



Date: March 2022

National Grid Electricity Transmission by email

Planning Act 2008: Bramford to Twinstead NSIP

This is the response of Babergh and Mid Suffolk District Councils to the informal public consultation between 25 January and 21 March 2022 to the statutory pre-application consultation undertaken by National Grid Electricity Transmission for the proposed National Grid Bramford to Twinstead NSIP.

Although they remain two separate sovereign councils, since 2013 Babergh and Mid Suffolk District Councils have been working together to deliver services and they share a Chief Executive, management team and joint workforce who work across both authorities. The comments below are submitted on behalf of both councils except where they are specifically attributed to a single council.

Introduction

Babergh and Mid Suffolk District Councils work collaboratively with other local organisations as part of the Suffolk Climate Change Partnership to support Suffolk's communities, businesses and residents to reduce carbon emissions.

In 2019, both authorities declared a 'climate emergency' alongside the other SCCP members. They are committed to working together and aim to make Suffolk carbon neutral by 2030.

The authorities recognise the challenge of net zero and their roles in contributing to the government's climate change objectives.

Cumulative impact

The councils have concerns about the timing and consideration of the project and its impact on and interaction with other large scale energy projects in the region, particularly having regard to the need for adequate assessment of potential cumulative impacts.

Undergrounding

The issue of undergrounding is recognised as a significant issue of concern to the affected communities. Babergh District Council has concerns regarding the potential impact of locating the sealing end compounds on the margins of the AONB and adverse visual impacts associated with their construction. Babergh is concerned to ensure the intrinsic cultural and visual value of the Stour Valley is adequately protected and feel strongly that this includes



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undergrounding of at least the entire section that passes through the whole of the the designated Dedham Vale AONB, the proposed Dedham Vale AONB extension area and the Stour Valley project area including a reasonable buffer and consideration of appropriate siting of sealing end compounds.

Particular consideration should be given to the following documents:

- Valued Landscape Assessment - Stour Valley Project Area
- Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks
- Special Qualities of the Dedham Vale AONB Evaluation of Area Between Bures and Sudbury

These documents and further details about the AONB, proposed extension and project area can be found here: <https://www.dedhamvalestourvalley.org/>

Babergh and Mid Suffolk's joint landscape guidance is available here:

<https://www.babergh.gov.uk/assets/DM-Planning-Uploads/Joint-Landscape-Guidance-Aug-2015.pdf>

The Council welcomes the opportunity to discuss the importance of this matter and how the development can be delivered with the minimum impact possible further as the pre-application engagement progresses.

Opportunities

The councils recognise the recent growth of large-scale energy developments within the region and invite National Grid to enter into a dialogue with the councils and relevant parties to discuss coordination of project delivery as well as the exploration of opportunities for the sharing of assets / infrastructure so as to minimise the physical impacts of growth on the communities.

The councils expect the project to progress having regard to, and in alignment with where appropriate, the corporate priorities of the councils in respect of job creation and investment.

The councils have previously suggested that National Grid should set up and financially support an Environmental Improvement Fund to be used on local initiatives, such as the provision of community woodlands, tree and hedgerow planting, the establishment of traditional orchards and the enhancement of wildlife habitats. Community groups, parish councils and voluntary sector organisations would be encouraged to make applications to this fund. The Councils welcome further discussions to explore opportunities to secure benefits for the host communities arising from the development.

Key technical issues

The development will have a range of impacts, some of which involve technical matters that fall within the responsibility of either the district or county councils. The following are some of the main issues that the councils wish to highlight in this response and full details of the technical officer's advice are appended.



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This list is not exhaustive and does not prejudice the consideration of any other issue at this time or in the future.

Biodiversity:

- There is insufficient ecological information relating to the options for Hintlesham woods.
- It will be important to agree how the proposal impacts the SSSI habitats and functionality.
- There are potential impacts on protected species not linked to the SSSI and we welcome discussions with National Grid and other parties, particularly in relation to bats.
- All non-significant impacts will also be required.
- We would like to be involved in discussions on HRA.
- Please refer to specific comments on individual documents and sections.

