APPENDIX 1:

Please find below the full details of technical officers' advice to BMSDC on the Norwich to Tilbury statutory consultation 2024.

BMSDC Environmental Protection:

We have reviewed the information given in the PEIR volume I Main text (April 2024)

Chapter 14 considers noise. Baseline data has been taken in respect to noise from roads and rail. We do have some concerns in that much of our district is rural and no background noise levels appear to have been taken for this. This is particularly important for the area surrounding the substation at Bramford and we would ask that this be addressed.

Noise sensitive receptors (NSRs) have been identified within 300m of the draft order limits for noise and 100m for vibration. The ABC method in BS:5228 has been used to identity LOAEL (Lowest Observed Adverse Effect Levels) and SOAEL (Significant Observed Adverse Effect Level) which we are in agreement with.

Section 4.7.3 states that normal working hours will be 07.00 – 19.00hrs Monday – Fridays, and 08.00 – 17.00hrs Saturdays, Sundays and Bank Holidays. We would advise that hours of work be limited to 07.30 – 18.00 Monday – Fridays and 08.00 – 13.00hrs on Saturdays, with no working on Sundays or Bank Holidays.

Section 14.7 of the chapter sets out mitigation which is split into 'embedded' (design features and technology selection), 'standard' (construction 'Best Practical Means' [BPM]) and 'Additional' (to take place at NSRs identified as hotspots).

Table 5.1 outlines the Best Practical Means measures. This includes the production of a noise and vibration management plan which is to be produced by the main contractor prior to construction commencing. We would recommend this document should be available at least 28 days prior to construction commencing.

Standard mitigation makes reference to applications for prior consent under the Control of Pollution Act being made if work is needed outside of the approved working hours. This is not in itself BPM and we would comment that prior consents would not be guaranteed unless full acoustic information including details of proposed attention is submitted as well as justification for the works – we would not consider overrunning works due to insufficient programming to be justifiable in terms of the need for night time working. Whilst prior consent would cover noise, we would also require details of lighting.

Figure 14.2 identifies NSRs at risk of an exceedance of SOAEL noise levels if BPM was not used. Section 14.8.7 states that the use of BPM will be sufficient to deal with this and that details of updated BPM will be set out in the outline Code of Construction Practice (CoCP) but that this will not be finalised until the prepared by the mains works contractors to discharge the DCO requirement. We would therefore request further details on how it has been determined at this stage that BPM will be sufficient to prevent an exceedance of SOAEL, and what level of BPM from the gradings set out in 14.7 will be needed for those NSRs identified in figure 14.2 within our districts. We welcome that the CoCP will be a 'live' document and advise that this should have a fixed 'broad content' which should be agreed, and then site specific sections for each worksite, outlining additional BPM/attenuation where necessary. We

would request these be submitted at least 28 days in advance of commencement of work at each site, for approval. However, approval is not guaranteed.

325 Noise Sensitive Receptors are noted as being at risk of adverse noise from access and road haul construction but these are discounted due to being exposed for less than 10 days in any 15 day period. It would be useful to have sight of mapping showing where these NSRs are. Table A14.2.2. (Construction traffic noise assessment – temporary haul road) in Volume III of the technical appendices 4 of 4, finds that there are no haul roads within our districts likely to result in the SOAEL limit being breached at a noise sensitive receptor).

In terms of dust, whilst dust control is addressed we would recommend that the CoCP specifies the means of water suppression to be available for use on site (e.g. bowsers or fine mist deployment) and how this supply will be maintained particularly during periods of dry and windy weather. The supply shall be suitable and sufficient having regard to the size of the area under development.

We would also ask for further methodology on the construction of the pylons – is this done in-situ, and if so, is this on the ground, or are they built vertically? We would appreciate an approximation of how many lifts and bolting operations need to take place and whether any of this is attenuated. We would also ask for details of whether the pylons are illuminated at height during construction, and roughly how long each pylon takes to construct and erect. Further information on the decommissioning and dismantling of existing pylons would also be appreciated.

We would also ask for details of any proposed additional lighting at Bramford substation.

EMFs during operation have been scoped out of the environmental statement but a qualitative assessment has been prepared. Section 10.8.11 of the Preliminary Environmental Information Report (PEIR) states that *" EMFs arise from the generation, transmission, distribution, and use of electricity. The Project would be designed in accordance with National Grid design standards and would be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2023), including the ICNIRP guidelines. Compliance with these guidelines and policies mean that the Project would already have designed out potential effects from EMFs to a level to meet health and safety standards. It is acknowledged that residents may be concerned about the potential health effects associated with EMFs and that this could affect mental health and wellbeing. Messaging and awareness raising about the Project and potential effects (including in relation to EMFs) will continue through the Project development phase. The effects on health and wellbeing are therefore considered to be neutral and not significant. An EMF compliance report will be produced to support the application for development consent and sits outside the EIA process. However, a summary of this report will be included in the ES".*

This is reiterated in the 'Embedded mitigation', given in section 10.7, which states that *"The Project would be designed in accordance with National Grid design standards and will be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2023), including the ICNIRP guidelines. Compliance with these guidelines and policies mean that the Project will already have designed out potential effects from EMF to a level to meet health and safety standards*".

We feel that is an acceptable approach and we await this information/confirmation as it comes, which should be prior to determination.

If this is not provided prior to determination then we would recommend the following condition:

Development shall not begin until a scheme for protecting residents in the proposed dwelling[s] from electromagnetic fields from [overhead power lines] has been submitted to and approved in writing by the local planning authority. All works which form part of the approved scheme shall be completed before occupation of the permitted dwelling[s], unless otherwise agreed in writing by the local planning authority.

I can confirm that I am broadly happy with the approach to contamination and can concur that the only possible site where risks may be elevated are in the vicinity of the former Raydon airfield owing to the use of the site for military purposes which may have a legacy of contamination owing to fuel storage, waste disposal and general made ground on such sites (amongst other aspects). The area of Raydon Airfield (PRC C3) is subject to underground cabling which may with rise to preferential pathways for contaminants should they be found at the site, and these will be considered during that more detailed investigation that will be coming in due course (along with a small number of other, off district) sites where contamination may be a concern.

Overall, from the perspective of public health it would seem reasonable to progress with the site provided that the additional investigation demonstrates that risks can be managed appropriately (including offside disposal of any potentially contaminative arisings along the cabling route. The EA may wish to provide additional comments with relation to protection of groundwater.

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Dear Bron,

RE: Landscape Advice Babergh Mid-Suffolk – Norwich to Tilbury

This response in relation to landscape issues has relied primarily on the following documents made available as part of the Statutory Consultation April 10th to June 18th 2024.

- Design Development Report and appendices
- Waveney Valley Valued Landscape Assessment (2024)
- Preliminary Environmental Information Report Volume 1 and 2 particularly:
    - Figures 13.1, 13.5, 13.6, 13.7
    - Figures 13.8.1 to 13.8.11
    - Figures 13.9.1 to 13.9.89
    - PEIR, Volume 3 Technical Appendices - Part 4 of 4, Appendix 13.1 and 13.2

1.1 Summary of Comments

- The PEIR acknowledges that the proposals will have a significant negative landscape and visual impact at both construction and operational stages over the length of the Project. This is identified as up to 1Km from the Project line in many situations.
- We consider that based on the information supplied, that significant negative impacts could occur at a greater distance from the Project than that identified, including on intangible landscape assets at the operational stage.
- The limited number of viewpoints and visualisations that are proposed over the length of the Project needs to be reviewed. In particular, more assessments need to be carried out beyond 1Km from the Project in order to demonstrate assertions regarding extent of significance.

- The preliminary LVIA does not appear to include details of the agreed criteria on which the assessment judgements are based. Without details of these criteria, it is hard to appraise whether the impacts are significant or not. Where negative effects are judged not to be significant the experience of receptors is still likely to be negatively affected over a wide area, reducing aesthetic enjoyment, the sense of place, history and identity, and inspiration for learning.
- In order to reduce significant landscape and visual impacts at the operational stage over the length of the Project, more use of undergrounding or re-routing is required particularly in river valleys to protect valued local landscapes, long-distant rights of way and rural amenity sites.
  In order to assess where alternative proposals for undergrounding should be put forward, a Valued Landscape Assessment should form part of the Landscape and Visual Impact Assessment along the length of the Project, to be submitted with and inform the future EIA.
- Should the Project go ahead, a substantial funded landscape compensation scheme, as opposed to community benefits, is needed, to off-set the long-term significant negative un-mitigatable construction and operational effects on both landscape and visual receptors that this Project will generate. Compensation is promoted in National Policy EN5.
- We have identified a number of areas where we believe data presentation could be improved in order to aid access and interpretation.
- Any previous consultation comments made with regard to landscape and visual issues have not been referenced here but should be taken as still relevant.
- We have not made reference in detail about issues relating to vegetation removal but it is expected for these to be fully quantified and identified in developing the EIA submission.
- Additionally, in regard to Babergh and Mid-Suffolk only:
- The alternative proposals for the Waveney Valley are to be welcomed. However, we judge the undergrounding does not go far enough.

1.2 Review of Submitted Information

The submission consists substantially of the Preliminary Environmental Information Report and its Appendices, the Design Development Report and its Appendices, as well as background documents, consultation reports and materials.

The approach to the preliminary Landscape and Visual Impact Assessment is identified as in accordance with the 'Guidelines for Landscape and Visual Impact Assessment,' Third Edition (GLVIA3, 2013). Whilst this appears to be broadly the case, the PEIR itself, in Volume 3 Technical Appendices - Part 4 of 4, Appendix 13.1 and 13.2, does not appear to include details of the agreed criteria on which the assessment judgements are based. i.e., for the sensitivity (susceptibility and value) of the landscape and the visual receptors, nor for the magnitude of the effects. It is not clear whether a preliminary judgement on significance has been determined without going through the stage of identifying susceptibility and magnitude of effects or whether this stage has been carried out but not shared.

The Project runs through one National Landscape (Dedham Vale National Landscape) and the Stour Valley Project Area. County, district and local level landscape protection is no longer government policy, and few Valued Landscape Assessments have been carried out at a district or local level.

1.3 Policy

National Policy Statement for Electricity Networks Infrastructure (EN-5) (November 2023) is clear on the importance of the mitigation hierarchy in Critical National Policy projects which includes onshore electricity networks. In paragraph 2.16 it states that:

'The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged…' Our underlining.

Whilst the government's presumption is for overhead lines for onshore power lines, it is recognised in Paragraph 2.9.7 of EN5 that '… in practice new overhead lines can give rise to adverse landscape and visual impacts.' Our underlining.

Paragraph 1.1.12 of the PEIR recognises the need for environmental compensation beyond BNG 'There would also be land required for mitigation, compensation and enhancement of the environment including Biodiversity Net Gain (BNG).'

1.4 Landscape Value

In rural landscapes, through which the Norwich to Tilbury route is substantially planned, the default preferred alignment, as promoted by the Holford Rules, is to avoid routeing close to residential areas as far as possible on grounds of general amenity. This is interpreted as including individual rural properties, as well as avoiding protected heritage assets. Whilst nationally protected landscapes and their settings, have the benefit, in landscape and visual terms, of proposed cabling being substantially undergrounded, the remaining undeveloped landscapes along the route, are not generally identified as being a constraint when it comes to alignment, even though some of these are of strong local character. Many of these landscapes will have value at a local level but not have the benefit of local landscape designation as this approach is not preferred policy at a national level (and hasn't been for several decades) and thus successive Local Plans have discarded local protections.

Lack of local landscape designation does not imply lack of landscape qualities or value. The current Holford Rules advise 'Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.' And yet districts which adhere to national policy on local landscape protection and base their policy on local landscape character assessments not designation are effectively penalised via this advice. The Holford Rules appear to have been last updated in the 1990s and would seem to be at odds with current general national landscape policy and guidance.

The treatment of undesignated landscape as blank space is compounded by adherence to Rule 5 of the Holford Rules which states that in routeing of high voltage overhead transmission lines, these should '… be kept as far as possible from smaller lines, converging routes and other poles, masts, wires, and vales to avoid a concentration or 'wirescape'. This has the perverse effect of distributing adverse impacts over a wider area of unspoilt countryside rather than containing them in a narrower corridor.

Whilst existing landscape character assessments in the region may have some analysis of value, such data is not necessarily consistent with current understanding of valued landscapes and does not necessarily reflect current understanding of landscape in terms of sense of place and identity, cultural heritage, artistic inspiration, sustainability

nor mirror current policy.

