

To be Considered by the Walberswick Parish Council 16 October 2023

**Response of the Walberswick Parish Council
Non-Statutory Consultation for NGV MPI Lionlink**

Walberswick now has two potential landing sites for Lionlink (formerly Eurolink). As the elected Parish Council, we are writing on behalf of Walberswick residents, businesses, and visitors to object in the strongest terms to the proposal of using Walberswick as a landing site and a cabling route on the way to a proposed substation near Friston.

Our consultation response deals with NGV's proposals in three parts. First, we comment on the quality of the non-statutory consultation to date. Second, we make the case that NGV should recognise that Walberswick is wholly inappropriate as a landing site. This is true for both the original site (G) and the second site (G2) added in the current non-statutory consultation. Third, we point out that we expect NGV to consider a much broader and more appropriate approach to landing sites and sub-station construction than its current set of proposals, all of which fall within and/or threaten green field, AONB, SSSI and protected reserve locations in a concentrated area of coastal Suffolk.

Section I: Quality of the Non-Statutory Consultation

As a Council, and based on the feedback from our constituents, we have found the approach taken by Lionlink in this non-statutory consultation to be inadequate at best and deliberately vague and disingenuous at worst. For example, we were appalled by Lionlink's consultation literature that stated that Lionlink had taken into account previous consultation responses by adding a second landfall site in Walberswick! Rather than 'listen to' and take account of our concerns, Lionlink instead doubled down on the inappropriateness of the initial site selection by (i) keeping the first site (G) which should have been discarded and (ii) adding yet another site in Walberswick (G2) which brings the proposed landfall construction even deeper into the village. The pre-consultation briefing materials and maps were extraordinarily unclear about Lionlink's plans, and despite the efforts of the staff at the consultation events, clear answers and rational reasons for Lionlink's proposed plans for coastal Suffolk were not forthcoming. One such example is that the literature mentions the need for a haulage road, but neither the documentation nor the Lionlink representatives at the consultation event, could shed any light on where such a road would be located nor why and for how long it would be needed. Such an approach simply underscores the impression of disregard that Lionlink and National Grid have for the impacted communities and the protected habitats and increases the distrust that a proper, transparent and justifiable investment decision will be reached.

Section II: Inappropriateness of Walberswick as a Landing Site

We would have expected Lionlink to acknowledge that its own lack of understanding of Walberswick's geography led it to inappropriately identify the initial site (G) that has no land access for construction equipment, would require the taking of land held in trust by Walberswick Common Lands Charity and would remove nearly half of all the Village's parking during construction. We find it remarkable that Lionlink has not removed site (G) from consideration, although its decision to choose a second site in Walberswick is, presumably, a tacit acceptance that site (G) has no real possibility of being taken forward. To remind Lionlink why (G) is wholly inappropriate, please see attached the response of Walberswick Parish Council to the 2022 non-statutory consultation. (It can also be viewed here: <http://walberswick.onesuffolk.net/assets/Parish-Council/Agendas/Agendas-2022/December-2022/DRAFT-consultation-response-eurolink.pdf>)

The remainder of our response is related to the proposal for G2 (known locally as Manor Field) that was introduced in this second non-statutory consultation. In summary, the WPC wholly rejects Manor Field as a possible landing site. This is on the basis that this proposal would bring the construction site into the very heart of the village, to a location surrounded by homes including those that are within the village's conservation area, that is bordered by protected habitat, that is adjacent to some of the most heavily used footpaths by residents and visitors alike including those that provide access to the Walberswick beach, and that would cause maximum disruption to the village's amenity and tourist driven economy.

A . Environmental Concerns

Walberswick has a unique and delicate coastal environment. Specifically, a landing on Walberswick and/or under the beach and subsequent drilling and cable laying to reach a sub-station inland and to the south would impact nearly all of following designated and protected sites:

- Suffolk Coast and Heaths AONB
- Minsmere-Walberswick Heaths and Marshes SSSI
- Suffolk Coast National Nature Reserve
- Walberswick Salt Marshes
- Minsmere-Walberswick Heaths and Marshes Ramsar & SPA
- Minsmere to Walberswick Heath and Marshes SAC.

In short, it would be difficult for NGV to find a location that has more environmental protection designations. To emphasise the catastrophic impact that Lionlink construction would have on flora and fauna in and around Walberswick, we use the example of the protected Marsh Harriers which were saved from extinction in the UK by a program launched in RSPB Minsmere.

Marsh Harriers are included as part of the important assemblage of rare breeding birds on the Minsmere – Walberswick Ramsar site. The harriers depend heavily on reedbed habitat (including Walberswick) located to the north of the Minsmere New Cut (a sluice boundary at the southern end of RSPB Minsmere) for breeding but are known to also forage widely for food over the Minsmere South Levels and also the EDF Energy estate, including Sizewell Marshes SSSI. The difficulty of mitigating the impact that the construction of Sizewell C will have on Marsh Harriers was one of the many concerns of the Inspection Panel that recommended against the building of the nuclear plant. An important consideration in the construction of Sizewell C was whether it could mitigate its impact on Marsh Harriers. It was ultimately argued that the protected and undisturbed Minsmere-Walberswick Heaths and Marshes Ramsar & SPA would serve as the area of breeding protection for the Harriers. Additional land was then identified around Westleton to try to replace the harriers' foraging areas lost to Sizewell C. These areas were noted in NGV's Sealink documentation as needing to be avoided in determining best locations for cabling and sub-station construction. Therefore, it would seem impossible for Lionlink to now propose disturbing the Marsh Harriers habitat north of the Sizewell C site, including both Walberswick and Dunwich where the Harriers breed and forage. Marsh Harriers hunt regularly in the skies above the proposed landing site at Manor Field.

