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Date: 1 November 2023  
Our Ref: ESC response to LionLink supplementary non-statutory  
consultation – 8 Sept to 3 Nov 2023  
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**Re: East Suffolk Council's response to National Grid Ventures' Supplementary Non-Statutory Consultation for LionLink (8 September to 3 November 2023).**

East Suffolk Council (ESC) welcomes the opportunity to comment on the supplementary non-statutory consultation for the LionLink project, being held between 8 September and 3 November 2023. ESC acknowledges that the LionLink project would provide a Multi-purpose Interconnector (MPI) linking the electricity systems of Great Britain with the Netherlands, while also facilitating the connection of Dutch offshore wind to be connected to the MPI. We understand that this supplementary non-statutory consultation focusses on an alternative landfall site at Walberswick and cable corridor to the north of Southwold, with the feedback received being used by National Grid Ventures (NGV) to refine proposals before a statutory consultation is held in 2025 - ahead of the final proposals being submitted in a Development Consent Order (DCO) application.

ESC has reviewed the published consultation materials including the LionLink exhibition banners, maps 1-8, the briefing pack, the consultation leaflet and the published FAQ's for the project. The consultation feedback form is separated into two main sections, with Section One (Q4 – Q9) containing new questions that focus on the alternative landfall and onshore cable corridor options, and Section Two (Q10 – Q22) containing questions about the project as a whole and the other elements of the infrastructure (with these questions also being asked during the 2022 non-statutory consultation).

As ESC previously provided detailed responses for the 2022 non-statutory consultation as copied in Annex B to this letter, this response mainly focusses on the alternative landfall site at Walberswick and cable corridor to the north of Southwold, together with overarching comments reflecting the current planning landscape impacting this project. We have provided a high-level response within the main section of this letter, followed by more detailed technical comments in Annex A.

**Opportunities for coordination**

There has been no mention of offshore connection options being explored in the recent consultation materials. ESC considers this should be fully explored, minimising the need for onshore infrastructure. Should this not be viable, NGV will be expected to provide clear justification why an offshore connection option has not been taken forwards as this is currently unclear in the consultations held. ESC recently wrote to the Rt Hon Claire Coutinho to request a full cost-benefit analysis of the options for connecting all the currently proposed and consented offshore wind, MPIs and reinforcements projects to users in the UK, with prioritisation given to the offshore solutions connecting power directly to areas where the demand is needed and the utilisation of brownfield sites<sup>1</sup>.

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<sup>1</sup> [Letter-from-ESC-to-Secretary-of-State-for-Energy-Security-and-Net-Zero-201023.pdf \(eastsuffolk.gov.uk\)](#).

In our previous response to the EuroLink public consultation (18 December 2022 – copy provided in Annex B to this letter), ESC welcomed the identification of the project as an MPI as part of the Offshore Transmission Network Review (OTNR). However, we also raised significant concerns (which remain current concerns) that there are no firm proposals in place to connect the MPI project to any other UK energy projects, unlike the Dutch offshore wind connections being proposed. It is apparent that LionLink still effectively remains a point-to-point interconnector rather than a MPI in terms of British energy.

Whilst MPIs are still being considered as one of the coordinated solutions within the OTNR, coordinated outputs from the OTNR and its 'Early Opportunities' workstream remain to be identified and secured despite efforts being made by Renewable UK who have been facilitating the exploration of potential solutions for East Anglia. ESC finds such a lack of commitment disappointing. We welcome that NGV, alongside other developers, signed a joint statement committing to exploring coordinated designs in East Anglia, with LionLink also being accepted by Ofgem as a MPI pilot project, however, we were disappointed that LionLink was not also nominated as a pathfinder project.

The LionLink MPI is therefore unlikely to include any offshore coordination at the British end, resulting in missed opportunities for associated coordinated reductions in the extent of the onshore infrastructure. As stressed in our previous consultation response, we find this unacceptable given that NGV has a connection offer in the Leiston area. East Suffolk has significant constraints along the coastline with high environmental sensitivity and designation. Given the anticipated generation predicted to require connection in the area in the future in our region, the lack of offshore wind coordination remains unacceptable. The current absence of any firm commitment to connect the project with British offshore wind in this region highlights that the proposed connection offer in Leiston has been poorly planned, making a connection for an MPI in this area geographically unsuitable, with better opportunities to connect the project up with British offshore wind at other locations.

In addition to the absence of coordination with British offshore wind, it is known that NGV are promoting a separate Nautilus MPI and National Grid Electricity Transmission (NGET) are promoting the SeaLink project, which all have the same proposed connection location. As requested in our previous consultation response, ESC continues to request that should all the projects proceed, NGV and NGET should work together to ensure maximum coordination between the projects is achieved onshore, minimising disruption and environmental impacts introduced through the construction of onshore infrastructure.

The draft Overarching National Policy Statement for Energy (EN-1) states that the preference should be for coordination and seeks to address the need for more coordination in the design and delivery of onshore and offshore electricity transmission infrastructure. This must therefore be fully explored, with robust justification being demonstrated should this not be viable across the proposed projects. ESC cannot at present see clear evidence of a coordinated approach being taken which raises significant concerns. We are also waiting for outputs from the Government piloting Offshore Coordination Support Scheme (OCSS) which is meant to incentivise developers who 'volunteer' coordination through a bidding system to fund feasibility for coordination options. We eagerly await the outputs from this scheme later this year.