The Landscape Institute produced guidance on how to assess landscape value in 2021. The guidance clarifies that landscape value is the relative value or importance attached to different landscapes by society on account of their landscape qualities. We judge that an up-to-date assessment of landscape value along the proposed swathe is required in order to understand what we have in terms of valued landscape and what will be lost in the process of creating a substantially overhead cable route in the east of England. A valued landscape assessment should form part of the Landscape and Visual Impact Assessment carried out through the future EIA.

1.5 Compensation

Paragraph 15.5.14 of the PEIR confirms that 'Compensation matters are not addressed within the PEIR and will be dealt with separately as part of the DCO process...' This is at odds with EN5's requirement, stated above that '…early application of the mitigation hierarchy is strongly encouraged…' We do not think it is acceptable to treat compensation separately from the PEIR particularly when significant, un-mitigatable landscape and visual impacts are being identified over such a wide area. The term 'compensation' is barely used in the PEIR.

1.6 Cumulative Effects

The PEIR identifies schemes short-listed as having potential cumulative effects on receptors. We surmise some of these could have implications for this assessment area by virtue of their location. We surmise the following could have implications for this assessment area by virtue of their location:

- Bramford To Twinstead Reinforcement
- Five Estuaries Offshore Wind Farm
- North Falls Offshore Wind Farm
- Mangreen Quarry, Ipswich Road, Dunston, NR14 8DD
- Brockley Wood Land off A12, Belstead, Suffolk, IP8 3JS Babergh DC
- Land North Of The A1071, Ipswich, (Wolsey Grange)
- Anglian Water services Bury to Colchester Pipeline
- Bramford Solar Farm and Battery Storage Facility
- Land West of Blacksmiths Lane Earl Stonham (Solar Farm)
- Land North of Lion Road Palgrave (Solar Farm)

We anticipate seeing assessment of how these schemes affect or not landscape or visual issues in the LVIA in the EIA. Mapping of these proposals would assist with understanding and review.

1.7 Visual Assessment – General

The preliminary LVIA overall has been supported by 89 Photographic Viewpoints and Wireline visualisations including Landscape, Visual and Heritage. Figures 13.7 Landscape and Visual Receptors identify potential additional/alternative viewpoint

locations that will be considered for the Environmental Statement (ES). Additional Historic Environment Viewpoints are also identified.

We consider that 89 Photographic Viewpoint assessments and Wireline visualisations are wholly insufficient for a scheme of this size where there is anticipated significant negative landscape and visual effects over a likely minimum width of 1Km from the Project line in both directions. That is less than one every two kilometres, and effectively means one every 4Kms on alternating sides of the scheme. The scale of effects on local landscapes and receptors cannot be captured and demonstrated at this level. All the additional potential viewpoints shown on Figures 13.7 Landscape and Visual Receptors should also be assessed as well as in those places mentioned elsewhere in this text, for example, between the 1-1.5Km distance where the question of significance of effect is debated.

In accessing and trying to appraise the information provided we encountered several issues which we hope can be resolved before the ES is submitted. These are listed below.

- Some of the location labelling on the visualisations is non-specific i.e., identification of a place name but with no road name or PRoW number, or a PRoW is indicated but a number isn't given.
- The location maps for the viewpoint visualisations have a satellite rather than an OS base which is hard to read, especially in the field.
- The visual receptor maps are very small-scale (1:50,000) and therefore hard to read in the field. It would be preferable if the VPs could be identified on a 1:10,000 baseline such as is used for the Proposed Project Design Maps i.e., Figures 4.1
- Wireline visualisations e.g., Volume II: Figures Part 18 of 27: Figures 13.9.51 - 13.9.56 - Wireline Visualisations. It would be preferable if, in the next iteration of the documentation, these figure volumes could be labelled by route section and/or district in such a way that it is easier to tell which section of the route they relate to before opening.
- The preliminary LVIA does not appear to include details of the agreed criteria on which the assessment judgements are based. i.e., for the sensitivity (susceptibility and value) of the landscape and the visual receptors, nor for the magnitude of the effects. Without details of these criteria, it is hard to appraise whether the impacts are significant or not.
- Indicative layouts and elevations for the SECs and EACN would be helpful to convey the scale of these rather than just descriptions.
- The file sizes and document formatting make viewing and analysing the plans difficult and time consuming; an alternative approach to plan formatting should be explored and considered.

1.8 Landscape Character Baseline and Assessment

National Character Assessment: The Project runs through two National Character Areas within Suffolk:

- NCA 83 South Norfolk and High Suffolk Claylands
- NCA 86 South Suffolk and North Essex Clayland

East of England Landscape Typology: The East of England Landscape Typology (Landscape East, 2010) is a regional level study which identifies Landscape Character Types (LCTs) across the East of England. The Project runs through the following East of England typologies in Suffolk:

- Valley Settled Farmlands
- Wooded Plateau Claylands
- Valley Meadowlands
- Plateau Estate Farmlands
- Wooded Plateau Farmlands

District / County Landscape Character Types and Areas

The landscape of the study area is described within a series of district and county level landscape character assessments identifying Landscape Character Types (LCTs) and Landscape Character Areas (LCAs). The PEIR contains a preliminary assessment of effects on LCAs and LCTs during construction and operation on the county level assessments.

Suffolk Landscape Character Assessment

The Suffolk Landscape Character Assessment identifies 12 No. LCTs along the Project line. The preliminary Landscape and Visual Impact Assessment suggests that significant effects would likely be substantially limited to within 1 Km of the Project, generally at both construction and operations stages. Whilst accepting that at construction stage this is likely to be the situation, it is not accepted that this would be the case at the operational stage where the outcome is generally an overhead line with 50m pylons as opposed to undergrounding, and where intervisibility is quite high.

The visualisations demonstrate that within Suffolk, the landscapes affected by the Project are substantially undeveloped, rural landscapes where intervisibility is often quite high due to large scale flat or gently undulating landscapes or in shallow river valleys, where the sheer scale of the pylons and overhead wires means the effect is to industrialise the countryside significantly in places up to 2Km away. These are usually landscapes without existing significant detractors.

Even where the effects are deemed not significant, the character of the landscape is changed over a much wider area, with proposed overhead lines reducing the provision of what GLVIA3 (Page 18. Para 2.11) describes as:

- Opportunities for aesthetic enjoyment
- A sense of place and a sense of history which contributes to individual, local, national and European identity.
- Inspiration for learning, as well as for art and other forms of creativity

In relation to specific Landscape Character Types:

Rolling Valley Farmlands and Furze LCT – we would query whether the operational effect would be significant negative only at 1Km or less as the presence of the 50m high pylons and overhead lines would likely have an impact on the sense of rurality and tranquilness of most of Wortham Ling and its setting. Further undergrounding of the line to the southeast would be required for the Waveney Alternative in order to reduce further the negative operational effects of the proposed Cable Sealing End (CSE) compounds on the heathland landscape.

Wooded Valley Meadowlands and Fens LCT – we do not agree that significant negative landscape effects, particularly indirect ones, would be limited to 0.5Km as the valley bottom is quite open, for instance close to The Doit, over which the Project line crosses, nor that the Waveney Valley Alternative would reduce all significant effects at the operational stage, because of the sheer size and scale of the CSE and the effects of it and any proposed mitigation on the openness of the valley side.

- Ancient Plateau Claylands – such as experienced at Mellis Green and its setting, Stowupland, Creeting St Peter, Burstall, Barking Tye, Elmsett, Great

Bricett. We would query whether the operational effects would be significant negative only at 1Km or less. These areas are characterised by flat or gently rolling arable clay landscapes where the presence of the 50m high pylons and overhead lines would have an extended impact on the sense of rurality and tranquilness of the countryside, and the experience of its amenity and aesthetic value.

- Plateau Claylands – a landscape of heavy clay soils very gently undulating or flat dissected by small streams, such as is found at Gislingham, Dandy Corner, Cotton and Mendlesham. Due to topography and lack of substantial woodland it is hard to see that significant indirect effects on the landscape would not extend beyond 1Km affecting its sense of place and history. Much of the setting is deeply rural with single track lanes with few existing detractors.
- Valley Meadowlands LCT - This is a narrow, linear LCT occurring in two discrete areas. The northernmost area follows the course of the River Gipping and its tributaries, north and west of Needham Market and west of Ipswich. The southernmost area follows the course of the River Brett to the west of Raydon. The LCT would be directly affected by construction works undergrounding of an existing 132 Kv overhead line where it crosses the Project near Badley Hill, including a CSE compound. We do not agree that likely significant effects would be limited to 0.5Km from the Project line, especially once operational, due to the height and linear extent of the Project. Due to their intimate character valley landscapes contribute considerably to a sense of place and history which would be affected by strongly industrial infrastructure at a local level.
- Rolling Valley Farmland - This occurs at six discrete areas, following the valleys of tributaries of the River Gipping, Belstead, Brook, River Brett and River Stour. The LCT would be directly affected by construction activity southwest of Willisham Tye, west of Offton, near Washbrook Street, and along the proposed cable route north-west of Stratford St Mary, within Dedham Vale National Landscape. We do not agree that the likely significant negative effects on this LCT would be limited to 0.5Km from the Project line. Due to their intimate character valley landscapes contribute considerably to a sense of place and history which would be affected strongly at a local level by such industrial infrastructure.

- The Plateau Farmlands LCT - This occupies two discrete areas. The smaller, northern most area lies to the west of Ipswich. The larger, southern most area encompasses Holton St Mary and East Bergholt, and the southern edge of the LCT is within Dedham Vale National Landscape. These would be directly affected by construction activity, west of Ipswich and west of Holton St Mary. We agree that the likely significant negative effects on this LCT would be limited to 1.0Km from the Project line.
- The Ancient Estate Farmlands LCT - The Ancient Estate Farmlands LCT occurs to the south-west of Ipswich and includes the settlement of Washbrook. Due to the Ancient Estate Farmlands LCT being only indirectly affected by a relatively small amount of construction activity, we agree that at the construction stage the effect on the LCT would likely be negative but likely not significant at the construction stage and there would likely be no effect once the Project was operational.
- The Wooded Valley Meadowlands LCT - These occur along the River Stour within the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB), to the east of Stratford St Mary. We agree the indirect effect on the LCA at construction would likely be negative but is not likely to be significant and there would likely be no effect once the Project was operational.

1.9 Visual Assessment

1.9.1 Theoretical visibility of Project

The preliminary LVIA identifies Section B covering the Project line broadly between Diss in the north and Ipswich to the south-east. The Zone of Theoretical Visibility (ZTV) mapping indicates relatively widespread theoretical visibility of the overhead line within the 3 km study area including from villages, the PRoW network, National Cycle Network routes in this area, from the rural lanes and road network. This highlights how widespread the potential negative landscape and visual effect of the scheme are.

The study also identifies that there would be theoretical visibility of one or more pylons from ground level to tip from the majority of the study area. From the more elevated parts of the study area, it is identified that there would be theoretical visibility of up to 80 pylons. There is no theoretical visibility from parts of settlements due to buildings that would screen and filter views, from some areas due to intervening topography or woodland. This also highlights how widespread the potential negative landscape and visual effect of the scheme are.

Theoretical visibility of CSE compounds in the Waveney Valley and Bramford Substation Extension is identified as relatively widespread within approximately 1 km of the Project line, with more intermittent theoretical visibility between 1 km and 3 km.

1.9.2 Visual Receptors and Groupings

The preliminary LVIA groups the visual receptors into Visual Receptor Areas. These Visual Receptor Areas have been identified based on geographical location, shared landscape characteristics and a similarity in the nature of views. We understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail may have been lost as a result. It would be expected that the groupings might follow the landscape character areas or types far more closely.

Visual Receptor Areas B4, B5 and B6 do not appear to be labelled on Figure 3 Pages 3 or 4.

B1 Wortham: This Visual Receptor Area is located to the west of the Project, broadly between Roydon to the north and Gislingham to the south. Representative viewpoints are identified as:

- Viewpoint 2.01 Wortham Ling
- Viewpoint 2.04 Burgate
- Viewpoint 2.22 PRoW near Goodrich Park

During construction, we agree that it is likely that effects on visual receptors would likely be *significant (negative)* within approximately *1.5 km* of the draft Order Limits. It is likely that the enormous impact of access for construction and operational purposes and the temporary and permanent haul roads throughout the Project merits the creation of a haul road decommissioning plan so that the effects of this infrastructure's removal is understood.

