

LIONLINK

Targeted Consultation

Suffolk County Council

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Glossary of Acronyms and Abbreviations

<i>AIL</i>	<i>Abnormal Indivisible Loads</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>DEPZ</i>	<i>Detailed Emergency Planning Zone</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>GW</i>	<i>Gigawatt</i>
<i>HDD</i>	<i>Horizontal Directional Drilling</i>
<i>HVAC</i>	<i>High Voltage Alternating Current</i>
<i>HVDC</i>	<i>High Voltage Direct Current</i>
<i>LHA</i>	<i>Local Highways Authority</i>
<i>MPI</i>	<i>Multi-Purpose Interconnector</i>
<i>NGV</i>	<i>National Grid Ventures</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SLR</i>	<i>Sizewell Link Road</i>

“The Council” / “SCC” refers to Suffolk County Council.

Purpose of this Document

Suffolk County Council (SCC) has prepared the document in response to the Targeted Consultation for LionLink set out by the Applicant, National Grid Ventures (NGV) between 7 July and 5 August 2026.

This follows non-statutory consultations in late 2022 and late 2023 and a statutory consultation which took place in early 2026.

The first section summarises the Council’s position regarding the LionLink proposals, the changes put forward by the Applicant and the key issues identified by Suffolk County Council. The second section (Appendix A) contains the full comments of each specific specialist area.

It is essential that the document is considered in its entirety, including the appendix.

1 Introduction

- 1.1 The proposed development, developed by NGV involves a new 1.8GW Multi-Purpose Interconnector (MPI) which will create a new electricity link between the UK and the Netherlands.
- 1.2 The proposals include to construct an onshore High Voltage Direct Current (HVDC) and High Voltage Alternating Current (HVAC) cables and a transition bay. The onshore HVAC cables will connect to a new converter station, to be constructed near Saxmundham, Suffolk and onto the consented but as yet unbuilt National Grid substation in Friston, Suffolk.

2 Current SCC Position on the LionLink Proposals

- 2.1 In its response to the s42 Statutory Consultation, which was agreed by the Council's Cabinet in February 2026, the SCC strongly objected to the LionLink proposals for reasons which include the following: -
 - The choice of a landfall site at Walberswick as the Applicant's preferred option, is unacceptable due to its proximity to residential properties, which would be severely affected by impacts relating to the construction activities on this site, including noise and vibration caused by the HDD cable installation. Access to the landfall for construction vehicles is also challenging due to the constraints of the road network in the area.
 - The landfall site would also require a long cable route to connect to the proposed converter station site in Saxmundham, therefore meaning a lack of coordination with Sea Link with regards to onshore cable routing as a result of the choice of Walberswick as the preferred landfall site.
 - The use of the weight restricted and unsuitable Benhall Railway Bridge (B1121) for construction traffic, including heavy and large deliveries, to the converter station site in Saxmundham, without providing justification to reject alternative and potentially less impactful routes.
 - The construction of a private haul road, which includes the construction of a new bridge over the River Fromus which will impact the setting of the Grade II Listed Hurts Hall. The Council considers this to be a disproportionate solution for accessing the construction site when less impactful alternatives should be considered.
 - Cumulative impacts of multiple NSIPs on local communities, including construction traffic, health and wellbeing, mental health, road closures, diversions of Public Rights of Way and noise and associated impacts on tourism, ecology, and landscape.

- The location within the Suffolk and Essex Coast and Heaths National Landscape and Heritage Coast, and negative and highly sensitive consequences in terms of built heritage, archaeology, ecology, tourism, highways access, public rights of way, water courses, and vegetation loss.
- 2.2 Full details of the Council's response to the s42 Statutory Consultation can be found via the following link: -

<https://www.suffolk.gov.uk/asset-library/lionlink-multi-purpose-interconnector.pdf>

The following response has been drafted to consider the proposed changes to the LionLink scheme, notwithstanding Suffolk County Council's stance on the wider project.

3 Summary of Proposed Changes to the LionLink Project

Alternative Landfall site (G3) in Walberswick

- 3.1 The Applicant has identified an alternative landfall site (G3) in Walberswick situated approximately 450 metres west of the previously presented G2 site.
- 3.2 The offshore cable landfall point itself would remain as previously proposed, however the cable installation method would be extended as the Horizontal Directional Drilling (HDD) route is longer to reach the G3 site.
- 3.3 Access arrangements are planned to be amended at the landfall with Stocks Lane and other footpath areas being removed from the draft order limits as these would no longer be required for utilities connections to the B1387.
- 3.4 Construction access would be mainly from the proposed temporary haul road off the B1387. With no construction planned at Manor Field as part of the alternative G3 landfall site, there would be no requirement for construction vehicles to use Stocks Lane.

Proposed Changes at Lymballs Lane

- 3.5 The construction area near Lymballs Lane is proposed to be updated to provide a temporary haul road between the A12 and the HVDC underground cable corridor. The haul road has been moved further south with additional land required to construct and operate the haul road safely.

Proposed Changes at Benhall Railway Bridge

- 3.6 NGV are proposing to change the Draft Order Limits at Benhall Railway Bridge (B1121), located over the East Suffolk Line, as this is planned to be used as part of the route for construction traffic travelling to the converter station site near Saxmundham.

- 3.7 The bridge currently has a 46-tonne weight restriction and although the Applicant considers this sufficient for most construction vehicles, it will not support very large or heavy deliveries to site, including converter transformers and some specialist construction plant.
- 3.8 Therefore, the Applicant is proposing to include additional land within the highway boundary around Benhall Railway Bridge within updated Draft Order Limits to allow works to enable large or heavy deliveries to safely cross the bridge.