#### **Converter station siting, cable routing and connection**

It is noted from the consultation material that NGV remain in the early stages of converter station design, with further details being published in due course. As no new converter station sites have been proposed as part of this supplementary non-statutory consultation, the comments previously provided in Annex B remain relevant. However, the information provided within the consultation materials remains limited at this time in terms of its level of detail.

As previously stated, ESC has significant concerns in relation to the different siting and routeing options proposed, none of which are deliverable without significant challenge and introducing adverse impacts on the rural communities of East Suffolk who are currently facing a significant number of large-scale energy projects being introduced in similar areas and on similar timescales. It is therefore vital that the impacts both during construction and operation are comprehensively considered holistically in relation to the different elements of the project, but ultimately the combined impacts anticipated as a result of the landfall, cable routeing, converter station and connection site. In addition, it is essential that the full cumulative impacts of the project, as well as consented, planned, and forthcoming projects, are fully considered and assessed together to identify both direct and indirect constraints being introduced on the sensitive environment and rural communities of East Suffolk.

Noting that the typical footprint for a converter station site identified in the consultation covers an area of five hectares (12 acres), with an additional two hectares being required for the construction service areas, such a structure would be a significant industrial addition at any of the site options and must be carefully designed to minimise adverse impacts on East Suffolk's heavily designated rural landscape. ESC considers that significant further work is required to comprehensively evaluate the siting and routeing options, including consideration of the factors which ESC has identified as currently missing from the key site selection criteria in Annex B before a preferred site can be identified. It is essential that technical officers from host authorities are provided an opportunity to engage at the early stages in design parameter discussions with the NGV design team and it is requested that such engagement is initiated at the earliest opportunity.

The consultation materials state that in 2017, NGV received a connection agreement from the National Grid Electricity System Operator (NGESO) to connect to a new substation in the Leiston area, and that NGV have assumed that the point of connection will be at the proposed Friston substation as this already benefits from consent. NGV add that an alternative substation for LionLink in the Leiston area would introduce additional above ground infrastructure, and that alternative substation sites were considered as part of the NGESO's grid connection process but were deemed less favourable due to a series of factors, such as technical and environmental challenges and cost. Additionally, NGV has stated that they would not be able to secure a grid connection at another substation location in time to meet government 2030 targets, underpinning their position that alternative substation locations do not represent feasible alternatives for the project. This claim raises significant concern for ESC as discussed later in this section.

Within the consultation materials, Question 4 within the FAQ states that alternative brownfield sites elsewhere are not being considered for the LionLink converter station site as NGV's initial siting and routeing work is based on a connection at the proposed Friston substation, in line with the LionLink project's connection agreement. Additionally, Question 5 states that NGV has identified possible converter station sites within a 5km radius of the proposed Friston substation based upon its experience and industry standard requirements, adding that the most efficient technical solution is to locate the converter station as close to the proposed Friston substation as possible for a variety of technical reasons, including minimising disruption and land take required for cable burial.

ESC recognises that NGV has a connection offer from NGESO in the Leiston area, and that it is proposed that the connection location will comprise the proposed Friston substation consented under the East Anglia One North (EA1N) and East Anglia Two (EA2) DCOs. However, the LionLink connection agreement specifies the Leiston area rather than specifically identifying the proposed Friston site. The DCOs for the Scottish Power Renewables (SPR) projects (EA1N and EA2) identified Friston as the approved site for a National Grid substation and two substations for connecting the offshore wind farms. This was not approved on the basis of comprising a strategic connection hub providing future connections for projects including LionLink.

The SPR projects have also been delayed due to the current legal challenge, and they also did not receive Contract for Difference (CfD) funding in the recent Round 5 Government allocation bringing project certainty

and timeliness into question. It is understood that SPR are waiting for CfD before a fixed commencement date is set for the projects. Therefore, the planning and financial environment has changed introducing greater uncertainty for the projects. It is therefore wrong to assume that a connection in the Leiston area should automatically mean a connection at Friston. The NGV LionLink project team must therefore fully justify why the siting and routing options for the MPI project is focussed on this connection site over other possible locations in the Leiston area, as denoted by the connection offer. Should the SPR projects not go ahead for whatever reason, ESC is unlikely to support the need case for a strategic National Grid substation providing a connection hub being located at Friston solely for the purpose of future connections at that site.

As stated in our earlier response copied in Annex B, notwithstanding this connection offer, ESC is not aware of any specific geographical reason why the LionLink MPI needs to connect in this area. In fact, NGV has recently announced that an alternative connection location is being considered for the Nautilus MPI at the Isle of Grain in the Thames Estuary. If there is indeed no geographical reason why LionLink needs to connect in this area (noting the project does not propose connections with British offshore wind in this region), ESC would welcome NGV similarly exploring alternative connection opportunities for this project which could provide greater opportunities for coordination.