At operation, it is identified that within approximately 0.5 km of the Project, there would be close views of the overhead line from the local road and PRoW network. Pylons and the overhead line would also dominate views from *VP 2.01 Wortham Ling*, where the viewpoint is only 400m from the Project at its closest point. Wortham Ling is important as it is open access land, thus allowing views from many different angles. The wireline appears to show the pylons disappearing into vegetation on the northern side of the Project but much of this could be lost in order to facilitate construction and then kept open over a wide swathe for operational purposes.

It is also identified that the Project would be visible in close views from the east of the Visual Receptor Area and in some longer-range views, where the tops of pylons would be seen above existing vegetation. The views from *VP 2.22 Goodrich Park* are taken from 400m away and there are no wireframes from the medium-long distance VPs 2.32 and 2.31. Wireframes are needed from these viewpoints to demonstrate that there is no likely significance beyond 1.5Km.

It is also likely that close views would include views from the Waveney Valley, notably from The Doit (also Angles Way PRoW) north to the proposed CSE (for the Waveney Alternative) and pylons on the northern side of the Waveney, and we judge a viewpoint and visualisation is needed at this location.

The assessment states that between approximately 0.5 km and 1 km the overhead line would most often be seen on the skyline above intervening layers of vegetation from the local road and PRoW network citing the visualisation for *Viewpoint 2.04 Burgate* as an example that demonstrates this.
However, this understates what is in many cases a major part of the pylons and the overhead wires being visible in the middle-distance, and not on the horizon, as the term 'skyline' implies.

VP 2.01: Waveney Valley Alternative: the wireline indicates the Cable Sealing End (CSE) compounds and pylons would dominate the close views from this viewpoint. There is an improvement on the overhead line but still produces a major negative impact with potential clear views of the pylon run going south due to the need to remove trees and other vegetation to facilitate construction and operation. The opportunities for visual mitigation on Wortham Ling itself, a heathland landscape, would be slight.

It is suggested that for the Open Access Land to benefit from the undergrounding fully, this should be extended by up to an additional 7 No pylons as far as Brook Farm airstrip and the proposed construction compound nearby and the CSE located in that area.

It is also likely that close views would include views from the Waveney Valley, notably from The Doit (also Angles Way PRoW) north to the proposed CSE (for the Waveney Alternative) and pylons on the northern side of the Waveney, and we judge a viewpoint is needed at this location. Pushing back of the CSE from the Waveney Valley to the Snow Street area, potentially east of Darrow Lane, should also be investigated as the proposed CSE height of 15m will be hard to mitigate successfully from the valley and the extent of the compound will dominate the valley floor and/or sides.

We agree that generally operational effects on visual receptors would likely be *significant (negative)* within approximately *1.5 km* of the Project, and that is currently the same for the Waveney Valley Alternative. However, additional assessments and wireframes are needed from medium-long distance viewpoints to demonstrate that there is no likely significance beyond 1.5Km as well as additional assessment and wireframe from The Doit to demonstrate the extent of the negative effect of the Project and the Waveney Alternative on the Waveney Valley itself from the Suffolk side.

B2 Palgrave: This Visual Receptor Area is identfied as east of the Project, broadly between Diss to the north and Thrandeston in the south. The area comprises part of the Waveney Valley and one of its tributaries. The sole Representative Viewpoint is identified as:

- Viewpoint 2.03 PRoW Palgrave

We do not accept that the effects on visual receptors would likely be significant (negative) within only 1 km of the draft Order Limits, particularly towards the end of construction period. *VP 2.03 ProW at Palgrave* is taken 0.8Km from the project line and demonstrates that at this distance there is a major negative effect anticipated on completion due to the sheer extent, density and height of the Project. The landscape at

this point consists of large-scale arable fields, providing open views with intermittent boundary vegetation. Beyond 1 km, effects would likely remain significant, therefore, especially towards the end of the construction period. The Waveney Line Alternative reduces some of these effects.

At operational stage, we judge the effects on visual receptors could be significant (negative) at a greater range than 1 km from the Project. The Waveney Valley Alternative only reduces effects in one small section of the northern part of the area.

We do not think it sufficient on a Project of this scale and with the predicted significant negative effects on both landscape and visual receptors that only one viewpoint is being used to represent the effects on local receptors in this area. It is suggested that viewpoint assessments and wirelines are provided from VP 2.33 and VP 2.31 in order to demonstrate no significant effects from between 1-1.5km for both options.

B3 Mellis: This Visual Receptor Area is located to the east of the Project, broadly between Thrandeston to the north and Thornham Park in the south. The sole Representative Viewpoint is:

- Viewpoint 2.05 Mellis Green

Agree within approximately 0.5 km of construction activity, and between approximately 0.5 km and 1 km, there would be close and open views from the local road and PRoW networks, scattered properties, and parts of Mellis and Mellis Common. The latter is demonstrated in wireline in *Viewpoint 2.05 Mellis Green* which is 1Km from the Project line.

It is stated that 'The Project would be seen on the skyline and layers of field boundary vegetation would filter views.' However, that is truer to the west of Mellis Green rather than to the north-west where views are far more open and the impacts far more substantial.

We acknowledge there is some mitigation from the under grounding of the existing overhead line, however the increased height of the Project pylons introduces far more intrusive and dominant infrastructure.

We do not think it sufficient on a Project of this scale and with the predicted significant negative effects on both landscape and visual receptors that only one viewpoint is being used to represent the effects on local receptors in this area. Potential additional viewpoints are already identified at VP
2.33 and VP 2.39 and assessments and wireframe visualisations at least should be carried out for these additional VPs.

Generally, we agree that effects on visual receptors would likely be significant (negative) within approximately 2 km of the Project. Beyond 2 km, effects would not likely be significant due to a reduction in perceptibility of the overhead line which would increase with distance, however, additional viewpoint assessments and visualisations are needed to demonstrate this.

B4 Finningham and Gislingham: This Visual Receptor Area is located to the west of the Project, broadly between Gislingham in the north and Gipping to the south. The identified Representative Viewpoints are:

- Viewpoint 2.06 Mill Street, west of Gislingham
- Viewpoint 2.09 Dandy Corner
- Viewpoint 2.11 Middy Railway Footpath

Grouping Areas B4, B5 and B 6 do not appear to be labelled on Figure 13.7 Page 3 and Page 4.

We generally agree that effects on visual receptors would likely be significant (negative)

within approximately 2 km of the Project at both construction and operational stage, and that between approximately 2 km and 3 km distance and layers of vegetation would reduce visibility of construction activity and operational effects. *VP2.09 Dandy Corner* which is 0.7Km from the Project line demonstrates the major negative effects that will occur from this distance where there is an open view. It would also dramatically affect the experience of the landscape including the perception of its tranquillity and rurality in a place where there is a strong sense of isolation.

Similarly, as *VP 2.11 Middy Railway Footpath* is 0.6km distance from the Project line it creates major negative effects where there is an open view and therefore a significant negative impact as a result. Whilst not impacting directly on views from the centre of Mendlesham, the overhead line and pylons will have a profound effect on the setting of the village and the perception of its rurality.
There are two potential viewpoints set between 1-2.5 kms in this area, VP 2.10 and 2.35, that could usefully be assessed and visualisations created to demonstrate more clearly where significant effects are likely to end.

However, the wireline Visualisation from *Viewpoint 2.06 Mill Street, west of Gislingham* which is taken from 2.1Km specifically Figure No: 13.9.19b demonstrates that significant effects will still be present in places on completion beyond 2Km due to the often large-scale, open landscape with extended intervisibility. Dozens of pylons are visible to the north-east of Gislingham in a currently peaceful, rural landscape with few detractors.

B5 Wickham Skeith and Mendlesham: This Visual Receptor Area is located to the east of the Project, broadly between Thornham Magna in the north and Middlewood Green in the south. There are two Representative Viewpoints:

- Viewpoint 2.24 PRoW near Mendlesham
- Viewpoint 2.08 Wickham Street

Close to impacts would occur from parts of the Mid Suffolk Footpath and Middy Railway Footpath, Quiet Lanes, parts of local villages and hamlets, at both construction and operational stages. *VP 2.24 near Mendlesham* demonstrates the significance of the effect at 0.4Kms from the Project line in an open landscape, that is generally flat with gappy hedgerows and trees. It is a tranquil landscape with quiet single-track lanes and sparse traffic. Although there is an existing 132Kv line in the middle distance in some views there are few other detractors.

VP 2.08 Wickham Street is south-east of Gislingham and the railway, 0.7Kms from the Project line. This visualisation demonstrates how significant effects are at 0.7Kms, therefore we consider that further assessment and visualisations are needed between 1Km and 1.5Kms in order to demonstrate why a cut off for significance at the operational stage is made at 1Km. This is often a large -scale open, gently undulating landscape with good intervisibility, but with scattered copses and the poplar plantation providing some screening, so the pylons and line are generally visible over a wide area.

B6 Stowupland: This Visual Receptor Area is located to the west of the Project, broadly between Gipping in the north and Creeting St Peter in the south. There are three Representative Viewpoints:

- Viewpoint 2.12 Mid Suffolk Footpath
- Viewpoint 2.13 Stowupland
- Viewpoint 2.14 Creeting Lane, Creeting St Peter

It is identified that close and medium distance views at construction and operation stages will be had from local lanes, the PRoW network including the Mid Suffolk Footpath, scattered properties, Saxham Street and the eastern fringes of Creeting St Peter. *VP*

2.12 Mid Suffolk footpath is 1.2Km from the Project line, looking east/southeast gently sloping towards the viewpoint giving wide open views of a large-scale arable landscape with few or no detractors. The lanes are single track, quiet and rural. The overhead line is clearly visible across a wide area creating significant effects even from this distance, so we do not consider that significant effects occur only up to 1 km. There are no viewpoint assessments and visualisations greater than 1.5 kms in this area therefore some need to be identified beyond this to demonstrate whether effects are significant beyond 1,5Kms and not 1Km as claimed. There is more topography towards the River Gipping and Gipping Great wood where there is an undulating/sloping valley landscape.

VP 2.13 Stowupland As the viewpoint here is at 1.5km and is still clearly visible across a wide area creating significant effects, we do not agree that significant effects occur only up to 1 km. This viewpoint demonstrates that effects are significant at least to 1.5kms. The viewpoint looks east with Stowupland to the west. Existing 132Kv overhead line can be seen in the middle-distance. However, the proposals would intensify and extend these effects making dozens of pylons visible.

VP2.14 Creeting St Peter taken from 0.9Km away demonstrates the effects of the pylons as they're viewed on the neighbouring ridge, thereby filling the whole view looking east just north of Creeting St Peter on the edge of a PRoW. Again, from this viewpoint, it is an open undulating unspoiled agricultural landscape sitting to the north of the Gipping valley. Stowmarket and the A14 lie just to the west and south but this northern approach to the village is unspoiled.

B7 Forward Green and Creeting St Mary: This Visual Receptor Area is located to the east of the Project, broadly between Middlewood Green to the north and Creeting St Mary in the south. There are no representative viewpoints within this Visual Receptor Area which is not acceptable. The closest viewpoint visualisation to the east of the line going north is approximately 10Kms away near Mendlesham. To the south it is approximately 3Kms to Barking Tye. We cannot comment on the judgements in this section without a viewpoint assessment and visualisation.

B8 Stowmarket: This Visual Receptor Area is located to the west of the Project, encompassing part of the Gipping Valley including the eastern side of Stowmarket and adjacent farmed valley sides.
There are no representative viewpoints within this Visual Receptor Area. Although this is a small Visual Receptor Area it contains a lengthy stretch of the undeveloped Gipping Valley, along which the Gipping Valley River Path runs. It is imperative to have at least one viewpoint assessment and visualisation from these receptors as the Project is prosed to over sail both. Potential VP 2.29 could be used and another viewpoint chosen between 1-1.5Km. It is difficult to comment on the judgement that there would be no significant construction or operational impacts beyond 1Kms without a VP between 1Km and 1.5Km to confirm this.

B9 Needham Market: This Visual Receptor Area is located to the east of the Project, encompassing part of the Gipping Valley including the settlement of Needham Market. There is one Representative Viewpoint which is identified as *Viewpoint 2.15 Needham Market*. However, VP 2.15 does not appear to be marked on the map so it is hard to make an assessment about whether significant construction and operational effects would be limited to 1.5Kms. We suggest an additional viewpoint at that distance from the Project line is required.

B10 Great Bricett: This Visual Receptor Area is located to the west of the Project, broadly between Stowmarket to the north and Great Bricett in the south. There are two Representative Viewpoints:

- Viewpoint 2.16 Badley
- Viewpoint 2.18 B1078, Great Bricett

It is identified that there would be close views of construction activity from the local road

and PRoW network, scattered properties and the eastern edge of Ringshall Stocks. Close to medium views are represented by *VP 2.16 Badley* which is 0.9km from the Project line. Although there are existing overhead lines and pylons from this viewpoint the visualisation shows how that wirescape is extended and densified, despite some of the existing 132Kv line being undergrounded.

