

FOR CONSIDERATION AT THE WPC MEETING OF 12 DECEMBER 2022

DRAFT Response of the Walberswick Parish Council
NGV Non-statutory Consultation: Eurolink

Walberswick beach is one of the proposed landing sites for the MPI Eurolink. As the elected Parish Council, we are writing on behalf of Walberswick residents, businesses, and visitors to object in the strongest terms to the proposal of using Walberswick as a landing site.

Our consultation response deals with NGV's proposals in two parts. First, we make the case in Section I that NGV should recognise that Walberswick is wholly inappropriate as a landing site and that it should, therefore, exclude it from further consideration. Second, in Section II, we point out that we would expect NGV to consider a much broader and more appropriate approach to landing sites and sub-station construction than its current set of proposals that all fall within and/or threaten green field, AONB, SSSI and protected reserve locations in a concentrated area of coastal Suffolk.

I. Inappropriateness Of Walberswick as a Landing Site

Through our participation in webinars and visits to the consultation exhibits, it quickly became clear that NGV knows very little about Walberswick. Its desk study missed a plethora of information that would have discounted Walberswick as a potential landing site. The information set out below should serve to inform NGV.

A. Environmental Concerns

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

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

In short, with the exception of RSPB Minsmere, it would be difficult for NGV to find a location on the Suffolk coast that has more environmental protection designations. To emphasise the catastrophic impact that Eurolink would have on flora and fauna in and around Walberswick, we use the example of the protected Marsh Harriers which were saved from extinction in the UK by a program launched in RSPB Minsmere. Marsh Harriers are included as part of the important assemblage of rare breeding birds on the Minsmere – Walberswick Ramsar site. The harriers depend heavily on reedbed habitat (including Walberswick) located to the north of the Minsmere New Cut (a sluice boundary at the southern end of RSPB Minsmere) for breeding but are known to also forage widely for food over the Minsmere South Levels and also the EDF Energy estate, including Sizewell Marshes SSSI. The difficulty of mitigating the impact that the construction of Sizewell C will have on Marsh Harriers was one of the chief concerns of the Inspection Panel that recommended against the building of the nuclear plant. (BEIS, however approved the DCO anyway overriding the recommendation of the Inspection Panel.) An important consideration in the construction of Sizewell C was whether it could mitigate its impact on Marsh Harriers. It was ultimately argued that the protected and undisturbed

Minsmere-Walberswick Heaths and Marshes Ramsar & SPA would serve as the area of breeding protection for the harriers. Additional land was then identified around Westleton to try to replace the harriers' foraging areas lost to Sizewell C. These areas were noted in NGV's Sealink documentation as needing to be avoided in determining best locations for cabling and sub-station construction. Therefore, it would seem impossible for Eurolink to now propose disturbing the Marsh Harriers habitat north of the Sizewell C site, including both Walberswick and Dunwich where the Harriers breed, which would entirely undo the Sizewell C Marsh Harrier mitigation plans.

B. Logistical Concerns: There is currently no road access for construction vehicles of any kind to reach the proposed Walberswick landing site. Reaching the shore is either by a small wooden footbridge and footpath through marshy terrain and over dunes to the beach or via a very narrow bridge (less than one lane) at the end of a gravel track that can carry only a single passenger car at a time. The load limit on this bridge and its narrowness mean that it cannot physically carry lorries. From there, only a footbridge through marshy land and then a walk over the top of the dunes does one reach the beach. The narrow bridge is owned by the Environment Agency and protects a sluice flap under it that separates sea water from the brackish marshes behind. The Environment Agency has already informed the Walberswick Common Lands Charity (the landowner) and the Walberswick Parish Council that the bridge may be unstable even for future passenger car use. The EA is looking at alternative means for accessing and maintaining the sluice flap. Therefore, NGV would have no means of accessing the proposed landing site.

It is worth noting that even before reaching this small bridge, access from the sole road into Walberswick (the B1387) is by a narrow single lane dirt track that is bounded by an Environment Agency sea wall protecting the marshes to the south and hedges that separate several private homes from the track on the north. Large construction equipment would be unable to realistically navigate this track even if there was a bridge capable of handling the load.

The constantly changing coastline and beach at Walberswick would be another challenge for using this as a landing site. The coast is extremely unstable and susceptible to erosion and the shape and surface of the beach is in constant flux. During many regular high tides, and nearly always during high tides when the weather is poor, Walberswick's shingle and sand beach is completely submerged up to the marron grass sand dunes and the marsh that lies behind them. Even the car parking area, proposed for construction support, is highly susceptible to flooding when the sea over tops the dunes especially during winter and spring tides. We would not think that such conditions were useful in managing construction timelines and costs. There are no electric connections to this area.