Changes to project access points and Draft Order Limits

- 3.9 The Applicant has proposed the following amendments to Draft Order Limits around specific access points along the wider project route: -
- A1094 – Additional space for large construction vehicles to pass
 - Moat Road – Additional space to support access and visibility at the junction
 - Fordley Road – Refinement to the HDD alignment in this area
 - Yoxford Road – Additional support access and visibility
 - Moor Road – Additional space to allow protective measures, such as temporary matting, for large or heavy vehicle movements
 - B1387 – Additional space for large and heavy construction vehicles and junction visibility
 - Lodge Road – Additional space for junction visibility and planting
 - Butchers Lane – Additional space for planting

4 Key Issues Relating to the Proposed Changes

General Comments

- 4.1 The Council acknowledges that these changes made by the Applicant for this targeted consultation were developed in response to comments made by statutory consultees during the s42 Statutory Consultation in Q1 2026. Notwithstanding the Council's reasons for objection to the LionLink proposals, some improvements have been made to the proposals, including the removal of the use of Lymballs Lane as an access route due to the repositioned haul road and the inclusion of the Benhall Railway Bridge within the Draft Order Limits to manage works to accommodate construction deliveries.
- 4.2 The Sizewell Link Road (SLR) is currently under construction and should be included on all relevant drawings, so it can be shown how the draft order limits interact with the new road.

- 4.3 In the consultation documents, the Applicant states that vehicle tracking has been undertaken. The Council would be interested in seeing the data gathered from this exercise.
- 4.4 The Applicant will need to acquire and plot the definitive alignment of the Public Rights of Way (PRoWs) affected within the draft order limits, including any temporary diversion routes. These routes connect Walberswick to the King Charles III coast path and will need to be carefully considered and mitigated.
- 4.5 It is essential an Ecology Working Group is set up for this project in order to discuss the ecological implications of the project and work to find possible solutions where necessary.

Alternative Landfall (G3) at Walberswick

General

- 4.6 The Council acknowledges that the proposed landfall G2 site has been relocated by the Applicant after considering the comments of statutory consultees who made representations regarding the unsuitability of this site due to the impacts on a considerable number of residents in the vicinity of this site.
- 4.7 The removal of works from Manor Field and the exclusion of Stocks Lane and footpaths from use for utility connections is an improvement on the previous proposals.
- 4.8 However, the Council remains concerned with the continued proposed siting of a landfall site at Walberswick due to: -
- access constraints for construction traffic with the dependence on the B1387, the only route into the village.
 - lack of coordination with the adjacent Sea Link proposals regarding landfall and cable route resulting in a long cable route to the converter station site at Saxmundham.
 - the impacts of Horizontal Directional Drilling (HDD), including noise and vibration for extended periods, on residential receptors, many of which are likely to be more sensitive to the impacts of construction, considering the demographics of the East Suffolk coast.
- 4.9 Although the alternative landfall site is located further to the southwest of the centre of Walberswick and the Applicant suggests a reduction in residential receptors, a number of dwellings on both sides of the G3 site will still be directly affected by the construction impacts of this landfall site.
- 4.10 The Environment Statement must provide information on the characteristics and sensitivity of newly affected receptors affected by the relocation of the landfall site, including whether they include groups known to be more vulnerable to

prolonged noise, lighting and amenity disturbance, such as older people, disabled people and those with existing physical or mental health conditions. This would provide greater confidence that the reduction in the overall number of significantly affected receptors is not masking disproportionate impacts on particular communities or population groups.

Archaeology

- 4.11 Suffolk County Council Archaeological Service (SCCAS) has raised considerable concerns regarding the proposed changes to the LionLink landfall site as the area to the south of Walberswick is of extremely high archaeological potential, especially for remains of Saxon and medieval date.
- 4.12 The new proposed landfall site (G3) and the area identified for HDD underneath part of the current proposals have not been subject to full archaeological evaluation, even though these are potentially the most archaeological sensitive and significant areas and include what has been identified as the early church site itself and the focus of the associated settlement, as well as the old harbour.
- 4.13 There is potential for these remains to be of national significance and therefore worthy of Scheduling. This would have implications regarding scheme design and appropriate mitigation. It is likely that if deemed to be nationally significant, no below ground impacts will be acceptable in these areas, which includes undergrounding, in order to achieve long term preservation in situ.
- 4.14 Further evaluation before a change to the landfall location and design is made, and prior to DCO submission, is essential as the proposed changes may not be acceptable or feasible on heritage grounds (in line with EN-1 5.9.8 and 5.9.13).
- 4.15 Historic England will also need to be involved in discussions regarding the proposed design changes in this part of the scheme and we would welcome a meeting with the applicant to discuss ongoing assessment requirements for the landfall area.

Ecology

- 4.16 The Council notes that HDD will be used to route the cable along the seabed to the landfall site. This method does come with risks of frac-outs occurring and the Applicant must assess the risks and set out how this will be managed should such an incident occur.
- 4.17 The Council remain concerned regarding the choice of landfall at Walberswick due to the potential impacts on vegetated shingle and saltmarsh habitats (both national and county priority habitats) from any works at the proposed landfall site.
- 4.18 There is the potential for reedbed habitat to be impacted at the landfall site as it is located close to where the landfall site location is proposed. An assessment of impacts on Reed Warbler, Grasshopper Warbler, Cetti's Warbler, Bittern, Water

Vole, Water Rail, Water Shrew, and other species associated with this habitat should be undertaken by the Applicant.

- 4.19 Potential impacts on the Dunwich & Minsmere Rivers and associated species resulting from operations at this location should also be assessed and robust mitigation measures drawn up to minimise potential impacts on protected species and habitats.

Highways

- 4.20 The G3 site has similar access issues as G2, namely difficulty turning onto and off The Street to Lodge Lane and turning from Lodge Lane to Seven Acres Lane. The latter is also a private street accessing properties and a public footpath.
- 4.21 The Council notes that due to the limited width, any works included for statutory apparatus may require closure of Lodge Lane, which although a through road, only accesses the B1125 via a long length of unsurfaced highway to the west. Use of traffic signals will still require sufficient space for two-way traffic to pass at the signal heads.

Landscape

- 4.22 The relocation of the landfall site means a shift in the alignment of where the offshore cable meets the joining bay at the landfall site. The Council is concerned that this will result in a greater area of the Minsmere to Walberswick Heath and Marshes being potentially impacted by HDD activities.

Public Health

- 4.23 The Council considers that the Environmental Statement should provide further information on the characteristics and sensitivity of these newly affected receptors, including identification of whether they include groups known to be more vulnerable to prolonged noise, lighting and amenity disturbance, such as older people, disabled people and those with existing physical or mental health condition. This would provide greater confidence that the reduction in the overall number of significantly affected receptors is not disproportionately masking impacts on particular communities or population groups.

