Walberswick Common Lands Charity
Founded 1901 - Registered Charity No. 206095
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LIONLINK

RESPONSE TO STATUTORY PUBLIC CONSULTATION

Introduction

1. This response is submitted on behalf of the Directors of WCLC Trustee Ltd, which is the sole corporate trustee of the Walberswick Common Lands Charity ('the Charity').[1] It has been considered and approved by the Board of the Charity.

2. The Charity owns land in and around the village of Walberswick in Suffolk. The original proposed landfall site, 'G', was on land owned by the Charity. The present proposed landfall site ("PLS") is not on land owned by the Charity. However, access to the PLS from the sea would require access via land owned by the Charity.

3. The Trustees submitted a Response to the Original Non-Statutory Public Consultation on 18 December 2022 and a Response to the Supplementary Non-Statutory Public Consultation on 2 November 2023. We continue to rely upon the material set out in those Responses.

4. The Trustees have seen the Response to the Statutory Public Consultation submitted by Walberswick Parish Council. We entirely agree with it.

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[1] With effect from 1 January 2026 the individual Trustees were replaced by a Corporate Trustee. The former individual Trustees became Directors of the Corporate Trustee. For convenience, the individuals are referred to as 'the Trustees'.

The Charity

5. The Charity was founded in its current form in 1901. However, our earliest records are from 1815 and its origins go back to the Poor Laws. The Charity generates income from its land and buildings which it uses for: (i) environmental stewardship of its land; (ii) providing support to individuals in need and hardship; and (iii) providing charitable assistance to charities, groups and for projects; all within the Parish of Walberswick. One of the most significant and regular sources of its income derives from the charges for parking in the two car parks which are owned by the Charity and used by visitors to the village. It also derives income as landlord of a number of village businesses.

6. The Charity's environmental stewardship work operates under a Countryside Stewardship Agreement (Higher Tier) ('CSA') with Natural England and includes conserving open heathland, grazing marshes and reedbeds. We return to this below.

7. In addition, the Charity works closely with the Suffolk Wildlife Trust to ensure that it maintains best practice.

8. The village of Walberswick has a diverse community of differing economic circumstances. The Charity provides discreet support to individuals in need and hardship in a variety of ways. It also supports charities and groups that themselves support the community, such as Dementia UK, the East Anglian Air Ambulance and the Lowestoft Food Bank. The largest beneficiary is the Sole Bay Care Fund which provides, amongst other services, end of life care. The Trustees are proud of the Charity's record in enabling village residents to pass away in their own homes, rather than more anonymous care facilities. For the 2025 year the Trustees gave charitable support and grants totalling over £58,000.

9. The Charity's annual returns and accounts are accessible through the Charity Commission's website.[2]

10. The Trustees take their environmental stewardship responsibilities extremely seriously, regarding it as a duty and a privilege to protect this important natural environment for current and future generations. The agreed vision for the Charity's environmental stewardship plan is that it "stewards its land in a world class manner, following a nature-first philosophy, with the support of the village community and partners." To achieve this we work closely with Natural England, National Landscapes, the Suffolk Wildlife Trust, RSPB and other environmental organisations.

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2 https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/206095/accounts-and-annual-returns

The Trustees' Position

11. The Trustees are unequivocally opposed to the proposal, both in general terms and in relation to the PLS in Walberswick.

A. Overall approach

12. No one applying objective criteria (apart from profit) in a rational way could conclude that Walberswick was appropriate for the landfall site. For example:

    (a) The village is accessed by a single, rural road; it has (and could have) no alternative vehicular access. Access to the PLS will depend upon that same road.

    (b) The PLS is surrounded on three sides by residential properties and the construction would be within metres of those properties. Unsurprisingly, this seems to be unprecedented.

    (c) Despite the repeated characterisation of the PLS as being 'south of Walberswick',[3] it lies in the heart of the village. It sits within metres of The Street, and some of its key businesses (The Tuck Shop and The Black Dog Deli).

    (d) The village is celebrated for its "rural character, tranquillity and wildness".[4]

    (e) The PLS sits within a small envelope which is surrounded by areas with various national and international designations[5] intended to protect the environment and its flora and fauna, as well as its "rural character, tranquillity and wildness". The land around Walberswick is amongst the most highly protected in the UK, in recognition of its national and international importance for landscape and biodiversity.

    (f) As a result, it has an established and thriving tourist economy, and is a "popular, high-end tourist destination".[6] That is not just because of the village and its beach, but because of the access it provides to the surrounding environment.

