Voles					

Saxmundham Town Council expects that the Applicant will undertake a comprehensive ecological assessment for the proposed Converter Station site.

Chapter 10 - Health and Wellbeing

It is noted that two of the main themes identified in the non-statutory consultation were:

- Community fatigue and stress from being subjected to prolonged consultation on a number of projects in the area;
- Detail on mitigation aspects for residents 'enjoying' where they live, access to leisure amenities, and the impact this will have on their quality of life and therefore their mental and physical health;
- The cumulative impact of the LionLink and associated projects on air quality.

Saxmundham Town Council would add at this stage our concerns regarding the proximity of the proposed Converter Station in respect to:

- Proximity to housing, creating issues of stress due to physical issues of noise, dust, vibration and light pollution during construction.
- Proximity to housing, creating issues of stress due to physical issues of noise during operation.
- Proximity to housing creating stress due to devaluation of housing.

Proposed Scope of Assessment¹⁷

There appears to be no reference to noise in the Scoping Assessment for the operational stage. Considering there are up to three proposed Converter Stations to be sited, the issue of Operational Noise should be included.

¹⁶ Information sourced from Friends of the Earth for Saxmundham's response to SeaLink Consultation.

¹⁷ Table 10-1

Chapter 11 - Historic Environment¹⁸

Saxmundham Town Council considers that Hurts Hall, a Grade II Listed Building in Saxmundham, should be included in the Scoping Opinion.¹⁹ Whilst the original building was destroyed by fire in 1890, it was rebuilt and is a building of note, and the house and grounds are identified in the Saxmundham Neighbourhood Plan as a protected view, 'important' to the overall landscape character of the parish and which can be enjoyed from publicly accessible locations.²⁰ There are two views of particular note from the B1122 looking across to Hurts Hall and St John's Church. The first panoramic view, looking north-east, includes open farmland in the foreground, Hurts Hall and St Johns Church in the middle distance, backed by wooded rising land. The second view, from a high point of The Layers looking across the River Fromus to Hurts Hall, gives a wide view of the buildings and the backdrop of rising woodland. It demonstrates the contrast between the open landscape of the valley and wooded ridge, below which the town sits.

We are concerned that the development of the converter site will lead to industrialisation of the open countryside to the east of Saxmundham and due to the magnitude, will also adversely affect the important open views. Contrary to claims made in the Scoping Opinion, this site is not naturally screened by adjacent woodland at Bloomfield's Covert and thus existing screening to the west is unlikely to provide mitigation to the north, south and east. The huge converter station buildings will be out of keeping with the character and landscape of rural East Suffolk where the local architecture is predominantly of low build.

Proposed Scope of Assessment²¹

Saxmundham Town Council wishes to correct the following description given in the table: 'The village of Saxmundham and its environs are adjacent to proposed Converter Station Site.' Saxmundham is a town of approximately 5,000 people. It is not a village!

Chapter 12 - Hydrology, Hydrogeology and Drainage²²

It is noted that the River Fromus is considered by the Applicant to be outside the scoping area but within the study area. Saxmundham Town Council requests that the River Fromus is included within the scoping.

¹⁸ Paragraph 11.3.25

¹⁹ Historic England website, [HURTS HALL, Saxmundham - 1268178 | Historic England](#)

²⁰ Saxmundham Neighbourhood Plan [Saxmundham neighbourhood plan » East Suffolk Council](#)

²¹ Table 11-4

²² Table 12-7

Currently there are moves to improve the river and we consider that the construction of the proposed Converter Station may increase surface water run-off from former farmland which may result in pollution.

Chapter 13 - Landscape and Visual Amenity

Converter Station Site²³

Whilst the Applicant correctly identifies that the proposed Converter Station will be visible from the B1119, it has, however omitted the B1121. The proposed Converter Station will blight the view towards Hurts Hall and entirely change the attractive vista of this Grade II listed building and its associated parkland. This view is identified as significant in the Saxmundham Neighbourhood Plan.²⁴ As such it must be included within the scoping.

Operation²⁵

The Applicant states that during the operation of the proposed Converter Station, that there will be 'impacts on tranquillity and night-time lighting effects'. Due to the proximity to housing, we suggest that mitigations be put in place by the installation of sensor lights and screening to prevent constant illumination and disturbance to residents.

Chapter 14 - Noise and Vibration²⁶

Whilst outside the scope of Saxmundham, the Town Council is surprised to note that our neighbouring parishes of Benhall and Sternfield and Kelsale-cum-Carlton, are not recorded in the Scoping Opinion. Undoubtedly, they will be affected by the proposed development's construction, road traffic, noise and vibration. In our opinion these villages should be considered.

Chapter 15 - Traffic and Transport

Saxmundham Town Council is unable to comment to any degree on this chapter as the Applicant has not undertaken a cumulative impact assessment, but we reiterate our observations previously stated in respect to air quality. This includes the need for the Applicant to conduct a full traffic impact

²³ Paragraph 13.3.29

²⁴ Saxmundham Neighbourhood Plan [Saxmundham neighbourhood plan » East Suffolk Council](#)

²⁵ Paragraph 13.4.3

²⁶ Paragraph 14.3.10

assessment of the town centre and to direct all site traffic away from this point to prevent further congestion and to collaborate with Sizewell C Co to use their park and ride, traffic incident management, freight management and postal consolidation facilities to reduce the number of vehicles movements during the construction phase.