Proposed Changes at Lymballs Lane

Archaeology

- 4.24 The new haul road route at Lymballs Lane will need to be subject to archaeological evaluation at the earliest opportunity, as it has not previously had either geophysical survey or trial trenching.
- 4.25 Archaeological remains have been recorded along the previous haul road route during the current phase of assessment work. Whilst preferably pre-consent, SCCAS would not object to trial trenching of this new haul road route being

undertaken as part of the post-consent phase of assessment work, although all outstanding areas of archaeological evaluation should look to be completed at the earliest opportunity so that mitigation requirements can be understood and factored into the project.

- 4.26 SCCAS supports the refinement of the red line boundary which has taken archaeological findings into account on the basis of archaeological assessment work which has been completed so far and also the results from other archaeological projects which interact with this scheme, especially the removal of areas of sensitive archaeology to the south of Blythburgh and either side of Yoxford Road.
- 4.27 Any areas within the red line boundary which will see impacts as part of the scheme, but which have not been included in the current phase of trial trenched evaluation will need to be scoped in for further archaeological assessment and mitigation at the earliest opportunity post-consent.

Highways

- 4.28 The Council agrees with the Applicant that Lymballs Lane is unsuitable for the project's construction traffic in its current form. Whilst the Council has no objection to the provision of an off-carriageway haul road south of Lymballs Lane, the Council does have concerns regarding how construction traffic can be safely managed at the junction with the A12 and construction access off Lymballs Lane.
- 4.29 Importing and removal of the haul road is a main constituent of HGV traffic associated with onshore cable routes. The Council would support any innovation to reduce dependency on imported aggregate or sustainable delivery methods.

Proposed Changes at Benhall Railway Bridge

General Comments

- 4.30 Suffolk County Council proposed an alternative access route to the converter station site during the Sea Link examination potentially utilising the Sizewell Link Road to avoid the need to deliver AILs across the Benhall Bridge. Concerns about LionLink's AIL route across the Benhall Bridge are provided in this response and the Council's response to Statutory Consultation. Alternatives to the proposed route which provide a more resilient long-term solution to access to the converter station site should be explored and discussed with the Council.
- 4.31 The Applicant should engage in continued dialogue with the Sea Link Applicant to ensure any new information regarding the condition of the Benhall Bridge, following surveys undertaken by Sea Link, is shared with the Applicant and reflected in the proposals should that option be included in the application upon submission.

Ecology

4.32 The Council remains concerned using the proposed use of Benhall Bridge, from an ecology perspective, given the sensitive habitats and the potential presence of protected species within close vicinity of the bridge and along the adjacent railway embankments. Surveys and assessment for bats, birds, badgers, and dormice will be required if any proposed works impact the areas of vegetation on the railway embankment underneath and adjacent to the bridge.

Highways

4.33 The Council has previously raised concerns regarding the use of Benhall Railway Bridge as part of the access route for the Sea Link proposals, which include: -

- a failure by the Applicant to demonstrate that a temporary overbridge solution can be accommodated within the existing geometry of the highway, noting the slope and curvature of the road to the west of the bridge.
- a lack of assessment regarding impacts to pedestrians and cyclist using the crossing and whether utilities remain accessible.
- traffic management on the bridge during works if one lane kept open due to potential of queuing back on the A12 due to the proximity of the bridge to this road.

4.34 The proposed southern diversion route via Friston and Sternfield is unacceptable due to the constraints of the road.

4.35 The northern route via Saxmundham uses the A12/B1119 junction which has an elevated frequency of collisions and the use Chapel Road/Fairfield Road or Mill Road/Chantry Road are appropriate due to parked cars, the level crossing on Mill Road, the low bridge at North Entrance and the capacity issues at the Church Street/Chantry Road/South Entrance junction.

4.36 Notwithstanding the Council's concerns regarding the use of the Benhall Railway Bridge, the inclusion of the bridge within the draft order limits is a reasonable action considering that the structure will require either temporary overbridging or permanent improvements to increase its load capacity.

Changes to project access points and Draft Order Limits

A1094 – Additional space for large construction vehicles to pass

Highways

4.37 The Council notes the additions to the draft order limits for improvements, however these alterations, particularly the access to the west of Snape have not been discussed with the Council and therefore cannot comment on their effectiveness and whether the revised order limits are sufficient to deliver these

improvements. Swept path assessments are required to demonstrate the effectiveness of these proposed improvements.

- 4.38 It should be noted that Sizewell C and Scottish Power Renewables (developer of the 'East Anglia' offshore windfarms) are undertaking improvements in this area, so it is recommended that the Applicant discusses any proposals with these developers.

Moat Road, Theberton

Highways

- 4.39 The Council notes the extension of the draft order limits to enable connection of the haul road to Moat Road as modified by the construction of the SLR.
- 4.40 The Council would support an access adjacent to and accessed from the SLR as this would avoid less suitable roads in the area, however, the applicant will need to demonstrate how highways and construction traffic can be safely segregated.

Fordley Road, Middleton

Landscape

- 4.41 Although the reduction of draft order limits in this area is welcomed, the Council requires more information regarding this issue. It should be clarified which field boundaries are referred to in relation to the widening of the trenchless design and the impacts of trees and vegetation should be assessed.

B1122 Yoxford Road, Middleton

Highways

- 4.42 The Council is concerned regarding the access from the B1122 immediately north of Fordley Road due to the difficulties with providing an acceptable layout for the access due to the narrow width of the B1122, the geometry of the road, vegetation, and the level difference with the land to the east.
- 4.43 The changes proposed in the draft order limits do not reduce these concerns.

Moor Road, Theberton

Ecology

- 4.44 This is a narrow country lane that has lines of trees and hedgerows either side. The Council has concerns that using this for any purpose will cause serious disturbance to bats, birds and other wildlife that use this area for foraging and refuge. Alternatives must be considered.

Highways

- 4.45 The Council has significant concerns regarding the proposed use of Moor Road for construction traffic. The road is narrow and has limited capacity to accommodate large construction vehicles.

