

***Comments on Action Points arising from Issue Specific Hearing 2 (ISH2)
on environmental issues held on Wednesday 28 January to Friday 30 January 2026.***

4. Noise pollution at HDD Compound, RSPB North Warren reserve. *Please note this is not between Aldeburgh and Thorpeness, this is within the Aldeburgh boundary completely.

Should commitment be changed to read; 'for a maximum of 6 months'. And would ExA please ask for provision of quiet (enclosed) generators to further reduce dB created.

Linked to this, what measures could also be incorporated to reduce vibration impact to receptors?

The HDD compound is proposed to be sited within a sensitive area of National Landscapes, can the compound size/impact be reduced further by providing equipment storage, workers parking and welfare facilities elsewhere (with shared transport provided to/from a location further away)?

What light pollution would also be caused by 6 month working timeframe?

15. Construction vehicles using Suffolk Access S-BM13 off Thorpe Road in the Construction Traffic Management Plan.

It is not clear how the King Charles III England Coast Path and Suffolk Coast Path, or the Thorpe Road will be 'managed' by the Applicant during HDD construction operations, and maintenance if vehicles are needed to access S-BM13.

The shingle area to the East of Thorpe Road is an extensively used footpath and cycleway to/from Thorpeness as part of the vital Tourism economy, and daily exercise/enjoyment as it links directly to the ancient, Grade I* Moot Hall to the South walking past the Scallop Shell sculpture tribute to Benjamin Britten.

The Applicant states there will be no need to restrict access, but this cannot be the case during HDD which will require safety fencing and exclusion around it. Applicant said that vehicles may need to access the beach to clean up any Frac-out.

How close to the shoreline will HDD equipment or shipping be required? People walk along the high-water mark and where the sea breaks onto the shore, and daily swim in this area.

45-49. Suffolk Coast & Heaths National Landscape (AONB)

It is widely accepted and articulated in NPS EN-1 that AONBs have the highest status of protection in relation to landscape and scenic beauty and that development consent can only be granted in these areas in "exception circumstances". There is strong evidence that this application is not compatible with the special characteristics of the Suffolk Heritage Coast especially landscape character and visual amenity.

Scenic qualities include;

- striking landfall of shingle beaches and cliffs, inspiration for poetry, music etc.
- varied habitats, and protected species of flora and fauna, birds and insects.
- appeal to the senses – from openness of vista, big skies and memorable views, and
- the quality of light, smell, sounds (including bird song).

Other landscape characteristics and qualities include;

- a sense of remoteness with few major roads and minimal traffic, dark skies,
- a lack of human influence (few man-made structures, absence of development),
- a sense of the passing of time, and
- a return to nature, in other words relative tranquillity not found elsewhere.

I would encourage the ExA to also ask the Suffolk Coasts & Heaths National Landscape to also address this question and provide evidence to you.

Part of the test for exceptional circumstances EN-1 5.10.32 is the **needs case** for the development. I would request ExA to hold an ISH on the Need Case so this can be examined.

I believe there is no evidence that there is a need to bring 2GW power into this area via SeaLink. Equally both SZC and SPR EA1N & EA2 were offered connection agreements based on capacity being available on the Grid, with no mention of the need for SeaLink within their DCO examinations, and no other projects have been approved since, so therefore there is no additional need to take 2GW away from the area.

If there is a national need/overriding public interest to bring addition power to Kent this could come direct from offshore windfarms or via an offshore HVDV Convertor Station similar to the new SPR High Voltage Direct Current off-shore Convertor Station for EA3.

If there is a need to take excess power brought ashore by SPR EA1N and EA2 outside of the East Suffolk coast and the 400KV line does not have capacity, then this power should not be brought ashore to begin with to the Friston Substation and should connect via offshore cable to an industrial area closer to where the power is needed.

This assessment should include the cost of, and scope for, developing all or part of the Application elsewhere outside of the designated area or meeting the need for it in some other way – and the Applicant has not included this. Other technologies exist which have not been costed or presented as part of this Application including OHA approaches. There is also no negative impact on the local economy if the project was not located here. In fact, the tourist economy would be better served if it was not consented here.

The special qualities of the Suffolk Coasts and Heaths National Landscape also includes the SSSI categorisation at RSPB North Warren and Aldeburgh-Leiston SSSI. 5.3.11 states that “where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments) development consent should not normally be given. (*Note this does not have to be significant adverse effect.) And an exception should only be made “where the benefits

(including need) of the development at this site clearly outweigh both the impact that is likely to have on the features of the site that make it of specific scientific interest and any broader impacts on the national networks of SSSIs. “

In conclusion it is clear that the needs case for the development at this site versus elsewhere need to be examined and the extent established.

The negative impact cannot be fully mitigated within the budget or timeline which the Applicant has. The ExA for SPR EA1N and EA2 commented that the environmental harm of that project to the area was only just outweighed by the overarching public interest, and that any further development in the area should be considered very carefully. NGV LionLink project rejected landfall in the same location at Aldeburgh saying there was “substantial ecological and other challenges, and constraints”.

The Applicant themselves in discussing Inter-project cumulative effects 7.16.16 states that “The concentration of construction activity associated with the landfalls and HVDC cable corridors within part of the Suffolk Coasts and Heaths AONB has the potential to alter the perception of the AONB with construction of major energy projects becoming a temporary characteristic feature of the landscape.” Even temporary would be of harm to the National Landscape and SSSIs. Total cumulative effects on representative viewpoints would also have the “potential to be significant” as a result of the Suffolk Onshore scheme (SeaLink) with SPR EA1N & EA” and LionLink – at all project stages.

130. Design Principles.

It is not clear how even with involvement of the Panel that the Guidance for National Infrastructure Commission Design Group principles can be incorporated into this Application and consulted on. The Design Principles Handbook is clear that these should include;

- Lowest possible carbon impact to enhance the environment and contribute to nature recovery, and be ready to withstand growing climate pressures. (*Note a further 5m of cliff was lost at Thorpeness since the ISH2 with 23m lost in the last 6 months).
- Developing a truly inclusive and accessible design that is sympathetic to the social and community context in which it will operate
- How the project will serve as a “active Steward” for the local landscape, prioritizing nature-based solutions and boosting a local sense of identity
- Look beyond the site boundary at how the project can maximise the value of investment, including by working with other partners.

With ref to NPS EN-1 5.10.33 I am concerned that the Sec of State would not be able to ensure that the project should be carried out to the highest environmental standards secured via the DCO because the Application lacks design detail and my experience is that it is only when contracts are let (post approval) that full details of projects are agreed. The Applicant has also demonstrated that they wish to provide minimal landscaping and has consistently downplayed impacts throughout the application.