

OPEN FLOOR HEARING #1 – WRITTEN SUBMISSION 26/11/2026

Verbal evidence given on Thursday 6th November 2025

My name is Nicholas Bridges. I am a chartered architect specialising in heritage and planning, living in Orford. My mother was a founding member of the Alde and Ore Association. My Relevant Representation number is 3944. I have 3 points on heritage and landscape impacts, and the importance of the ExA recording its assessments without fear or favour.

1 The LVIA's Area of Search was so small that it excluded the visibility of the Substation and converter station shown in the ZTV plans. These will be visible from the south side of the Alde Estuary, in the AONB, and within the settings of the listed St. Botolph's, Iken, and Martello Tower CC at Slaughden. Both have high national historical and architectural interest. Despite my request for NGET to submit their ZTV plan which already shows visibility of both the Saxmundham and Friston buildings at the south side of the Alde Estuary, they have not done so, nor explained why not. The lack of assessment on the effects on Landscape, Visual and Cultural Heritage ES topics is a major omission as the part of the estuary affected is inside the Suffolk Coasts and Heaths AONB and is covered by multiple natural designations.

This is contrary to the multiple statutory constraints in the National Policy Statements, noted below:

EN-1 The Overarching National Policy Statement of Energy

4.1 Assessment Principles

4.1.5 Weighing impacts and benefits – Secretary of State should take into account ... potential adverse impacts on the environment, including any long-term and cumulative adverse impacts

4.3 Environmental Effects / Considerations

4.3.2 The EIA Regulations 2017 specifically refer to effects on population, human health, biodiversity, land, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them.

5.9 Historic Environment

5.9.4 Designated heritage assets and non-designated heritage assets of archaeological interest (5.9.6)

5.10 Landscape and Visual

5.10.4

Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement.

5.10.7

National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty.

5.10.8

The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them.

5.10.10

Heritage Coasts are defined areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.

5.10.11

Development within a Heritage Coast (that is not also a National Park, The Broads or an AONB) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area.

5.10.12

Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention.

EN-5 Electricity Networks Infrastructure

Landscape and Visual Impact

2.9.17 Apply the Holford Rules

2.9.18 Apply the Horlock Rules

[many good bullet points – good to just refer to these 2 paras]

2.11.2 The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules.

2 The impact of the development on the character of the countryside, which is protected in policy even if not in the AONB. The impact will be direct and permanent in ES terms. The effects of the proposed mitigation will be limited and will not remove the harm. NG have reserved land for further developments which should be in the cumulative assessments. Any permitted harm

should not be a precedent for further development with similar effects on the landscape. That countryside which remains if DCO consent is granted will become even more valuable.

3 Detail of submission documents: The submitted design control drawings of the new buildings are inadequate. The design analysis has been done in Co-ordination **document 7.10**. Using the Rochdale envelope to avoid committing now is an abuse of the process. The LVIA is consequently inadequate as it has no massing to image.

The responses by National Grid in the last few days still do not commit to a design which can be controlled by any permission of the EXA or Secretary of State. The updated LVIA verified views are still only AVR2s, not the full renders of AVR3s. These are simple buildings and NGET has much experience in designing them.

4 Cumulative Assessment: If the ExA is minded to recommend approval to the Secretary of State, it is essential that the harm in the tilted balance is clearly valued and expressed, as with Friston's EA1North DCO report to the SoS. This is to guide any future ExAs assessing future cumulative developments.

My opinion, and that of many others from all walks of life heard here in the last two days, is that the benefits of this development do not justify the permanent harm when less damaging designs are possible elsewhere.