

Our Ref: BTNO
Date: 17 July 2023
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BY EMAIL

For the attention of Jake Stephens

BramfordtoTwinstead@planninginspectorate.gov.uk

Dear Mr Stephens

**BRAMFORD TO TWINSTEAD DCO APPLICATION
RELEVANT REPRESENTATIONS**

Thank you for the notifications that the Planning Inspectorate has accepted the above application and that interested parties have until 18 July 2023 to submit Relevant Representations. Please therefore accept this letter as a response from Suffolk County Council (the Council) to the Planning Inspectorate's request.

The Council's Relevant Representations, are as set out in the following paragraphs:

Policy

- a) Recognition that grid reinforcement is necessary for the delivery of net zero but not at any environmental cost; the Council recognises that, whilst the development of infrastructure to enable the decarbonisation of energy supply is supported in principle, there are still significant shortcomings within the submitted proposals which need to be addressed.

Landscape

- b) Landscape and visual amenity; the project creates unmitigated residual landscape and visual amenity impacts that need to be addressed by the promoter. The Council does not consider the currently proposed mitigation to be sufficient.
- c) Cumulative impacts; the Council remains concerned about the cumulative impacts with other development within the area, including the Norwich to Tilbury proposals for an additional new powerline. Those proposals will also connect at the Bramford Substation where only very limited Biodiversity Net Gain focused landscaping is proposed. The Council objects to the lack of strategic landscaping proposals for visual mitigation around Bramford Substation. Vegetation will also need to be removed adjacent to the public highway to provide safe access to the substation site. Details of the scope of this

vegetation removal are not made clear in the application. The Council would prefer to see an indicative master planning approach to placemaking in the Bramford substation area. Placemaking such as this should include effective engagement with the local community. Such a placemaking approach may also be appropriate in respect of the detailed design and landscaping of the sealing end compounds.

- d) Cable Sealing End Compounds; the Council welcomes the work done to reduce the potential landscape impacts although further detailed mitigation proposals will be required for example in respect of the establishment and management of planting designed for landscape mitigation.
- e) Climate Change; in accordance with the County Council's Energy and Climate Adaptive Infrastructure Policy (2023), the landscaping and planting across the project should be designed, planted and maintained in such a way that it is responsive to local conditions and adaptable to the impacts of climate change.

Biodiversity

- f) Routeing of the proposed overhead lines to avoid Hintlesham Woods; the Council acknowledges that this routeing option would avoid potentially unacceptable impacts upon the Hintlesham Woods SSSI.
- g) Biodiversity Net Gain; whilst the principle of Net Gain within the Order Limits is strongly supported, the Council considers more detailed information will be required within the relevant management plans.

Historic Environment

- h) Impacts upon the setting of listed buildings in the vicinity of and including Hintlesham Hall; the Council considers that the micro-siting of towers is essential to minimise the impacts of the adjacent new 400kV overhead line and 50m high pylons in this location. The Council notes that the proposals are based upon the micro-siting of towers agreed with the Applicant prior to the project being put on hold in 2013. However, the limits of deviation proposed would allow towers to move away from the agreed position which might result in significant harm to the setting of the listed buildings at this location. Any repositioning including height would need to be agreed. The Council also considers that more effective mitigation should be provided in relation to addressing/reducing the impacts on the settings of the heritage assets in and around Hintlesham Hall.
- i) Archaeological mitigation requirements: the Council welcomes the work that has been completed to date on the archaeological assessment however there is concern that the mitigation requirements are not appropriately represented within the Register of Environmental Actions and Commitments additional measures (section 3 in 7.5.2). The Council would want to see further requirements to secure the archaeological work appropriately.

Water Environment

- j) Impacts of construction; the Council seeks reassurance that adequate catchment is made available for surface water run-off during construction.

Geology and Hydrology

- k) Minerals safeguarding; the Council acknowledges that there are no detrimental impacts upon existing minerals and waste facilities. In terms of underlying sand and gravel resources the national importance of the proposals outweighs the sterilisation of the affected regionally important minerals. Additionally, for much of the route, proposals for sand and gravel extraction would not be acceptable due to the high landscape quality, including within the AONB.