- 4.46 Moor Road runs across Middleton Common, which the Council notes is included within the draft order limits, however certain works are restricted by s38 of the Commons Act 2006, including resurfacing of the land, although this can be consented by the appropriate national authority.
- 4.47 The Council would expect the Applicant to resolve these legal matters, particularly if there is an intention for permanent improvements to the road for adoption by the LHA.

Landscape

- 4.48 The installation of temporary matting on the verges to enable HGV and AIL movements is acceptable in landscape terms. It is welcomed that no trees or hedges (highways or private) will be lost as a result of the works.

B1387, Walberswick

Highways

- 4.49 The Council has recently undertaken improvements to the B1387 between the A12 and B1125, which included widening and drainage. As the Applicant has not shared design of the accesses on the B137 to the east of the B1125, the Council cannot comment on whether the remaining access in this section is safe and can be delivered with less impacts (e.g. vegetation clearance) than the other accesses removed from the order.

Landscape

- 4.50 The access onto the B1387 features a row of semi mature mix deciduous and conifer trees. The Council welcomes works to the trees only being restricted to 'minor trimming' however this will need to be anchored into management plans.

Lodge Road

- 4.51 No comments

Butchers Lane

Highways

- 4.52 Access via the B1387 and Hinton Corner remain difficult due to the restricted width and challenging geometry of the carriageway, particularly at the junction. The Applicant has not demonstrated that access can be safely achieved without further improvement to the highway.

Yoxford Road, Darsham (not shown on the targeted consultation map)

Highways

- 4.53 The reduction in draft order limits here may restrict the Applicant's ability to provide a safe access from the highway noting that both Yoxford Road and Fenstreet Road are narrow and heavily vegetated.

Appendix A – Detailed Technical Comments

5 Archaeology

- 5.1 Suffolk County Council Archaeological Service (SCCAS) are extremely concerned regarding the proposed changes to LionLink landfall. As has been highlighted since the start of the project, to the south of Walberswick is an area of extremely high archaeological potential, especially for remains of Saxon and medieval date.

This is believed to be the location of the early original settlement at Walberswick and to contain the site of the early church (WLB 010/080) and is associated with cropmark features and a large number of finds (WLB 010, 012, 015-018, 024). The potential for preservation in situ to likely be a consideration for remains in this area has also been flagged at every consultation stage.

The site of the current landfall location (G2) and cable corridor have been subject to full archaeological evaluation, and this work has defined remains of Roman, Saxon, and medieval date of local significance. Whilst appropriate mitigation would be required for these remains should any works take place which would have an impact upon them, SCCAS would not advise that their significance is such that the criteria for preservation in situ has been met and therefore preservation by record through archaeological excavation would be acceptable.

- 5.2 However, the new proposed landfall site G3 has not been subject to full archaeological evaluation and neither has the area which would now have HDD underneath as part of current proposals, even though these are potentially the most archaeological sensitive and significant areas and include what has been identified as the early church site itself and the focus of the associated settlement, as well as the old harbour.

There is potential for these remains to be considered to be of national significance and therefore worthy of Scheduling, which would have implications regarding scheme design and appropriate mitigation. It is likely that if deemed to be nationally significant, no below ground impacts will be acceptable in these areas, which includes undergrounding, in order to achieve long term preservation in situ. As such, further evaluation prior to DCO submission and before a change to the landfall location and design is made is essential as the proposed changes may not be acceptable or feasible on heritage grounds (in line with EN-1 5.9.8 and 5.9.13). We would also strongly disagree with 4.7.1 of the EIC report as the statement ‘as such, there are no new or materially different likely significant effects due to the proposed change to the location of the proposed Landfall Site’ is incorrect and cannot be determined until full archaeological evaluation has been completed- the potential impacts of this design change requires full and proper assessment. This is because different archaeological remains, of differing significance and with

differing mitigation requirements as a result are likely to be present within the two areas. The G2 site is now known following the completion of evaluation work to impact upon remains of local significance, but if it is shown that nationally significant remains are present within the area of the G3 site or revised HDD route, then the effects in this area would be substantially more significant.

Until evaluation has been completed, it must therefore be assumed that the proposed change in this area will have a significant adverse effect to important heritage assets and at present, SCCAS would object to the change in design at landfall as it is not possible for the applicant to prove that they are able to appropriately mitigate the impacts of the latest proposals upon surviving heritage assets. An initial programme of Ground Investigation assessment work has also shown that some areas of the scheme, including landfall, have the potential for remains of geoarchaeological significance and therefore the landfall areas also requires an ongoing programme of geoarchaeological work to properly assess deposits and allow the potential impacts of planned works in these areas to be fully understood.

- 5.3 Historic England will also need to be involved in discussions regarding the proposed design changes in this part of the scheme and we would welcome a meeting with the applicant to discuss ongoing assessment requirements for the landfall area.
- 5.4 The new haul road route at Lymballs Lane will need to be subject to archaeological evaluation at the earliest opportunity, as it has not previously had either geophysical survey or trial trenching and archaeological remains have been recorded along the previous haul road route during the current phase of assessment work. Whilst preferably pre-consent, SCCAS wouldn't object to trial trenching of this new haul road route being undertaken as part of the post-consent phase of assessment work, although all outstanding areas of archaeological evaluation should look to be completed at the earliest opportunity so that mitigation requirements can be understood and factored into the project.
- 5.5 SCCAS are however pleased to see that the refinement of the red line boundary has taken archaeological findings into account on the basis of archaeological assessment work which has been completed so far and also the results from other archaeological projects which interact with this scheme, especially the removal of areas of sensitive archaeology to the south of Blythburgh and either side of Yoxford Road.
- 5.6 Any areas within the red line boundary which will see impacts as part of the scheme, but which have not been included in the current phase of trial trenched evaluation either due to design changes or constraints which prevented their assessment at the pre-consent stage, will need to be scoped in for further

archaeological assessment and mitigation at the earliest opportunity post-consent.

