



Babergh District Council and Mid Suffolk District Council (20041302)

Deadline 6 submission for Bramford to Twinstead (EN020002)

The purpose of this submission is to present the councils' response in respect of the following items due at deadline 6:

1. **Comments on deadline 5 submissions**
2. **SoCG**
3. **LEMP**
4. **CEMP/REAC**
5. **Written summaries of oral submissions to the Hearings.**
6. **AP from ISH5**

Responses:

1. **Comments on deadline 5 submissions**

Landscape / visual

Regarding applicant's Rep5-025: In relation to section 2.2 'Compensation and the mitigation hierarchy', in the November 2023 NPS EN-1, Paragraph 4.2.11 states that '*Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated*'. The applicant has identified this in the draft SoCG as meaning that compensation is not required for all residual impacts by NPS EN-1. However, paragraph 4.2.12 says, '*Applicants should set out how residual impacts will be compensated for as far as possible.*' The Councils judge this could be taken to read that compensation is required.

In relation to '*the proposals for aftercare presented in the LEMP ...*' discussions are ongoing.



Re 3.5 Visual mitigation planting at the CSE compounds - Dedham Vale East: The applicant responds, *'The hedgerow is reinforced by blocks of woodland and scrub planting which have been positioned to screen views for people travelling south Millwood Road'*. The Councils still have concerns that views into the site and of the facility will be available via the entranceway without additional planting close to the facility, and that mitigation of the visual effects is not demonstrated.

Re 3.5 Visual mitigation planting at the CSE compounds - Dedham Vale West: *'Applicant considers the current planting proposals sufficient to mitigate the visual effects...'* The Councils judge that mitigation of all residual visual effects is unlikely.

Re 3.5 Visual mitigation planting at the CSE compounds - Stour Valley East The applicant identifies in 3.4 that *'Users of a short section of W-171/001/0 near Sawyer's Farm 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.'* A photomontage from the section of PRoW near Sawyer's Farm would help illustrate this claim.

Heritage:

Babergh DC note the additional documentation provided by the applicant regarding Benton End which clarifies their position whilst the other documentation submitted raises no concerns.

Environmental Health:

As the compounds may be in situ for lengthy periods and have fixed plant, equipment and associated vehicles in use we would recommend that an assessment is undertaken for each compound under the provisions of British Standard 4142 assessment (or any subsequent revisions) by an independent professional qualified in acoustics. The assessment shall consider the likely noise impact associated with such activities and recommends appropriate mitigation as required. The assessment shall consider the cumulative impact of other active compounds in the locality. The assessment shall be provided to the LPA no less than 28 days in writing for approval in consultation with Environmental Protection.

2. SoCG



Babergh and Mid Suffolk District Councils
Endeavour House, 8 Russell Road, Ipswich IP1 2BX
Telephone: (0300) 1234 000
www.babergh.gov.uk www.midsuffolk.gov.uk

Mid Suffolk District Council and Babergh District Council continue to engage in ongoing dialogue with the applicant regarding the SoCG.

3. LEMP

Mid Suffolk District Council and Babergh District Council continue to engage in ongoing dialogue with the applicant regarding the LEMP.

4. CEMP/REAC

The Councils have no further comments at this time.

5. Written summaries of oral submissions to the Hearings.

The following is a written summary of the oral submission to Issue Specific Hearing 5 by Babergh District Council & Mid Suffolk District Council

Recording Part 1

6:14 Bron Curtis

“Good afternoon, Bron Curtis, from Babergh District Council and Mid Suffolk District Council. Thank you.”

33:24 Bron Curtis

“Thank you. Bron Curtis, from Babergh District Council and Mid Suffolk District Council. Just to reiterate the comments of the two colleagues who have just spoken and not to revise old ground but our deadline 5 and previous submissions have given comments on that the working hours that our environmental health advisors consider to be appropriate, particularly having regard to noise sensitive receptors and bearing in mind the information the applicant has put in regarding flexibility either side of construction working for other ancillary work for other sort of ancillary work on site so that is already in our submission. Thank you”

Recording Part 2

1:10:56 Bron Curtis

“Thank you. Bron Curtis, from Babergh District Council and Mid Suffolk District Council. I’m afraid I am going to take those away if that is okay please ma’am



because I am not supported by our environmental health officers this afternoon. So if it is ok to give you that at deadline 6 next week please?”

6. AP from ISH5

In relation to your Deadline 5 submission [REP5-030] the Councils are referring to all and any overruns/out of hours working proposed.

We defer to the comments of Braintree District Council in response to the matter of statutory nuisance.