The siting and routing options are predicated on the SPR consents and should there be any change to the status of the consents in the future, NGV will need to review the principles underpinning the site selection process for the LionLink project. The published consultation materials also fails to assess or even consider the possible opportunities and benefits resulting from the collocation of converter station sites with connection location options. ESC continues to have significant concerns about the current proposals for this project and does not accept the current justification provided by NGV for the proposed converter station sites, or the need case for the additional connection at SPR's Friston site for the reasons stated.

#### **Alternative Walberswick Landfall G2**

It is understood from the review of published consultation materials that the proposed refinements to the LionLink project resulted from the feedback received during the 2022 non-statutory consultation. NGV has highlighted that traffic and access concerns were raised in relation to the original Walberswick landfall location (Landfall G) which resulted in an alternative landfall site (Landfall G2) being identified further to the west of the original site. The supporting material highlights that G2 has been selected as it helps to reduce access constraints and potential traffic impacts within the area. It is acknowledged that key considerations used by NGV in site selection included avoiding the temporary loss of use at the beach carpark and associated disruption to users of the beach huts during construction. It was also stated that G2 would result in a reduction of impact resulting from construction traffic for the Town of Walberswick, also avoiding the bridge crossing over the Dunwich River, and where possible, reducing the potential impacts on designated sites.

Whilst landfall G2 is not located within any designated nature conservation sites, it is immediately adjacent to part of the Minsmere-Walberswick Special Protection Area (SPA); Minsmere-Walberswick Ramsar Site; Suffolk Coast National Nature Reserve (NNR) and Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), all of which are located to the south of the site. In addition, any cable landfall at this location will also have to cross the Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC) located to the southeast of the site. It therefore appears that whilst the use of this site as a landfall would not result in any direct loss of, or damage to, any designated nature conservation site, it is likely to result in indirect impacts on the neighbouring sites.

In terms of heritage and conservation constraints, landfall G2 is adjacent to the Walberswick Conservation Area boundary and would be even closer to listed heritage assets than landfall G including The Old Corner House (Grade II), Thorpe View (Grade II) and the Barn at Thorpe View (Grade II). The visual impact of the landfall site on the listed buildings during operation is likely to be limited due to the intervening development, however the impact on the Conservation Area could be greater.

It is also noted from the consultation material that landfall site G2 introduces the potential for a construction haul road that could 'mostly avoid Walberswick', however limited detail has been provided on this within the published consultation materials. ESC therefore has concerns as there does not appear to be any direct connection to The Street/B1387 from the G2 site, other than via Stocks Lane, which is very narrow and residential in nature. For a haul road to access site G2, it is anticipated that this would need to link back on to Lodge Road to the west of the Town, running across agricultural land to the south of Misty Acre in proximity to the rear gardens associated with the residential properties on Seven Acres Lane. This is a concern due to its inevitable impacts on residential amenity for occupants. Walberswick Parish Council has expressed concerns to ESC stating that the additional site moves landfall from the edge of the beach to the middle of the settlement which will make things worse for the residents of Walberswick if this option is progressed.

Whilst offering a new landfall location which does not impact upon the beach car park and beach huts is welcomed, landfall G2 appears to introduce potential new impacts for the residents of Walberswick which must be fully considered before a decision is taken on the preferred landfall location.

#### **Alternative underground cable 'northern' search area**

The published consultation materials identify an alternative onshore underground cable corridor to the north of Southwold, linking proposed landfall site F with the original underground cable search area to the south of the A12 at Blythburgh. The consultation materials highlight that this alternative underground cable 'northern' search area has been identified to help reduce potential impacts on designated sites of ecological importance.

Whilst the alternative 'northern' search area does not include any statutory designated nature conservation sites, it does include a number of non-statutory sites (County Wildlife Sites) and also appears to involve crossing the River Blyth upstream of the Minsmere-Walberswick SPA; Minsmere-Walberswick Ramsar Site; Suffolk Coast NNR and Minsmere-Walberswick Heaths and Marshes SSSI.

The use of this corridor may not result in any direct impacts on statutory designated nature conservation sites, however it introduces the potential for indirect impacts which must be fully assessed before this route option is potentially progressed. Potential impacts on non-statutory designated sites (direct or indirect), as well as protected species and UK Priority habitats and species, must also be fully assessed.

In terms of heritage constraints, the alternative cable corridor search area to the north of Southwold includes many Grade II listed buildings (and some Grade II\* buildings), similar to the other cable route search areas. Cable routes have the potential to affect the setting of designated heritage assets through impacts in their landscape setting, the extents of which are not fully understood currently. This must be fully understood prior to a preferred cable corridor being progressed. ESC will not support unacceptable levels of harm being introduced upon heritage assets forming part of East Suffolk's historic landscape.

In terms of coastal management constraints, the alternative northern search area is located in proximity to a section of defended coast that is due to receive significant management works over the short and medium term. Experience at other sites has shown that the presence of a cable landing on this frontage has the potential to limit options for coastal management and/or future works at that location, and in some cases, this can obstruct the coastal management process, adding additional cost.

Southwold Town Council has expressed concerns to ESC regarding the apparent lack of information available supporting coastal erosion calculations resulting from landfall and cabling activities. They asked the NGV team representatives for further detail on this at the recent Reydon consultation event and have been informed that this has not been looked at in detail yet so there were no answers available at the time. Such a response does not instil confidence in the local community.

