



Ministry of Green Transition

ESPOO

J.nr. 2025 - 12669

Ref. MARBS

3rd of September 2025

To Espoo Points of Contact

Germany
Poland
Russia
Estonia
Latvia
Lithuania
Finland
Sweden
Norway

Notification concerning environmental impact assessment of Nordhavn-Lynetteholm

Legal authority

The Espoo Convention¹ on Environmental Impact Assessment in a Transboundary Context, which has been incorporated into the Environmental Impact Assessment Directive² and the Strategic Environmental Assessment Directive³, along with the Danish Public Roads Act⁴, requires the parties to notify and enter into consultations with affected countries and carry out transboundary environmental impact assessments.

Denmark hereby notifies Germany, Poland, Russia, Estonia, Latvia, Lithuania, Finland, Sweden and Norway of the conduct of an environmental impact assessment process for the 'Nordhavn-Lynetteholm' project. Notification is given pursuant to Article 7 of the EIA Directive.

On 28 June 2021, a political agreement was reached between the Danish government and a number of parties on the "Infrastructure Plan 2035". On the basis of this agreement, the Ministry of Transport has launched an environmental impact assessment process for the 'Nordhavn-Lynetteholm' project.

Background and relationship to the 'Eastern Ring Road' project

The examination of the 'Nordhavn-Lynetteholm' project has been decided on at government level as a supplement to the ongoing examination of the 'Eastern Ring Road' project, which the Espoo countries were notified of in spring 2024. The

¹ Convention of 25 February 1991 on Transboundary Environmental Impact Assessment

² Directive 2011/92/EU of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment

³ Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment, and Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

⁴ Consolidated Act no. 421 of 25 April 2023 on public roads etc.

relationship between the two projects is that they partly overlap in purpose and geography, where the 'Nordhavn-Lynetteholm' project is a shorter road connection than the Eastern Ring Road, covering only two of the four connection points included in the 'Eastern Ring Road' project. The two projects will be assessed in parallel.

Because of the geographical overlap between the two projects, it will only be relevant to start one of them. If it is decided to start the Nordhavn-Lynetteholm project, a decision can be taken at a later date to assess the environmental impact and establish another phase covering the stretch from Lynetteholm to Copenhagen Airport.

Description of the Nordhavn-Lynetteholm project

Nordhavn-Lynetteholm is planned as a road connection from Nordhavn through an extension of the Nordhavn Tunnel to Lynetteholm, which is currently being built by another client; see Figure 1 below. The location of the connection point at Lynetteholm is basically unchanged from the location determined at the time of the environmental impact assessment for the Eastern Ring Road. The connection point at Lynetteholm will be designed with access and exit ramps to the north and will be closed off to the south in a blind tunnel, so it will be possible to plan, examine and decide on a further extension from Lynetteholm to Prøvestenen and/or Kastrup at a later date; see Figure 1 below.



Figure 1 Nordhavn-Lynetteholm is planned as a road connection from Nordhavn, extending the Nordhavn Tunnel to Lynetteholm.

Nordhavn-Lynetteholm is being examined and planned as a road connection combining a site-cast tunnel and an immersed tunnel solution. The tunnel elements are expected to be produced in a dry dock at the tunnel element factory for the Fehmarn Belt Fixed Link in Rødbyhavn on Lolland. The immersed tunnel will be made up of four individual tunnel elements, to be produced at the tunnel element factory and then towed by sea to the project site outside Copenhagen. The elements will be placed end to end on the seabed in a pre-dredged tunnel trench. Once they are in place, the tunnel elements will be covered with a protective layer and the seabed restored on top of the trench.

In the continued work on the design and environmental impact assessment of Nordhavn-Lynetteholm, a range of technical and environmental matters need to be

investigated in more detail. For example, the final design of the tunnel, the technical solutions for the two access points and the connections to the surrounding road network have to be determined. As part of the project, raw materials for the construction of the tunnel are expected to be extracted at sea in an area still to be confirmed. Finally, it has to be determined whether the relocation of existing installations, including cables, wastewater pipes etc., results in new discharge points into the sea.

Possible transboundary impacts on the environment

Based on the project description (see preceding text), the following issues have been initially identified as relevant to investigate and assess further in relation to potential transboundary impacts during the construction and operational phases of the project: changes in hydrography and sediment dispersion, impacts on marine flora and fauna, water quality, underwater noise, emissions, shipping and traffic conditions on land. This list is not necessarily exhaustive.

Invitation to participate in the consultation process

The task of preparing an environmental impact assessment of the Nordhavn-Lynetteholm project is being undertaken by the state-owned company Sund & Bælt, which has been delegated the task by order of the Minister of Transport. According to the Executive Order, the Danish Transport Authority will handle the necessary regulatory matters.

The environmental impact assessment for Nordhavn-Lynetteholm is covered by the process described in Chapter 2a of the Danish Public Roads Act on environmental impact assessment of state road projects. This means that, prior to preparation of the EIA report, Sund & Bælt has to notify any states that could be affected; see rules in the Espoo Convention.

The environmental impact assessment process for Nordhavn-Lynetteholm is expected to run until 2026. The environmental impact report will then be sent out for public consultation in Denmark, and the Espoo report will be sent to potentially affected states, probably for 8 weeks. The documentation will be translated into the relevant languages; however, maps will only be available in Danish and English. Based on the environmental impact assessment and consultation, a political decision will be made on a possible Construction Act for 'Nordhavn-Lynetteholm'.

If you wish to participate in the environmental impact assessment process and have any requests or comments on the potential transboundary environmental impacts to be investigated in the environmental impact report, please send your request for participation or comments no later than 06.10.2025 to espoo@sgav.dk, quoting reference number: 2025-12669.

Kind regards,

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