



Reydon Parish Council Response to LionLink Consultation, October 2023

Reydon Parish Council (RPC) represents 2,699 residents (2016 census estimate). This response follows a public meeting of more than 170 residents which allowed the Council to ensure it is reflecting the views of its community.

RPC strongly opposes the current proposals for onshore infrastructure and cabling for LionLink and, in particular, the northern and southern cable routes from Southwold (Easton Bavents) to Friston which will do unnecessary damage to our village, its environment and community.

RPC, nonetheless, strongly approves of plans for renewable and green energy and of resilient electricity transmission capacity to meet future needs in a non-carbon economy. As an area of the country which is highly exposed to coastal erosion, exacerbated by sea-level rise, we are acutely aware of the existential need to combat climate change.

We, therefore, support the aims of LionLink and other local energy projects, including offshore wind. We also recognise that economic and social benefits may be gained locally from these projects.

However, that is no reason for developing these projects in ways that will do avoidable environmental, economic and social damage to our communities, landscape and environment.

LionLink, and in particular the “northern” cable route, will do significant damage to our community, our local economy and our environment and create long term or permanent damage to our wildlife and their habitats. These include:

- Impact on the hydrology of Reydon Smear and the consequences for the adjacent Reydon Smear marshes and reedbeds (and their flora and fauna);

- Destruction of hedgerows and ancient trees which either cannot be replaced or will take many years to recover, with significant consequences for wildlife and biodiversity;
- Disturbance of dwellings and households adjoining the proposed cable routes and construction corridors;
- Harm to the visual amenity of the landscape, including the size and duration of trenches and construction roadways;
- Noise and disturbance to the tranquility of the AONB, which is an important feature of the local environment;
- Reduction of tourism and our tourist economy (on which we depend) due to the loss of the quality of landscape, wildlife and tranquility which are key factors in attracting visitors;
- Temporary suspension of PROWs that are an important local amenity and a significant attraction for tourists;
- Financial losses to residents living in the areas of cabling and other construction, including impact on property values, and to landowners and their businesses/employees where agricultural land is taken out of action for cabling and construction.

The northern route would also run in close proximity to protected sites including Reydon Wood, Blyth floodplain and Benacre NNR which is a major concern of local and national conservation bodies. Smear Marshes and Potters Bridge Marshes are both SSSIs. Potter's Bridge Marshes, to the east of Potter's Bridge are also part of a Special Area of Conservation. 30 red listed bird species have been identified in the areas proposed for the cable routes from the landfall at Southwold.

This landfall is, in itself, problematic and is a key reason for opposing both proposed routes from Southwold. Although we have been told the connection point will be behind the concrete seawall north of Southwold Pier, the cliffs to the north of this wall (at Easton Bavents in Reydon) continue to erode as fast as any other area of the Suffolk and Norfolk coast. This will reach a point where inundation occurs behind the current sea wall putting an onshore connection point at severe risk. For this reason alone, the Southwold landing point should be discarded. Although our focus here is on the "northern route" which would go through our village, we also note that many of the same disruptions listed above also apply to the route south from Southwold and that this route would involve tunnelling under the Blyth estuary which does not seem a wise or cost-effective approach.

The "northern" route would involve development on one of the most valued areas of local countryside identified in our Reydon Neighbourhood Plan and protected by its Policy RNP5. The plans do not meet the tests set out in this policy that development should only be allowed where there is an evidenced need to use that location and there is no suitable and available alternative. Of course, in addition, much of this route runs through the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). Such areas enjoy the highest level of protection from development which should be respected.

We note that applications for development consent orders relating to Nationally Significant Electricity Infrastructure Projects are required to follow the current guidelines for how such

schemes are to be determined. These are set out in the 'Overarching National Policy Statement for Energy (EN-1)' published by the Department for Energy Security and Net Zero in their final report of March 2023.

In particular, clause 5.10.31. states that the Secretary of State should give substantial weight to the conservation of the natural beauty of the landscape and countryside in deciding on any applications for development consent in AONB's. The cost of, and scope for, siting the development outside of any AONB's has to be assessed before approving any applications in an AONB.

It is very clear that granting development consent for the onshore infrastructure and cabling for LionLink would be contrary to National Planning Policy, because these proposed developments would have an unacceptable adverse effect on the AONB and on one of the most valued areas of countryside in the Reydon Neighbourhood Plan. The key test for granting exceptional consent to any such development is that there is no suitable alternative.

Along with SEAS and other local groups, we have identified suitable alternatives. The best of these would be to co-ordinate all the offshore wind and interconnector projects and create combined offshore infrastructure to serve them all and to bring power onshore close to the area of need which is Greater London and its hinterland. As an initial step towards that, Scottish Power's EA1N and EA2 and LionLink should combine energy offshore and take power to the brownfield site of Bradwell which is closer to London and has an existing substation and pylons that can be upgraded. This would replicate the Modular Offshore Grid approach now being successfully implemented in Belgium and Holland.

For this reason, the current non-statutory consultation is fundamentally flawed. It fails the test of exploring all reasonable options before making proposals for a major development. The consultation only offers onshore options for the necessary infrastructure and does not include any offshore option(s). LionLink (and the nearby offshore wind projects and Sealink) should not proceed until a full cost benefit analysis of an Offshore Grid is completed and published as part of a proper consultation. Adequate weight must be given to the protected status of the AONB and offshore alternatives for the infrastructure and cabling must be properly costed and considered as required by EN-1 (as set out above).

We recognise that creating a national non-carbon energy system will require major developments across the country, including the creation of a national electricity transmission system with considerably increased capacity and resilience. We have the responsibility and opportunity to do this now, with Suffolk making a leading contribution, but we need to do so in the best way possible for our environment and communities. We believe LionLink can, and should be, developed differently to be a first step towards the best possible solution to our future needs.