If the alternative cable corridor is pursued by NGV for this project, in reference to ongoing access works related to coastal process management, ESC will require the developer to bear the ongoing cost associated with heavy construction equipment associated with coastal management activities crossing over the line of the cable. The northern cable corridor option should therefore include either the installation of a permanent cable crossing point, or temporary works for the duration of each / every new build / maintenance activity to ensure heavy equipment activities are not restricted. This includes (but is not limited to) the demolition and removal of existing defences, pile driving and pile extraction, rock armour placement and excavation.

It is apparent that the northern search area includes a 'pinch point' to the north of Reydon between Green Lane and Rissemere Lane East/Smear Farm. This raises significant concerns as such a narrow area of search limits the potential for micro siting and landscape mitigation options, passing in very close proximity to local residents. The gap between Green Lane to the south and Rissemere Lane East to the north is estimated to be circa 400m, with residential property and gardens being located within this at both the northern and southern end. There is also the Jubilee Camping and Caravan Club site together with a large, elongated pond running north-south which are both located centrally within this land parcel, further constraining cable routing options. Sufficient assessment of the potential impacts introduced on residential amenity must therefore be assessed. However, should this cable route be selected, it is unlikely that negative impacts could be fully avoided at this 'pinch point', which is not likely to be acceptable.

Reydon Parish Council has also raised concerns with ESC about the potential for permanent landscape scarring in this area, noting that cable trenching through sensitive marshes will likely have a permanent hydrological impact at Reydon, as well as other environmental impacts. Should the alternative cable corridor be progressed, this must be sufficiently assessed with any such impacts being avoided.

#### **Additional comments**

ESC has received feedback from Town and Parish councils which highlighted that the leaflets circulated for the consultation events were not clear for residents, resulting in many being mistaken as junk mail or spam and subsequently discarded. We appreciate this comes down to individual actions, however wanted to bring this to your attention for consideration in future consultation publicity.

Additionally, Walberswick Parish Council has raised concern in relation to the consultation materials implying that local communities have been listened to and that local concerns have been taken into account. This has not been well received by the local communities potentially affected by this project in light of the vocal concerns being raised. Local community perceptions are often that their concerns have not been listened to. ESC has recently been made aware by local representatives that such a claim in the consultation materials is disingenuous and insulting to potentially affected communities.

Concerns were also raised regarding the absence of any SeaLink project representatives being available to answer questions at the recent LionLink in person events held across East Suffolk. We note from the consultation materials in the FAQ (Question 10) that NGV and NGET decided to hold separate exhibition events for the non-statutory consultations, advising that the LionLink supplementary non-statutory consultation events will have leaflets advertising the SeaLink project which will be provided by the SeaLink team and that this will be replicated vice versa at the SeaLink statutory consultation events. ESC had requested representatives from the Sea Link project to be present at the LionLink public events and we feel that their absence at LionLink in person events was a missed opportunity, as the local community had questions for both project teams together which went unanswered. In light of this, joint in person events (or some degree of overlap) would have been beneficial for all parties.

In addition to the specific comments made in relation to the management of this consultation, ESC would also like to highlight the need for greater coordination between the various NSIPs projects within the consenting phase, particularly in relation to the Sea Link and Nautilus projects. Engaging during the pre-application and consenting phases of the projects places a huge burden on local communities and the local authorities, it is essential that every effort is made to ensure that greater coordination is incorporated to ensure that the impact of these phases is minimised. This could be achieved through combined consultations, cojoining or single examinations etc. should timings align. This is a matter which ESC is keen to continue discussing with NGV and NGET.

### **Summary**

ESC continues to have significant concerns regarding the LionLink project for the reasons set out in this letter. We therefore maintain our objection to this project based on the current proposals. The LionLink project fails to deliver coordination with British offshore wind energy providers (or any other British energy project), missing vital opportunities to reduce the amount of onshore connection infrastructure required across projects within our region. NGV will be required to demonstrate the geographical need case for a connection at Friston in light of the current uncertainties discussed.

The landfalls identified within the consultation remain of significant concern and will result in undesirable adverse environmental, economic, and social impacts. East Suffolk is a highly designated landscape with high ecological sensitivity to proposed development. ESC considers an alternative connection elsewhere would enable the potential use of the multi-purpose element of the interconnector to facilitate connection to offshore wind projects.

As previously raised, should NGV progress the LionLink project within East Suffolk, onshore coordination must be maximised through coordination with the Nautilus project and NGET's Sea Link project. This will be a minimum expectation of ESC and the local communities we represent. ESC would urge NGV to focus on siting and routeing options which can facilitate this level of coordination. We remain disappointed at the lack of demonstratable coordination between projects and maintain our strong objection to the current proposals.

ESC also maintains that insufficient information has been provided within the consultation to give the Council confidence that the siting and routeing options presented are viable. There are significant challenges in relation to securing an appropriate landfall, cable route and converter station site for the project and managing and mitigating the impacts at the connection site. ESC considers that further work is necessary to demonstrate the viability of the siting and routeing options proposed prior to NGV selecting and progressing associated works on preferred options.