B. Failure to consult

13. We are also deeply concerned by the purported consultation. There are a number of key features in relation to which no assessment has been undertaken and so as to which no consultation is possible. In broad terms, these fall into two categories:

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3 See eg PEIR Non-Technical Summary ("NTS") ¶ 2.1.1(e), 2.2.1, 2.3.1
4 See eg PEIR ¶ 13.6.28
5 See Appendix
6 See eg PEIR 10.8.28

(a) No firm proposals have been made in relation to access to construction work, whether for vehicles, machinery or workers. That is astonishing given that the village has a single access road and given that this has been an issue of particular concern since Walberswick was first mentioned as an option and throughout the Non-Statutory Consultation exercise.

(b) Whilst the site's location within the heart of the village means that the construction phase will have significant impacts upon both residents and visitors, no specific mitigation measures have been identified but are said to be 'in development'. Mitigation measures are the single most important issue for consultation and yet there can be none.

14. "The information and documents that the applicant provides for consultation need to be clear and informative so that the project can be understood by anyone looking at it."[7] "A good PEI document is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Proposed Development and helps to inform their consultation responses on the Proposed Development during the pre-application stage."[8] The LionLink documents do not so enable consultees. For example:

(a) The potential environmental effects related to construction works upon human and ecological receptors have not been determined and require more detailed modelling.[9]

(b) Localised temporary adverse effects on ecology and biodiversity during construction have been identified, including potential effects associated with habitat loss and disturbance to protected species; however, compensation measures "are being developed".[10]

(c) Opportunities to reduce potential impacts on health and wellbeing from construction traffic, including noise and delays on local routes, remain to be explored.[11]

(d) Whilst significant effects are anticipated during the construction phase for receptors around the proposed Landfall site with regard to environmental amenity, and access to community facilities (including for vulnerable groups), any mitigating measures have yet to be explored.[12]

(e) Mitigation measures (including landscaping proposals) for the historic environment "are still under development at this stage".[13]

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7 NSIPs Guidance: "the stages of the NSIP process and how you can have your say"
8 NSIPs Advice Note 7 ¶ 8.4
9 PEIR NTS ¶ 5.2.10
10 PEIR NTS ¶ 5.2.17-18
11 PEIR NTS ¶ 5.2.29
12 PEIR NTS ¶ 5.2.30
13 PEIR NTS ¶ 5.2.37

(f) Nighttime working will lead to a significant adverse effect, as to which additional mitigation measures "are being developed".[14]

(g) Traffic modelling has not been undertaken (despite the potential for significant effects) and further mitigation will be required in relation to the significant effects on public rights of way. In each case further mitigation measures "are being developed".[15]

(h) The significance of intra-project effects (in particular on recreation and birds during the construction phase) has not been assessed.[16]

15. These failures are symptomatic of an enterprise which is driving forward a decision it has taken without undertaking proper due diligence. Moreover, it renders any meaningful consultation impossible. It is deeply regrettable that we made this point in our Response to the Supplementary Non-Statutory Consultation but it has not been heeded.

Impact of continuous drilling

16. These failures are amplified in circumstances in which it has been acknowledged that during the construction phase "Continuous 24-hour directional drilling works at the Landfall site would be needed during construction (as there will be instances where when the drill begins its work, it cannot stop)." "It is not anticipated" that 24-hour working will be required throughout the construction phase. However, there would be continuous working for up to 10 days in relation to each of 4 anticipated HDDs, a total of up to 40 days' continuous working (and potentially more) in 4 stages.[17] During such periods "lighting will be used throughout the night".[18] In a striking use of understatement verging on the insulting, this "may result in a diminished perception of the tranquillity of the village, resulting in perceived degradation of the local environment."[19] The noise will create a significant impact, coupled with a lack of predictable respite that will "likely" lead to adverse effects on mental wellbeing and quality of life.[20]

17. On any basis, this is a significant adverse impact on the village, its residents and visitors, as to which "additional mitigation measures are being developed".[21] As a result, there is no possibility of consultation in relation to any such measures.

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14 PEIR NTS ¶ 5.2.63
15 PEIR NTS ¶ 5.2.79
16 PEIR Table 28.5
17 PEIR ¶ 2.5.74
18 PEIR ¶ 10.8.28
19 Ibid
20 PEIR ¶ 10.8.26
21 PEIR NTS ¶ 5.2.63

Wellbeing, generally and of vulnerable groups

18. A still further worrying aspect of the PEIR is the failure adequately to address issues relating to wellbeing. This is an issue of particular concern to the Charity which (as noted above) has a particular focus on providing support to individuals in need and hardship. It has a particular understanding of the needs of the vulnerable within the village. There has been no attempt within the PEIR to consider how the construction stage might impact upon the vulnerable, other than at the highest, generic level.[22] There has not been the necessary focus on the fact that the residents of the village have a higher proportion of older residents[23] and how those residents might face a particular adverse disadvantage as a result of the proposals, including as a result of increased noise and lighting (especially during the extended periods of 24-hour work) and the lack of predictable respite; and as a result of the inevitable, but unexplained, limitations on access to, and within, the village. There is not even a suggestion that such impact can be mitigated. This is a significant failure in undertaking even any preliminary impact assessment, and one that should be obvious to anyone with even any moderate understanding of the village population.

