



Date: June 2022

National Grid Electricity Transmission by email

## **Planning Act 2008: East Anglia GREEN**

### **RESPONSE OF BABERGH AND MID SUFFOLK DISTRICT COUNCILS: OBJECTION**

This is the response of Babergh and Mid Suffolk District Councils to the informal public consultation between 21 April and 16 June 2022 to the non-statutory pre-application consultation undertaken by National Grid Electricity Transmission for the proposed National Grid East Anglia GREEN 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 consider their role of protecting and promoting the interests of the districts' communities, businesses and environment to be of utmost importance and recognise the contribution Babergh and Mid Suffolk make to the unique character and quality of Suffolk and the wider eastern region.

Whilst acknowledging the government's net zero objectives, the councils are mindful of energy security, carbon reduction and energy poverty issues related to the delivery of energy development schemes and offer this response in context with their consideration of how these issues affect the districts.

#### **Principle of development**

There has recently been a notable increase in NSIP proposals and other large-scale energy developments across the country with a high proportion located in the eastern region meaning that some communities are seeing a number of proposals in the same area.

Whilst this is an understandable consequence of the location of generation development, points of network connection and the limitations of existing transmission and distribution infrastructure, the councils are concerned at the seeming lack of coordination and overview of these developments and their cumulative impacts which risks a confused and incoherent



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approach to project delivery that fails to effectively safeguard the interests of the host communities.

Although the councils acknowledge the challenge of achieving net zero, '50 by 30' offshore wind generation targets and ongoing energy security and recognise their roles in contributing to the government's climate change objectives, the EA Green development would have substantial and serious impacts on the residents, businesses and environment of the Babergh and Mid Suffolk districts and the councils remain to be satisfied that this project represents the most appropriate solution to the network reinforcement objectives it is intended to address.

The councils' overriding preference is for a coordinated, offshore approach to deliver the transmission network reinforcement objectives of this and other projects in the region in order to minimise onshore infrastructure and the associated impacts on the districts communities and environment. It is unclear why sub-sea cabling options have not been brought forward for the eastern region in the same way as is being developed for the north of England and Scotland.

The councils are concerned that National Grid decided, prior to this consultation, to choose a land route for ATNC rather than the undersea route, SCD2. There is a lack of transparency about how and why the recommendation for SCD2 was changed to 'Stop' in NOA 2020/21 after it had initially been assessed as viable. This decision should not have been made without public consultation.

In the absence of greater clarity around the options for strategic offshore coordination of transmission reinforcement and a sub-sea alternative for this project Babergh and Mid Suffolk District Councils both **object in the strongest possible terms** to the proposed development at this time.

We would also like to endorse the comments from councillors representing individual communities, businesses and areas along the route which are included in Appendix 1 to this document.

Notwithstanding the councils' position of objection, and without prejudice to that position, the following technical and issue specific comments are offered. The full text of technical advice is included in Appendix 2 to this document.

## Undergrounding

In the event that the need for onshore cables can be demonstrated the councils request further consideration of options for undergrounding the full length of the route through the districts.

Babergh District Council is concerned to ensure the intrinsic cultural and visual value of the Stour Valley is adequately protected and raise additional concerns regarding the potential impact of sealing end compounds and the impact on the designated AONB.



Mid Suffolk District Council are concerned that much of the affected area with the district lies within an elevated and open plateau landscape occupied by numerous residential and business properties and heritage assets.

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

Babergh and Mid Suffolk District 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 note the government's intention to consult on the delivery of community benefits from energy developments and encourage National Grid to engage with officers to provide a proactive position in respect of community benefits.

The project would be expected 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. BMSDC 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.

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

### AONB:

- Impacts on AONBs purpose as defined by Natural beauty and Special Qualities during construction. Particular concern around relative tranquility, landscape quality, scenic quality, natural heritage features and cultural heritage.
- Impacts on AONBs purpose during operation (landscape quality, scenic quality) from infrastructure eg Sealing End Compounds, new overhead powerlines
- Impacts on enjoyment of AONBs and associated value to visitor economy and operation-loss of relative wildness, relative tranquility, scenic quality, loss of reputation as place to enjoy these characteristics.