6 Ecology

- 6.1 The Ecology Team maintain concerns about the potential impacts on vegetated shingle and saltmarsh habitats (both national and county priority habitats) from any works at the proposed landfall site in Walberswick.
- 6.2 HDD will be used to route the cable along the seabed to the landfall site, but this will come with risks of frack-outs happening. The Applicant should set out how this will be managed should such an event occur.
- 6.3 There is the potential for reedbed habitat to be impacted at the landfall site as this habitat is located close to where the landfall site location is proposed. An assessment of impacts on Reed Warbler, Grasshopper Warbler, Cetti's Warbler, Bittern, Water Vole, Water Rail, Water Shrew, and other species associated with this habitat. Potential impacts on the Dunwich & Minsmere Rivers and associated species resulting from operations at this location should also be assessed and robust mitigation measures drawn up to minimise potential impacts on protected species and habitats.
- 6.4 SCC Ecology would like clarity on where the haul road is routed to get to the landfall site at Walberswick. There is an area of woodland approximately 100 metres west of proposed landfall site and reedbeds & saltmarsh directly south of the proposed landfall site. In addition to this, there are sand dunes, shingle, and the North Sea coast to the east of the site. Careful consideration of the haul road route is essential to minimise potential impacts on these habitats and disturbance to the species that will make use of these habitats. The local road network is too narrow for the large vehicles and plant that are likely to need to access the landfall site.
- 6.5 There is the potential to use an existing farm track off The Street to gain access to landfall site but would result in fragmentation of habitat connectivity via hedgerow loss along Lodge Road. This has the potential to cause impacts on Skylark, Grey Partridge, and other ground nesting birds and this will need to be considered and mitigated for if required. There are also likely to be impacts on bat foraging and commuting ability from loss/fragmentation of hedgerows along Lodge Road and The Street for the possible construction of a haul road off Lodge Lane in Walberswick.
- 6.6 SCC Ecology are of the opinion that the proposed landfall site is too restricted to be considered as a viable option, and the applicant should consider alternative sites for the proposed landfall location.

Proposed Cable Route Access:**Moor Road**

- 6.7 This is a narrow country lane that has lines of trees and hedgerows either side. There are concerns that using this for any purpose will cause serious disturbance to bats, birds and other wildlife that use this area for foraging and refuge. Alternatives must be considered.

Lymballs Lane

- 6.8 Using this road as a potential site access should be reconsidered – this is a narrow road with extensive lines of trees and hedgerows either side. Considerable impacts on wildlife features would result in using this as an access route. Alternatives must be considered.

Benhall Bridge

- 6.9 SCC Ecology remain concerned using the proposed use of Benhall Bridge given the sensitive habitats and the potential presence of protected species within close vicinity of the bridge and along the adjacent railway embankments. Surveys and assessment for bats, birds, badgers, and dormice will be required if any proposed works impact the areas of vegetation on the railway embankment underneath and adjacent to the bridge. Any lighting proposed for this area should be avoided as the railway line is a well-used bat migration corridor.

Butchers Lane

- 6.10 The proposed use of Butchers Lane as a site access route should be reconsidered. It is a narrow country lane with scrub and hedgerows either side of the road, which is likely to be severely impacted to allow construction plant to use the road as a site access. Potential impacts on bats, birds, reptiles would result from the vegetation clearance that will be required and alternative route options should be considered.

Moat Road

- 6.11 This is an unsuitable option for a site access road. It is a narrow, well vegetated road and there will be serious impacts on ecological features (bats, birds, reptiles, badgers) if this was used as an access route due to the considerable vegetation clearance that would be required to facilitate access for the machinery required along the cable route at this location.

Fordley Road

- 6.12 This is an unsuitable option for a site access road. It is a narrow, well vegetated road with a watercourse present on the northern side of the road and there will be serious impacts on ecological features (bats, birds, reptiles, badgers and potentially water voles) if this was used as an access route due to the considerable

vegetation clearance that would be required to facilitate access for the machinery required along the cable route at this location.

Lodge Road

6.13 SCC Ecology has concerns about using Lodge Road as a haul road access point. The highway is narrow and is well vegetated on either side. There are likely to be serious impacts on bat foraging/migration corridors through the loss of vegetation that would be required to create the access points for the haul roads at this location. Alternative options must be considered.

6.14 Overall, SCC Ecology considers the proposal to use the abovementioned locations as site access routes would cause significant long-term damage to the East Suffolk landscape and we do not support this extensive, highly disruptive approach.

Impacts from the use of AIL on the local road network & visibility splays:

6.15 Suffolk's highway verges are very important parts of our ecological network providing for wildlife, amongst other things, a means of moving between habitats and foraging. Suffolk County Council are committed to retaining and improving this network.

6.16 Any application that could cause impacts upon an SCC highway verge must contact SCC Highways in the first instance to discuss this. Please also consult the SCC Ecology and Landscape Team when any proposed development potentially impacts on SCC highway verges.

6.17 Any proposed site accesses off existing highways should make use of existing access points to avoid the loss and fragmentation of habitats (farm tracks and the like). If any vegetation removal is required, this should be in the form of coppicing and crown lifting in the first instance. Any loss of trees or vegetation should be compensated for through replacement planting. This should be as close to the location of the removed vegetation as possible and should be native species of local provenance.

6.18 Applicants should also refer to the Suffolk Streets guide for details regarding works on Suffolk's highway verges:

https://www.suffolk.gov.uk/assets/Roads-and-transport/maintaining-roads-pavements-and-verges/5647_21%20-%20Suffolk%20Design%20Street%20Guide%20v26.pdf

Conclusions:

6.19 There are serious concerns about potential impacts resulting from the loss, fragmentation of habitat connectivity and the disturbance caused by construction works, movement of plant, HDD works at the landfall site, site access roads and along the proposed cable route to Friston.

- 6.20 SCC Ecology would like to see alternative options considered for the landfall site and the proposed cable route. Should the Sea Link project be granted consent, National Grid Ventures should consider whether the proposed cable route for this scheme could be shared with the proposed Lion Link development.
- 6.21 It is essential an Ecology Working Group is set up for this project in order to discuss the ecological implications of the project and work to find viable solutions where necessary.

7 Economy, Skills, and Tourism

- 7.1 No comments.

8 Flood and Water Environment

- 8.1 Any cable below a watercourse must be min of 1.5m below the bed and be location marked on site.
- 8.2 No materials nor compounds should be located within medium or high surface water flood risk areas.