Walberswick is not only home to Marsh Harriers, but to more than a hundred other species of birds drawn to this irreplaceable habitat. The proposed G2 landing site is in the centre of our village where some 130 different species of birdlife have been recorded by bird-watchers in Walberswick's bird hide. On two recent "Birdsong Walks" in the summer of 2023, 63 bird species were spotted in and around the area of proposed construction of the landing site and cabling.

The constantly changing coastline and beach at Walberswick is extremely unstable and susceptible to erosion and the shape and surface of the beach is in constant flux. During many regular high tides, and nearly always during high tides when the weather is poor, Walberswick's shingle and sand beach is completely submerged up to the marron grass sand dunes and the marsh that lies behind them. To reach the sea from Manor Field would require extensive drilling to cross under the Dunwich River, the marshes, reed beds, the sea defence sand dunes and out into the sea. The relatively long trip to the sea, across and/or under this highly sensitive and protected habitat, along with the inevitable noise and vibration this would entail, seems to us wholly inappropriate and unjustifiable when many better options are available.

B. Logistical and Safety Concerns

There is currently no road access for construction vehicles and workers to reach Manor Field, meaning that Lionlink would have to construct a haulage road to the site through or around existing homes causing further destruction of habitat and undercutting the Conservation Area. The inability of Lionlink to state how this site would be reached further indicates how ill-conceived its proposal is. It is also worth noting that even before reaching any proposed haulage road, access to the village would have to be via the sole road into Walberswick (the B1387). There is no other way in or out of Walberswick and residents are rightly alarmed by the impact that heavy equipment and worker vehicles during construction would have. The B1387, (which becomes "The Street" when it enters the village settlement) has no pedestrian pavements, street lighting or crossing points and is shared by cars, bicycles, pedestrians and horses. The remainder of the streets surrounding Manor Field consist of unimproved, single lane tracks that are more heavily used by pedestrians and cyclists than by vehicles. Suffolk Highways acknowledged that the narrowness of The Street and its extremely heavy shared use by non-vehicular traffic justified making Walberswick one of the very few 20 mph areas in Suffolk. Given this situation, we believe that the safety risks associated with putting a landfall construction site in Walberswick village are overwhelming.

C. Impact on Homes and Businesses

Walberswick's economy is built around tourism drawn to the village by its beautiful natural beach, its areas of unique environmental interest, direct access to nature, our dark skies and historic character of the village. Two pubs, three cafes, pub accommodation, 2 summer camping sites, dozens of self-catering businesses and several shops are all supported by the year-round tourist trade. The noise, dust, vibration, light-pollution, increased traffic and destruction of habitat that would be associated with the Manor Field landing site would disrupt everything that underpins the Walberswick economy. Subsequent drilling and trenching would lead to additional closures of footpaths heavily used by tourists and residents year-round. In 2021, statistics were shared with Suffolk Highways demonstrating that in excess of 100,000 people walk through Walberswick and its footpaths every year. Evidence from the purchase of car park tickets shows that in 2021, over 51,000 cars parked at the Walberswick car parks. With an estimate of 4 passengers per vehicle, that would indicate that up to some 200,000 day visitors to Walberswick could be lost. This does not count those who stay overnight, live in the village or walk to or take the rowing ferry from Southwold to Walberswick. Whilst summer is the busiest time, Walberswick is a year-round destination for day and overnight visitors. In short, if Lionlink was to land in the middle of Walberswick village at Manor Field, the impact would be catastrophic for every village business. No business could realistically be expected to survive such a loss of tourist trade during Lionlink construction.

D. Loss of Amenity

The construction phase of Lionlink and ongoing maintenance required would have a hugely negative impact on those living here. We note that it is highly unusual to put the cable landing and main construction site squarely in the midst of where people live, work and walk and none of the proposed landing sites except G2 propose to do this. Manor Field is surrounded on three sides by homes including those in Walberswick's Conservation Area. It is also bordered by a caravan and camping ground. It would be impossible for those living so close and fully exposed to the site to be well protected from the noise, vibration, dust, light pollution, traffic and debris associated with the project, as well as to the need to construct or bring in other infrastructure (such as electricity, water and sanitation) to support the construction site itself.

Section III: Need to Consider Alternative Sites and Cumulative Impact

The objection of the Parish Council to the Lionlink proposal extends beyond our Parish boundaries. It is the view of our Council, as it is by many others locally and nationally, that NGV has not properly considered alternative sites away from the Suffolk coast. We understand that locating grid infrastructure offshore is a common practice throughout continental Europe and there is no consideration of this in NGV's proposals (although it does show an off-shore substation on the Dutch side). Nor does NGV consider taking its cable ashore on the plentiful brownfield sites either further south or to those further north. Since the power that Lionlink would be carrying from the Netherlands is not focused on Suffolk, we question why NGV is not considering bringing its cable on land to areas of the UK where it is intended to be consumed. Lionlink should also be considering bundling its cable with other off-shore cables to come into brownfield sites. Lionlink has not proven why it is determined to use greenfield sites in coastal Suffolk but not considering brownfield sites at Sizewell which are already industrialised.

Finally, we note that NGV has not considered the cumulative impact that the multitude of energy project proposals including Sizewell C, the Friston substation for EA1 and EA2, Sealink, Nautilus and others would have on the environment and on the area's inadequate transport infrastructure. Taken together, these projects would have a devastating impact on the lives of the people who live here, on local businesses and community amenity. Even in its own self-interest, NGV should recognise the huge risks of cost and time over-runs that its own project would face in trying to bring its cable and substation onshore in greenfield, protected sites on a very small section of Suffolk coast. There are many far better alternatives.