The Great Grid Upgrade

BT-NG-020621-545-0233

Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.5.3.3: Applicant's Comments on Babergh District Council Additional Local Impact Report

Final Issue A
October 2023

Planning Inspectorate Reference: EN020002

The Infrastructure Planning (Examination Procedures) Rules 2010
Regulation 8(1)(j)

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1. Introduction

1.1 Purpose of This Document

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on the separate submission from Babergh District Council (additional Local Impact Report (LIR) submitted for Deadline 1 [**AS-007**] in response to an application for development consent for the Bramford to Twinstead Reinforcement (the project). It is worth noting, however, this Deadline 1 submission from Babergh District Council [**AS-007**] was inadvertently omitted from publishing on the 27 September 2023 and was subsequently published on 26 October 2023. Nevertheless, the Applicant provides this response document for Deadline 3 (31 October 2023).

1.1.2 As stated in the joint Local Impact Report from Suffolk County Council, Babergh District Council and Mid Suffolk District Council [**REP1-045**], this additional response was from Babergh District Council only and diverges from the position of Suffolk County Council and Mid Suffolk District Council. Paragraph 6.1 of the joint Local Impact Report states that [**REP1-045**]:

'*Suffolk County Council and Mid Suffolk District Council agree on all landscape matters as outlined below. Babergh District Council diverge in their position on undergrounding, particularly Babergh District Council support the consideration of additional undergrounding between the Dedham Vale Area of Outstanding Natural Beauty (DVAONB) and Stour Valley Project Area; in this instance, SCC and MSDC cannot agree with this position. BDC will provide separate written evidence to support this position.'*

1.1.3 Babergh District Council's additional LIR raises the following matters in respect to the project, which are addressed in the following Chapters:

- Chapter 2: Stour Valley East cable sealing end (CSE) compound – the additional LIR raises matters regarding the location of the CSE compound and its' visibility;
- Chapter 3: Additional underground cabling – the additional LIR suggests that the underground cable should be extended between the Dedham Vale West and Stour Valley East and the CSE compounds;
- Chapter 4: Landscape and visual effects – the additional LIR suggests that there are additional landscape and visual effects in the River Brett and River Gipping.

1.2 Project Overview

1.2.1 An application for development consent was submitted to the Planning Inspectorate on the 27 April 2023 to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The project would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km comprising of overhead lines, underground cables

and a grid supply point (GSP) substation. It also includes the removal of 25km of the existing distribution network, 2km of the existing transmission network and various ancillary works. The application for development consent was accepted for Examination on the 23 May 2023.

2. Stour Valley East CSE Compound

2.1 Matters Raised

2.1.1 Babergh District Council's additional LIR (submitted at Deadline 1 but only published on 25 October) [**AS-007**] raises a number of points in respect to the Stour Valley East CSE compound which are addressed in Table 2.1. These points are supplemented by the comments contained in Babergh and Mid Suffolk District Councils' - Comments on any other submissions received at Deadline 1 [**REP2-008**] which states, '*BDC welcomes the additional undergrounding in the Stour Valley. The Council retains concerns that the assessment of the Stour Valley East CSE 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.'*

2.2 Applicant's Comments on the Additional LIR [AS-007]

2.2.0 Table 2.1 below details the Applicant's Comments on Section 2 of the additional LIR [**AS-007**] (Impact of Stour Valley CSE Compound).

Table 2.1: Applicant's Comments on Impact of Stour Valley East CSE Compound

Reference	Point Raised	Applicant's Comments
2.1	The proposed Stour Valley East CSE Compound lies within the Stour Valley Project Area (SVPA) and the Stour Valley Special Landscape Area (SLA), both identified for their scenic landscape character, sensitivity and value (ES Figure 6.1: LVIA Study Area and Landscape Designations). The SVPA has been assessed for its landscape value in the 'Valued Landscape Assessment Stour Valley Project' in March 2020 by Alison Farmer Associates (Available at Appendix A to this submission).	The Stour Valley has a number of designations and sensitive features that have been considered as part of the ongoing and extensive options appraisal in this location. The Applicant notes that although not a designation, the SVPA has similar picturesque landscape qualities to Dedham Vale AONB, being valued for its similar gently undulating river valley topography, medieval settlement pattern and rural characteristics, it is also covered within the same management plan (Dedham Vale AONB and Stour Valley Partnership, 2021). Hence, undergrounding was considered appropriate in the most sensitive parts of the Stour Valley. The Applicant has undertaken an options appraisal of the CSE compounds, which considered alternative locations and took into account the local landform and existing screening when determining the preferred locations. The environmental effects associated with each of the different CSE compound locations explored are presented in Table 3.13 of ES Chapter 3: Alternatives Considered [**APP-071**].