Agriculture and Soils

- l) Best and Most Versatile Agricultural (BMV) Land; the Council acknowledges the limited negative upon BMV land so long as appropriate soil handling techniques are guaranteed.

Traffic and Transport (including Public Rights of Way)

- m) Construction traffic; considering the potential for significant adverse environmental impacts, including cumulative impacts, the Traffic and Transport section should include a statement around requiring more extensive monitoring, controls and enforcement for construction traffic, as it is almost absent from the documents, as well as further information on the assessment method. The transport impacts of the pre-commencement operations including the creation of temporary site accesses and construction compounds are also not referred to. Accesses and haul routes should minimise impacts on ecological and landscape features and minimise impacts on the efficient and effective operation of agricultural land and businesses.
- n) Public Rights of Way; (PRoW) given the significance of PRoW for access to the countryside, for wellbeing and within national planning policy, the Council is disappointed that Public Rights of Way are not treated as a separate topic, as requested during consultation, but split up over a number of disciplines that makes it difficult to see the full picture. Effective mitigation is needed for the impacts on recreational users of the PROW network, especially during the construction period.

Air Quality

- o) Sudbury Air Quality Management Area (AQMA); the Council supports proposals to avoid construction traffic routing via Sudbury AQMA.
- p) Fugitive dust emissions; the Council supports proposals to use best practice measures to avoid fugitive dust emissions so long as the appropriate methodology can be guaranteed.

Noise and Vibration

- q) Proposed working hours; the Council objects to proposals set out in the Draft Development Consent Order (dDCO) Requirement 7 to allow any construction on Saturday afternoons, Sundays and Bank Holidays and outside of core construction times.

Economic Development, Skills and Tourism

- r) Economic Development and Skills (Socio-economics); the Council agrees with the conclusion of NGET in relation to socio-economics. However, the Council considers that there are significant positive opportunities that the project alone will bring to the county and the wider region, and where there is synergy alongside further transmission, distribution and generation projects. The Council expects National Grid to coordinate their projects in Suffolk and actively engage with the Council via a Memorandum of Understanding, with regard to East Anglia Green, Sealink and Bramford to Twinstead, to secure benefits for and investment in local businesses and employment networks.

Critical national infrastructure must not only deliver the Government's energy objectives but also deliver sustainable societal and economic impacts in the regions that are hosting them and as set out in Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy. National Grid as a responsible corporate entity should actively engage with the Council and its partners to identify and deliver inclusive growth, social value and additional wider benefits.

- s) Scoping out of tourism; NGET has not included full consideration of tourism in the Environmental Statement (ES). The Council strongly objects to this as a serious omission, and that an assessment of the impacts upon tourism should have been undertaken. The Council anticipates that the proposed development, given its location across the Dedham Vale AONB and the Stour Valley project area, could have significant impacts upon visitor perception and ultimately visitor numbers, hence it is not acceptable for this impact to remain unassessed. The Council expects NGET to develop initiatives to counter act the negative impacts upon tourism.

Public Health

- t) Electric and Magnetic Forces: the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to.

Draft Development Consent Order (dDCO)

In November 2022, the Council commented on an early draft of the dDCO and while NGET has made several of the changes suggested, the Council remains concerned about numerous matters, including the following;

- u) the definition of “commencement” and, in particular, the implications arising from certain works which are drafted as falling outside that definition;
- v) the limits of deviation;
- w) the way in which street works are controlled under article 11 (and under the corresponding requirement, Requirement 11);
- x) the proposals for stopping up streets and public rights of way under article 15;
- y) the proposals for constructing, altering and maintaining streets under article 17;
- z) the proposals for regulating traffic under article 47;
- aa) the drafting of article 48, which concerns the felling or lopping of trees;
- bb) the drafting of certain requirements (including Requirement 7 (regarding archaeology), Requirement 8 (construction hours), Requirement 10 (planting schemes), and Requirement 11 (highway works)); and
- cc) in Schedule 4, the timeframes for determining applications by the Council after consent is granted need to be extended and the fees proposed for determining application are woefully low and need to be increased.

Yours sincerely,

Graham Gunby

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