

Deadline 2 submission for Bramford to Twinstead (EN020002)

1. Introduction:

1.1 This is the joint deadline 2 submission of Babergh District Council and Mid Suffolk District Council

1.2 It sets out the councils' response to documents submitted at deadline 1 and any other comments required by deadline 2 in accordance with the Rule 8 letter. All document references correspond with those specified in the document library.

2. The applicant's draft itinerary for an accompanied site visit (ASI) [REP1-026]:

2.1 BMSDC strongly suggest that the driven route to stop 1 does not include the B1113 through Sproughton village due to known traffic congestion issues. It is preferable for the ExA to drive the construction traffic route from the A14, junction 52 (the Claydon interchange) then south on the B1113 to Bullen Lane. Subject to the suggested route change at 2.2 below, the onward route to Burstall Bridge can travel via Burstall Lane, thereby avoiding the B1113 through Sproughton village in both directions.

2.2 As explained in oral submission at the preliminary meeting, Babergh District Council and Mid Suffolk District Council consider it appropriate for the ExA to consider the visual and landscape impact of the development at Bramford substation, together with the potential cumulative effects of other development in that area. As such, it is considered that this would be best understood by driving the following route, leaving from and returning to Bullen Lane, Bramford:

Bullen Lane, left onto B1113, left onto Tye Lane, left onto The Channel, left onto Church Hill, left onto Burstall Lane, left onto B1113 back to Bullen Lane.

2.3 The ExA is encouraged to take up the opportunity to visit viewpoints on the PRow network unaccompanied, in order to fully understand the potential long-term visual effects on recreational receptors and on local landscape character.

3. Ecology comments on other Submissions received at Deadline 1

3.1 There is some uncertainty regarding biodiversity net gain and Requirement 13. We have been unable to find the information referred to in the documents submitted.

3.2 We support the RSPB's requests in their Statement of Common Ground for monitoring of impacts on Hintlesham Woods.



4. Landscape comments on other Submissions received at Deadline 1

4.1 Please can the ExA confirm that US14 to Appendix 6.4 of the ES (APP101) to (APP-107) were used in the field to inform understanding of LVIA issues alongside photomontages of the relevant viewpoints (APP-063 to APP-065).

4.2 Specific reference is made in US11 and US12 that viewpoints HV01, AB20, AB10, CO8, and F2 were visited. Please can ExA clarify which if any, additional viewpoints have already been visited?

4.3 The Councils suggest that additional viewpoints could usefully be visited, if not already done so, to understand the scale of the adverse landscape or visual effects and/or where the sensitivity of the receptors are important, such as:

- i. AB21 View from PRoW north of Hintlesham
- ii. GO1 View from PRoW near Dorking Tye house.
- iii. GO7 View from PRoW near Mabb's Corner

4.4 Additionally, it is suggested a closer viewpoint assessment and photomontage is needed for the Stour Valley East Cable Sealing Compound. The current photomontage from VP G2.5 is around 1.8Km away to the southwest and does not demonstrate the effects on the recreational receptors of the local footpath network.

4.5 Babergh District Council's (BDC) position is that the role of undergrounding has not been fully explored in relation to the Rivers Brett and Belstead Brook, both of which sit within existing Special Landscape Areas, demonstrating their value at the local level.

4.6 The UK is a signatory to the European Landscape Convention which recognises the importance of all landscape not just protected areas. The Guidelines for Landscape and Visual Impact Assessment 3rd Edition identifies that landscape is important for creating a sense of place and history, a source of memories and associations and an inspiration for art¹. The Suffolk Landscape Character Assessment ² states that the rolling Valley Farmlands, of which these valleys form a part, are locally distinctive and have some of the highest recognition of any Suffolk landscape.

¹ GLVIA 3rd Ed Paragraph 2.11

² <https://suffolklandscape.org.uk/> accessed 05/10/23.