Reference	Point Raised	Applicant's Comments
		The preferred location for the Stour Valley East CSE compound has not altered since the publication of the Connection Options Report (COR) May 2012 [**APP-164**]. This concluded that the eastern CSE compound could be located to the south of Sawyer's Farm and west of Upper Road, as this location took advantage of a natural depression on the edge of the Stour Valley and the presence of existing vegetation to screen the site. Following recommencement of the project in 2020, further work was undertaken to verify the undergrounding and the location of the CSE compound. The review concluded that further site selection optioneering was required in relation to the CSE compound to justify the extent of proposed undergrounding within the SVPA. A number of options were considered between St Edmunds Hill and Chestnut Grove including options within and outside the SVPA. These were assessed from a technical engineering, and environmental perspective. This work concluded that the original location identified (and the current location of the CSE compound as presented in the application for development consent), was preferred as it balanced the length of cable required and landscape and visual effects; the selected site making use of existing woodland to partly screen the compound site to help mitigate effects. The proposed CSE compound is outside the Area of Outstanding Natural Beauty (AONB) and outside the area submitted to Natural England for consideration as part of an extension to Dedham Vale AONB. The CSE compound is proposed within the SVPA. As stated in paragraph 1.4.2 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**], the SVPA is not assessed as a receptor in its own right in the LVIA because, as agreed with Natural England (August 2021), it is not a statutory designated landscape. It is considered in the assessment of the AONB **[APP-098]** as parts of the SVPA forming part of the AONB setting. The Stour Valley is also considered under the relevant landscape character areas in ES Appendix 6.3: Assessment of Effects on Landscape Character [**APP-100**]. ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**] also presents the assessment of the effects on the landscape within the Stour Valley SLA. This includes the eastern part of the SLA where the Stour Valley East CSE compound is located. Section 3.6 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**] states that, due to the removal of the existing 132kV overhead line in association with the proposed undergrounding, the long-term residual effect on the landscape would be moderate beneficial (significant) locally within approximately 1km of the Limits of Deviation (LoD) and minor beneficial (not significant) for the SLA as a whole.

Reference	Point Raised	Applicant's Comments
2.2	The Typical Design and Layout Plans for the Stour Valley CSE Compound (Figure 3.3.4 Typical Design and Layout Plans: Stour Valley East CSE Compound January 2022) do not show the proposals in their context, nor indicate possible mitigations, making landscape and visual effects hard to judge. The compound structures are approximately 37.4m x 74.1m x 14.3m to the top of the gantries.	The viewpoint assessment for the Stour Valley is presented at ES Appendix 6.4: Viewpoint Assessment Section G Part 6 **[APP-106]**. The photomontages for relevant viewpoints are presented at Photomontages Appendix 3 Part 3 **[APP-065]**. The photographs provided for viewpoints G-02, G-03, G-04, G2.5 and G-24 [**APP-106**] and the photomontages for viewpoints G2.5 and G-24 [**APP-065**], illustrate how from most locations, the topography and existing vegetation would screen and filter views of the CSE compound including the gantries, which are the tallest part of the compound infrastructure. Viewpoint G2.5, although at some distance, was one of the few locations identified which would have visibility of the gantries. The photomontage prepared for this viewpoint **[APP-065]** shows that by Year 15 the gantries would be barely discernible in this wide view from the Stour Valley. This is due to the existing vegetation and embedded planting, which by Year 15 would be maturing. The proposed planting at the CSE compound is shown on Sheet 19 of LEMP Appendix B: Vegetation Reinstatement Plan (**document 7.8.2(B)**).
2.3	The effects on the landscape and visual receptors of the CSE Compound are hard to judge from viewpoint VPG2.5 (Document 5.8.3: Photomontages) which is southwest of the compound near Lamarsh, but around 2km distant.	A viewpoint selection document presenting representative viewpoints proposed for the assessment was issued to SCC and BMSDC on 16 June 2021 following a meeting in May 2021 and locations were updated in line with comments received. No additional viewpoints were requested by SCC and BMSDC. There would be very little visibility from the PRoW closest to the Stour Valley East CSE compound (W-171/001/0 and W171/002/0), which is why no viewpoints were identified on these routes. Users of a short section of W-171/001/0 may have views of the top of the gantries which would be some 300m distant. The adverse effects on these views would however be outweighed by the beneficial effects of removing the existing 132kV overhead line which is seen in much closer proximity as it overflies the footpath. The Applicant disagrees with the statement in the LIR that the effects on the landscape and visual receptors of the Stour Valley East CSE compound are hard to judge from viewpoint VPG2.5 which is presented at ES Appendix 6.4: Viewpoint Assessment Section G Part 6 **[APP-106]**. The wireline for the project on page 9 of this document shows (in red) that the Stour Valley East CSE compound and new 400kV pylons would be distantly visible, with the pylons being present on the skyline. This would result in the small and negligible magnitude of adverse change predicted at Year 1 and Year 15 respectively.
2.4 – 2.5	The compound is on a high point (c 60m AOD) so has the potential for high visibility (See Photomontages). The visual effects could have been assessed from the PRoW to the west of the compound (c550m away), or from the	A viewpoint selection document presenting representative viewpoints proposed for the assessment was issued to SCC and BMSDC on 16 June 2021 following a meeting in May 2021 and locations were updated in line with comments received. No additional viewpoints were requested by SCC and BMSDC.