We understand that NGV will analyse the feedback received in this supplementary non-statutory consultation informing the DCO application submission in 2025. ESC would welcome communication in relation to the formal round of consultation to progress a positive dialogue with the project team, and we would welcome discussion with NGV, NGET, and the Planning Inspectorate at an early stage regarding how the consenting process could be managed. Finally, ESC would welcome ongoing discussions in relation to securing a mechanism to ensure the level of input required can be appropriately resourced.

Yours sincerely,



Philip Ridley BSc (Hons) MRTPI | Head of Planning and Coastal Management  
East Suffolk Council

## **Annex A – East Suffolk Council Technical Summary - Alternative landfall site (G2) at Walberswick and alternative underground cable corridor to the north of Southwold.**

### **1. Landscape**

- 1.1. Regardless of which landfall and cable routes are selected, it is inevitable that significant landscape and visual impact effects will arise during the construction period. Whilst the restoration of farmland is relatively straightforward, the indicated cable route and landfall areas include more sensitive landscapes, the fabric of which is likely to be more challenging to restore successfully in the early years after the project's completion. This is particularly true of uncultivated semi-natural landscapes. This could result in lasting change to landscape character which would be unacceptable to the Council.
- 1.2. Irrespective of which cable route is selected, its construction will inevitably lead to impacts on and losses of field boundary hedgerows and trees, and possibly woodlands. It is expected that all potential such impacts will be assessed and identified by the developer using relevant professional standards and guidance. Where notably adverse impacts are identified to be affecting important trees, hedgerows and woodlands, the Council expects that these landscape features will be retained as the first option and micro-siting used to avoid and prevent the anticipated impacts. Unjustifiable loss of key landscape elements will not be acceptable to the Council.
- 1.3. Further, the Council expects that the anticipated landscape and visual impacts arising from the chosen converter station and connection sites, and their significance, will be fully assessed so that they can be understood by all parties. Where identified, the Council expects that effective, appropriate, and achievable mitigation measures will be put forward to minimise the anticipated landscape and visual effects/impacts.

### **2. Terrestrial Ecology**

- 2.1. In addition to the terrestrial ecological comments previously provided in Annex B to this letter, our overarching comments in relation to following the principles of the mitigation hierarchy remain relevant for the supplementary non-statutory consultation focussing on the alternative landfall site and underground cable corridor. The only amendment we wish to make is to recognise that Map 6 (Environmental Constraints Overview: Landscape and Ecology) has now been updated to include SSSIs and NNRs, however it continues to omit locally designated (Local Nature Reserves (LNRs) and County Wildlife Sites (CWSs)) sites. It therefore remains unclear whether these have been considered as part of this process to date. Given the importance of such sites, it is essential that impacts on them are considered as part of the project.
- 2.2. The consultation documents also do not appear to consider the potential for impacts on UK Priority habitats (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)); protected species or UK Priority species, again these must be considered as part of the assessment of potential options for this development.
- 2.3. ESC remains disappointed with the lack of information and engagement on ecological matters prior to this consultation given the number ecological constraints the project faces (highlighted on Map 6 Environmental Constraints Overview: Landscape and Ecology).



- 2.4. In reference to the siting and routing options, all comments previously provided (Annex B) regarding the proposed landfall, cable route and converter station options remain relevant for this supplementary consultation, no new information appears to have been provided by NGV.
- 2.5. Considering the alternative Walberswick landfall site (G2), whilst this proposed landfall option is not located within any designated nature conservation sites, it is immediately adjacent to part of the Minsmere-Walberswick SPA; Minsmere-Walberswick Ramsar Site; Suffolk Coast NNR and Minsmere-Walberswick Heaths and Marshes SSSI (all to the south), in addition, any cable landfall at this location will also have to cross the Minsmere to Walberswick Heaths and Marshes SAC (to the south-east). It therefore appears that whilst the use of this site as a landfall would not result in any direct loss of, or damage to, any designated nature conservation site, it is likely to result in indirect impacts on the neighbouring sites.
- 2.6. Considering the alternative onshore underground cable corridor to the north of Southwold, although this cable corridor does not include any statutory designated nature conservation sites, it does include a number of non-statutory sites (County Wildlife Sites) and also appears to involve crossing the River Blyth upstream of the Minsmere-Walberswick SPA; Minsmere-Walberswick Ramsar Site; Suffolk Coast NNR and Minsmere-Walberswick Heaths and Marshes SSSI. Whilst the use of this corridor may not result in any direct impacts on statutory designated nature conservation sites, the potential for indirect impacts remains, and must be fully assessed before this route option is potentially progressed. Potential impacts on non-statutory designated sites (direct or indirect), as well as protected species and UK Priority habitats and species, must also be fully assessed.

### 3. Environmental Protection

- 3.1. The overarching comments previously provided (Annex B) remain valid for the supplementary non-statutory consultation's alternative landfall and cable route options.
- 3.2. Additional feedback has been provided in the main body of this letter.