VP 2.18 Great Bricett 1.6Km This is an open gently undulating quite large scale arable landscape. TheB1078 is quite fast but the traffic is intermittent. There are few other visible detractors.
Wattisham Flying Station is close by but there is no sense of it at this point. There are distant pylons to the east of the view. The impacts remain significant even at 1.6KM. We would therefore query that effects on visual receptors at construction and at operation would likely be significant (negative) only within approximately 1.5 km. It would be useful to have a close view visualisation as proposed from VP 2.38 to contrast with the two more distant viewpoint assessments. It would also be useful to have a viewpoint closer to 2Kms to clarify where the significant effects are likely to stop.

B11 Barking and Willisham: This Visual Receptor Area is located to the east of the Project, broadly between Needham Market to the north and Willisham in the south. There is one Representative Viewpoint:

- Viewpoint 2.17 Barking Tye

It is identified that close and close to medium distance views of construction activity and the completed Project would be had from the local road and PRoW network, parts of the B1078, scattered properties including Hascot Hill Farm and parts of Barking, the Open Access Area at Barking Tye and the settlement at Willisham. Further south, part of the existing overhead lines are to be undergrounded to accommodate the Project.

Barking Tye green is a large traditional open green, substantially retained as meadow with mown margins. It provides extensive essentially open views beyond the hedgerows on the boundary towards rising arable farmland beyond. *VP 2.17 Barking Tye* is situated 0.8Km from the Project line and illustrates how the pylons would be visible over 80% of the view either wholly or in part. They would form a new negative backdrop to the green. Additional viewpoints are needed between 1.5- 2Kms to demonstrate where significant effects cease.

B12 Elmsett: This Visual Receptor Area is located to the west of the Project, broadly between Greenstreet Green to the north-west and Flowton to the south-east. The sole Representative Viewpoint is:

- Viewpoint 2.21 Elmsett

The assessment identifies that there would be close and close to medium views of construction activity from the local road and PRoW network, scattered properties and the fringes of Flowton. Works include the undergrounding of an existing overhead line between Offton and Bramford Substation and works at the substation. There would be close to medium distance views from the local road and PRoW network and parts of Flowton. There would be views from some elevated areas, such as illustrated from *VP 2.21 Elmsett*. There is a very intimate landscape around Elmsett with steep valley slopes rising up from Offton Road to the flatter or gently undulating more open ridge tops. The lanes are single track, and it is intensely tranquil. These areas would all be visually affected once the Project is complete. VP 2.21 Elmsett is taken from 1.3Km so is quite distant as opposed to a close to medium view. This Visual Receptor Area is very large and so warrants additional viewpoints, both close to, and between 1.5-2Kms to demonstrate that 1.5Km is the limit for significant effects.

B13 Somersham: This Visual Receptor Area is located to the east of the Project, broadly between Offton to the north-west and Bramford Substation to the south-east. There are two Representative Viewpoints:

- Viewpoint 2.19 Offton
- Viewpoint 2.25 Nettlestead

The assessment identifies close views of construction activity from the local road (including a Quiet Lane) and PRoW networks, scattered properties and parts of Somersham and Offton. *Viewpoint 2.19 Offton* The visualization demonstrates the major impact and significant negative effects of the overhead line in an undulating landscape. This is rolling countryside with intimate heavily vegetated stream side valleys, with quiet single-track lanes and scattered settlement, rising to more open large-scale plateaus. Although existing overhead lines exist in the distance, the proposed Project will significantly add to the negative effects of this Receptor Area when seen close to.

It is identified that at completion, between approximately 1 km and 2 km there would be some medium to long distance views of the Project from elevated areas. However, *VP 2.25 Nettlestead* is taken from 1.9Km from the Project line on elevated land to the northeast of Nettlestead. It shows the existing pylons dominating about 25% of the existing view, but the proposed ones extend both the extent and intensity of the existing infrastructure to the point where the whole view is dominated by infrastructure. It seems unlikely that even at 2 Kms in elevated and open landscape that this extent and density of 'wirescape' will not appear significant. In the south of the Visual Receptor Area construction activity and the completed Project line would be seen in the context of existing electricity infrastructure.

As elsewhere, more viewpoints are needed to demonstrate the extent of these effects. Potential VP 2.26 would be useful in demonstrating the effects of removal of the existing 132Kv line in close to views. A viewpoint is also needed from this Visual Receptor Area towards Bramford substation. Potential VP 2.20 may suffice for this.

C1 Burstall: This Visual Receptor Area is located to the west of the Project, in the area surrounding Burstall and Hintlesham. There are three Representative Viewpoints:

- Viewpoint 3.01 Church Hill
- Viewpoint 3.02 Burstall
- Viewpoint 3.06 Hintlesham

The assessment identifies there would be close views of construction activity from the local road and PRoW network, including a short section of the A1071, as well as scattered properties and clusters of properties including those along Church Hill to the north of Burstall. *VP 3.01 Church Hill* is taken from 0.7Km from the Project line not 0.5Km or less so represents a close to medium view. It demonstrates how, even though the existing view is dominated by overhead lines in about 50% of the view, this is greatly amplified and extended by the proposals to impact over a far wider view and appearing much closer to the viewer, in part because of the greater pylon height.

Between 0.5-1Km there are identified medium distance views of construction and the finished Project from the local road and ProW network, including the A1071 and also scattered and clustered properties including those along Washbrook Street and those to the north-east of Burstall

VP3.02 Burstall is also 0.7Km from the Project line and shows again how, despite the existing overhead line, the proposed line would be closer (on Burstall Lane by c 300m) and taller and the alignment runs along a ridge at this point making them far more dominant. There are also long views from Hintlesham Priory over 2Km from Burstall to the southwest that have existing prominent views of the substation and existing pylons so likely to have an intensified impact from the proposals.

Between approximately 1 km and 2 km construction activity and the operational pylons are described as 'would likely be perceptible in some medium to long distance views',

and ‘form a component ‘ in some medium to long distance views, yet the visualisation from VP *Viewpoint 3.06 Hintlesham* at 1.6Kms distance shows that the effects are more than perceptible. This landscape is likely to be affected by the proposed Bramford to Twinstead Reinforcement and forms part of the historic park of Hintlesham Hall so the cumulative effects on this landscape could be major. We disagree that the effects on visual receptors within approximately 1 km of the Project would likely be significant (negative) only within approximately 1 km, therefore.

C2 Washbrook: This Visual Receptor Area is located to the east of the Project and south-east of the existing Bramford Substation. There are no representative viewpoints within this Visual Receptor Area. This is not acceptable as this Receptor Area contains an intimate landscape of streams and valleys, Belstead Brook and Spring Brook, criss-crossed by PRoW and lanes. The assessment identifies there would be close views from the properties along Burstall Lane and those associated with the valley systems to the south of the A1071 such as at Washbrook Street. The Grindle is designated as a Quiet Lane, located to the north of Sproughton.

A viewpoint is needed in this area. Potential VP 3.22 which is about 1Km from the Project line is a possible choice or VP 3.07 which is on the border between C1 and C2. The assertion that the removal of three sections of existing 132 kV overhead line to the south of Bramford Substation would avoid the Project adding to the appearance of a ‘wirescape’ in some views could be demonstrated if a visualisation was done for VP 3.22.

Without a demonstration of the effects, it is hard to make a response on the distance beyond which significance of effects will end.

C3 Ipswich West, Bramford and Sproughton: This Visual Receptor Area is located to the east of the Project, on the edge of Ipswich. There are no representative viewpoints within this Visual Receptor Area. It is identified that effects on receptors within this Visual Receptor Area would likely not be significant but we consider that a viewpoint towards the west of the Receptor Area is needed to confirm this.

C4 Chattisham: This Visual Receptor Area is located to the north of the Project in the area broadly between Chattisham and Duke Street in the east and Upper Layham in the west. There are four Representative Viewpoints:

- Viewpoint 3.05 Chattisham, National Cycling Network (NCN) Route 1
- Viewpoint 3.08 NCR 1, Woodlands Road
- Viewpoint 3.06 Hintlesham is just outside to the north
- Viewpoint 3.25 PRoW near Woodlands Hall

The assessment identifies close views of construction activity and the operational line, including views towards the CSE compound and construction activity associated with the underground cable, from the local road and PRoW network, including from NCN 1 on Chattisham Road, as well as the linear settlement of Chattisham, and a relatively small number of scattered properties.

Viewpoint 3.05 Chattisham, NCN Route 1 is taken from 0.6Km so just outside the ‘Close view’ definition. The pylon line is a dominant feature in about 75% of the visualisation. *Viewpoint 3.25 PRoW near Woodlands Hall* is taken from 0.6Km and illustrates the dominant impact of the CSE compound from this distance and view. It is not clear where VP 3.25 is located on Figure 13.7. 0.6Km is outside the applicant’s definition of close view. *Viewpoint 3.08 NCR 1, Woodlands Road* taken from 1Km distance illustrates how the overhead line is still of moderate i.e., of significant impact at this distance. *Viewpoint 3.06 Hintlesham* is at 1.6Kms distance shows that the effects are more than perceptible. We consider that significant effects remain somewhere between 1-1.5Kms rather than 1Km.

C5 Capel St Mary: This Visual Receptor Area is located to the south of the Project in the area broadly between Copdock in the east and Capel St Mary in the west. There are two Representative Viewpoints

- Viewpoint 3.04 Washbrook
- Viewpoint 3.09 Little Wenham

The assessment identifies close views of construction activity, including some views towards the CSE compound, from the local road and ProW network, NCN Route 1, as well as scattered properties close to medium distance views of construction from the local road and PRoW network (as represented by *Viewpoint 3.04 Washbrook*). Other receptors would include NCN Route 1, as well as a relatively small number of scattered and clustered properties such as those along Wenham Road. VP 3.04 is taken from 0.8Km away from the Project line. The visualisation demonstrates the widespread and significant impact of the line at this point with dozens of pylons dominating the fore and middle ground. This is a landscape with some infrastructure visible on the horizon but this is c4Kms away and so currently barely perceptible in the wider landscape. It is disingenuous to state the overhead line would most often be seen on the skyline, above intervening vegetation and hedgerows when the visualisation clearly shows the proposed overhead line in the foreground of view. Likewise, to state that between approximately 1 km and 2 km the overhead line would be 'perceptible' in some medium to long distance views is not borne out in *Viewpoint 3.09 Little Wenham* completely understates the visibility of the line in this visualisation from 1.4Km distance, when the overhead wires and pylons are clearly visible in the mid-ground.

C6 Raydon: This Visual Receptor Area is located to the west of the Project in the area around Raydon. Part of the area falls within Dedham Vale National Landscape (an AONB). There is one Representative Viewpoints outside this area to the south-west, although VP 3.10 appears also to be in this area:

- Viewpoint 3.24 Higham Hill

The Project would be undergrounded within this Visual Receptor Area. The assessment identifies close views of construction activity associated with the underground cables from the local road and PRoW network, including the B1070, NCN Route 48, as well as scattered properties and the eastern and southern edges of Raydon. People using Noaks Road and Sulleys Hill Road, which are designated as Quiet Lanes would also have close views towards this activity. *Viewpoint 3.24 Higham Hill* which is located outside this area to the south-west within Dedham Vale National Landscape identifies that the finished infrastructure is likely barely perceptible if at all. However, between approximately 1 km and 2 km the overhead line would be perceptible in some limited medium to long distance views from a small part of the north-east of this area. A VP 3.10 is identified on Figure 13.7 Page 5 but there is no viewpoint photograph and visualisation. These would be useful to demonstrate that views from the north-east are only 'perceptible'.

C7 Great Wenham and Holton St Mary: This Visual Receptor Area is located to the east of the Project in the area around Great Wenham and Holton St Mary. The sole Representative Viewpoint identified is:

- Viewpoint 3.25 PRoW near Woodlands Hall

The sole Representative Viewpoint is outside the C7 area to the north-west. The assessment identifies that lost views can be had of construction activity, including views towards the CSE compound and construction activity associated with the underground cable, from the local road network including the B1070, from the local PRoW network from NCN Route 48 as well as from Bacon's Green and scattered properties. *Viewpoint 3.25 PRoW near Woodlands Hall* Properties at Lark Hall, just south of Bacon's Green would be entirely encircled by construction works associated with the construction of underground cables. There would also be open views of the underground cable construction works from Raydon Airfield Memorial.