Reference	Point Raised	Applicant's Comments
	southeast (c400-600m away) and from Workhouse Green to the northwest (c600m away). Whilst the visual effect of the compound is not significant from VPG2.5 as it is c2km away, this viewpoint is not representative of the experience of people using the PRoW network closer to the compound, nor does it demonstrate the effects on the local landscape itself or its fabric. The assessment approach does not appear to consider the character of the cultivated fields (as opposed to the structures, woodlands, trees or hedgerows found on or around them) as part of the fabric of the landscape which is an omission.	The effects of the proposed Stour Valley East CSE compound on the landscape are presented at ES Appendix 6.2: Assessment of Effects on Designated Landscapes **[APP-098]**. This includes the eastern part of the SLA where the Stour Valley East CSE compound is located. Section 3.6 of this document states that, due to the removal of the existing 132kV overhead line in association with the proposed undergrounding, the long-term residual effect on the landscape would be moderate beneficial (significant) locally within approximately 1km of the LoD and minor beneficial (not significant) for the SLA as a whole. The proposed Stour Valley East CSE compound is located within the Bures St Mary community area. Section 2.7 of ES Appendix 6.5: Assessment of Effects on Communities **[APP-108]** presents the assessment of visual effects on this community area and includes the relevant viewpoints. Paragraph 2.71 includes reference to the relatively sparse PRoW network but notes that the latter includes St Edmund Way and The Painters Trail. The assessment concludes that due to the removal of the existing 132kV pylons, the long-term residual effects of the Project on this community area would be minor beneficial (not significant). The effects on the Rolling Valley Farmlands in which the proposed Stour Valley East CSE compound is sited are presented at ES Appendix 6.3: Assessment of Effects on Landscape Character **[APP-100]**. The assessment takes account of landscape character which includes the physical attributes of the landscape (i.e. its elements and features) as well as its overall composition, character and how this is perceived. Section 3.1 of this document concludes that the long-term residual effects on LCA 1e would be minor beneficial (not significant). This is because the embedded planting around the Stour Valley East CSE compound in LCA 1e would be maturing and both screen the infrastructure and integrate it into the wider landscape. Similarly, the reinstatement planting associated with the 400kV underground cables would be maturing and the landscape would be returning to its existing character.
2.6	The CSE Compound appears to be theoretically visible over a wide area. The Zone of Theoretical Visibility (ZTV) shows that there are potential effects of the mid-height of the gantries in the compound from the B1508 from around 700m away. In addition, widespread although distant visibility is indicated west of the railway line, around Alphamstone in the west, St Edmund's Path/Stour Valley Path west of Henny Road, and around Lamarsh. Most of these effects fall within the SVPA.	The ZTV presented on ES Figure 6.11 [**APP-147**] shows the limited visibility of the CSE compound, with no locations being able to see the full CSE compound and only limited areas being able to see the top half of the gantry. Although the ZTV takes account of some vegetation, woodland being mapped using National Inventory of Woodland, it does not take account of the screening and filtering effects of individual trees and hedgerows which would further reduce the visibility of the gantries within the CSE compound.