### 4. Heritage and Conservation

- 4.1. Considering the alternative landing site proposed in Walberswick (G2), this site is adjacent to the Walberswick Conservation Area boundary, and closer to The Old Corner House (Grade II), Thorpe View (Grade II) and the Barn at Thorpe View (Grade II) than the original Walberswick landing site G. The visual impact of the landfall site on the listed buildings during operation is likely to be limited (or none) due to the intervening development, however the impact on the Conservation Area could be greater. The consultation material provides limited information on how landfall site G2 would be accessed. There does not appear to be any direct connection to the street, other than via Stocks Lane, which is very narrow.
- 4.2. Considering the alternative onshore underground cable corridor to the north of Southwold, this search area includes many Grade II listed buildings and some Grade II\* buildings, similar to the other cable route search areas. Cable routes have the potential to affect the setting of designated heritage assets through impacts in their landscape setting, the extents of which are not fully understood currently.

## 5. Coastal Processes

- 5.1. The adequacy of the coastal process comments previously provided (Annex B) remain valid for the supplementary non-statutory consultation's alternative landfall and cable route options.
- 5.2. It is noted that technical appraisals, surveys and engineering studies for all options are ongoing for the LionLink project. Having reviewed the consultation material, we are extremely disappointed that NGV has not included interaction with coastal defences, coastal change and planned coastal management actions in line with the Shoreline Management Plan (SMP7<sup>2</sup>) among the criteria under which the technical appraisals are proceeding at this stage of the project. ESC and Coastal Partnership East (CPE) requested that this be considered in our previous consultation response (Annex B), however details of this assessment have not yet been provided for consideration.
- 5.3. Considering the alternative onshore underground cable corridor to the north of Southwold, the cable landing corridor runs through a section of defended coast that is proposed to receive significant management works over the short and medium term to deliver policy. These works are described in high level terms in SMP7. More detail can be provided by ESC and the Environment Agency who have joint management responsibility for the frontage. Experience at other sites has shown that the presence of a cable landing on this frontage has the potential to limit options for coastal management and/or future works at that location, and in some cases, this can obstruct the coastal management process and add additional cost.
- 5.4. If the alternative onshore underground cable corridor to the north of Southwold is pursued by NGV for this project, in reference to ongoing access works related to coastal process management, ESC will require the developer to bear the ongoing cost associated with heavy construction equipment crossing over the line of the cable. The cable corridor option should therefore include either installation of a permanent cable crossing point or temporary works for the duration of each / every new build / maintenance activity to ensure heavy equipment activities are not restricted. Additionally, the developer will be required to position the cable in a location that does not prevent works that are anticipated to occur at the site based upon current policy (SMP7) and strategy documents. This includes (but is not limited to) demolition and removal of existing defences, pile driving and pile extraction, and rock armour placement and excavation.

## 6. Economic Development and Regeneration

- 6.1. The Economic Development & Regeneration (ED&R) team provided feedback on the project in the initial non-statutory consultation (Annex B), where the significance of the scheme in terms of its size, scale, and permanence were recognised; and the potential for adverse economic impacts during the construction, operation, maintenance, and de-commissioning lifecycle of the scheme were commented upon.
- 6.2. The current non-statutory consultation by NGV summarises the feedback received during the initial consultation and outlines how NGV have responded to this feedback. Three key issues were highlighted by consultees in 2022, including a preference for coordinated infrastructure options, avoiding protected areas, and cumulative impact on local communities. The ED&R team maintain

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<sup>2</sup> <https://www.eastsuffolk.gov.uk/environment/coastal-management/coastal-strategies-and-schemes/>

that NGV needs to continue their efforts to minimise the adverse impacts of the scheme, especially those cumulative impacts caused by multiple, concurrent infrastructure developments proposed within the East Suffolk District.

- 6.3. Recognition by NGV that there are specific concerns about the impact of multiple developments on the visitor economy is welcome and ESC would wish to work with NGV to develop a mitigation strategy which could be implemented should the project go ahead.
- 6.4. ESC notes the continued evolution of site selection for onshore infrastructure, noting that NGV has identified an alternative landfall site at Walberswick (G2), and an alternative onshore underground cable corridor to the north of Southwold. The comments provided in the previous consultation response (Annex B) remain relevant.
- 6.5. The ED&R team would like to emphasise the expectation that NGV addresses the concerns raised in the previous non-statutory consultation and incorporates appropriate assessments within their site selection criteria. Specifically, focussing on a preference for coordinated infrastructure options, avoiding protected areas, and cumulative impacts on local communities as highlighted in the previous feedback provided.

**Notes from Town and Parish Council Meeting held on 3 October 2023 to discuss the LionLink Supplementary Non-Statutory Consultation.**

**Attendees:**

Pam Cyprien	Councillor, Reydon Parish Council
Simon Flunder	Councillor, Southwold Town Council
Rebecca Whiting	Councillor, Walberswick Parish Council
Josie Bassinette	Councillor, Walberswick Parish Council
Philip Hall	Councillor, Uggheshall Parish Council
Jude Blois	Councillor, Blythburgh Parish Council
Mike Wilkinson	Councillor, Wenhaston Parish Council
Peter Wildish	Councillor, Wenhaston Parish Council

**East Suffolk Council – Officers:**

Philip Ridley	East Suffolk Council (ESC)
Naomi Goold	ESC
Bethany Rance	ESC

**East Suffolk Council – District Councillors:**

Cllr David Beavan	ESC Councillor, Southwold
Cllr Tom Daly	ESC Councillor, Aldeburgh and Leiston
Cllr Paul Ashton	ESC Councillor, Wrentham, Wangford and Westleton

**Agenda for the meeting:**

- Introduction from Cllr Daly;
- Brief presentation by East Suffolk Council;
- Questions and comments from Town and Parish Councils and Ward Councillors;
- Next steps, thank you;
- Close of meeting.

