

The Parish Councils of Assington, Bures St Mary, Leavenheath, Little Cornard, Polstead & Stoke by Nayland

Combined representations to the Planning Inspectorate regarding National Grid Electricity Transmission's application for a Consent Order for the Bramford-Twinstead network reinforcement

As the representatives of six communities covering a continuous stretch towards the western end of the proposed development, the Parish Councils have previously prepared joint responses to National Grid during earlier rounds of consultation, and are concerned that NGET has not taken legitimate planning policy concerns into account in the development of the scheme.

The parish councils are fully supportive of the need to develop the electricity grid to support the transition to net zero, and acknowledge that the principle of reinforcing the network from Bramford to Twinstead is already established.

However, we believe that further undergrounding is both justified and necessary in order to prevent damage to the setting of the AONB:

1. Throughout almost all of Section F (Leavenheath & Assington), the proposed overhead line runs within 1.6km of the boundary of the Dedham Vale AONB, and significantly closer to the Stour Valley Project Area along much of its length
2. In Section E, throughout the consultation process we have emphasised the likely impact of the proposed siting of the Dedham Vale East CSEC immediately adjacent to the edge of the AONB, which would be substantially mitigated by siting the CSEC in Layham Quarry. This would significantly reduce visibility of the proposed line from the AONB and from the Millwood and Heath Roads in Polstead, which are significant routes for visitors to the AONB. Furthermore, the exhausted portion of Layham Quarry would provide a vastly superior base from which to support construction when compared to the main construction camp sited alongside the A134 at Leavenheath.

NGET's current proposals for the Norwich to Tilbury line include an underground section through Great Horkesley, based on acknowledgement that overhead line in such close proximity to the AONB would have meaningful impact on its setting. We do not believe that NGET has taken the similar impacts and the depth of local concern into account in its Consent Order application for the Bramford to Twinstead reinforcement, and we request that the Planning Inspectorate consider this disparity in its examination of the current application.

The overarching National Policy Statement for Energy makes explicit that outside structures have impact on AONBs, and the Holford Rules emphasise the need to avoid impact altogether. We believe that there is significant danger that the proposed scheme would cause 'significant adverse landscape and/or visual impacts on highly sensitive visual receptors out-from and in close proximity to nationally designated landscapes' (Draft National Policy Statement for Electrical Networks Infrastructure (EN-5) (Sept 2021) § 2.11.14), which has not been taken properly into account.

The Parish Councils' position is that NGET's interpretation of the NPS in relation to Bramford-Twinstead is excessively narrow, and therefore that the proposal does not address the requirement to protect the setting of the AONB and Project Area adequately. The Dedham Vale AONB Position Statement (November 2016) emphasises that (i) the setting of an AONB does not have a geographical border, and (ii) in national policy terms, adverse impacts such as the blocking or interference of **views out of the AONB** carry the same weight as adverse visual impacts from developments **within the AONB**.

We intend to seek expert landscape to establish whether the Applicant's submissions regarding the setting of the AONB have been competently interpreted in conformance with relevant national policies, and whether the two overhead sections referenced above create unacceptably negative landscape and visual impacts when set against planning policy and best practice. Following advice from the Inspectorate, we intend to submit our findings by Deadline 9 (23 February 2024), and request that the Inspector regard this submission as a summary of the Parish Councils' concerns until then.