We accept that visual effects on visual receptors would generally be significant (negative) within approximately 1 km of the draft Order Limits. However, it is important that a close view of the CSE is provided to demonstrate the extent of the effects of that piece of permanent infrastructure and the beneficial effects or not of any proposed mitigation. A potential VP 3.16 is identified on Figure 13.7 Page 6 and may fulfil this need if assessed.

C8 (Undergrounding section – 1 km buffer) Higham

C9 (Undergrounding section – 1 km buffer) Stratford St Mary

We accept that effects on visual receptors would likely be significant (negative) within approximately 0.5 km of draft Order Limits at construction in these two Visual Receptor areas.

Yours Sincerely,

Catherine Bailey BSc (Hons) MPhil MA CMLI

Principal Landscape Consultant at Place Services

Additional Place Service – Landscape comments for Babergh Mid Suffolk landscape and visual supplementary issues

June 20th 2024

Query April 30th Bron: The impact the EACN might have on the setting of the NL.

The Applicant's preliminary assessment identifies that the new substation, the East Anglia Connection Node (EACN), is to the south-east of the National Landscape. The Project would run on an overhead line between the EACN Substation and Great Horkesley to the west. There is Theoretical visibility of the EACN Substation to the south of the National Landscape, but visibility is very limited from within the National Landscape itself (see Figure 13.8.7: ZTV of the EACN in Volume II, Figure 13.9.47: Wireline Visualisation from Viewpoint 3.15: Birchwood Road near Lamb Corner and Figure 13.9.47: Wireline Visualisation from Viewpoint 3.19: Essex Way, Dedham Road in Volume II).

We concur in relation to the EACN itself, although a viewpoint visualisation is still required identifying full mitigation proposals, including at Year 10. Note: These judgements do not cover the effects of the OH line itself.

Query April 29th Bron: Waveney undergrounded section and siting of the sealing end compounds.

In our landscape response we wrote:

VP 2.01: Waveney Valley Alternative: the wireline indicates the Cable Sealing End (CSE) compounds and pylons would dominate the close views from this viewpoint. This is an improvement on the overhead line proposals but still produces a major negative impact with potential clear views of the pylon run going south due to the need to remove trees and other vegetation to facilitate construction and operation. The opportunities for visual mitigation of the CSE compound on or near Wortham Ling itself would be slight as tree planting to screen the CSE would be inappropriate in a heathland landscape.

It is suggested that for the Open Access Land to benefit from the undergrounding fully, the undergrounding should be extended by up to an additional 7 No pylons south as far as Brook Farm airstrip and the proposed construction compound nearby and the CSE compound located in that area away from Wortham Ling.

It is also likely that close views would include views from the Waveney Valley, notably from The Doit (also Angles Way PRoW) north to the proposed CSE (for the Waveney Alternative) and pylons on the northern side of the Waveney, and we judge a viewpoint assessment and visualisation is needed from The Doit to analyse this. Pushing back of the CSE from the Waveney Valley to the Snow Street area, potentially east of Darrow Lane, should be investigated as the proposed CSE height of 15m will be hard to mitigate successfully within the open valley and the extent of the compound will dominate the valley floor and/or sides.

We agree that generally operational effects on visual receptors would likely be significant (negative) within approximately 1.5 km of the Project, and that is currently the same for the OH line as well as the Waveney Valley Alternative. However, additional assessments and wireframes are needed from medium-long distance viewpoints to demonstrate that there is no likely significance beyond 1.5Km as well as additional assessment and wireframe from The Doit to demonstrate the extent of the negative effect of the Project and the Waveney Alternative on the Waveney Valley itself from the Suffolk side.

Query April 29th Bron: At Mellis will there be parallelling with the existing 400kv line, especially as the railway line (and PROWs) goes between the two.

Our understanding, from looking at *Figure 4.1 - Project Description - Proposed Project Design Page 12 of 60* is that the existing overhead line is undergrounded from north of Dam Lane to close to proposed pylon RG110, to the west of Mellis. It looks as though the proposed pylons will run along the old line but at an increased height so the Project pylons introduces far more intrusive and dominant infrastructure at a similar distance from Mellis as the existing OH line. The abrupt turn in the proposed pylon run from south- west to due south creates additional negative effects to the west. (See Representative Viewpoint 2.05 Mellis Green). It is stated by the Applicants that '*The Project would be seen on the skyline and layers of field boundary vegetation would filter views.'* However, that is truer to the west of Mellis Green rather than to the north-west where views are far more open and the impacts far more substantial. Generally, we agree that effects on visual receptors at the operational stage would likely be significant (negative) within approximately 2 km of the Project, however, additional viewpoint assessments and visualisations are needed to demonstrate that significant effects do not occur beyond this.

Query April 29th Bron: Crossing of the A14 / Gipping / B1113 close to Badley Church in unspoilt heritage landscape.

It is identified that there would be close views of construction activity and the finished Project line from the local road and PRoW network, scattered properties and the eastern edge of Ringshall Stocks. Close to medium views are represented by VP 2.16 Badley which is 0.9km

from the Project line. Although there are existing overhead lines and pylons from this viewpoint the visualisation shows how that wirescape is extended and densified, despite some of the existing 132Kv line being undergrounded.

It may be pertinent to request further undergrounding of existing or proposed lines in this area as mitigation.

Query April 29th Bron: Offton, especially the castle SAM and the nearby OSSI have lots going on.

In our response we noted the assessment identifies close views of construction activity from the local roads (including a Quiet Lane) and PRoW networks, scattered properties and parts of Somersham and Offton. Viewpoint 2.19 Offton, visualization demonstrates the major impact and significant negative effects of the overhead line in an undulating landscape. This is rolling countryside with intimate heavily vegetated stream side valleys, with quiet single-track lanes and scattered settlement, rising to more open large-scale plateaus. Although existing overhead lines exist in the distance, the proposed Project will significantly add to the negative effects of this Receptor Area when seen close to.

It is identified that at completion, between approximately 1 km and 2 km there would be some medium to long distance views of the Project from elevated areas. However, VP 2.25 Nettlestead is taken from 1.9Km from the Project line on elevated land and shows that although the existing pylons dominate part of the existing view, the proposed ones extend and intensify the negative effect to the point where the whole view is dominated by infrastructure. It seems likely that, even at 2 Kms distance in an elevated and open landscape, the extent and density of 'wirescape' will appear significant negative.

As elsewhere, more viewpoints are needed to demonstrate the extent of these effects. Potential VP 2.26 would be useful in demonstrating the effects of removal of the existing 132Kv line in close to views. A viewpoint is also needed from this Visual Receptor Area towards Bramford substation. Potential VP 2.20 may suffice for this.

Query May 2nd Susan Edwards - three-acre water meadow with haul road going through it; avenue of mature trees, and a very old, veteran oak which is hollow.

Historic England has drawn up guidance on the role of Historic Water Meadows.

https://historicengland.org.uk/images-books/publications/conserving-historic-water-meadows/heag176-conserving-water-meadows/

To quote '*They are an important part of our cultural and agricultural heritage – painted by John Constable, described by Thomas Hardy and vital to the economy of many river valleys for over four hundred years'*. Also '*Redundant water meadows are far more commonly seen,*

and their remains contribute greatly to the character of the landscape in some areas of England'.

'Ground disturbance on historic water meadows will damage and distort their earthwork profiles' and *'track-ways and footpaths, whether permanent or temporary, should avoid clipping or cutting across historic features*.'

Veteran oaks - The National Planning Policy Framework (paragraph 175c) requires local planning authorities to refuse development that would lead to the loss or deterioration of irreplaceable habitats including ancient or veteran trees. In our initial response, we did not make reference in detail about issues relating to vegetation removal but it is expected for these to be fully identified and quantified as the EIA submission is developed.

Cllr Warboys: Trees at Risk, Spring Farm, Gislingham

The Avenue of Chestnut Trees - It may be worth proposing that an access road is created outside the avenue instead of along it e.g., in an adjoining field, if that is within the landowner's ownership. I would agree that use of the avenue as an access route by heavy plant would likely result in the destruction of the avenue of trees in their current form.

Email from resident in Burgate June 4th 2024

We cannot comment on the role of pylons per se for UK electrical networks except to point out they are the default solution enshrined in current national policy para 2.9.20 of EN5 Nov 2023 which states *'… it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general'*. That being said, En5 para 2.2.10 points out that '*… applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders … to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."*

We have agreed with the applicant's consultants that, at construction, it is likely that effects on visual receptors would likely be significant (negative) within approximately 1.5 km of the draft Order Limits and that a haul road decommissioning plan is needed so that the effects of this infrastructure's removal as well as construction is understood.

The assessment states that between approximately 0.5 km and 1 km the overhead line would most often be seen on the skyline above intervening layers of vegetation from the local road and PRoW network citing the visualisation for Viewpoint 2.04 Burgate as an example that demonstrates this. However, the visualisation actually shows the majority of the

pylons and the overhead wires being clearly visible in the middle-distance, and not on the horizon, as the term ‘skyline’ implies. There is sparse screening from the Burgate viewpoint.

We agree that generally operational effects on visual receptors would likely be significant (negative) within approximately 1.5 km of the Project, but that additional assessments and wireframes are needed from medium-long distance viewpoints to demonstrate that there is no likely significance beyond 1.5Km.

In relation to the Holford Rules,

1. It is likely the deviation is occurring to avoid Mellis and Big Wood. That being said, the result demonstrates how difficult it is in a rural landscape to follow the ‘most direct line’ rule without falling foul of the duty in Schedule 9 to the Electricity Act 1989 to *“have regard to the desirability of preserving natural beauty’.*
2. Tree and Hill backgrounds – we would agree that the Holford rules in relation to not siting against the sky are harder to achieve in open, flat or gently undulating lowland landscapes where proposed infrastructure will almost always be seen against the sky. I surmise that the Holford Rules were drawn up at a time, in the 1960s, when most electricity infrastructure was serving coal-fired power stations, most of which were sited in upland Britain coinciding with the coal seams.
3. Confusing appearance – The proposed line does appear to replace the existing pylon line from approximately RG100 to RG110 to the southeast of Burgate. The existing line appears to be undergrounded at this point, but the map keys are unclear. However, the proposed pylons will be higher and the two lines will be seen together in some views to the north-east of Burgate.
4. In relation to the Special Landscape Area designation, these are no longer included in the *November 2023 Babergh and Mid Suffolk Joint Local Plan.* However, that does not negate the special qualities and value that pertain to the landscapes that used to be designated at a local level. The current Holford Rules advise ‘*Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.’* And yet districts which adhere to national policy on local landscape protection and base their policy on local landscape character assessments not designation are effectively penalised via this advice. The Holford Rules appear to have been last updated in the 1990s and would seem to be at odds with current general national landscape policy and guidance. We suggest in our landscape response that the whole route of the Project should be subject to a valued landscape assessment. The Landscape Institute provides guidance on this.
5. Avoid routing to residential areas – See response to item 1.

BMSDC Economy response to Norwich to Tilbury Statutory consultation:

There are a number of aspects of the proposal which are not yet satisfactorily addressed, including the impact upon skills and tourism which have not been assessed fully within the most recent documents.

The Councils expect National Grid to coordinate their projects in Suffolk and actively engage with the Councils via a Memorandum of Understanding, with regard to Norwich to Tilbury, 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. National Grid as a responsible corporate entity should actively engage with the Councils and its partners to identify and deliver inclusive growth, social value and additional wider benefits.

It is welcomed that the Study Area has been expanded to include Ipswich, Norwich and West Suffolk, but it is unclear whether there has been any direct engagement with these LPAs to understand their position in relation to the potential impact of this proposal, specifically in relation to impact on the visitor economy, community and economy, particularly during construction when access is likely to be restricted.

The proposal also doesn't appear to take into account the difference in impact between the areas where pylons would be deployed as opposed to those areas where cables are proposed to be undergrounded or where the haul road is to be constructed. These need to be assessed separately as the impact, visually as well as environmentally and economically will be very different.

The PEIR makes reference to the decisions being made on the basis of experience of delivering previous projects, however, we remain concerned that the uniqueness of this project, traversing a very rural part of the country is very different to an urban programme and as such this proposal does not appear to have been tailored to fit the local circumstances.

A range of the data in the PEIR is not broken down by District, including the employment sector classifications and skills levels. There is a huge variation in this data across the region and it would be preferable if this data wasn't amalgamated in this way.