C. **Socio-economic impacts including tourism**

19. A third area of concern is with the significant disjunct between various aspects of the PEIR. The most obvious is the anticipated impact on tourism within the village. Within chapter 16 of the PEIR (which addresses Socio-economics, Recreation and Tourism), table 16.23 concludes that there may be a "small, temporary impact on visitor experience". This is said to be because access to the village would be maintained and construction traffic would "not be directed through/into the village". This is an extraordinarily narrow impact assessment.

(a) The construction phase would take place within the village.

(b) The construction traffic would use the only access road into the village. Whilst it would be diverted from that road shortly before that road entered the village, the diversion would be via a haul road which would cross Lodge Road and a number of Public Rights of Way ("PRoW") which provide access from the village to the marshes, beach and surrounding landscape.

22 PEIR ¶ 10.8.30, 10.8.37

23 2021 census: 43% aged 65+; 35% 70+; 11% 85+

(c) Each of these factors would create a significant impact on "the rural character, tranquillity and wildness" which are accepted elsewhere within the PEIR to be precisely the qualities which attract tourists because they "provide respite and recreational opportunity".[24]

(d) Indeed, "the tranquillity around the southern, western and eastern edges of the village would be reduced by the noise and visual disturbance of construction plant and vehicles and offshore. This would affect its rural and coastal setting. The magnitude of impact would be medium, and this, assessed against the very high sensitivity of the LLCA [Local Landscape Character Area], would result in moderate adverse effects during construction, which is **significant**."[25]

(e) As for Walberswick Common (which is owned and managed by the Charity, and lies to the north), "The magnitude of impact would be medium and this, assessed against the very high sensitivity, would result in moderate adverse effects, which is **significant**."[26]

(f) The fact that a PRoW will either remain open or require only a minor diversion[27] ignores the fact that (for example) the PRoW will be fenced off from the surrounding landscape and/or will pass the construction site and/or will cross over the haul road. They may be usable, but the pleasure in doing so will be removed.

(g) Even with mitigation, there will be "A significant noise effect" along the Street, Stocks Lane and Millfield Road[28] and within the surrounding 'public realm' so that "Changes to the noise environment are likely to affect the community's perception of the character tranquillity of the area, adversely affecting wellbeing and quality of life."[29]

(h) This all in the context of "an idyllic seaside destination".[30]

(i) The disjunct is that the impact on the environment and on residents is not read across into the impact on visitors and, in turn, on tourism within the village. Rather than the impact being "small, temporary" it will – consistently with the other conclusions within the PEIR – be significant.

20. In summary, the impact of major construction work at the PLS, involving heavy machinery, excavations, drilling, noise, dust and lighting, would be immense in social, environmental and economic terms. There will inevitably be an impact on the area not only as an amenity to local

24 PEIR ¶ 13.6.28
25 PEIR ¶ 13.8.79
26 PEIR ¶ 13.8.78
27 PEIR ¶ 16.8.13
28 PEIR ¶ 10.8.26
29 PEIR ¶ 10.8.27
30 PEIR ¶ 10.6.37

residents, but on the potential attraction of the area to the thousands of visitors who come from far and wide – to walk, to go to the beach, to surf, to go crabbing or to watch wild birds. This represents a real threat to Walberswick's economy and the revenues of local businesses.

21. That will, in turn, have a significant impact on the Charity's income which will limit our ability to fulfil our objectives. This is because:

    (a) The Charity is the landlord to a number of local businesses, which depend upon tourists to generate revenue – moreover, the income from tourists in the season means that the businesses can survive to support the residents throughout the year; and

    (b) The Charity derives a significant amount of its income from the two car parks (which are managed for it by Walberswick Car Parks Limited). In 2025, 44,000 car parking tickets were purchased. There can be little doubt that during the construction phase this number would fall dramatically as, in turn, would the Charity's income.

22. There is an assumption underlying the PEIR that any adverse impact will last only for the duration of the construction work. That is not a safe assumption: the work is very likely to taint the reputation of the village as a an idyllic seaside destination, a hard-won reputation that will need to be regained.

Environmental impact

23. Any investigation and assessment of a landfall site which is proposed to be located in such a highly protected environment must be detailed and thorough.

24. The Trustees are concerned that the assessments underpinning the PEIR are, at best, perfunctory.

25. For example:

    (a) The survey of marsh harriers bears no relation to the experience of any visitor to the area.