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- Temporary impacts on enjoyment of AONBs during construction (access on PRoW)
- Impacts on setting of AONBs including location of Sealing End Compounds and use of T Pylons
- Reference to expected policy relating to undergrounding in nationally designated landscapes such as AONBs (draft NPS, sec 85 CRow Act 2000 etc, Electricity Act, Holford Rules etc)
- Assessment of impacts on AONBs and measures to avoid, reduce, mitigate
- Options for compensation and mitigation.
- Potential for removal of the UKPN line (similar to Bramford to Twinstead scheme)

### Biodiversity:

- We note that the routing constraints in Tables 3.1 only refer to statutory designated sites and we strongly recommend that non-statutory designated sites e.g. County Wildlife Sites (CWS )are also included.
- Undergrounding in visually sensitive areas such as AONBs, may result in increased ecological impacts from trenching and construction of Cable Sealing End compounds. We are willing to be involved in fine tuning the locations and methodologies, with site visits as appropriate.
- We note that the A14 crossing near Needham Market is likely to need a complex assessment which will need to include impacts on the River Gipping and various adjacent waterbodies. Where it is considered that the alignment will need to divert around constraints, we highlight that the aim should be to avoid pylons being placed near to hedgerows and associated hedgerow trees which would consequently be affected.
- We welcome the statement in 4.5.27 that all options avoid ancient woodlands (Holford Rule 5) however there is little description of the potential impacts on Redgrave and South Lopham Fens Ramsar which is also part of Waveney and Little Ouse Valley Fens SAC.
- Based on the information provided, we acknowledge that the graduated swathe for Norwich to Bramford based on Option NB1 would be less harmful than other options.
- We understand that the Bramford to East Anglia Connection section, as well as the substation site, will need to fit in with other projects e.g. Bramford to Twinsted NSIP, and we would welcome the opportunity to input local knowledge to this element of the project.
- We note that para 5.5.3 recognised that from a Biodiversity and Ecology perspective, Options BE1 and BE2 were considered to perform more poorly than other options due to the potential for a Likely Significant Effect (LSE) on the Stour and Orwell Estuaries SPA and supporting Cattawade Marshes SSSI (which forms part of the SPA). We welcome this as NPS- EN5 states that particular attention will be needed to minimise the likelihood of large birds such as swans and geese colliding with overhead lines associated with power infrastructure particularly in poor visibility.
- We recommend that crossing the Suffolk/Essex county boundary needs careful consideration as Swans are a qualifying feature of the Stour & Orwell Estuaries SPA which includes Cattawade Marshes SSSI. We highlight that this would trigger a requirement for a shadow HRA screening report to assess impacts from EA GREEN, either alone or in combination with other plans and projects.



- We note that, overall, western options (Options BE3 and BE4) are preferred from a Biodiversity and Ecology perspective as they would not be likely to result in LSEs on these designations. However, with the exception of Option BE3, which contains (though does not route through) the Hintlesham Great Wood SSSI, all options avoid smaller areas of high amenity value or scientific interest (Holford Rule 2). Whilst Options BE3, BE4 and BE5 do contain more areas of woodland than the other options, the corridors are considered to be of sufficient width to allow the identification of alignments which would avoid such woodland. We agree that further work is required as part of the detailed routing process to refine an alignment to comply with this rule as far as possible. Whilst more westerly options are preferred from a Biodiversity and Ecology perspective, Option BE5 is assessed to have the least potential of those that pass through the Dedham Vale AONB to have potential for effects resulting in LSEs on the designations of the Orwell Estuaries SPA and Cattawade Marshes SSSI (part of the above SPA).
- Based on the information provided, we acknowledge that the graduated swathe for Bramford to EAC based on Option BE5 is likely to be less harmful than other options.
- Other matters: We are concerned that more information is needed to understand the impacts on hedgerows along the route, in particular those that could be important for bat foraging and commuting routes for the Barbastelle Bat or the Dormouse.
- We seek to inform choices on species options for restoration planting schemes as well as securing temporary mitigation measures during construction.

Heritage: (Please refer to Heritage Officer's response for full comment)