Summary

The Councils consider that the analysis of impact on economic development, skills and tourism has been underestimated and that there are significant impacts in respect of these issues, especially tourism, that should be more accurately quantified. The Councils consider that there may also be positive impacts for economic development and skills that can be achieved through collaboration with the promoter and delivered within the communities that are hosting this project.

- **Socio-economics**
    - The Councils consider that the assumptions used to reach the conclusion that the project is unlikely to have a significant effect on the local economy, businesses, jobs or employment during construction were flawed. No assessment has ever been carried out that looks at incidental impacts linked to the impact of construction disruption on communities and travel to work, education, healthcare or provision of services. The development is proposed in

a rural area with limited routes for public transport, if any of these main routes are impacted during construction, the impact on the affected communities could be significant.

- We recognise that the Local Study Area has been expanded to a 1km radius as opposed to the 500m radius previously proposed. This is welcomed, but the Councils believe that this is still unacceptable as this fixed radius doesn't reflect local geography where in some areas the pylons will be visible from a much greater distance. Access to facilities during construction is also likely to be felt on a much wider radius than 1km – if the venue isn't within the 1KM radius, but its access is, this should still be considered when assessing potential impact or if the construction of the haul road necessitates a larger diversion. A variable approach to this local study area boundary could be considered to identify issues across a wider geography that are relevant during the construction phase, but not during operations and vice versa.
- Through use of the VisitBritain hotel occupancy survey from 2016, the occupancy details have been under-represented. Based on an Ipswich Borough Council commission in 2018, the Ipswich Urban area average occupancy for hotels was 68%; and the average for Suffolk Coastal District was 74%. This section also does not take into account challenges relating to cumulative demands on accommodation from other NSIPs including Sizewell and offshore wind alongside other major local developments. VisitBritain data on self-catering occupancy is available, but has not been used - https://www.visitbritain.org/research-insights/uk-short-term-rentals.
- The VisitBritain information on growth of the tourism market is relating to overseas visits, this is not the core market for most destinations within the East. Domestic visitors are our key market and they are more easily discouraged from visiting if accommodation isn't readily available or if their visit is perceived to be disrupted by construction works.
- There is no recognition of the potential leisure impact of use of Hintlesham Fisheries as a construction compound.
- The assessment criteria that have been shared as part of the ES are believed to be flawed. The proposed development is primarily crossing a very rural area, very few of the major attractions across Suffolk have over 100,000 visitors a year. It is recommended that this threshold is reconsidered and a different approach to assessing impact is proposed. A baseline assessment also needs to be completed to understand current operating arrangements to ensure that the impact of development on the business can be mitigated.
- We also require further clarification on the definitions of "moderate" impact or "small" impact as this is open to interpretation and will vary depending on the size of business impacted.
- The assessment criteria are also skewed and unlikely to be relevant for most accommodation providers, irrespective of the scale of impact, as most accommodation providers, with the exception of very large hotels or campsites, will have subdtantially less than 10,000 guests a year.
- The assessment criteria also do not take into account the length of time that the business faces disruption and how frequently.

- **Supply Chain and Economic Development**
  - The Councils welcome the opportunity to strengthen and support the growth of local businesses through their involvement in a project such as this. However, to achieve any growth the promoter must be willing to engage collaboratively,

as early as possible, with the economic development partners within Suffolk. This is especially pertinent when it is known that this project is one of a series of projects being brought forward by National Grid in the locality and therefore will provide a far greater opportunity than a single project would.

- **Employment, Skills and Education**
    - As an individual project, National Grid Electricity Transmission – Norwich to Tilbury, offers no substantial opportunity 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 Babergh and Mid Suffolk District Councils would welcome working with National Grid Plc alongside partners in SCC to deliver a package of training, skills and growth opportunities that engages with the local supply chain strategically across all local projects e.g.; Bramford to Twinstead and Norwich to Tilbury overhead lines, Suffolk to Kent marine link, Nautilus, and Eurolink interconnectors alongside this project, East Anglia GREEN.
    - The Councils consider it essential that the inward investment, socio-economic and skills benefits of these projects is maximised, ensuring the best possible outcome for the communities that are hosting this Net Zero transmission, connection and generation infrastructure which has significant impact on them and their environment. Initiatives such as those delivered in Somerset, associated with the Hinkley Point C connection project, where communities have benefited from over £1 million of community funding and access to an education fund.
    - There is an absence of reference to several key documents and sources of data that will enhance the provided socio-economic assessment. These include the Economic Strategy for Norfolk and Suffolk and the Technical Legacy Report for Norfolk and Suffolk and the Culture, Heritage and Visitor Economy Strategy for Babergh & Mid Suffolk.
    - The Councils cannot fully determine the sufficiency of the approach to determining socio-economic impact ahead of the levels of expected employment, and the detailed workings supporting it, being provided and assessed by the promoter.
    - We consider further work to be required by the promoter, including clearly setting out the expected number and nature of employment opportunities during each phase of the project. These employment opportunities need to be related to the expected availability of labour in the area.
    - The promoter's commitment to prepare and implement an Employment, Skills and Education Strategy is welcomed and the Councils are willing to work with the promoter to ensure that there is alignment between the strategy and ongoing local activity supporting education, skills and employment to ensure that the strategy can have as great as impact as possible. This would be in line with the Council's Planning Policies which requires developers to undertake comprehensive and effective engagement with the Councils and supply chain partners to maximise the local business opportunity, skills inspiration and employment benefits – including the development of a skills and employment plan which is negotiated with the Councils as part of the Planning application process.
    - Financial measures in respect of relevant skills training within the local area should be agreed. There must also be adequate assessment of the likely origins of the labour force (both local and non-local), especially in the context of other energy projects with potentially overlapping construction periods.

- **Tourism**

  Following some challenges with the quality of data that NGET included within the Environmental Statement (ES), we are concerned that the PEIR does not rectify this error. Suffolk offers a rich and varied tourist offer known for its heritage assets, landscape designations and promoted areas, such as, two designated AONBs, the Dedham Vale, Stour Valley, Waveney Valley and Suffolk's Wool Towns. NGET needs to fully assess the direct and indirect impacts of this project and its associated infrastructure on all of these known features 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 impact known visitor attractions such as Bressingham Steam and Gardens, Needham Lake, Hintlesham Hall, RSPB Wolves Wood, and these sites have not been picked up within the 1km radius for the local study area. More broadly, 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 construction period.

  - The Councils anticipate 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, both during construction and during operation. This will be exacerbated due to the combination of other projects happening simultaneously in the area, hence the reason for requesting that all NSIPs are considered on a cumulative basis, particularly as National Grid are directly responsible for a number of these current proposals. Hence it is not acceptable for this impact to remain unassessed. The Councils expect NGET to develop initiatives or provide local funds that can be used to counteract the negative impacts upon tourism.

- **Community Benefit and Project Legacy**

  - Community benefits should be in addition to the required secondary mitigation for the development, including those based on emerging requirements in the expected Government publication in respect of Community Benefits from energy generation projects.

Cross-Referencing Chapters:

There has been a substantial challenge in the need to cross-reference chapters to understand wider impact and it is concerning that this information appears to have been gathered and assessed in isolation as opposed to a coherent approach to the proposed development.

An example of this is that there is no reference in Chapter 15 on Socio-Economics to the numbers or types of jobs that could be created, yet this data appears in Chapter 10 on Health & Wellbeing (The Project is expected to generate approximately 800 Full Time Equivalent (FTE) gross direct employees across the (184 km) Project throughout the approximate four year construction duration).

There are identified interrelationships related to the potential effects on Socio-economics, Recreation and Tourism within the following chapters:

- Chapter 7: Air Quality
- Chapter 10: Health and Wellbeing
- Chapter 13: Landscape and Visual
- Chapter 14: Noise and Vibration
- Chapter 16: Traffic and Transport

However, Chapter 6: Agriculture & Soils and Chapter 11: Historic Environment have not been considered in relation to socio-economic impacts. This is concerning as impacts on visitor economy of restricted access or other impact on listed buildings, heritage assets or historic landscapes or impacts of severance of farmland on productivity of the farm business during construction period or siting of pylons (although this is partially referenced in 6.8.7 and 6.8.8) has not been considered as part of the PEIR.

Health & Wellbeing

The range of personal, social, economic, and environmental factors that influence health status are known as health determinants and include the physical environment, income levels, employment, education, social support, and housing.

The baseline for Health and Wellbeing has not included the impact of the Project on our non-resident population (incl. tourists) or specific indicators of deprivation including access to services or affordability which are particularly poor in Babergh.

It is noted that the stated mitigation on diversions is limited to PROWs rather than assessing impact of restrictions on public transport, healthcare, education or other access to services and this will need to be addressed.

There is reference to potential contamination of waterways during construction, but no reference to specific mitigation needed in the River Stour to maintain the bathing water designation, particularly during construction of the trenches.

Even though the potential identified effects of the Project on health and wellbeing include changes to landscape character and visual amenity, increased traffic flows and severance effects, potential influences on air quality during construction, potential disruption and closures of business, recreation and tourism facilities and potential influences on noise levels, the assessment concluded that effects would be not significant in relation to health and wellbeing. This conclusion is not accepted.

The response of, and impact on, local communities to the landscape and visual aspects of the Project are subjective. There has also been no reference to the socio-economic impacts of visitors not travelling to the area because of the landscape damage and disruption and the loss of trade and income that this could result in.

It is recognised that negative health and wellbeing effects are likely to be experienced by a proportion of the local population as a result of how the Project may affect the setting of homes, businesses and / or culturally or ecologically important community assets, but the assessment still concludes that there is no significant, negative impact. This conclusion is not accepted.

The study area for the landscape and visual assessment comprises a 1 km buffer from the Project (for the underground elements) and a 3 km buffer from the Project (for the above ground elements). There is no reference to a specific buffer for the haul road construction.

Trenchless crossings are proposed at four locations within the National Landscape to cross the River Stour. Whilst some of the mitigation proposed could see these reduced to 2 or even 1 crossing, there is no mitigation of the impact that this would have on the leisure use of the river, biodiversity or recreation and tourism. A number of businesses operate pleasure craft on this river and the River has recently been awarded designated bathing water status and this is not identified as a significant impact.

Traffic & Transport

Whilst the ES will include an assessment of the following, there is a significant risk relating to changed journey times and distances for private and commercial vehicle occupants that hasn't yet been assessed, particularly in relation to access to healthcare, education or employment or impacts on services including passenger transport, mail and retail delivery vans, ambulances, fire etc:

⚫ Potential effects related to driver delay and public transport delay to passengers
⚫ Potential effects related to pedestrian, cyclist and horse-rider delay, severance, and amenity
⚫ Potential effects related to fear and intimidation
⚫ Potential effects on collisions and road safety
⚫ Potential effects on parking and loading

Hydrology & Land Drainage

Chapter 12 – no reference to Bathing Water designation of the River stour at Sudbury and the need to ensure that this designation is maintained.

Landscape & Visual

Chapter 13 – the study area during construction for the undergrounded section and the haul roads needs to be significantly larger due to the scale of works and visual impact during the construction phase.

Given the substantial amount of vegetation and trees that are proposed to be removed during construction and a substantial area is to remain substantially altered, it is unclear if the visual impacts have been assessed based on the existing vegetation cover or with the reduced cover as this might change the assessment.

Cumulative impact

Cumulative impact is identified against other NSIP projects within Chapter 13, but no other.

The preliminary cumulative effects assessment concluded that inter-project cumulative effects are considered to be likely on ecology and biodiversity, landscape and visual, noise and traffic and transport during the construction stage. Potential inter-project cumulative effects during operation have been identified in relation to historic environment and landscape and visual.