- 4.7 The argument for overhead lines is stated as a combination of economic and other environmental factors. The Council wishes to point out that the applicant's statement does not state that significant landscape and visual effects will not occur in these landscapes.
- 4.8 In relation to mitigation for overhead lines, BDC's position is that 50m high pylons and overhead lines are very hard to mitigate with traditional planting due to their height and industrial nature. BDC draws ExA's attention to the Overarching National Policy Statement for Energy (EN-1) (March 2023) which identifies in para 4.15 that '*In considering any proposed development... the Secretary of State should take into account...its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*'. (BDC emphasis)
- 4.9 BDC's position is that, should the project go ahead, long-term adverse landscape and visual effects, including significant ones, will take place over a wide area within the district outside the protected landscape, that cannot be mitigated through landscape planting due to the sheer height and extensive character of the infrastructure, and that therefore a significant landscape and visual compensation package should be drawn up by the applicant in association with the relevant Councils and their key environmental partners, over and above the 'softening' measures already suggested, the biodiversity net gains to be provided and distinct from any discussions of community benefits.
- 4.10 BDC welcomes the additional undergrounding in the Stour Valley. The Council retains concerns that the assessment of the Stour Valley East Sealing End Compound has been considered at some distance from the facility therefore does not fully consider the experience of sensitive receptors using the PRoW network close by. As a result, there are concerns that any proposed mitigation or compensation will be insufficient to offset these anticipated adverse effects. BDC would like to see further assessment carried out from the PRoW network close to the facility and provision of a demonstrably effective mitigation and/or compensation scheme.
- 4.11 The applicant identifies in 2.27 that during operation, '*the project would have a significant adverse effect on the landscape of the Ancient Plateau Claylands ...*



Landscape Character Area (LCA) within 1km of the existing Bramford Substation’ and acknowledges that significant cumulative landscape and visual effects would arise between the project and East Anglia THREE and Norwich to Tilbury. Further ‘The potential for significant cumulative effects would be greatest close to Bramford Substation...’ and ‘The inter-project CEA [APP-083] concludes that additional mitigation, such as planting, would not reduce these effects to a non-significant level, because the effects cannot be fully screened by tree planting due to the height of the pylons.’

4.12 However, The Council does not agree with the applicant that identifying a few properties to benefit from landscape ‘softening’ in proximity to the proposed 400kV overhead line is sufficient for such cumulative adverse effects. Nor is it sufficient to rely on proposed Biodiversity Net Gain planting to the west of Bramford Substation to assist with filtering views.

4.13 The Council draws attention to the Overarching National Policy Statement for Energy (EN-1) (March 2023) which identifies in para 4.15 that ‘ *In considering any proposed development... the Secretary of State should take into account... measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*’. (Council’s emphasis)

4.14 The Council’s position is that a significant landscape and visual compensation package should be drawn up by the applicant over and above any mitigation or ‘softening’ measures, and distinct from the biodiversity net gains to be provided, in order to compensate for the significant cumulative landscape and visual effects identified by the applicant.

4.15 In relation to ‘*Landscape Impacts (General)*’ note also Overarching National Policy Statement for Energy (EN-1) (March 2023) which identifies in para 4.15 that ‘ *In considering any proposed development... the Secretary of State should take into account... measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*’. (Council’s emphasis)



4.16 'Extent of Undergrounding (within the RR of Babergh and Mid Suffolk District Councils only)' note also the requirement to take into account compensation in Overarching National Policy Statement for Energy (EN-1) (March 2023).