**Discussion topics and questions:**

- We want to hear from you in relation to the project and the current options presented.
- What are your key concerns in relation to the siting and routeing options identified?
- Do you consider there are any advantages to any of the siting or routeing options?
- Do you have any preferred options?
- Comments on coordination.

**Walberswick Parish Council:** dismay that ESC threw us all under the bus in not objecting to the proposals for Sizewell C and EuroLink. Thankful for new administration, welcomed new motion on ESC's view of energy projects. Conversation is now much more useful. Perception that ESC has been strongly pro-development no matter the impact previously.

Troubling that Lionlink is adding new sites rather than taking things away. For Walberswick, statements in the consultation that Lionlink "listened to us" are disingenuous and it is insulting to publish materials that say concerns have been taken into account when clearly they have not. Adding an additional site that moves from the edge of the beach to the middle of settlement is making things worse for Walberswick.

People are finding it extremely stressful given lack of information. Engineers really tried to engage, but when push comes to shove, admitted that they didn't have the answers because usually they don't build on greenfield sites. People at the consultation event were being told different timescales and methods. This all creates extra stress.

If this project continues, the developer needs to be more honest and straightforward rather than having the pretence of consultation.

In terms of processing, when will the developer specify their preferred site?

**ESC** – most developers narrow down to preferred site for statutory consultation, at the point the Preliminary Environment Information Report (PEIR) is provided, and surveys/assessments must be done. 2025 – DCO submission so statutory consultation to be held earlier in 2025 according to NGV's programme.

**Clarification** – will there be an Examining Authority (ExA)? Need to marshal resources to engage in Development Consent Order (DCO) process.

**ESC** – yes, DCO consenting process includes examination administered by the Planning Inspectorate, as part of this an ExA will be appointed.

**Clarification** – 2030 for operation – is that when they start or finish?

**ESC** – switch on in 2030, operational. Building 2026 onwards, finishing by 2030.

**Blythburgh Parish Council:** shares lots of concerns with Walberswick. Difficulty at consultation events with National Grid Ventures (NGV) and other National Grid branches, pushing answers to another branch. Environmental studies have begun already. Need more detail on construction and restrictions post-construction for reinstatement. When does reinstatement happen? Couldn't get answers on drilling out to shore, whether drilled or trenched, at consultation event. Not sure what is left after the construction period – could be 100m corridor that cannot be replanted/re-used. Engineers have given contradicting information.

**ESC** - noted swathes/parameters often start out large in early project development and are generally refined to reduce widths throughout project development. Balance of providing enough information for public to engage with, and not giving too much information so people feel like all decisions have been made. Reinstatement planting can be done, can be limited by not being able to plant trees on top of cable routes but can plant hedgerows.

**Blythburgh Parish Council:** landing stage at Sizewell connected to National Grid, why is that not considered appropriate?

**ESC** - SeaLink has considered Sizewell and said due to existing cabling including that from Galloper and Greater Gabbard and other constraints of Sizewell B and the coralline crag, there is not enough space for a coordinated multiple-cable route. SeaLink said enough space for one project but would only be one, meaning no coordinated multi-project landfall.

**Southwold Town Council:** supports all comments made. Questioning premise of bringing cables into this area. What can ESC do to argue that this is not the right area? We know there are arguments about offshore grids/converter stations, and we know there are brownfield sites like Bradwell which should be considered. This is creating divide and rule feeling.

**Reydon Parish Council:** agree with the points Josie has made. LionLink obviously doesn't know the area, how the area for the hub can be accessed by construction vehicles, environmental & business impact. No mention at all of offshore options. Reydon is having a public meeting on 27 October. Will send Reydon's stance for meeting on 27th & piece written for the Gazette.

**Cllr Daly:** LionLink has told me they will be challenging connection agreement. Public concern is so strong they are challenging back on connection agreement. Nautilus has decided to look elsewhere to Isle of Grain and are now scoping. Independent variable is connection agreement from National Grid. Connection agreements are legal agreements. SPR/LionLink may need to be incentivised to think again to change their approach. ESC has put its weight behind that to look at offshore options and put pressure on developers.

**ESC** - ESC raised an objection at previous LionLink consultation.

**Walberswick Parish Council:** following up on Jude's questions on Sizewell. If SZC did not go ahead, there would be a large brownfield site at Sizewell A and Sizewell B. If there was sanity in process and a good argument to be made for using big pylons already there connecting Sizewell, issue would be not building Sizewell C and then there would be room for the cables.

**ESC** - East Anglia One North (EA1N) and East Anglia Two (EA2) offshore wind farms looked at Sizewell, timeline for decommissioning for Sizewell A (SZA) did not align with projects. Lots of other constraints including communications cables, offshore wind farm cables, coralline crag, Sizewell B, all posed significant challenges. Based on current circumstances with no SZC, EA1N and EA2 discounted the option as not viable.