Proposed Scope of the Assessment²⁷

We note that abnormal loads are scoped out of the traffic assessment, and we consider that this is incorrect. The Applicant has not undertaken a cumulative impact assessment reflecting the extent of other NSIPs and considering the increased volume of traffic in this rural area, abnormal loads will likely create road delays, to workers, residents and visitors irrespective of being scheduled during off-peak hours.

Chapter 16 - Socioeconomics, Recreation and Tourism

Study Area²⁸

The Applicant notes that the Onshore Scoping Boundary is the study area plus a 500m buffer. Saxmundham Town Council considers this is far from sufficient for the following reasons:

- The Applicant has not taken into account the cumulative effects, of traffic issues of other major projects.
- Saxmundham, whilst not a tourist town, services the tourist industry as a shopping hub for nearby coastal resorts: namely Walberswick, Southwold, Aldeburgh and Thorpeness, Carlton Meres and Cakes and Ale Holiday Parks and visitors to the RSPB Nature Reserve at Minsmere. Major construction works, congested roads and road closures caused by major construction would likely deter shoppers and visitors to the town. Therefore, we suggest that the buffer area is substantially increased.
- Due to the cumulative impacts of the numerous NSIPS and the location of up to three Converter Stations adjacent to our town, we are concerned that the perception of Saxmundham as an attractive market town to visitors will change to that of an industrialised area. This may severely impact visitor numbers to the town and its tourism dependent businesses. We therefore require energy project developers in the area to consider, at the very least, to ensure that compensation

²⁷ Table 15-2

²⁸ Paragraph 16.3.2

and mitigation are commensurate with the scale of disruption and damage, both in the short and long term.

Local Business²⁹

We question why only parts of Saxmundham to the east of the High Street are included in the local business study area. This is unacceptable as all businesses within the town, and in the neighbouring parishes of Benhall and Sternfield and Kelsale-cum-Carlton should be included.

The impact of the proposed Converter Station on Saxmundham and the neighbouring parishes will be devastating including loss of labour, traffic and transport delay, and loss of business during both the construction and operational phases.

Community Facilities and Open Spaces³⁰

Considering that the study area should incorporate all of Saxmundham, the following, whilst not exhaustive, should also be included:

Saxmundham Primary School	SET Saxmundham School	Fromus Green
Chantry Road Recreation Area	Seaman Avenue Recreation Area	Saxmundham Memorial Field
The Fromus Centre	St John The Baptist Church	Saxmundham Market Hall
Saxmundham Adventure Playground		

Consideration should be given to including the primary schools and churches in Benhall, Sternfield and Kelsale parishes.

Visitor Attractions³¹

Considering that the study area should incorporate all of Saxmundham, the following, whilst not exhaustive, should also be included:

The Art Station	Saxmundham Museum
The Bell Hotel	Saxmundham Town Council Weekly and Monthly Markets

²⁹ Paragraph 16.3.21

³⁰ Table 16-5

³¹ Table 16-6

Site Allocations – Development Land³²

Considering that the study area should incorporate all of Saxmundham, it should be noted that Saxmundham is also identified in East Suffolk Council’s Local Plan as a growth node, with proposals for a ‘Garden Neighbourhood’ of 800 new dwellings, to be located between the railway line and A12. This development is due to be rolled out over the coming decade, including two new roundabouts to connect to a service station and a new employment zone to be created on the west of the A12.

Proposed Scope of Assessment³³

We note that direct impacts to residential property during the construction phase have been scoped out. The Applicant asserts that the proposed onshore scheme will be designed to avoid residential properties therefore it is not anticipated that there will be any demolitions, direct impacts or significant effects on residential properties.

Saxmundham Town Council insists that this aspect should be scoped in as the proposed Converter Station site is in close proximity to the urban settlement which will suffer direct impacts and significant affects.

Tourist Accommodation³⁴

We noted that the potential for impacts on the availability of tourism accommodation in East Suffolk due to use by the construction workforce is scoped out as the Applicant expects that the majority of the workforce will be sourced locally.

Saxmundham and the surrounding area is considered to be a high employment area however there is a skills shortage. Saxmundham Town Council contends that due to the cumulative impact of other NSIPs there will be a shortage of skilled labour which will lead to travelling workers being employed. This will affect the availability of all types of accommodation and thus this should be scoped in.

Tourism Destinations³⁵

Whilst scoped in, the Applicant states that ‘it is not anticipated that the construction of the proposed Onshore Scheme would result in a significant effect on tourism’.

³² Table 16-7

³³ Table 16-8

³⁴ Table 16-8

³⁵ Table 16-8

We differ in this opinion as various studies reflect a drastic decline in visitor numbers due to the various NSIPs in this area and, again, a cumulative impact assessment is lacking. A study conducted by the Suffolk Coast Destination Management Organisation reported³⁶ that a third of visitors are less likely to visit the Suffolk Coast during the construction of Sizewell C nuclear power station and EA1N and EA2 Sub Station at Friston. Many believe that the construction of energy projects will take away their reasons for visiting the area due to the impact to the tranquillity and natural surroundings, some are in principle opposed to nuclear or wind turbines and wish to make a stand, and others expect travel disruption to spoil their holiday experience. The addition of one or more Converter Stations at Saxmundham will further detrimentally impact this area as a tourism destination.

Conclusion

As an identified consultation body, Saxmundham Town Council requests the Planning Inspectorate to consider this submission which sets out the impacts we consider will have a significant effect on the local environment before the Planning Inspectorate adopts its Scoping Opinion for information that the Applicant must include in its Environmental Statement.

³⁶ [The Suffolk Coast - Tourism Research and Reports](#)