- The scheme should be considered holistically when developing the proposals to ensure a high-quality project which is sympathetic to the historic built environment.
- The EIA should include a Heritage Desk-Based Assessment (DBA), the objective of which is to identify all heritage assets which have the potential to be impacted by the proposals and which should therefore be taken forward for further assessment. A methodology for this should be provided and it is recommended that this is informed by Historic Environment Good Practice Advice in Planning Note 12: Statements of Heritage Significance and Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition).
- In identifying which heritage assets and their settings may be affected it is recommended, given the scale and nature of the proposals, that a study area of 5km from the graduated swathe boundary is adopted. All heritage assets within this study area including Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, and non-designated heritage assets should be identified.
- Should it be determined that a heritage asset should be scoped out and not taken forward for further assessment, a clear and convincing justification for this should be provided.
- The DBA should seek to demonstrate a sound understanding of historic use/land use and ownership, and identify which farm(s)/field(s) the heritage assets were historically and/or functionally associated with, in order to fully assess the impact of the proposals on the historic, architectural, and associative value of the heritage assets.
- Furthermore, the views from and to each heritage asset should be carefully considered. The following would be considered valuable in establishing a heritage



baseline: A ZTV overlaid with a Designations Map and a Viewpoint Location Plan, naming all Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, and non-designated heritage assets

- The methodology for the views and visual representations should be in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and guidance notes provided by the Landscape Institute. It is further recommended that views be undertaken during winter months at a minimum, to reflect and consider the 'worst case scenario.' All viewpoints should be consulted and agreed.
- Any heritage assets which are identified as being potentially impacted by the proposals should be taken forward for further assessment during which the effects of the proposed development, whether beneficial or harmful, on the significance of the heritage asset or on the ability to appreciate it, should be assessed.
- The third stage of any analysis is to identify the effects a development project may have on settings and to evaluate the resultant degree of harm or benefit to the significance of the heritage assets. Again, the guidance provided in Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) should inform the methodology for analysis.
- Given the scale and nature of the proposals, it is recommended that the evaluation extend to include an assessment of cumulative impacts which may arise from other large-scale developments or similar schemes. Furthermore, complex impacts arising from the development which may not be solely visual should also be assessed.
- Once the extent to which heritage assets are impacted by the proposals, through change within their setting, is fully understood, ways to maximise enhancement and avoid or minimise harm should be explored. There may be design amendments which could mitigate any identified harm, and these should be carefully considered.
- Should the proposals result in residual 'less than substantial' harm, despite mitigation efforts, then paragraph 202 of the NPPF would be a relevant consideration and the Local Planning Authority is required to make a balanced judgement between the level of harm and the public benefits.
- Paragraph 199 should also be considered as this gives great weight to the conservation of heritage assets, as well as the statutory duty of Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 under which local planning authorities should have special regard to the desirability of preserving the settings of listed buildings and the character and appearance conservation areas.
- It is recommended that further pre-application discussions are sought after the heritage assessment is completed.

### Landscape:

- We note that the routeing constraints in Tables 3.1 and substation siting constraints only refer to nationally designated sites and residential properties. However, we recommend that locally designated sites and similar e.g. Special Landscape Areas are also included as mapped landscape and visual constraints. It would also be beneficial for valued landscape qualities for landscape character areas to be analysed as these would be particularly useful in ensuring landscapes outside of designations are appropriately reviewed and impacts minimised as far as practicably possible by routeing revisions, design options and mitigation measures.



- Para 3.2.10 states that the potential to route parallel in close proximity to existing 400kV overhead lines is a principal opportunity and would restrict the geographic extent of environmental effects associated with such infrastructure. Earlier indications of the proposed power line corridor showed this was the case, however, under the new proposals, a large section of the new overhead lines will be over 4km west of the existing line, introducing landscape visual impacts in areas where the baseline landscape has not yet been affected by electricity infrastructure. We note that the Holford and Horlock rules have been used as a guide to routeing and siting of new infrastructure, however we would advise further details on the existing constraints are provided to justify the new routeing proposals.
- The location of Cable Sealing End compounds and proposed substations must not only be carefully considered in terms of impacts on visual amenity and landscape character, but also in regard to the setting of the AONB. It is considered that different locations of CSE compounds at extended distances from the AONB are explored to fully understand impacts on setting and natural beauty.
- Any undergrounding in visually sensitive areas such as AONBs, may result in increased landscape impacts from trenching and construction of Cable Sealing End compounds and we would expect a full audit of the landscape features and habitats on site to be undertaken to inform the alignment and mitigation proposals.
- The National Grid's Landscape Enhancement Initiative, which is part of the Visual Impact Provision project, is very much relevant to the AONB area. However, we would advise a similar framework approach is applied to the project as a whole given the evidence available that demonstrates the overall sensitivity of the landscape. Therefore, the extant and rationale for offsite planting and landscape improvement works should align with this initiative.
- Norwich to Bramford – Sections C-E: We note that the Corridor and Preliminary Routeing and Siting Study Report identifies that the A14 crossing near Needham Market is likely to need a complex assessment which will need to include impacts on the River Gipping and various adjacent waterbodies. Where it is considered that the alignment will need to divert around constraints, we highlight that the aim should be to avoid pylons being placed near to hedgerows and associated hedgerow trees which would consequently be affected.
- Bramford to East Anglia Connection: The landscape response to cumulative impacts at and around the Bramford Sub-station needs to be carefully considered. Currently there is a number of live and upcoming applications in and around the Bramford area of an industrial character, that will have a detrimental impact on the landscape and Bramford as a settlement. Mitigation measures such as the reinforcement of historic field boundaries, restoring and planting hedgerows, as well as increasing the stock of hedgerow trees are important measures to consider on site.
- We would expect preliminary consultations on other national grid schemes to be provided at the earliest opportunity to allow us to understand the cumulative impacts and assess whether there are opportunities for cumulative mitigation measures both on and off site.
- Refer to full landscape response for further technical comment.
- The councils welcome the consideration of alternative tower types at routing and siting stages and would like to participate in discussions about pylon design options.

