



LionLink – National Grid Ventures  
Supplementary Non-Statutory Consultation  
Suffolk County Council Response  
November 2023

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## 1. Introduction

- 1.1. These comments of Suffolk County Council (SCC) are in response to the supplementary non-statutory consultation held by National Grid Ventures (NGV) between 08 September 2023 and 03 November 2023.
- 1.1. The scheme consists of a 1.8GW Multipurpose interconnector (MPI) which will provide a new electricity link between Great Britain and the Netherlands and connect to Dutch offshore wind turbines.
- 1.2. The onshore infrastructure in Suffolk will consist of a Converter Station, onshore DC Cables, onshore AC cables and a transition bay. The onshore AC cables will connect the converter station to the consented, but as yet unbuilt, National Grid ET substation at Friston in East Suffolk, which SCC understands is likely to require additional infrastructure (and probably extension) to accommodate a connection for LionLink.
- 1.3. The SCC electoral divisions affected include:
  - Aldeburgh and Leiston.
  - Blything.
  - Felixstowe Coastal.
  - Felixstowe North and Trimley.
  - Halesworth.
  - Kessingland and Southwold.
  - Lowestoft South.
  - Wilford.
- 1.4. This representation provides an update on SCC's position, and comments on the additional options proposed; Landfall G2, and the alternative cable route from Landfall F. For detailed comments on the other landfall and cable route options please refer to SCC's response to the previous non-statutory consultation (December 2022).
- 1.5. SCC continues to be concerned about the very limited information which is being provided by NGV to explain its proposals, including in particular the factors to explain the choice of options presented. SCC expects to see a much clearer and more accessible approach adopted in future consultations. SCC is particularly concerned that the current consultation appears to have paid no regard to the central findings of the previous consultation (as summarised in the Interim Non-Statutory Consultation Feedback Summary Report of August 2023) that many respondents (the overwhelming majority once the 'don't knows' are discounted) wanted to see a commitment to co-ordination with other projects and that concerns were raised about the cumulative impact of energy projects on the affected communities. Notwithstanding this clear message, the current consultation seems to focus almost exclusively on options that will not accommodate co-ordination and will increase the potential for cumulative impacts.

- 1.6. SCC is also disappointed that the Consultation Feedback Summary Report has not reflected the many and detailed matters raised by SCC and that it shows little sign of having informed the current consultation.

## 2. General Comments

- 2.1. Please refer to the previous SCC non-statutory consultation response for comments on the need for the project, SCC's energy infrastructure policy, and the need for an exemplary approach to minimising long-term impact.

### **The case for coordinated consenting and full examination of alternative connection options**

- 2.1. SCC continues to expect the fullest possible coordination and co-location of LionLink's onshore cable corridor and infrastructure with those of the emerging proposals for the SEALink project, in order to minimise the combined impacts of the two projects. Any proposals that would reduce the level of coordination would require very robust justification as to why greater coordination is not achievable, and a full assessment of increased levels of impacts across both projects.
- 2.2. Therefore, the Council considers that it is essential that landing point E, at Aldeburgh, must be retained as an option, and should be considered the least harmful option moving forward as it offers the potential for maximum coordination which minimises the duration and spatial extent of harm during construction. Hence this coordinated landfall and cable corridor must be carried forward through scoping to be included as a potential route for connection, to a shared converter station site with the SEALink project, for consideration in full as an option, at the DCO examination.
- 2.3. The County Council maintains its stance that coordination between projects, including via the utilisation of closely parallel onshore cable routeing, should be a top priority in order to minimise the impacts upon the Suffolk coastline and because of this and other reasons considers that the potential northern routes are unacceptable. To ensure suitable public scrutiny and consideration in the examination, it will be essential for a coordinated landfall and cable corridor option to be considered as an available option within the examination, rather than this being potentially relegated solely to a chapter regarding consideration of alternatives, even if this is not the chosen option. This should include a full Environmental Impact Assessment.
- 2.4. If, despite SCC's position, in a future LionLink Section 42 consultation, the developer favours an option that does not allow maximisation of onshore coordination, the Council considers that the extent and magnitude of additional impacts of an uncoordinated approach to cable corridors, on the ecology, communities, and landscapes in East Suffolk, must be considered in full at examination, and cannot reasonably be relegated to a chapter covering the consideration of alternatives, in the Environmental Impact Assessment.
- 2.5. Given the spatial interdependencies of the two projects, and the expectation in the emerging NPS for coordinated approaches, the Council would urge National Grid Group to fully align the two projects, LionLink and SEALink, both spatially, and by aligning their timing and development across National Grid's two divisions.