9 Highways

Changes to proposed landfall, Walberswick

- 9.1 As Local Highways Authority, SCC notes that the change in location to G3 has similar access problems as G2, namely the difficulty turning onto and off The Street to Lodge Lane and turning from Lodge Lane to Seven Acres Lane. It should be noted that the latter is a private street accessing properties and is a public footpath.

However, the exclusion of Seven Acres Lane in the proposed order limits and 2.2.3 of the EICR implies all access, including light vehicles and for pre-commencement works, is from the west via a haul road.

The Council notes that due to the limited width, any works including for statutory apparatus may require closure of Lodge Lane, which although a through road, only accesses the B1125 via a long length of unsurfaced highway to the west. Use of traffic signals will still require sufficient space for two-way traffic to pass at the signal heads.

Lymballs Lane

- 9.2 SCC agrees with the applicant that in its current form Lymballs Lane is unsuitable for use by the project's construction traffic. Whilst having no objection to providing an off-carriageway haul road south of Lymballs Lane, the Council is concerned regarding how highway and construction traffic can be safely managed at the junction with the A12 and construction access off Lymballs Lane.

Benhall Rail Bridge

- 9.3 The inclusion of the B1121 Benhall Rail Bridge within the order limits appears a reasonable action considering that the structure will require temporary overbridging or permanent improvements to increase its load carrying capacity. SCC would be concerned if such works significantly impact road or rail traffic. No evidence has been provided to show if the proposed limits are sufficient to deliver either strengthening option. The EICR 2.6.5 states that no site compound is required as plant and material will be stored at offsite locations. Movements associated with inter compound movements should be included in any traffic assessment. SCC notes that if both Sealink and Lionlink are consented and a temporary solution is used the B1121 may be closed for up to 45 (SeaLink) plus 77 (Lionlink) days = 123 days.

Option 1: Temporary Overbridge and Option 2: Semi Permanent Bridge

- 9.4 Neither Sealink nor Lionlink have demonstrated a design can be fitted within the existing geometry of the highway noting the slope and curvature of the road to the west of the bridge. It is unclear what the impacts will be for pedestrians and cyclists or if utilities will remain accessible.

Option 3: Strengthening or Repair

- 9.5 This would be the Council's preferred option. However, as yet sufficient data is not available to identify what works are required and hence the impact on the road or rail line.

Option 4: Alternate AIL routes

- 9.6 This option was discussed in depth during the Sealink examination. Whilst routes for Abnormal Indivisible Loads (AILs) up to and including STGO2 (cable drums, piling rigs, cranes) may be available issues have been identified with loads of STGO3 or special-order movements on the A1094/ route and B122/B1069/B1021 routes.
- 9.7 SCC are assisting Sealink to undertake further investigation of the rail bridge which will provide data for reassessment of the structure. However, that applicant should be aware that either this or future assessments may result in changes to the capacity, which if further deterioration is identified could be a lesser capacity.

Diversion Routes

- 9.8 The southern diversion route via Friston and Sternfield is wholly inappropriate due to the nature of the road. The northern route via Saxmundham uses the A12/B1119 junction which has an elevated frequency of collisions and neither Chapel Road / Fairfield Road nor Mill Road / Chantry Road are appropriate due to parked cars,

level crossing on Mill Road, low bridge at North Entrance and capacity issues at the Church Street / Chantry Road / South Entrance junction.

Other Refinements to Order Limits

A1094, Friston

9.9 SCC notes additional order limits for improvements. However, improvements, particularly improving access from the west (Snape) have not been discussed with the LHA so it cannot comment on the effectiveness or otherwise of these nor that the revised orders are sufficient to deliver them. Swept path assessments to demonstrate the need or effectiveness of the improvements have not been provided.

Both SPR and SZC are undertaking improvements in this area.

Road, Theberton

9.10 SCC notes the extension of the order limits to enable connection of the haul road to Moat Road, as modified by construction of the Sizewell Link Road. The LHA has concerns about how highway and construction traffic can be safely segregated but would support an access adjacent to, and accessed from, the SLR as this avoid less suitable roads in the area.

Fordley Road, Middleton

9.11 The reduction in the order limits is unlikely to impact on highways and transportation noting this is the site at which the cable corridor passes under the SLR.

9.12 SCC welcome removal of a cable corridor along the SLR as the authority could not see how this could be delivered without compromising the integratory of the proposed SLR design.

B1122 Yoxford Road, Middleton

9.13 SCC has concerns regarding access from the B1122 immediately north of Fordley Road due to the difficulties associated with providing an access with an acceptable layout and visibility due to the narrow width of the B1122, geometry (bend), vegetation, and level difference with the land to the east. The changes in order limits do little to allay these concerns.

Moor Road, Theberton

9.14 SCC has significant concerns regarding use of Moor Road for construction traffic. It is narrow and of evolved construction has limited capacity to carry large construction vehicles. The road runs across Middleton Common, areas which we note are included in the proposed order limits. As such certain works including resurfacing of the land are prohibited by s38 of the Commons Act 2006 albeit this can be consented by the appropriate national authority. SCC

would expect the legal nuances of this matter to have been resolved by the applicant, particularly if there is any intention of making improvements to the road permanent and they being adopted by the LHA. Landscape / Ecology comments. Whilst the use of temporary plates may avoid this issue the applicant has yet to demonstrate how such matting can be installed and remain without creating a safety or impedance of access to those using the highway or the common, noting the ground level tends to be higher than the carriageway.

B1387, Walberswick

9.15 SCC has recently undertaken improvements to the B1387 between the A12 and B1125 junctions, funded by SZC. This included widening and drainage.

9.16 The applicant has not shared design of the accesses on the B1387 to the east of the B1125 so the authority cannot comment on whether the sole remaining access in this section is safe and can be delivered with less impact, for example vegetation clearance, than the other accesses that have been removed from the order.

Lodge Road

9.17 See comments on revised order limits for landfall.

Butchers Lane

9.18 The proposed changes to the order limits are minor. In the LHA opinion access to the order limits via the B1387 and Hinton Corner remains difficult due to restricted width / geometry of the carriageway particularly at junctions. The applicant has not demonstrated that access can be safely achieved without further improvement to the highway.

