

14 August 2024

## Response of Walberswick Parish Council to the Application submitted by NGV to ESC for Ground Investigation

Walberswick Parish Council has previously submitted consultation responses objecting to the use of Walberswick's Manor field as a potential landing site for the Lionlink cable landfall with the subsequent cable route through Walberswick to Saxmundham.

NGV's application to undertake ground investigations (GI), unfortunately, continues in the same vein as Lionlink's other documentation and proposals in that it is unaware and/or dismissive of the serious environmental impacts of its proposed development in the Walberswick site. It also continues with its incorrect categorisation of the site as being "south of the Village" when in fact it is precisely in the heart of the village, surrounded on three sides by homes (within 5 metres according to documentation) as well as by a caravan site. On the fourth side of the proposed landing site is a heavily used, publicly accessible beach.

In the case of the GI, we believe it is incorrect to claim that the actions will have no significant impact on the Minsmere-Walberswick European sites or SSSI qualifying features. Key areas of potential impact have failed to be fully and properly assessed, raising serious concerns about the project's consequences on local wildlife and habitats. These concerns must be addressed before any permission for GI is given.

Lionlink failed to do its due diligence on the Walberswick site in making its proposals. Our local community, on the other hand, has at its own expense and effort, been gathering information on the area of proposed development. Rich data has been collected on the many species of bird, reptiles (including slow worms and adders) and protected species that reside in the area where Lionlink proposes to build and where it now wants to undertake GI. Some of the many dozens of bird species include bearded Tits, Cetti's Warblers, Woodlark, Marsh Harriers and Nightjar, known to inhabit the affected areas. These species are crucial to the local ecosystem, and their habitats must be protected. Scientific evidence shows that UAVs disturb birds, yet NGV proposes to use them as part of their investigation. Given the known negative impact on these birds, and particularly on waterfowl, it is incumbent that NGV fully investigate these impacts before any GI could be considered.

Moreover, protected species such as the Barbastelle bat and water vole, covered under the Wildlife and Countryside Act and Habitats Regulations, have also been found to reside in the area of the proposed development and have not been considered in NGV's proposal. It would be completely inappropriate for ESDC to allow NGV to go forward with the GI until it has completed a full Ecological Impact Assessment to address the risks to these species, with precautionary measures to mitigate any identified risks.

In addition to the impact on wildlife requiring the environmental impact assessment, the Walberswick community is highly concerned about the proposal for Borehole BHB near the beach sea defences as this poses a significant erosion risk. Seawater incursion is recognized as the primary threat to the protected site, particularly for breeding bitterns, yet the potential for the borehole to exacerbate this risk has not been sufficiently assessed. The possibility of physical damage and increased erosion at this critical location requires full evaluation prior to any permission being considered for GI.

Finally, there is relatively little information on how the GI would impact the many people who live adjacent to the GI works and the thousands of people every month who use walking paths in the GI area. (In this regard, people counters that have been installed have already shown some 14,000 people a month use the footpaths surrounding Manor Field.) We have

pointed out repeatedly that the Walberswick site is within a settlement area making it wholly inappropriate. However, if NGV insist on proposing GI here, then the impact of the GI on residents, visitors and tourism need to be fully disclosed, mitigation measures need to be developed and we would expect ESC to consult appropriately on these before any actions are allowed to go forward.

In short, NGV's submission has clearly failed to demonstrate that the proposed GI will not impact on the integrity of the protected sites nor that they have given consideration to the impact on the human environment given that the work is in a settled area. Therefore, ESC should refuse permission until fuller assessment is completed.