



Babergh District Council and Mid Suffolk District Council (20041302)

Deadline 8 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 9:

1. Comments on submissions received at Deadline 8

RESPONSES

1. Comments on submissions received at Deadline 8

7.5.2 Appendix B – REAC:

- A Net Gain Monitoring and management plan for BNG areas - The applicant needs to produce this under Requirement 143 (Environmental Gain Report) which will be produced after the first monitoring visit at each BNG site and would be updated after each subsequent visit. I don't know if the LPAs have any role in its approval but you might know where to look for a list of Requirements with LPA involvement.
- Method statement for Hintlesham woods clearance – this purely relates to avoiding impacts on breeding birds as agreed with RSPB. This needs to cross ref to construction lighting as previously mentioned to avoid impacts on Barbastelle bats.

8.10.3 at section HE2.8.9:

- The placement of pylons at Hintlesham Hall remains a matter of disagreement as set out in the SoCG.

8.10.3 Applicant's Comments on Responses to the Second Written Questions:



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- LV2.9.1 Effects of The Levelling-up and Regeneration Act 2023 - No further comment
- LV2.9.2 landscape restoration fund - Babergh and Mid Suffolk District Council clarifies that a landscape restoration fund is sought to provide additional landscape and visual benefits and that the Councils are still seeking additional compensation to make the development acceptable in planning terms. The 10% net gain referred to by the Applicant is designed to deliver biodiversity enhancement not landscape and visual enhancement and may not be the most beneficial enhancement solution in landscape and visual terms.
- LV2.9.3 Stour Valley West CSE – Essex County Council and Braintree District Council support SCC's call for additional tree planting at Stour Valley West CSE to extend the proposed landscape softening. The Applicant talks about only needing to mitigate significant effects but BMSDC, ECC and BDC maintain that as many adverse effects as possible should be mitigated or compensated for, and that the recently published Overarching National Policy Statement for Energy (EN-1), in para 4.1.5, supports this position.

8.10.6 - Applicant's Comments on Other Submissions Received at Deadline 7:

- 8.8.6 Applicant's Response to Interested Party Comments on Management Plans Ref 5a Compensation (1.3.3) The Applicant states that whilst compensation is a component of the mitigation hierarchy, it is not treated in the same way as the other three elements of the hierarchy in planning policy terms. And that Paragraph 4.2.11 of EN-1 (2024) states that '*Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated*'. This sentence does not include the fourth element of the hierarchy, compensation. However, Para 4.2.12 goes on to say: '*Applicants should set out how residual impacts will be compensated for as far as possible.*' Thus, compensation for each residual impact should be identified as far as possible and not only residual significant impacts.