Yoxford Road, Darsham (not shown on targeted consultation map)

9.19 The reduction in the order limits may fetter the ability of the applicant to provide a safe access from the highway noting that both Yoxford Road and Fenstreet Road are narrow and heavily vegetated.

Other Comments

9.20 Sizewell Link Road is under construction and should be included on all the relevant drawings, therefore showing how the Order Limits interact with it.

ALLs on the local road network

9.21 It states that vehicle tracking has been undertaken, SCC has yet to see this data.

10 Joint Emergency Planning Unit (JPEU)

- 10.1 The proposals all fall outside the Sizewell B Detailed Emergency Planning Zone (DEPZ) under Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019 and outside the area where urgent countermeasures might be advised during any radiation emergency. As a result, the refined proposals do not impact on the ability to implement emergency arrangements for a radiation emergency at Sizewell B based upon a reasonably foreseeable accident. JPEU has also assessed the implications for a more severe radiation incident and again this proposed development does not impact on our ability to extend the existing emergency arrangements.
- 10.2 On behalf of Suffolk County Council, the duty holder for the REPPiR regulations for Sizewell B, JPEU confirms that the refined proposals can be accommodated within the off-site emergency arrangements set out in the multi-agency Radiation Emergency plan.

Additional observations:

- 10.3 JPEU has previously commented that the concurrent NSIP projects in this area will place significant challenges on the emergency services and other agencies' ability to respond to emergencies and also if required, to conduct an effective evacuation. The extent of the cumulative impacts is difficult to quantify, and we will expect traffic flows and volumes to be carefully monitored throughout and the project's Construction Traffic Management Plan (CTMP) to include relevant data.
- 10.4 Prior to project commencement, emergency plans for Lionlink will need to be produced that cover the arrangements for protecting construction and operational site staff during any Sizewell B radiation emergency and ensuring that the development does not adversely affect the abilities of the Emergency Services and other agencies to be effectively respond to an incident. These should form part of the Requirements within the Development Consent Order.
- 10.5 The Council as Local Highways Authority has previously commented on the risks associated with the Benhall Railway Bridge (B1121). Any impact on the A12 should be minimised.
- 10.6 Lymballs Lane, Darsham is a narrow country lane unsuitable for HGVs. Consideration will need to be given to the junction of Lymballs Lane and the busy A12 if this is to be used as a haul road to the primary cable compound. There is a parking layby nearly opposite the junction that is frequently used by Sizewell C HGVs awaiting their allocated start time.

11 Landscape

Proposed Landfall Site (G3)

11.1 The consequences of the proposed landfall site from a landscape perspective are as follows.

Extended distance of HDD activities

11.2 The relocation of the landfall site means a shift in the alignment of where the offshore cable meets the joining bay at the landfall site. This results in a greater area of the Minsmere to Walberswick Heath and Marshes being potentially impacted by HDD activities. SCC Landscape would echo concerns expressed by SCC Ecology regarding the increased chances for frac-out incidents to occur and how this will be considered for and mitigated.

Proximity to residential receptors and public rights of way

11.3 SCC acknowledges and welcomes several refinements in the placing of the landfall site;

- Fewer residences will be impacted in comparison to the current landfall site (G2).
- The proposed transport routes from The Street and Lodge Road have been dropped from the proposals.
- The bridle way (Stocks Lane) which extends south from Walberswick, and the footpath extending south from Seven Acres Lane would not be affected by cable laying works.
- The methodology, being a trenchless crossing up from the beach to the joining bay at the landfall site, and expected time frame for the completion of the works would remain the same (Approx 20 months)

11.4 Further consideration for the design team would be the proximity to the area of woodland southwest of the new landfall site, the corner properties off Seven Acres Lane, and the footpath extending south from those properties.

11.5 The same level of mitigation measure in reducing the impact of noise and vibration will need to be provided for the houses affected by this relocation.

11.6 Overall, SCC Landscape acknowledges the justifications for the relocation of the landfall site but would expect the areas now affected by this change to be sufficiently safeguarded from the impact of the works.

Lymballs Lane – Realignment of haul road further south into the field

11.7 SCC landscape recognises the new alignment will be moved south off the lane to avoid impacting residential receptors along Lymballs lane.

11.8 The new haul road alignment now passes through several lines of trees/ vegetation of varying size and maturity branching off Lymballs Lane. This will result in the fragmentation of these corridor features. Without the level of detail provided by a VRRP or arboricultural survey, it is expected that a route has been proposed which minimises the extent of vegetation loss and that the vegetation would be reinstated.

11.9 SCC Landscape would query why the DOL captures a portion of the frontage to the last property before Lymballs Lane joins the A12 and what the resulting impacts on vegetation are.

Moat Road

11.10 Of the two options SCC Landscape would consider Option One, the Temporary Construction Access, the preferred approach as this would make use of the adjacent infrastructure associated with the Sizewell Link Road, which would have carried out all the necessary vegetation clearance already and negating any need for further vegetation clearance, unlike Option Two, which would likely require further clearance for the associated road widening.

Benhall Railway Bridge

11.11 Works to accommodate Abnormal Indivisible Loads (AILs)

- Option 1 - Temporary Beam Overbridge
- 4/Snape Road Option 2 - Semi-Permanent Overbridge
- Option 3 - Permanent Strengthening or Repair
- Option 4 - Alternative Route for AIL Movements

11.12 This is predominantly a matter for SCC Highways. In landscape terms Option 2 - Semi Permanent Overbridge would appear to be the least disruptive of the presented options while Option 3 - Permanent Strengthening or Repair would provide long-term benefits.

Option 2 - Semi-Permanent Overbridge:

11.13 This approach could be considered a compromise between all the options when considering the duration and frequency of disturbances to the affected communities and habitats against the intensity of these disturbances. With only two periods of activity occurring at installation and dismantling of the overbridge lasting up to 3 weeks at a time would have a lesser effect than multiple periods disturbances on both local residents and wildlife. The two periods would also be easier to plan around breeding seasons for birds, organising road closures/ management for the installation and removal of the overbridge and coordinating with Sea Link.

Option 3 - Permanent Strengthening or Repair:

11.14 The strengthening of the Benhall bridge presents the greatest intensity of disturbance to both local communities, wildlife and the railway as a crane would be needed for the works on the bridge. The period of activity associated with the works would occur over several weeks or longer, depending on logistics and other variables. In terms of the intensity of the works, this option would generate the most noise/ vibration, given the use of percussive tools.