- 2.6. The alignment of project development and consenting by National Grid Group would enable National Grid to request that the Planning Inspectorate achieve coordinated consenting, by considering both projects simultaneously, using a single panel of examiners. Such an approach would not only reduce the impact of the consenting process on communities and statutory consultees, but it would also allow for a much more effective examination of the issues of coordination and cumulative impacts, and would therefore, significantly improve public confidence regarding the consenting and delivery of these projects.

### **Design Principles**

- 2.7. The previous SCC non-statutory consultation response included Siting and design principles, for the connection of offshore wind and interconnector infrastructure in Suffolk (Appendix B). In addition, the proposals should accord with the following design principles:
- 2.7.1. **Engagement:** with Parish Councils, local residents and relevant authorities.
  - 2.7.2. **Design:** Sensitive to place, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, coloration and finishes
  - 2.7.3. **Height:** substation building, and ancillary equipment will be kept to a minimum and the slab level will be set at the lowest practical level
  - 2.7.4. **Landscaping:** to minimise the visual intrusion, and respond to local landscape character and biodiversity; considered in the building design and layout of ancillary structures
  - 2.7.5. **Embedded ecological mitigation and enhancement:** with particular attention to lighting, large areas of glass and baffling of noise sources.
  - 2.7.6. **Sustainable Drainage (SUDS):** to be developed in accordance with DCO Requirements.
  - 2.7.7. **Engagement:** Through development of the final design and landscaping proposals provide opportunity to engage with local communities who will be directly affected by the substation.
  - 2.7.8. **Design review:** The design should be subject to design review, in consultation with the relevant local authorities.

### **3. Additional Siting Options**

#### **Landfall G2 (Walberswick - Alternative landfall)**

- 3.1. SCC considers this landfall site unacceptable and would not support landfall at this location. Landfall G2 is highly constrained and does not allow for the coordination and co-location of other projects.
- 3.2. The site is close to residential properties and is highly constrained in regard to highway access.
- 3.3. The Landfall is located within the Suffolk Coasts and Heaths National Landscape (AONB), and the cable route would be likely to impact the Minsmere-Walberswick Ramsar site and SPA, the Minsmere-Walberswick Heaths and Marshes SSSI, and the Minsmere to Walberswick Heaths & Marshes SAC.
- 3.4. SCC's concerns about Landfall G (Walberswick) remain as previously set out.

#### **Landfall F(Southwold/Reydon – Alternative cable route)**

- 3.1. SCC considers Landfall F and the northern cable route unacceptable due to the distance from the Friston substation and the substantial length of onshore DC cable this would require. Landfall F is also unacceptable because it does not allow for the coordination and co-location with other projects.
- 3.2. The cable route passes through the Suffolk Coast and Heaths National Landscape (AONB) and would likely require areas of Horizontal Directional Drilling (HDD) to avoid a significant impact on the highly sensitive landscape of the Wang River and Blyth River Valleys.
- 3.3. Highway access to the site is constrained, and not considered suitable for construction traffic. The need for the cable route to cross the A12 twice to achieve a connection to the Friston substation is also a potential concern, given the importance of this traffic corridor for movement in East Suffolk and the disruption caused by cable works across/under the highway.

## 4. Technical comments

### Introduction

4.1. SCC has gathered technical comments on the additional options from internal departments in response to the LionLink Non-Statutory consultation. The following comments focus on the additional options presented within the supplementary non-statutory consultation, for service area technical comments on all Landfall and cable corridor route options as well as general comments please refer to the previous SCC consultation response.