2.3 Further Comments

2.3.1 The relevant National Policy Statements (NPS) for the project are of primary importance to the decision maker in considering the need for the project and its acceptability in terms of the policy guidance in the relevant NPS. There are two relevant NPS for the project, Overarching NPS for Energy (EN1) (Department of Energy and Climate Change (DECC), 2011) and NPS for Electricity Networks Infrastructure (EN-5) (DECC, 2011).

2.3.2 National Policy Statement EN-1 provides the overarching policy framework for making decisions on development consent applications for energy infrastructure in England, and EN-5 is specifically related to electricity networks infrastructure and provides additional policy on specific matters. Draft replacement EN-1 and EN-5 are also important and relevant matters in the decision-making process.

2.3.3 Paragraph 5.9.8 of EN1 indicates *'virtually all nationally significant energy infrastructure projects will have effects on the landscape'* and paragraph 4.5.3 of EN-1 states that *'…whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation.'*

2.3.4 Specifically in relation to transmission infrastructure, paragraph 2.8.2 of EN-5 states '*new substations, sealing end compounds and other above ground installations that form connection, switching and voltage transformation points on the electricity networks can also give rise to landscape and visual impacts.'*

2.3.5 Of relevance to the siting of the CSE compounds; Horlock Rule 4 states, '*the siting of substations, extensions and associated proposals should take advantage of the screening provided by landform and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum.*' Generally, the Horlock Rules also apply to the design and siting of CSE compounds which is detailed further at Section 5.9 of the Planning Statement [**APP-160**].

2.3.6 The locations of the four CSE compounds on the project have been selected, in part, to take advantage of the existing landform and existing mature landscape features as well as being designed with embedded landscape planting around each CSE compound in accordance with Horlock Rule 4 and paragraph 4.5.3 of EN-1.

2.3.7 The Stour Valley East CSE compound is sited in a location that limits the effects on the surrounding landscape and visual receptors and is not very visible from the PRoW closest to the location, the nearest being over 300m away. The most open views of the Stour Valley East CSE compound are from the western side of the River Stour and these more distant views are heavily filtered by vegetation in the majority of locations. When visible, the Stour Valley East CSE compound would only form a very small proportion of the view and embedded planting would screen all but the tops of the gantries when mature.

3. Additional Underground Cable

3.1 Matters Raised

3.1.1 Babergh District Council's additional LIR raises a number of comments in respect to undergrounding between the Stour Valley East CSE compound and the Dedham Vale West CSE compound. The Applicant's comments to these are in Table 3.1.

3.2 Options Appraisal

3.2.1 As part of its options appraisal process, the Applicant considered whether the use of underground cables, rather than overhead lines in Section F: Leavenheath/Assington (the section of the preferred alignment between the Stour Valley East CSE compound and Dedham Vale West CSE compound) was appropriate. The Connection Options Report 2012 (COR) May 2012 [**APP-164**] considered an underground option for each section of the route and assessed the environmental, socio-economic, technical and cost issues associated with each option.

3.2.2 The capital cost of undergrounding through this section of the route was estimated at £111.8m, compared to a cost of £8.4m for the interim overhead alignment. The estimated lifetime costs were £117m and £22m respectively, (correct at the time of publication of the COR).

3.2.3 Following feedback received during the non-statutory consultation on the project, the Applicant undertook a back check and review to see if there was justification to extend the underground cable through Section F: Leavenheath/Assington. In addition, during the Statutory Consultation, views were specifically sought on Section F: Leavenheath/Assington (Question 12), details of which can be found in the Consultation Report [**APP-063**].

3.2.4 This came to the same conclusion as the COR [**APP-164**], that the reduction in landscape and visual effects in this area resulting from undergrounding this section of the cable were not sufficient to justify the very significant increase in costs required, particularly given that Section F is not designated. Actions have already been taken to avoid, reduce, mitigate and, if possible offset, impacts in line with the mitigation hierarchy; and the project as a whole delivers significant benefits to the more sensitive area of the AONB.