11.15 A benefit of this option would be that this activity would be conducted in a single intense window of time, which might be preferable for the local communities to enduring several episodic disturbances associated with the temporary over bridge option.

11.16 Additionally, it might be of benefit that the bridge is strengthened in the interest of future proofing this route as a longer-term strategy for community resilience.

11.17 Lastly, as a principle going forwards, the lighting associated with any nighttime works would need to be carefully considered, along with the necessary ecological surveys, to minimise the effects of construction lighting on residential and ecological receptors.

Fordley Road - Trenchless design realignment

11.18 Although it is welcome that the extent of the DOL has been reduced in this area, SCC Landscape requests additional information regarding this point. It should be clarified that which field boundaries are being referred to in relation to the widening of the trenchless design and what the impacts on trees/vegetation are because of this realignment?

11.19 Additionally, SCC Landscape would ask for confirmation that Fordley Road would not be used as a construction route on account of the mature vegetation which has formed a sheltered corridor along the road which would be considerably impacted from construction traffic and any associated works.

Lodge Road – Extension of the DOL to accommodate ecological mitigation planting

11.20 SCC landscape has no concerns regarding this amendment to the plans and welcomes the use of traffic signals to reducing the visibility splay, and thereby the impacts on vegetation.

Butchers Lane – Increase of the DOL to allow sufficient space for proposed mitigation planting

11.21 SCC landscape has no objections regarding the increase of the DOL to ensure sufficient space for mitigation planting.

AIL on the local road network

11.22 The access onto the B1387, which is being referred to here, features a row of semi mature mix deciduous and conifers trees. Assurances are welcome that the trees would be subject to “minor trimming” of trees which overhang the carriageway. This would need to be anchored into the management plans which will be produced in due course.

A1094 / Snape Road junction and A1094 Aldeburgh Road

11.23 Considering that both Sizewell C and Scottish Power Renewables (Eat Anglia One North and Two) are also progressing with similar proposals in this area to enable AILs to take this route resulting in vegetation clearance works, SCC Landscape would ask for more information regarding the timing and coordination between the adjacent NSIPS looking to make changes to these two junctions, as it may be the case that vegetation works would have been carried out before works for Lion link commences.

11.24 Should vegetation removal be required as part of this proposal, SCC Landscape would expect this to follow the principle of coppicing as opposed to outright removal, where possible, as this is a temporary amendment.

Visibility Splays – Yoxford Road bellmouth and B1387

11.25 SCC Landscape acknowledges the requirement for the increase of the DOL in the areas stated within the Environmental Implications of Change Report to allow for vegetation works to be conducted. However, at the detailed design stage for these temporary access, it is expected that the extent of vegetation cleared is limited to what is necessary, and that the hierarchy of vegetation works would seek to prune and crown lift trees and vegetation, before considering measures such as pollarding and coppicing, and, as the last resort, removal and reinstatement.

11.26 Also, practices such as coppicing would only be appropriate for certain species and ages of plants. This would need to be checked before works are conducted. For example, a mature oak tree would not recover from being coppiced and should be considered as a removal with it being reinstated at a 3:1 ratio.

12 Public Health

Proposed Changes at Benhall Railway Bridge

12.1 The Environmental Implications of Change Report identifies in Paragraph 4.6.11(b), impacts on access to schools and community facilities. There is however no specific consideration of access to healthcare. Temporary closures and diversion routes could increase travel times for residents accessing GP surgeries, pharmacies, hospitals, and community health services, particularly for vulnerable groups and those without flexible transport options. Public Health

consider that the ES should provide greater assessment of access to healthcare than has currently been afforded.

12.2 The report considers in Paragraph 4.6.10, two effects for health and wellbeing in relation to the proposed change: increased journey times and increased traffic. For some residents, particularly older people and those with limited mobility, the effects of community severance may extend beyond inconvenience and contribute to temporary social isolation, reduced participation in community activities and reduced contact with support networks. It is suggested that the ES should consider severance as a health determinant.

12.3 In respect of Air Quality, Public Health suggest that given the proximity of receptors to the bridge, and the sensitivity of residential park home users due to the building construction type, that any works to the bridge should be accompanied by dust and air quality impacts monitoring. This should be accompanied by a clear mechanism for the prompt implementation of additional mitigation should monitoring identify elevated levels or sustained impacts.

Alternative Landfall at Walberswick

12.4 Public Health notes the proposed relocation of the landfall to the G3 site and the Applicant's conclusion that the overall number of residential receptors likely to experience effects would be reduced compared with the previously proposed G2 location. However, the assessment also acknowledges that new receptors are likely to be affected by the revised landfall location. Public Health considers that the ES should provide further information on the characteristics and sensitivity of these newly affected receptors, including whether they include groups known to be more vulnerable to prolonged noise, lighting and amenity disturbance, such as older people, disabled people and those with existing physical or mental health conditions. This would provide greater confidence that the reduction in the overall number of significantly affected receptors is not masking disproportionate impacts on particular communities or population groups.

13 Public Rights of Way

13.1 These notes from Public Rights of Way (PRoW) are on the high-level plans which the Applicant has submitted, as the plans do not go into the changes in any great detail at this stage.

13.2 From a PRoW point of view, the new route at Walberswick is welcomed, however many PRoWs in the area will still be affected and these are well used routes for locals and tourists. Also, the Applicant will need to acquire and plot the definitive alignment of the PRoWs in this area, including for any temporary diversion routes. These routes connect Walberswick to the King Charles III coast path, and these routes need to be carefully considered and mitigated.

- 13.3 The Council has concerns over Walberswick Bridleway 021, as this is a tree lined route that affords much cover to PRow users, which is lacking on other routes in the area, due to the open nature of the coast. I wish to see more information about any possible tree removal along or through it. As with our previous comments to which these should be added, all temporary diversion routes should be at least commensurate with the original in width and surface. Any diversions should be as short as possible and a last resort after keeping them open with management.
- 13.4 In principle the Council does not have any strong concerns about these changes from a PRow point of view, however more detail is needed to be able to understand potential impacts on the network.