- No cumulative impacts identified for health & wellbeing or socio-economics and this will need to be reconsidered

Place Services – Ecology

21 June 2024

Bron Curtis
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

By email only

Dear Bron,
RE: Norwich to Tilbury NSIP, Statutory Consultation on PEIR - Ecology comments

Thank you for consulting Place Services on the PEIR for this NSIP. Place Services has reviewed the PEIR Volume 1 - Main Text, PEIR Volume 3 - Technical Appendices (Parts 1 and 2 of 4), and associated PEIR Volume 2 – Figures. We have made the following observations of the ecology reports which are relevant to MSDC and BDC:

Norwich to Tilbury PEIR

Document Ref	Topic	Comment
Volume 1, Chapter 4 Project Description; Para 4.8.18	Vegetation clearance for overhead lines	We note that where the 400kV overhead line will require vegetation removal, a 40m wide swathe will be removed to facilitate construction activities. We assume the sections would be felled to ground level with no removal of roots. We understand an additional up to 8m of vegetation either side of the 40m would be managed during construction, operation, and maintenance, to allow for clearance to be maintained and an additional up to 22m of vegetation either side would potentially be affected, This will result in a potential impact corridor of 100m width which should be reduced wherever possible. We seek reassurance that the mitigation hierarchy will be rigorously applied to avoid impacts before needing to consider mitigation and compensation.
Volume 1, Chapter 4 Project Description; Paras 4.8.34-35, 4.8.39-40	Vegetation clearance for underground cabling	Standard open-cut installation: We understand that, generally, a 120 m wide swathe of vegetation will be removed, although up to 50 m of

		vegetation either side of this would potentially be affected during construction. We welcome that soil will not be stored over hedgerows and that hedgerows would be replanted post construction. In total, we note that the impact corridor will be 220m width. <u>Trenchless installation</u> We understand a permanent easement of about 180m wide will be required, plus a construction corridor 200m wide and the impacts will vary with different activities.
Volume 1, Chapter 8 Ecology & Biodiversity; Para 8.5.6, Table 8.3	Site visits and surveys	We understand the following surveys for habitats, European Protected Species and protected species are due to take place in 2024: • Habitats • Terrestrial invertebrates • Aquatic ecology • Reptiles • Breeding birds • Bats • Badger • Hazel dormouse • Otter and water vole We await the results which need to inform the mitigation hierarchy and support the Statement of Common Ground with the LPAs. We highlight that surveys may also be needed for Priority species likely to be present and affected. This is necessary for the LPAs and Sec of State to demonstrate their strengthened biodiversity duty under s40 NERC Act as amended.
Volume 1, Chapter 8 Ecology & Biodiversity; Para 8.5.21-30	Biodiversity Net Gain	We note that the Project is committed to delivering a minimum of 10% BNG – for area habitats, hedgerows, and watercourses. The biodiversity unit calculations will be made using the Statutory Biodiversity Metric and presumably by adhering to all trading rules. However, we note that, at present, the project is indicating there will be a -6% BNG for area habitat units. We expect that the mandatory 10% BNG will be achieved through off-site measures. We ask for details of the 10% Environmental Net Gain scheme to meet the requirements set by OfGem, if that will differ from the BNG proposal. We also highlight that to meet the aspiration of NPS EN-5, the long-term maintenance and aftercare of mitigation

		planting will need to be for the appropriate timescales for delivery of the promised BNG condition, and to secure the integrity and benefit of these schemes.
Volume 1, Chapter 8 Ecology & Biodiversity; Table 8.4; Figure 8.1, MAGIC Maps	SAC / SPA /Ramsar	The nearest Habitats sites are: • Waveney & Little Ouse Valley Fens SAC – designated for Annex I wetland habitats and a population of Annex II Desmoulin's whorl snail Vertigo moulinsiana. The SAC is located 2.8km from the draft Order Limits. We are concerned about the potential for impacts on the SAC since the Waveney Valley Alternative (compared to the overhead line design) has not yet been decided. However, we welcome the discussions with Suffolk Wildlife Trust which manages the Waveney and Little Ouse Recovery Project. • Redgrave & South Lopham Fens Ramsar – cited for its lowland valley fen habitat and diverse invertebrate fauna. Supports a population of fen raft spider Dolomedes plantarius, which is listed on Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). The Ramsar is located 2.8km from the draft Order Limits. • Stour and Orwell Estuaries SPA and Ramsar site (3.07km from site). Cited for supporting internationally and nationally important numbers of numerous species of wintering wildfowl and waders. Also supports several nationally scarce plants and invertebrates. As these Habitats sites are hydrologically connected to the draft Order Limits, we would like to be involved in discussions on HRA to inform the shadow report supporting the DCO.
Volume 1, Chapter 8 Ecology & Biodiversity; Table 8.5, Figure 8.1	SSSIs	All SSSIs are provided a buffer except for: • Middle Wood, Offton SSSI– Ancient woodland. Positioned adjacent to the draft Order Limits. This wood is not listed in Table A8.1.6 List of Ancient Woodlands within or adjacent to the draft Order Limits. • Wortham Ling SSSI – Notified for lowland dry heath and acid grassland habitats. The southeast end of the SSSI is roughly adjacent to the draft Order Limits, plus there would be construction access via Ling Road (through the SSSI) which may require canopy lifting. The trees affected will need suitable assessment for any potential roosting bat impacts.

		[Para 8.8.10] We anticipate that the Waveney Valley Alternative (underground cabling) could result in a higher impact on Wortham Ling SSSI because of a need for additional clearance and the installation of outfalls for temporary drainage. We anticipate that an appropriate scope of ecological survey work is being caried out in the possibility that the Waveney Valley Alternative could be adopted.
Volume 1, Chapter 8 Ecology & Biodiversity; Table 8.7, Figure 8.1	LNRs	We note that Needham Lake LNR, a Regionally Important Geological/Geomorphological Site (RIGS), has potential to be impacted by the works because the site has hydrological connection to the draft Order Limits via the River Gipping.
Volume 1, Chapter 8 Ecology & Biodiversity; Table 8.9, Figure 8.2	Non-statutory designated sites (CWSs)	We highlight that there are nine CWSs that would be vulnerable to direct impact because of overlapping borders with the draft Order Limits: • River Waveney • River Gipping (sections) • Great Newton Wood • Bushey Ley Farm (Arable Fields) • Fore and Bushey Groves • Bullen Wood • Round Wood and Elms Grove • Sproughton Park • Higham Meadow It is important that the alternatives considered, impacts assessments and associated mitigation proposals are detailed in the ES.
Volume 1, Chapter 8 Ecology & Biodiversity; Para 8.6.22	Ancient woodland	The route appears to generally be located across arable land, but we note the buffer is adjacent to several ancient woodlands (Irreplaceable Habitat). For example, Middle Wood, which is approximately 1.4km south of Ringshall Stocks. The route also lies immediately east of Somersham Park, designated as ancient woodland, 400m to the north of Flowton. We also highlight that the Bullen Wood and Round Wood & Elms Grove ancient woodlands lie adjacent to the Burstall Substation and within the draft Order Limits. We expect that appropriate measures will be taken to protect these ancient woodlands (irreplaceable habitats).

		Smaller ancient woodland parcels (< 2ha) are not included in the Natural England inventory, and likewise individual ancient and veteran trees may not all be inventoried. We expect that the completed habitat survey work will identify any such features in the study area.
Volume 3, Technical Appendices - Part 1 of 4; Appendix 8.1; Paras 3.2.6; Table A8.1.4	Hedgerows	All hedgerows within the draft Order Limits will be surveyed as part of the habitat surveys. Hedgerows >30 years old will be assessed by an ecologist as to whether they meet any of the eight criteria outlined in Part II, Schedule 1 of the Hedgerows Regulations (HMSO, 1997). Within Section B (Mid Suffolk DC), 25 hedgerows have been targeted to go through Hedgerow Regs Assessment. Within Section C (Babergh DC portion), 11 hedgerows have been targeted to go through Hedgerow Regs Assessment.
Volume 1, Chapter 8 Ecology & Biodiversity; para 8.5.33 and Volume 3 – Technical Appendices – 2 of 4; Appendices 8.6-9	European Protected Species (Great Crested Newt, Hazel Dormouse, Otter & bats	<u>Great Crested Newt</u> We welcome confirmation that National Grid has agreed with Natural England to apply to the District Level Licensing scheme for Great Crested Newt (GCN) instead of surveys. We highlight that a countersigned IACPC will be needed to support the DCO. We acknowledge that GCN are therefore now scoped out from further assessment in the ES. However, it is expected that best practice methodology will be used during the construction phase to mitigate for potential impacts on other mobile species such as Priority species amphibians, reptiles and Hedgehog. <u>Hazel Dormouse</u> We agree that Hazel Dormice are present in Bonny Wood CWS, Bentley Long Wood CWS, Hadleigh Railway Walk CWS and Raydon Great Wood CWS, as shown in Table A8.8.3. We recommend that the Essex & Suffolk Dormouse Group should be involved in consultations on survey methodology. <u>Otter</u> We support the survey methodology outlined for Otter. Figure A8.9.1 shows multiple survey points within the Babergh and Mid Suffolk Districts. <u>Bats</u>

		Only the roosting bat desk study results are available at present, and so we await the results of the data collected during the 2023 surveys and the results of the Ground Level Tree Assessments undertaken between November 2023 and March 2024. It is noted that a desk study has identified five County Wildlife Sites within the Suffolk section of the project which are within 2km of the draft Order Limits, and which have potential to be significant areas for bats. These are Bonny Wood CWS, Bramford Meadows CWS, Sproughton Park CWS, Raydon Great Wood CWS and Chantry Park, Beech Water & Meadow CWS. We expect that fitting levels of investigation and thorough impact assessments will be provided in the ES. We note that static detector Bat Activity surveys are still being undertaken and that those results will inform the need for any further investigation (Appendix 8.6 and 8.7). We count 11 high risk level areas and eight medium risk level areas shown as identified within the Babergh and Mid Suffolk District limits by Figure A.8.7.1. Please be transparent as to how the static detector survey results were appraised, and the criteria used for judging if an elevated survey effort was warranted or not. We note there are 10 roost records and 78 activity records for the rare Barbastelle bat (Table A8.6.4) in Suffolk. This Appendix II species (Bern and Bonn Conventions) will need further assessment to avoid severance to foraging and commuting routes within any sustenance zones of a maternity colony. Based on experience from other linear projects, we suggest that where hedge crossings or removals are necessary to retain connectivity during construction, an alternative to dead hedging is the use of Heras fencing with camouflage netting attached. We can provide more information on request. This temporary measure will be needed to enable certain bat species to continue to use affected hedgerows as part of their established commuting and foraging networks.

Volume 3 – Technical Appendices – 2 of 4; Reptiles Appendix 8.3; Para 3.2.13, Table A8.3.8 Breeding birds Appendix 8.4, Para 1.2.4, 4.2.6, Figure A8.4.2 Water Vole Appendix 8.9, Paras 3.3.2 and 3.3.6; Table A8.9.2 Badgers Volume 1, Chapter 8 Ecology & Biodiversity; Para 8.6.61	Protected species	<u>Reptiles:</u> We note c.22 locations within Babergh and Mid Suffolk Districts have been identified as having suitability for reptiles. Two of these have been classed as 'Key Reptile Sites' to be subject to a series of reptile surveys following an appropriate methodology. These are Wortham Ling & Royden Fen SSSI and Sproughton Park CWS. The other sites have been ruled out from further presence / likely absence surveys, either because impacts are considered avoidable or because displacement by habitat manipulation is the most appropriate mitigation solution regardless of survey result. Whilst we assent the logic of this approach in principle, the applicant will need to provide a supported argument as to why is the best approach for reptile species. This should include demonstrating how effective mitigation will be achievable in all instances. <u>Breeding birds:</u> Natural England are stated as agreeing to the acceptability of the approach taken for breeding bird surveys, but also that they have not commented on the selection of survey locations. Seven 'Areas of Potential Importance for Breeding Birds' have been targeted based on desk study and the perceived risk of impact. These are the only sites to be subject to breeding bird surveys. The survey areas will cover 200 m buffers around "key areas of effects such as cable easement, CSE compounds and substations". Within Suffolk, an area southwest of Needham Market, the Waveney Valley Alternative area, the Bramford station area, and the underground cabling section in the Dedham Vale area, are being covered by breeding bird survey. The position that a total draft Order Limits of 184 km long and 100-220m wide (plus a 200m buffer) cannot be completely surveyed for breeding birds is recognised as reasonable, and that identifying priority sites for survey is the practical solution. However, it will be necessary for the applicant to demonstrate that they have not overlooked any additional sites worthy of survey. Furthermore, we would still expect that there will be a well-reasoned

		estimate made of the potential overall cumulative impact on breeding birds from the project. Wintering birds: We note that Wintering/Passage Bird Surveys have been undertaken (though yet to be analysed) to enable an assessment of the potential for disturbance of Functionally Linked Land (with National Site Network and Ramsar sites) and bird collision with / electrocution from new overhead lines. The methodology for these surveys has been agreed in consultation with Natural England. Water Vole: We support the survey methodology outlined for Water Vole. We would like to see clarification of the method used (i.e., habitat parameters) for determining the Water Vole habitat suitability of a watercourse, and more detail as to how the issue of dense vegetation was resolved so that it did not present a significant survey constraint. We note that Water Vole were identified during surveys in Sproughton Park CWS, which is within the draft Order Limits (Table A8.9.2). We agree that the ditches and ponds within this CWS are important for Water Vole. We expect that a fitting level of investigation and thorough impact assessment will be provided in the ES. Badger: It is understood that surveys are identifying all badger setts within 30m of the draft Order Limits, and that these surveys are ongoing. The mitigation hierarchy should be implemented to lessen the impacts to Badgers and their setts.
Volume 3, Technical Appendices - Part 2 of 4; Appendix 8.10	Non-significant impacts to protected and Priority species and habitats, and appropriate mitigation and compensation measures	We highlight that all non-significant effects on Priority species and habitats will need to be identified in the ES, so that all the LPAs and Sec of State can demonstrate their strengthened Section 40 biodiversity duty under the NERC Act 2006 (as amended). 'Notable' has a definition which does not match the very specific status of Priority species (aka Species of Principal Importance). Therefore, any use of

		‘notable_species’ needs to be clarified in the glossary as to what it covers to avoid confusion.