3.2.5 The Applicant undertook a Setting Study on the Dedham Vale AONB contained at ES Appendix 6.2 Annex A Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**]. Environmental Statement Chapter 6: Landscape and Visual [**APP-074**] subsequently considered that, although parts of Section F lie within the setting of the AONB, the magnitude of change associated with the project is considered to be small, when seen in the context of the existing 400kV overhead line, the removal of the existing 132kV overhead line and other infrastructure on the landscape in this section.

3.2.6 Therefore, undergrounding within Section F is considered to be disproportionate, having regard to the policy tests set out in EN-5, the magnitude of effect compared to the existing baseline and The Applicant 's duty to ensure value for money for consumers.

3.3 Applicant's Comments on the Additional LIR [AS-007]

3.3.1 Table 3.1 below details the Applicant's Comments on Section 3 of the additional LIR [**AS-007**] (Case for undergrounding between Stour Valley East and Dedham Vale West CSE Compounds).

Table 3.1: Applicant's Comments on the Case for the Consideration of Undergrounding Between Stour Valley East CSE Compound and Dedham Vale West CSE Compound.

Reference	Point Raised	Applicant's Comments
3.1 and 3.2	The proposed overhead route between the Stour Valley East and Dedham Vale West CSE compounds is a distance of some 5km. Approx 1km lies within the SVPA and 3km lies within the current Stour Valley SLA. Although the SLA designation is not going to be retained in the upcoming Joint Local Plan (JLP), this is to bring the new JLP in line with the current national position for local landscape quality to be established through character studies rather than designation.	The Applicant has no comment to make in response to this statement.
3.3	Several of the photomontages and wireframe images in the Landscape and Visual Impact Assessment (*Document 5.8: Photomontages Appendices and ES Appendix 6.4: Viewpoint Assessment Section F (Part 5*) and *ES Appendix 6.4: Viewpoint Assessment Section G (Part 6))* illustrate how, notwithstanding the mitigation effect of the removal of the 132Kv line, the increased height of the proposed pylons for the 400kV cable route have a cumulative adverse effect over extended areas, when combined with the detracting effect of existing pylon runs.	It is acknowledged that when a pylon is seen in close proximity it will be very visible and will give rise to significant effects, as is the case for some of the viewpoints presented at ES Appendix 6.4: Viewpoint Assessment Section F – G [**APP-105** and **APP-106**] and photomontages presented at ES Appendix 3 Parts 2 – 3 [**APP-064** and **APP-065**]. At many locations however the presence of the larger 400kV pylons along broadly the same alignment as the existing 132kV pylons to be removed, would result in a long-term residual minor adverse (not significant) effect. This is because pylons are already a key element in the view and the presence of this new pylon would not fundamentally change its composition or character. It should also be emphasised that in many situations the project involves the replacement of existing 132kV pylons by taller 400kV not the introduction of a completely new overhead line. This reduces the magnitude of change and significance of effect when comparing the development of the project to the baseline scenario. The Applicant notes that the existing overhead line forms part of the baseline landscape. ES Chapter 6: Landscape and Visual [**APP-074**] presents the results of the Landscape and Visual Impact Assessment and identifies the significant effects and the mitigation proposed to reduce residual landscape and visual effects.

		The purpose of the landscape and visual assessment is to assist the Secretary of State (SoS) in making a decision as to whether the combined effects of the project along the route are/are not acceptable in accordance with National Policy.
3.4	There appears to be an under-recognition in the assessment of the adverse visual effect of proposed pylons in close-up views (e.g., VP F08 judged as '*medium'* adverse change in Year 1) and an over reliance on existing and proposed planting to mitigate adverse effects for pylons that are 50m high, at a time when it is increasingly hard to both establish and maintain planting due to climate change effects and where pests and diseases (such as Ash dieback) are already having negative impacts on green infrastructure. The '*Assumed Minimum Height at Year 15 of Operation'* in *Document 5.8 (B): Photomontages* is only 3.67m to 7.7m tall for native woodland planting and 4.65m to 6.05m tall for native shrubs which in most situations would provide minimal mitigation for a 50m pylon.	ES Appendix 6.4: Viewpoint Assessment Parts 1–7 **[APP-101- APP-108]** present the assessment of effects experienced at the representative viewpoints for the project. It is acknowledged that when a pylon is seen in close proximity it will be very visible and this is the case for viewpoint F-08 **[APP-105]**. However as advocated by GLVIA3, the level of effect also takes into consideration the duration of the view. In the case of recreational receptors using PRoW, the view of the pylons will only affect the view transiently and for a short period. This moderates the overall effect. It should also be emphasised that in many situations the project involves the replacement of existing 132kV pylons by taller 400kV not the introduction of a completely new overhead line. This reduces the magnitude of change and significance of effect when comparing the development of the project to the baseline scenario. At viewpoint F-08 **[APP-105]**, pylons are already a key element in the view and the presence of the larger 400kV pylons would not fundamentally change its composition or character. No mitigation has been specifically proposed for screening of pylons as the Applicant recognises that planting has little effect in most locations due to pylon height, but areas have been identified (Areas LV01 and LV02 on ES Figures 16.1 Embedded Measures and Mitigation Proposals [**APP-155**] to filter views within communities. Planting has been included around the GSP and CSE compounds which contain lower height elements that would benefit from the long-term screening effects of vegetation.