Heritage:

- We largely agree with the statements in the PEIR in relation to built heritage impacts.
- Consideration should also be given to indirect effects on heritage assets.
- The potential for non-designated heritage assets to be affected remains high.
- A survey of non-designated assets that may be impacted must be carried out.
- Clarification regarding any demolition should be provided.
- Specific concerns relate to disruption to land use, removal of vegetation, potential to encounter archaeology or historic features, transport and noise.
- Concern the ES will be too reliant on geophysics. Trial trenching should occur on the underground sections.
- Good practice measures should extend to protecting known archaeological sites.
- It is unclear if works to highways are still required as previously discussed.
- A great deal of further information is required.
- Please refer to specific comments on individual documents and sections.

Landscape:

- We accept the categories of landscape and visual receptors to be included in the assessment as set out in the methodology section of the PEIR.
- We accept the categories of landscape and visual receptors to be included in the assessment.
- Consideration of combined and sequential effects as part of the landscape and visual assessment has not been reflected in the PEIR.
- Night-time effects (construction and operation) should be scoped in due to lack of information relating to size, location and the operating hours of construction laydown/compound areas.
- The Stour Valley Project Area (AONB extension area) has been identified as having a particular value and important role in the setting of the Dedham Vale AONB that is distinct from its Special Landscape Area (SLA) designation. As such, the ES should



include sensitivity testing against the Stour Valley Project Area as a landscape designation, separate to that of the Stour Valley SLA.

- Further reference/guidance documents need to be considered and used as part of the assessment. This includes:
 - Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks (July 2016)
 - Managing a Masterpiece Evaluation Report (Dec 2013)
 - Valued Landscape Assessment Stour Valley Project Area (March 2020)
- We agree that the removal of the existing 132kV overhead line would directly and beneficially affect the special qualities and setting of the Dedham Vale AONB Stour Valley Project Area would also arise due to the removal of several spans of the existing 400kV overhead line from Twinstead Tee southwards.
- We do not contest the judgements made on visual effects from CSE compounds such and welcome the opportunity to explore the potential for additional off-site planting.
- We are yet to receive information regarding the impacts on hedgerows and trees, the alignment of the cables in relation to hedgerows and the required easement areas and species restrictions. We don't have confidence that a 'not significant' effect can be determined at this stage, especially in regard to effects on landscape character and designations.
- We welcome the mitigation planting concepts for Hintlesham Hall and would also advise that grassland habitat opportunities are also explored.
- We are still awaiting details in regard to impacts on hedgerows, particular those that could be deemed 'important hedgerows' under the Hedgerows Regulations 1997 (both in terms of wildlife and landscape, as well as archaeology and history) and how this would impact effects on landscape character and designations.

Public health :

- We are satisfied that the methodology considers the correct guidance (such as BS5228, the DMRB) and has scoped in the appropriate matters into the assessment.
- Core working hours as stated in paragraph 14.4.19 are deemed acceptable in general however, where works are to occur close to noise sensitive receptors (NSR) and adverse impacts are likely to be observed noisy plant and works should not start before 08:00 hours. It is recognised that the nature of the works may lead to the need for noisy works to occur outside of core hours. Where this is anticipated the local authority should be notified. If works are likely to be of long duration, and/or continue into the late evening or nighttime hours (23:00 to 07:00) an application for a Control of Pollution Act 1961 – Section 61 prior consent for noisy works should be made. This can be discussed with the BMSDC Environmental protection team during the construction phase if such an occurrence is identified as necessary.
- Having reviewed the methodologies for the assessment and the results we are satisfied with the conclusions of the preliminary assessment that no significant impacts are likely when considering duration of exposure.

Socio-economic:



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National Grid should assess the impact of the proposals upon people and provide a comprehensive assessment of the socio-economic impacts upon the local economy, ensuring that communities and individuals are properly compensated.

Tourism:

the rural landscape has significant value to the local economy as a tourist attraction. The development has the potential to have a negative impact on the attractiveness of the area for both visitors and investors which must be considered.

Other:

The Councils refer to the comments of Suffolk County Council in respect of technical matters that fall within their function.

Kind regards,

Tom Barker
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