    (b) The surveys notably fail to consider the areas which are themselves the subject of proposed development (both the landfall site itself and the adjacent field through which the haul road would inevitably run). These are areas over which marsh harriers and lapwings are regularly present. The spinney at the bottom of the latter field is called locally 'nightingale alley' because of the annual return of nightingales during the late spring. None of this is surveyed, let alone recorded as part of the PEIR.

(c) The Charity is particularly proud of its work on Walberswick Common, including the fostering of an environment in which nightjars can breed. They are highly sensitive to noise, light and vibration. The threat to that habitat is of significant concern.

26. Furthermore, there will be a significant adverse impact on the protected habitats that surround the PLS which seem not to be capable of mitigation. There appears to have been no separate consideration of the impact of 24-hour construction work, including the inevitable noise and light disturbance, upon the local wildlife.

27. All of these factors mean that the highest level of assessment ought to be required before any intrusive work is even contemplated. That simply has not happened.

28. One final example: in August 2025 the first breeding pair of Zitting Cisticola in Britain was spotted at Walberswick.[31] This led to many birders from across the country visiting the village, parking in the car parks (generating income for the Charity) and walking along the beach to try to spot the birds. They stood on the bank between the coast and the marshes, looking inshore, directly towards the PLS. If the construction work takes place the birds are highly unlikely to return, the visitors will not come and their view will be scarred. It is not enough to assume that this will be temporary.

Conclusion

29. We reiterate our hope that at a national and regional level there is greater coordination between Government agencies, utilities and developers to combine resources and leverage existing infrastructure and sites.

30. There is no doubt that the construction works will have an impact on the Charity's income which will limit our ability to fulfil our objectives.

31. That unsuitability and that impact mean that the Trustees would be compelled to object to any proposal for an interconnector, or related cabling, on or under its land.

32. At the same time we note that the PLS is within the Suffolk Coast and Heaths AONB, and closely surrounded by sites of national and international environmental significance. Moreover, there appears to have been no proper consideration of the cumulative impact of the various projects proposed and in progress within the wider area. We would therefore urge NGV, related entities, Ofgem and the Government (in line with the proposals of the June 2023 Winser Report) to review the LionLink proposal in its current form, and to give further consideration

31 https://www.birdguides.com/news/historic-first-nesting-of-zitting-cisticola-in-britain/

to creating an offshore grid that would enable the power cables to be brought onshore at an existing brownfield site closer to the South East where demand is highest.

Richard Leiper KC
Chair of the Board of Directors of WCLC Trustee Ltd
8 March 2026

Appendix
Designations

1. The village of Walberswick sits in an Area of Outstanding Natural Beauty. The PLS falls within that AONB.

2. Access between the sea and the PLS involves land which is within:

   (a) A National Nature Reserve, established to protect the most important habitats, species and geology, and to provide outdoor laboratories; particular features of this NNR include rich beach flora, wetlands which are home to species such as marsh sow thistle and sneezewort, and wildlife including otter and Natterjack toad, along with 280 bird species including bittern, marsh harrier, bearded tit, woodlark and nightjar.

   (b) A Ramsar Site. In other words, they are Wetlands of International Importance. Under Article 3 of the 1971 Convention the United Kingdom has an international obligation to promote the preservation of those wetlands. It particularly warns against likely changes as a result of "technological developments, pollution or other human interference."

   (c) A Site of Special Scientific Interest. The land abutting it (including the south part of the field upon which the G2 proposal is sited) falls within an SSSI Impact Risk Zone.

   (d) A Special Area of Conservation (an area recognised as being of international importance under the Habitats Directive[32]).

   (e) A Special Protection Area (an area recognised as being of international importance under the Birds Directive[33]).

   (f) The Priority Habitat Inventory, under three categories:

      (i) Coastal Saltmarsh; or

      (ii) Maritime Slopes; or

      (iii) Reedbeds.

3. The village itself is a Conservation Area. The PLS abuts that conservation area on two sides.

4. In short, the land around Walberswick is amongst the most highly protected in the UK, in recognition of its national and international importance for landscape and biodiversity.

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32 Council Directive 92/43/EEC
33 Council Directive 79/409/EEC

5. In addition, the land falls within the East Atlantic Flyway, a migratory bird route recognised for its vital importance to bird populations and wildlife. As a result, it has been identified by the United Kingdom Government as one of only seven places on the UK's Tentative List of UNESCO World Heritage Sites (only three of which are 'natural', as opposed to 'cultural').[34] It is important to note that migratory birds are often to be seen resting in the field that is identified as the site for G2.

[34] https://www.gov.uk/government/news/seven-sites-confirmed-in-the-running-for-unesco-world-heritage-status; https://whc.unesco.org/en/tentativelists/6689/