

Walberswick Common Lands Charity

Founded 1901 - Registered Charity No. 206095

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RESPONSE TO “TARGETED 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. G2 and G3 are not on land owned by the Charity. However, access to both of those sites 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, a Response to the Supplementary Non-Statutory Public Consultation on 2 November 2023 and a Response to the Statutory Public Consultation on 8 March 2026. We continue to rely upon the material set out in those Responses.

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’.

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

The Trustees' Position

5. The Trustees are unequivocally opposed to the proposal, both in general terms and in relation to the new proposed G3 site in Walberswick.
6. The proposal of a third site in the village reveals how ill-thought out the identification of Walberswick as a landfall site was in the first place. In our Response to the Statutory Consultation, we observed that “These failures are symptomatic of an enterprise which is driving forward a decision it has taken without undertaking proper due diligence.” A further change to the proposed construction site reinforces that point.
7. No degree of tweaking can mitigate the fundamental problems associated with trying to undertake this work in the village – and it remains “in the village”.
8. Those issues include:
 - (a) The village has a population that is significantly older and/or more vulnerable than the average.
 - (b) The village is accessed by a single, rural road; it has (and could have) no alternative vehicular access. The Targeted Consultation document states that “Construction access would primarily use the proposed temporary haul road from the B1387”, but that is hopelessly vague. If the B1387 is used at all, as it must be, this will cause significant disruption to all people visiting the village – residents, their visitors, tourists, service-providers.
 - (c) G3 sits within a small envelope which is surrounded by areas with various national and international designations² intended to protect the environment and its flora and fauna, as well as its “rural character, tranquillity and wildness”.³ 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.

² See Appendix to our Response to the Statutory Consultation.

³ See eg PEIR ¶ 13.6.28

- (d) As a result, it has an established and thriving tourist economy, and is a “popular, high-end tourist destination”.⁴ That is not just because of the village and its beach, but because of the access it provides to the surrounding environment.
 - (e) G3 is extremely close to residential properties (as was G2).
 - (f) G3 is closer to Walberswick Common – owned by the Charity – which has these designations. It is also close to the village Church, which was dedicated in 1493.⁵
 - (g) It appears that surveys are now being undertaken to assess the possible impact of G3 upon the Common and its fragile ecology. We cannot see that a satisfactory and thorough assessment can be undertaken within a compressed timescale.
 - (h) Moreover, it means that the assessments set out in the PEIR are now based upon the wrong assumption; they have not been updated. By way of example only, in relation to the Common, the PEIR stated: “The magnitude of impact would be medium and this, assessed against the very high sensitivity, would result in moderate adverse effects, which is **significant**.”⁶ What now is said to be the magnitude of impact on the Common, or the adverse effects to it? How can a Targeted Consultation replace or supersede a Statutory Consultation if such fundamental information is lacking?
 - (i) The recent devastating fire on Dunwich Heath – an area afforded the same statutory designations as both Walberswick Common and the Charity’s littoral land under which the proposed HVDC offshore cable alignment would traverse – sadly illustrates how absurd it is to contemplate a national significant infrastructure project in this area.
9. Our Response to the Statutory Consultation identified a number of areas in relation to which there had been a failure to consult. That remains the position. The Targeted Consultation makes no effort to remedy the lack of information which underlies the purported consultation, including (for example):
- (a) The plans for the temporary haul road;
 - (b) The mitigation proposals for G3.
10. The position is all the more worrying in circumstances in which there has been a change from G2 to G3 (notified to us on 6 July 2026) within 4 months of the closure of the Statutory Consultation exercise on 10 March 2026.

⁴ See eg PEIR 10.8.28

⁵ Bettley & Pevsner, *The Buildings of England – Suffolk: East*

⁶ PEIR ¶ 13.8.78

11. It is impossible to have any meaningful consultation where significant information on the practical operation of the site is missing and where no apparent assessment has been undertaken.
12. The revised construction working hours are some improvement, but:
 - (a) The originally proposed working hours were so unreasonable that this was an obvious and inevitable development;
 - (b) The “limited exceptions” mean that the continuous 24-hour construction activity for up to 10 consecutive days per drill would remain a feature of the work. That will involve enormous disruption to local residents and visitors, and is a key factor in demonstrating why the site of the construction work for the landfall site can never be in any village, let alone one with the qualities of Walberswick outlined above and more fully in our Response to the Statutory Consultation.

Richard Leiper KC
Chair of the Board of Directors of WCLC Trustee Ltd
5 August 2026