4.17 'Hintlesham Hall Micrositing & Mitigation'; Although Hintlesham Park is an undesignated heritage asset, it provides an important setting for Hintlesham Hall. The Guidelines for Landscape and Visual Impact Assessment 3rd Edition identifies that landscape is important for creating a sense of place and history, a source of memories and associations and an inspiration for art³. The Council's position remains that the option proposed in relation to Hintlesham Hall and its setting is unsatisfactory. Further that should the project go ahead in its current form, consideration should be given to additional mitigation and compensation planting to offset the cumulative harm on the local landscape, recreational receptors and the setting of the hall. Overarching National Policy Statement for Energy (EN-1) (March 2023) identifies in para 4.15 that ' *In considering any proposed development... the Secretary of State should take into account... measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*'. (Council's emphasis)

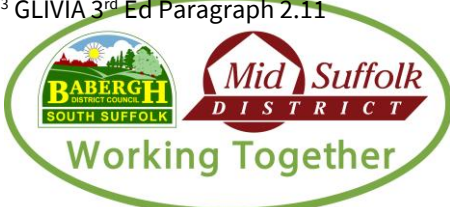
5. Heritage comments on other Submissions received at Deadline 1

5.1 No comments to make on Document 8.3.3: Applicant's Comments on Relevant Representations.

5.2 Inconsistencies within the applicant's submission regarding pylon height are referenced in Table 2.1 of Document 8.3.9, in which it is clarified that the maximum pylon height will be 62.23m. The Limits of Deviation (LoD) set out in the draft Development Consent Order (DCO) would allow for a potential 4m increase on this height of 62.23m. However, this increase in height has the potential to cause a greater impact upon the setting of heritage assets, by increasing (or allowing for) visibility of the power lines within areas of landscape which contribute highly to the significance of a heritage asset, for example. Therefore, it is highly recommended that this LoD is removed in areas where the DCO is within at least 500m of a designated heritage asset, as outlined in Document 6.3.8.1.1: ES Appendix 8.1 - Annex A Historic Environment Gazetteer. The gazetteer helpfully provides a table of all assets within 3km of the DCO, broken down into categories of 0-250m, 250m-1km and 1-3km, highlighting a number of clusters of listed buildings where the DCO will be in close proximity to heritage assets.

5.3 Whilst not all of these will also be the location of a new pylon, cross referencing the documentation does again highlight Hintlesham Hall as a particularly sensitive area, due to

³ GLIVIA 3rd Ed Paragraph 2.11



the number of heritage assets, their association with the surrounding landscape and proximity to the power lines. It is strongly recommended that the LoD does therefore not apply in this area, as the relocation and increased height of pylons within the LoD may have an affect which needs to be carefully considered in relationship to the listed buildings and surrounding landscape.

5.4 If it is not possible to vary the LoD in areas where the DCO is in close proximity (eg. 500m) from a designated heritage asset, it is recommended that additional surveys are required in these areas to inform pylon placement. As the NPPF states at paragraph 200, 'great weight should be given to the asset's conservation', and in many cases it should be considered that conservation also relates to an asset's setting, not purely its physical fabric. Surveys and heritage impact assessments should be used to inform pylon placement and height, with justification provided for any harmful affect on an asset's setting, as well as exploration of any potential mitigation solutions, such as the use of smaller pylons, planting or an alternate location, for example.

5.5 Regarding the proposed accompanied site visit, it would be beneficial if additional time was allocated to Hintlesham Hall. Including the refreshment /comfort break, thirty-five minutes has been allocated to view this site. As the parkland for the hall is extensive, additional time would be beneficial.

6. Environmental Health comments on other Submissions received at Deadline 1

6.1 We confirm the position set out in section 3.10.2 of the document REP1-015 and 016 (draft statement of common ground – Local Authorities) that some items including matters relating to the noise and vibration chapter (ES Chapter 14) and its translation to the Construction Environmental Management Plan and the Code of Construction Practice and construction traffic management plans remain unagreed and we would be pleased to provide further comments in due course as more information becomes available. The initial noise and vibration assessment 9 Chapter 14 of the EIA) identifies receptors at risk of significant adverse effects and gives overview details of potential mitigation methods but these would need to be detailed on a site-specific basis in any information submitted, going forward.

7. Socio-economic comments on other Submissions received at Deadline 1

7.1 None