3.4 Further Comments

3.4.1 It is widely acknowledged that in the coming years significant investment will be required in the electricity transmission network. Given the urgent need for new major energy infrastructure and not wanting to restrict such developments and investment in them, EN-5 does not adopt a presumption that electricity lines should be put underground. EN-5 considers overhead lines to be appropriate in most circumstances and the Applicant, therefore, considers this as a starting point when developing transmission projects. Draft replacement EN-5 considers at paragraph 2.9.20 that '…*it is the government's position that overhead lines should be the strong starting presumption…'.* Draft replacement EN-5 provides stronger policy wording than the extant EN-5, which demonstrates the Government's policy direction in this area.

3.4.2 Paragraph 2.8.2 of EN-5 states that '*Government does not believe that development of overhead lines is generally incompatible in principle with developers' statutory duty under section 9 of the Electricity Act to have regard to amenity and to mitigate impacts.' Additionally, paragraph 5.9.8 of EN-1 recognises that 'virtually all nationally significant energy infrastructure projects will have effects on the landscape'.*

3.4.3 Paragraph 2.11.4 of draft replacement EN-5 also details that the general presumption in favour of overhead lines should be 'reversed' to favour undergrounding in nationally designated landscapes. However, this is not a strict policy requirement and is caveated by paragraph 2.9.22 of draft replacement EN-5 which states, '*undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits.'*

3.4.4 Paragraph 2.8.4 in EN-5 states that *'… wherever the nature or proposed route of an overhead line proposal makes it likely that its visual impact will be particularly significant, the applicant should have given appropriate consideration to the potential costs and benefits of other feasible means of connection or reinforcement, including underground and sub-sea cables where appropriate.'*

3.4.5 Paragraph 2.8.8 goes on to state that *'where there are serious concerns about the potential adverse landscape and visual effects of a proposed overhead line, the IPC will have to balance these against other relevant factors, including the need for the proposed infrastructure, the availability and cost of alternative sites and routes and methods of installation (including undergrounding)'.*

3.4.6 Additionally, paragraph 2.9.23 of draft replacement EN-5 also details that undergrounding may also be appropriate even if no part of the proposed development traverses a designated landscape.

3.4.7 When considering the relative merits of undergrounding, therefore, the adopted and emerging policy clearly favours a flexible policy framework using case-by-case evaluation. The Applicant, therefore, considers the relative merits of using underground cables on a case-by-case basis.

3.4.8 Overall, avoiding the moderate adverse effects of an overhead line on a landscape which carries no national designation could only be achieved at a significant additional cost in these areas. EN-5 considers that the Examining Authority should only refuse consent for overhead line proposals in favour of an underground option if it is satisfied that the benefits from the non-overhead line alternative would clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable with consideration to the landscape in which the proposed line would be set, the additional cost of undergrounding and the environmental and archaeological consequences of undergrounding.

3.4.9 Additionally, the Applicant holds the Transmission Licence for England and Wales and is, therefore, regulated by Ofgem, the electricity and gas markets regulator, to ensure value for money for consumers and is required under the Electricity Act to '*develop and maintain an efficient, coordinated and economical electricity transmission system, and to facilitate competition in supply and generation of electricity.'* These duties and obligations mean that the Applicant has a responsibility to deliver new electricity transmission infrastructure but also to be responsible for the cost of projects as costs will ultimately be borne by electricity users.