4.2. The full list of technical comments is as follows:

- Archaeology
- Ecology
- Lead Local Flood Authority
- Highways
- Minerals and Waste
- Landscape and Visual
- Public Rights of Way
- Corporate Property
- Socioeconomic

### Service Area Comments

#### 4.3. Archaeology

##### Comments for the additional Landfall Site G2

4.3.1. To the south of Walberswick, an area of extremely high potential for medieval remains is present, believed to be the part of the original extent of the early town and to contain the site of an early church (WLB 010/080) and associated with cropmark features and a large number of finds (WLB 010, 012, 015-018, 024). The area close to Dunwich River and within Oldtown marshes has potential for waterlogged and organic remains, including wooden structures and also boats and remains associated with the medieval port at Walberswick which is recorded in this area. Documentary and desk-based research and full field assessment at an early stage would therefore be critical in this area to understand significance. Preservation in situ is likely to be a consideration for remains in this area. Various WWII remains are also recorded in this area and would require proper assessment and identification of any surviving upstanding remains and structures.

##### Comments for the additional route option between Blythburgh (west of A12) to north of Southwold

4.3.2. Wenhaston Roman Town (WMH 005, 004), including early Saxon burials. SCCAS would recommend removal from the scheme for the



immediate area or at the very least early above and below ground investigation to inform preservation in situ/mitigation.

- 4.3.3. Former Southwold to Halesworth railway line likely to have been destructive, but the possibility for industrial archaeology should be investigated.
- 4.3.4. This route option crosses the Rivers Blyth and Wang there is high potential for buried and organic (including wooden) remains in this area (timbers have been seen at a crossing of the Wang, STH 008). There may also be earthworks associated with the Blyth Navigation (BLY 010, SUF 094). Early assessment would therefore be necessary.
- 4.3.5. This entire route records multi period find scatters (BLB 004, 023, 37, 055, 13, 114, BLY 003, HAM 003, 004, 009, REY 009, 012, STH 015, WNF 004) and it is dense with features identified by cropmarks (BLB 050, 014, WNF 041, 039, 038, STH 001, 013, 011, BRP 008 009 018, , WNF 037, 061,062 UGG 001, 002 ,003, 006 016, 017, 019, 020, 021, WNF 051,059, HAM 024, REY 090, 093, 092, 094, 081, 080, 082, 088, 056, 089), many of which record ring ditches. Given the potential for further remains and specifically human remains (burials/cremations where ring ditches are recorded), above and below ground archaeological assessment of these areas to inform considerations of significance is essential.
- 4.3.6. There is a historically reported but thus far unconfirmed Saxon cemetery (BLB 013) in the vicinity of Lyons Farm (north of the B1123). Above (including metal detector) and below ground assessment is therefore appropriate at the earliest opportunity. If located preservation in situ is likely to be a consideration
- 4.3.7. The entire route (increasing in density as it nears the coast) contains records of features associated with WW2 training and defence (REY 034, 036, 037, 038, 099, UGG 012, BLB 041, EBV 013, 019, 026, 052, 053 SWD 016) Above (including earthwork survey) and below ground assessment is therefore appropriate at the earliest opportunity.
- 4.3.8. Medieval moats are present in the parish of Wangford with Henham, (HAM 001, 004), Given the significance of this site SCCAS would advise the need for the immediate area of the Scheduled Moat HAM 001 to be removed from the scheme entirely and full early assessment, including an earthwork survey, would be necessary for the area around both.
- 4.3.9. The HER records WNF 061 as banks and ditches of probable Roman date. These should receive full earthwork survey, and above and below ground investigation and depending on results consideration to removing this area from the scheme should be made.

#### **4.4. Ecology**

- 4.4.1. Please refer to SCC's non-statutory consultation response (December 2022)

#### **4.5. Lead Local Flood Authority**

- 4.5.1. Please refer to SCC's non-statutory consultation response (December 2022)

#### **4.6. Minerals and Waste**

- 4.6.1. The County Council as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources.
- 4.6.2. Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that the proposals have the potential to come into conflict with a Concrete Batching Plant at Saxmundham and a number of Waste Water Treatment Plants.
- 4.6.3. In general there would potentially be a positive impact upon minerals and waste facilities arising from the demand for sand and gravel and waste disposal.
- 4.6.4. In terms of the underlying sand and gravel resources the majority of the proposed development is not irreversible and although during the operational life time of the proposal, which would likely extend beyond the life time of anybody alive today, extraction within parts the area occupied by the underground cables would not be possible. Where minerals are extracted on site during the course of construction then they should be used in the construction of the proposed development where possible. Removal of the development following cessation of use should be required to restore access to mineral resources.
- 4.6.5. Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of: a) prevention; b) preparing for re-use; c) recycling; d) other recovery, and; e) disposal.