C. Impact on Businesses: Walberswick's economy is built around tourism drawn to the village by its beautiful natural beach, its areas of unique environmental interest and the tranquil and historic character of the village. Two pubs, three cafes, pub accommodation, 2 camping sites, dozens of self-catering businesses and several small shops are all supported by the year-round tourist trade. Walberswick beach is small and a large portion of it would be cordoned off as a construction zone. It would be impossible to walk along the beach from Walberswick towards Dunwich (part of the designated Suffolk Coastal Path) because the beach would be cut in two by the cable landing site. Subsequent tunnelling would lead to additional closures of footpaths heavily used by tourists and residents year-round. The bifurcation of the beach, the presence of construction equipment, tunnelling, noise and light pollution would destroy all the major elements that bring visitors to Walberswick. In 2021,

statistics were shared with Suffolk Highways demonstrating that in excess of 100,000 people walk through Walberswick and its footpaths every year. Evidence from the purchase of car park tickets shows that in 2021, over 51,000 cars parked at the Walberswick beach car parks. With an estimate of 4 passengers per vehicle, that would indicate that up to some 200,000 day visitors to the Walberswick beach would be lost. This does not count those who use the beach but stay overnight, live in the village or walk to or take the rowing ferry from Southwold to Walberswick. Whilst summer is the busiest time, Walberswick is a year-round destination for day and overnight visitors. In short, if Eurolink was to land on the Walberswick beach, the impact would be catastrophic for every village business. No business could realistically be expected to survive such a loss of tourist trade during Eurolink construction.

Finally, the Parish Council fully supports the points raised by the Walberswick Common Lands Charity (WCLC) in their consultation response about the specific devastation that would be caused to its financing and its ability to fulfil its charitable purpose if Walberswick were to be used as the Eurolink landing site. It is critical to note that the land identified for Eurolink in Walberswick is held in trust by WCLC on behalf of the people of Walberswick and it is not free to sell it. *(Note: This paragraph will be reviewed and updated prior to submission of the consultation document as necessary following any additional input from WCLC's consultation response.)*

D. Loss of Amenity: The construction phase of Eurolink and ongoing maintenance required would have a hugely negative impact on those living here. The loss of access to the beach and to land along the cabling route during construction, and the long-term environmental damage left behind, will represent an extremely serious loss of amenity. In addition, road access to Walberswick is limited to the B1387. This B-road is shared not only by vehicles (including a large number of farm vehicles) but by a very large number of cyclists and pedestrians. Walberswick has no roadside footpaths. Walberswick has the rare designation in Suffolk as a 20 mph zone in recognition of the danger to pedestrians, bicyclists and vehicles of having to share this single roadway that has only single lane access in many places. It would not be possible to safely accommodate the additional construction and worker vehicles associated with Eurolink.

II. Need to Consider Alternative Sites and Cumulative Impact

Section (I) above highlights the key reasons why Walberswick is an inappropriate site for cable landing and related cable laying. However, the objection of the Parish Council does not end there. It is the view of the Council that NGV has not properly considered alternative sites away from the Suffolk coast nor has it considered the cumulative impact that the multitude of energy project proposals including Sizewell C, the Friston substation for EA1 and EA2, Sealink, Eurolink, Nautilus and pending extension of power pylons would have on this one very small area of greenfield coast line and rural communities. We understand that locating sub-stations offshore is a common practice throughout continental Europe and there is no consideration of this in NGV's proposals (at least on the British side). Nor does NGV consider taking its Eurolink cable to the plentiful brownfield sites either further south or to those further north. Since the power that Eurolink would be carrying from the Netherlands is not destined for Suffolk, why is it not considering bringing its cable on land to areas of the UK where it is most needed? Nor has Eurolink shown why it is not considering sites around Sizewell which are already industrialised.

Finally, Eurolink has shown no effort to consider the cumulative impact that its proposals would have on the communities in its path. NGV has not acknowledged that its project would face

tremendous logistical constraints in terms of workers, worker accommodation, road access, rail access, and water supply for the construction of its substation and cable laying. Already, Sizewell C has admitted that its “local” work force will need to come from a distance of 90 minutes by car each day, that it will need to build dormitories for up to 5000 workers, that it will need to put thousands of additional HGVs on Suffolk’s roads every day for a decade or more. Sizewell C will have no water source and will have to bring in some 40 water tankers each day from the start of construction and then will have to build a desalination plant to provide it with potable water. The sub-station at Friston would add to this same picture making it inconceivable that more construction for Eurolink’s substation, cable routes and landing sites could be added to this mix in the same part of the Suffolk coast. Therefore, in addition to all the environmental destruction, the impact on the local community, and the devastation it would cause to local businesses and community amneity, NGV should also recognise the huge cost and time delays that its own project would suffer from trying to bring its cable and substation onshore here.

DRAFT