Public health:



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Environmental Protection wish to see further detailed information in respect following:

- The submission of a detailed construction management plan
- The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the CMP.
- A noise assessment to be undertaken and submitted with regard to noise levels associated with both the construction phases of the proposal and resulting from operational noise. Methodology of the assessment to be agreed with the Local Planning Authority once specific details of the proposal are known.
- A lighting assessment
- A site specific risk assessment to include calculations of the maximum possible levels of non-ionizing radiation at the nearest residential properties at various floor levels. The values obtained shall then be compared to the current guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) limits for exposure to electromagnetic radiation. The levels quoted shall be during operation at maximum capacity/power. A valid ICNIRP certificate must also be submitted.

#### Economic Development & Skills:

- As an individual project, National Grid Electricity Transmission – East Anglia GREEN, offers no substantial economic benefit in its own right. However, it should be viewed as one of the many individual projects that National Grid Plc via NGV and NGET are delivering in region and we should be working with National Grid Plc to deliver a package of training, skills and growth opportunities that engages with the local supply chain strategically across all local projects eg; Bramford to Twinstead and Norwich to Tilbury overhead lines, Suffolk to Kent marine link, Nautilus, and Eurolink interconnectors alongside this project, East Anglia GREEN.
- It is essential that we seek to maximise the inward investment, socio-economic and skills benefits of these projects, ensuring the best possible deal for the communities that are hosting this vital Net Zero transmission, connection and generation infrastructure which has significant impact on them and their environment.

#### Tourism & Visitor Economy

- The pre-covid Visitor Economy in Suffolk was worth over £2bn a year to the local economy, and whilst reduced by almost 60% during 2020, we are expecting a strong recovery due to the strength of the staycation market and the rich and varied tourist offer including heritage assets, landscape designations and promoted areas, such as, two designated AONBs, the Dedham Vale, Stour Valley, Waveney Valley and Suffolk's Wool Towns.
- The Government has spent billions supporting these businesses and attractions throughout the pandemic, alongside support from VisitBritain/VisitEngland to encourage people to holiday at home and explore coast and countryside destinations across England, and we must ensure that this recovery is not negatively impacted by this, or any other, national infrastructure programme without being fully managed and mitigated.



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- In order to manage these anticipated challenges, this project and its associated infrastructure will need to fully assess their direct and indirect impacts on the wider tourism, cultural and visitor economy and particularly the extent to which the physical infrastructure will impact and detract from the environmental quality of an area for recreational activity.
- The proposed route will also directly impact some of the key visitor attractions within Babergh and Mid Suffolk such as Needham Lake (the most visited free attraction in Suffolk), Hintlesham Hall, RSPB Wolves Wood, Dedham Vale, Constable Country, Stour Valley and more broadly, the wider landscape within the AONB and listed buildings and conservation areas within the market towns.
- It is also imperative that the project considers its part in the cumulative impact on the perception and propensity of people to visit the area during the works period.
- Please note that when considering the pylon routes some routes will be more sensitive than others due to the businesses located on the route. I have not gone into this detail at this stage but can do when necessary and there is likely to be a requirement for environmental and/or economic mitigation measures to reduce the impact of this development on the local economy should it proceed.

Other:

The councils encourage National Grid to engage with local communities throughout the pre-submission stage via in-person discussions and other media, including sharing the feedback from this consultation.

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

Kind regards,



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