**Walberswick Parish Council:** is there clarity on pylons? Are new pylons needed?

**ESC** - as part of Connections and Infrastructure Options Note (CION) process, the capacity and deliverability in specific locations is examined, in addition to the cost of providing connection in those locations and what infrastructure would be needed, National Grid state that environmental factors are also considered. The objective is to ensure the most economic and efficient connection option is identified. This is then used to identify where connection should be. No projects at present proposing pylons except for SZC, all cabling is currently proposed to be undergrounded.

**Cllr Beavan, ESC:** there will not be capacity to take power to London, so pylons may be needed here. What will happen for additional windfarms waiting for connection – will they come to Suffolk? ESC cabinet is fully behind Cllr Daly's motion, determined to stop this in its tracks.

**ESC** – can push back hard on coordination in this consultation. Government piloting Offshore Coordination Support Scheme (OCSS) to incentivise developers who volunteer coordination. Bidding system to fund feasibility for coordination options. Waiting for outputs from OCSS, hopefully this year. Difficulty that current cable designs are limited for capacity. Cabling has limits of up to 2GW. Same with substations and converter stations, at a certain capacity point the size has to increase. However, with clear direction from Government supply chains could potentially react.

**Cllr Beavan, ESC:** the GW limit can be broken. Capacity issue, infrastructure issue. Government needs to get involved. Government should provide offshore grid.

**Walberswick Parish Council:** hard to understand how Sizewell can be excluded even before the non-statutory consultation, and yet Area of Outstanding Natural Beauty (AONB) was not excluded. Hard to trust developers

with limited information. If certain areas have been excluded because of existing cabling and other constraints like coralline crag, why has none of the literature made that clear? Would like to see clear maps showing why options have to be these areas and not brownfield sites, Sizewell, or other sites.

**ESC:** SeaLink looked at Sizewell, argued only one project could make landfall here due to the constraints. EA1N and EA2 looked at it more closely. For Bradwell, at time of connection agreement, National Grid Electricity System Operator (NGESO) looked at what infrastructure would be needed at Bradwell to form a connection there and took the view that it was less economic and efficient. Coralline crag is a crucial constraint for Sizewell Bay, concern about coastal processes. Concern about projects drilling through coralline crag and impacts on coastal processes. One project has drilled through crag, have dissuaded others.

**Walberswick Parish Council:** unsure how drilling into crag is worse than drilling into a beach/dune. Would like more information on impacts for both.

**Cllr Ashton, ESC:** working in the wrong direction with approach to connections, does not feel strategic at all. Need to impress the importance of net zero and government ambitions.

**Cllr Daly, ESC:** lack of intelligent application and strategic approach. Strategic approach needs to start now, and we have communicated this to government. Projects already in the pipeline like Scottish Power Renewables (SPR) and LionLink need to fall under strategic approach, response has been no. Any delays to projects in pipeline would limit reaching carbon reduction targets. Starting now in the most efficient strategic way is the best way to achieve carbon reduction. Bradwell requires less network reinforcement, nearer demand in London, would come in at 3 billion, Friston 2.7 billion. Bradwell has lower social and environmental impacts which makes it a better choice.

**ESC** - would be useful to gauge understanding if people feel – while we make comments about offshore options and alternative sites, should matters still progress in East Suffolk as expected, we need to make comments about how we shape those proposals. Are there views that there are benefits of looking to coordinate?

**Uggeshall Parish Council:** attended Reydon meeting, and the lanyard people were nice but couldn't answer many questions. Arguing in the dark. Limited time and resources to engage. Has ESC got a strategic view on its approach to this project?

**ESC** - at present, ESC has not directed LionLink in terms of specifying the siting and routeing. Where LionLink identifies corridors, we have highlighted challenges and areas where we think difficulties will be had, i.e., cable routes near properties and businesses, and given technical input. We have given comments on sites we think would be extremely challenging and have identified constraints as we see them.

**Uggeshall Parish Council:** experience that reinstatement can be done well. Construction requires space and time, can look awful, but once reinstatement has been done, can be difficult to tell where cables/pipelines go.

**Walberswick Parish Council:** correct for ESC not to specify which communities should host. In response to the statement made by Uggeshall Council, it was important to note that impacts from landfall and substations are different and longer lasting than cable routes. Huge issue for coastal Suffolk, need to maintain focus on local impacts and not be sold on storylines from national government and National Grid that this impact can be bought off with community benefits like village halls.

**Southwold Town Council:** asked about coastal erosion calculations at Reydon consultation event and was told it hadn't been looked at yet, should be part of the whole planning process.

**Reydon Parish Council:** relating to earlier comments about lack of permanent landscape scarring, the argument doesn't apply when going through sensitive marshes which will have a permanent hydrological impact which will happen at Reydon as well as other environmental impacts. On coastal erosion – have been told the lifetime of a hub at, e.g. Easton Bavents is 50 years, many of us feel that the area will be significantly different in 10-20 years.

**Cllr Daly, ESC:** thanks for attending and engaging. Notes to be shared and will inform ESC's consultation response and appended to our consultation response.



**Annex B - Copy of ESC response to National Grid Ventures Non-Statutory Consultation on the EuroLink Multi-purpose Interconnector Project - 18 December 2022**