3.4.10 It should also be emphasised that in many situations the project involves the replacement of existing 132kV pylons by taller 400kV pylons not the introduction of a completely new overhead line. This reduces the magnitude of change and significance of effect when comparing the development of the project to the baseline scenario.

3.4.11 The additional length of undergrounding in this location is not considered necessary from an environmental perspective. In this instance, it is not considered that there is justification for the significant added cost that would be passed on to the Applicant's bill-paying consumers in their duty to '*develop and maintain an efficient, coordinated and economical electricity transmission system'*. Additionally, having specific regard to the policy tests of paragraph 2.8.9 of EN-5 and in paragraph 2.9.25 of draft replacement EN-5, the 'potentially very disruptive effects of undergrounding' are not justified as the harm to the landscape, visual amenity and natural beauty would not outweigh the environmental effects associated with undergrounding. The Applicant is confident that the project strikes the appropriate balance of overhead line and underground cables on the project.

4. Landscape and Visual Effects

4.1 Matters Raised

4.1.1 Babergh District Council's additional LIR raises a number of comments in respect to landscape and visual effects in the Rivers Brett and River Gipping. The Applicant's comments to these is in Table 4.1. These points are supplemented by the comments contained in Babergh and Mid Suffolk District Councils - Comments on any other submissions received at Deadline 1 [**REP2-008**] which states, '*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…' 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.'*

4.2 Applicant's Comments on the Additional LIR [AS-007]

4.2.1 Table 4.1 below details the Applicant's Comments on Section 4 of the additional LIR [**AS-007**] (Landscape and Visual Effects in the Rivers Brett and River Gipping).

Table 4.1: Applicant's Comments on Landscape and Visual Effects in the Rivers Brett and River Gipping

Reference	Point Raised	Applicant's Comments
4.1 to 4.6	The Babergh District Council's additional LIR describes the existing baseline environment for the following locations: • River Brett; • Narrow Valley Meadowland; • Rolling Valley Farmlands; • Benton End and East Anglian School of Art; • Belstead Brook (Gipping Valley); and • Belstead Brook (tributary of the River Gipping).	The Applicant has no comment to make in response to this description.

Reference	Point Raised	Applicant's Comments
4.7	This is an intensely rural landscape crisscrossed by a myriad of PRoW. The photomontage from viewpoint AB21 shows there would be a significant additional adverse effect from the proposed new 400kV from the new pylons on the valley sides landscape and the users of the PRoW network. The effects on the floor of the valley are not demonstrated but would include views back to the new pylons and a new set of over-sailing cables.	Viewpoint AB-21 at ES Appendix 6.4 Viewpoint Assessment Section AB Part 1 [**APP-100**] records a large magnitude of change at Year 1 and Year 15 and represents the views experienced by people using the local PRoW network and visitors to Hintlesham Golf Club. Section 2.8 of ES Appendix 6.5: Assessment of Effects on Communities [**APP-108**] presents the assessment of visual effects on Burstall community area. Burstall community area includes the eastern side of the Gipping Valley. The assessment concludes that the long-term residual visual effects of the project on the community area would be moderate adverse (significant). Section 2.16 presents the assessment of visual effects on Hintlesham community area and refers to the many PRoW at paragraph 2.16.3. Hintlesham community area includes the western side of the Gipping Valley. The assessment concludes that the long-term residual visual effects of the Project on the community area would be moderate adverse (significant).
4.8	The proposed new line is only 200m from Hintlesham Home Wood which historically formed part of the parkland of the Grade 1 listed Hintlesham Hall. The proposed new 400kV line is only around 900m from the hall itself. Historic England's *'The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'* makes clear that the setting of a heritage asset are the surroundings in which a heritage asset is experienced.	ES Appendix 8.2 Annex A: Hintlesham Hall Assessment [**APP-128**] sets out the assessment of setting effects on Hintlesham Hall. As set out in Table 4.2 in ES Appendix Historic Environment Impact Assessment [**APP-127**] there are only very limited views from the Grade II* Ancillary buildings north, towards the location of the proposed 400kV overhead line. The principal views from the Grade I Hintlesham Hall are towards the west. As a result, there would be very limited additional visual intrusion within the setting of the Hall from the proposed 400kV overhead line and the overall effects of the project are assessed to have a minor adverse effect on the Hall and its ancillary listed buildings. The Applicant has provided further comments to these points in 6.135 to 6.138 and also Chapter 16 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (**document 8.5.3.1**).

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