#### **4.7. Highways**

- 4.7.1. Alternative Landfall G2 (Walberswick) - This site appears difficult to access. The only viable access route appears to be from the east and the turn from Lodge Road onto The Street and into Stock Lane would be a difficult manoeuvre for all but light vehicles.
- 4.7.2. Alternative cable route between Landfall F, Southwold and Blythburgh - Extending the length of the cable route would create additional construction traffic as may a selection of a route across river valleys where ground conditions may be poor necessitating specialist engineering processes. In terms of access, it is presumed the site would be accessed from the B1127 Reydon, B1126 between Reydon and Wangford, A12 north of Wangford, A145 Uggleshall to Blythburgh and A12 south of Blythburgh. Of these the B1127 at Reydon is subject to frequent flooding and the B1126 despite being a B class road is unsuitable for significant construction traffic, particularly through Wangford. The rail bridge on the B1123 in Halesworth restricts access by high vehicles. The junctions at the

A12/A145 Blythburgh and A12/B1126 Wangford have been the location of serious collisions in the past.

#### **4.8. Landscape and Visual**

- 4.8.1. In the following comments the additional shortlisted options for Landfall G2 and the new underground cable search area (circumventing Southwold to the north) included in the Supplementary Non-Statutory Consultation shall be discussed.

##### Landfall Location Option G and G2

- 4.8.2. Landfall Location Option G and G2 (south of Walberswick) are located within the Suffolk Coast and Heaths National Landscape (AONB), and the southern Underground Cable Search Area from this site would be likely to traverse the Minsmere-Walberswick Ramsar site and SPA, the Minsmere-Walberswick Heaths and Marshes SSSI, and the Minsmere to Walberswick Heaths & Marshes SAC. The highways access to both sites is unsuitable.

- 4.8.3. While option G2 would avoid passing a number of Listed Buildings along The Street (B1387), and crossing the Dunwich River, it would potentially still need to pass the Grade I Listed St Andrew's Church. The existing access via Stocks Lane is considered unsuitable for construction traffic.

##### Underground Cable Search Area from Landfall options F, G, G2 and H to Converter station site options 4 and 5 and onwards to Friston substation

- 4.8.4. None of the Underground Cable Search Areas relating to Landfall Location Options F, G, G2 and H with potential converter station sites 4 or 5 would offer the potential for coordination and colocation with other projects. Furthermore, they would significantly increase the overall length of required cable routes compared with landfall site E, with the result that wide-ranging additional areas of the Suffolk Coast and Heaths National Landscape (AONB) would be affected.

- 4.8.5. The Underground Cable Search Area heading south from Landfall F, passing Southwold on the western side, passes through many sensitive and designated areas (see comments above on Landfall options).

- 4.8.6. The Alternative Underground Cable Northern Search Area, also beginning at Landfall Option F, proposes an even longer route. Approximately two thirds of this search area is located within the Suffolk Coast and Heaths National Landscape (AONB). While there are fewer designations in this search area, the search area is located in highly sensitive and largely intact rural landscapes such as the Wang River and Blyth River valleys. Throughout this corridor the landscape is characterised by intact historic field boundaries (see OS Six Inch map, 1888-1913). Many of these field boundaries are lined with hedges and mature trees. There is a likelihood that a significant number would be veteran trees, which are considered irreplaceable. Even with careful micro-siting it is considered that the environmental impacts would result in severe adverse residual

impacts not only on landscape, but also biodiversity and cultural heritage, all of which would be compounded by the length of the corridor.

#### **4.9. Public Rights of Way**

4.9.1. Alternative landfall G2 is flanked on 3 sides by public rights of way, all of which are extremely well used. There is no public vehicle access to the site; Stocks Lane to the west is a public bridleway shared in part with private vehicle access to property and farm access and construction traffic would not be welcomed.

4.9.2. Alternative Cable corridor for landfall F - Both proposals for the cable corridor, original and alternative will impact on a number of public rights of way although those on the alternative route are less heavily used than those on the original proposal.

#### **4.10. Corporate Property**

4.10.1. Please refer to SCC's non-statutory consultation response (December 2022)

#### **4.11. Socioeconomic**

4.11.1. Please refer to SCC's non-statutory consultation response (December 2022)

## 5. Appendix A - Maps