Other matters

We understand that noteworthy habitats (potentially including Priority Lowland Deciduous Woodland and a potential veteran oak tree (irreplaceable habitat) at Spring Farm, south of Thornham Road, Gislingham IP23 8HH (Grid Ref TM 080717) would be impacted by these works. It is noted that this site has been identified by the project as a Red (Risk Level High; Ref# 62) area for potential impacts on bats. We advise that a thorough impact assessment be undertaken for this site, along with appropriate application of the mitigation hierarchy. This will be necessary to include in the Statement of Common Ground (SoCG).

If you have any queries regarding the above matters, please contact us.

Best regards,

Seth Lambiase

On behalf of the Ecology Team, Place Services

Place Services provides ecological advice on behalf of Babergh & Mid Suffolk District Councils

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

The contents of this letter may vary from the response provided by Place Services on behalf of Essex County Council (ECC) due to the multi-disciplinary approach that ECC are adopting for this consultation. This is due to the strategic nature of the proposed development that spans across Essex and beyond, and therefore the need to consider issues, including for example those that are cross-boundary, as relevant to the scope of the proposal. The Local Planning Authority have been advised that the specialist advice contained within this letter may therefore vary, when read in conjunction with any wider specialist considerations made by Place Services.

Place Services Heritage for Babergh District Council

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FAO:
Planning Department,
Babergh District Council

Ref: Norwich to Tilbury PEIR Consultation
Date: 21/05/2024

BUILT HERITAGE ADVICE

Dear Sir / Madam,

RE: Norwich to Tilbury National Infrastructure Project.

This letter provides built heritage advice concerning the first statutory consultation on National Grid's Norwich to Tilbury project, to reinforce the 400kV high voltage power network in East Anglia to include a new 400kV connection substation in the Tendring district. This letter is in two sections: section one provides overarching commentary of the Preliminary Environmental Information Report document in the form of a table, with comments specific to Babergh district below.

Preliminary Environmental Information Report: Volume I – Main Text

Chapter 11 (11.1 – 11.7)

Paragraph No.	Comments
4.7.11	The temporary closure of PRoWs may impact the ability to appreciate the significance of heritage assets. This should also be assessed.

5.6.8	With regards to built heritage, there is clear national guidance on assigning significance. A building is listed when it is of special architectural or historic interest, considered to be of national importance and therefore worth protecting (Historic England, *Living in a Grade I, Grade II* or Grade II listed Building.* 2012). As such, and in the context of Table 5.1 (page 110), all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of 'high value' could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. Consequently, some non-designated heritage assets should be considered of medium value as may be of regional importance. The baseline report should be amended to reflect this categorisation of all designated heritage assets as 'high value'.
11.1.1	No reference is made to conservation areas in this paragraph (however it is noted that conservation areas are referred to in 11.6.6 and have been assessed in Appendix 11.2). For clarity, conservation areas should also be referenced in this paragraph.

11.1.3	The Historic Environment Baseline Report and, consequently the PEIR, are based on preliminary project design information and survey data gathered to the end of September 2023. It is understood from 'alignment briefings' provided by National Grid throughout March 2024, that the project design has evolved since this time, and so the 'Historic Environment Study Area' will need to be refined. As such, it is possible that not all heritage assets which have the potential to be impacted through change within their setting have been identified to date. It is therefore noted that the Historic Environment Baseline Report will require review and is likely to change.
11.3.1	The scope of the assessment is in line with comments provided at non-statutory consultation.

11.4.2 Table 11.1	We are awaiting further engagement with National Grid to agree the methodology/selection process for viewpoint assessments. At this stage, the methodology for the assessment of heritage-specific viewpoints presented in March 2023 is felt to be insufficient in scope, with limited information given on the reasons for inclusion/ omission of numerous assets. It remains unclear whether the viewpoints proposed for assessment within the ES will be agreed with the LPAs prior to assessment or based solely on National Grid's assessment criteria. There should be scope for the creation of an agreed list of viewpoints, prior to the ES being written, and following detailed discussion. NB: the table states 'An agreed list of heritage viewpoints will be presented in the ES.', but no details are given of how this will be agreed. The comments on LPA engagement re. viewpoints make no reference to non-designated heritage assets; however, these are described as being under discussion with Historic England. This two-pronged approach, differing between HE and the LPAs is not acceptable.
11.5.3	Although the principles of the study area are agreed, it is noted that the existing study area, the Historic Environment Baseline Report, and the PEIR, are not based on the current preferred alignment and thus subject to change.
11.5.16	It is agreed that the development will not result in any direct impacts to listed buildings or locally listed buildings. As such it is reasonable that the scoping exercise is based on assessing which built heritage assets are likely to experience change to their settings resulting from the development project, during either construction or operation (and maintenance). It is noted, however, that several conservation areas (or parts of) fall within the Draft Order Limits (DOL) and so have the potential to be directly impacted by the development project. In these instances, a setting assessment only will not be sufficient. A full Heritage Impact Assessment should be conducted for conservation areas which fall within the DOL, as they are likely to have a direct impact upon their significance as a consequence of the proposals.

11.5.17	Vibration assessment: Any vibration assessment to extend to heritage assets within a 30m of the construction access routes, utility diversions, or works areas. It may be the case that heritage assets within the 30m buffer could experience impacts from vibration caused by HGV movements during construction phase. Commitments and recommendations regarding noise and vibration in terms of stopping work in the event of unacceptable impacts, monitoring vibration, and reducing vibration (or providing other mitigation) should form part of CoCP.
11.5.19	The statement within the third bullet point suggests those buildings within settlements were scoped out based on a desk-based assessment rather than a site visit. Topography is very difficult to judge from a desk-based situation and these settlements should have been visited to make this sort of assessment.
11.5.23	The settings survey was conducted between autumn 2022 and summer 2023. It is unclear if future development, e.g., permitted schemes or partially constructed development, were considered, and informed the assessment. A thorough and detailed setting assessment based on up-to-date and relevant project design information is critical to understanding the contribution the setting of a heritage asset makes to its significance, how and to what degree the development project will impact on that setting and significance, and to informing any mitigation strategy. A review of the survey, assessing if any change has occurred which alters the conclusions, would be beneficial.
11.5.26	It is recommended that the consultation of historic maps is not limited to those listed; other local and regional maps are likely to be available. It is recommended that the use of historic photography to inform the ES is not limited to historic aerial photography. The inclusion of protected lane data is welcome; these also have the potential to be impacted by noise and vibration.
11.5.29	It is unclear if the assessment of setting (and the contribution it makes to the value [significance] of heritage assets) includes views towards, from and including heritage assets. This would be difficult to assess without a site visit. If so, for scoped in Listed Buildings and Conservation Areas (where the setting of the asset extends to the Draft Order Limits), relevant viewpoints should be taken forward for assessment as part of the LVIA (or ideally, a Heritage and Townscape Visual Impact Assessment).

11.5.31	It is acknowledged that any assessments are an iterative process which is subject to change and updates as the project design evolves. In this instance that process may require undertaking Steps 1, 2 and 3 of the assessment set out in Historic England's guidance GPA3: The Setting of Heritage Assets (2017), when design changes are considered; design changes may affect the accuracy of the Historic Environment Baseline Report.
11.5.34	Re-assessment should include any heritage assets which may have previously been scoped out due to distance etc. but have the potential to be impacted due to project design changes. NB: some designated heritage assets will not require new or re-assessment e.g., letter boxes, milestones, telephone kiosks, as they do not have settings that will be impacted. The typologies not requiring re-assessment can be agreed with National Grid.
11.5.35	It should be noted that neither low heritage value nor a low magnitude of impact will negate the requirement for mitigation. The assessment of impact (expressed as Significance of Effect) should be translated into harm to significance in terms of the Department for Energy Security and & Net Zero's Overarching National Policy Statement for Energy (EN-1). Where less than substantial harm is found to the significance of a designated heritage asset, the level of less than substantial harm should be assessed and stated on a scale ranging from e.g., very low to high. The scale of any harm or loss to the significance of non-designated heritage assets (NDHAs) should also be assessed and stated.
11.5.36	The commitment to consider any effects on the Historic Environment associated with mitigation proposals for other environmental receptors is welcome.
11.6.1	It is noted that the baseline conditions may not be accurate and are thus subject to change.
11.6.9	No narrative is provided as to how non-designated heritage assets (NDHAs) have been identified. Are those identified based on the HER and/or local lists only, or have further NDHAs been identified as part of the DBAs, site walkovers, and setting assessments? This will require clarification; further NDHAs may be identified throughout the NSIP process.
11.6.17	Due to the evolution of the project design since September 2023, there may be known and anticipated changes to the baseline. It is noted that the conclusions are subject to change at all times as a result of alignment or design changes.
11.7.4	*Re: Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance*. This should not be in lieu of mitigation measures that wholly

	eliminate risk or harm. Additional mitigation (beyond embedded and standard mitigation) should be targeted and site-specific and should be clearly evidenced to be as such.
11.7.5 H03:	The impact of loss of any vegetation within 3km of the DoL should be carefully assessed. The loss of any vegetation that is cited as a justification for scoping out heritage assets for further assessment should be wholly avoided. Where it cannot be avoided, the relevant heritage asset must be re-assessed and steps 2, 3 and 4 of the Historic England's guidance GPA3: The Setting of Heritage Assets (2017) should be undertaken.
11.8.4	Construction Effects: The assessment of the contribution of setting to the significance of non-designated heritage assets should be carried out as part of completion of the Environment Statement.
11.8.10	There is scope for further significant temporary negative effects on non-designated heritage assets to be identified once the contribution of setting to significance and the effects of the construction phase of development have been assessed.
11.8.15	The level of identified harm to the significance of each of the designated heritage assets should be expressed in terms of the Department for Energy Security and & Net Zero's Overarching National Policy Statement for Energy (EN-1). Where less than substantial harm is found to the significance of a designated heritage asset, the level of less than substantial harm should be assessed and stated on a scale ranging from e.g., very low to high.
11.8.18	*The preliminary assessment identified 14 'not significant' permanent positive effects to listed buildings (in sections B, C, E and G) and one to a scheduled monument (in section B, Offton Castle 1006049). This is the result of removal of an existing overhead lines and replacement either with underground cable or the placement of the 2024 proposed draft alignment further away from the asset than the existing overhead line.* Are these to be identified as public (heritage) benefits arising from the scheme?

PEIR Non-Technical Summary: Chapter 5.7: Historic Environment

The non-technical summary condenses the results of the baseline report, providing key facts and points. These are noted below.

Paragraph No.	**Comments**
5.7.2	The study area used is: 250m for non-designated assets, 2km for all designated assets, 3km for Scheduled Monuments, Grade I and GII* Listed Buildings and Registered Parks and Gardens.
5.7.4	Mitigation to avoid and reduce significant effects are included in Table 4.2, Chapter 4 of Volume 1 of the PEIR. It is worth noting that the table makes no explicit reference to mitigation measures which change the impact of the proposal on the setting of heritage assets.

5.7.5	Standard mitigation is in Appendix 4:1, Draft Outline Code of Construction Practice. It is noted that this mitigation appears to only relate to archaeological assets. The document references informing the LPA if new heritage assets are discovered, or found to be more significant than thought, however this makes no reference to buildings, and is assumed to only refer to the uncovering of new archaeological finds, or if known find spots or features are larger/more significant that thought, when works occur.
5.7.7	A summary of findings is given: the construction phase will have significant temporary negative effects on 215 Listed Buildings, 5 Schedule Monuments, 6 Conservation Areas, 1 Registered Park and Garden.
5.7.8	There will be 223 ‘not significant’ negative temporary effects to designated heritage assets.
5.7.10	During operation and maintenance 123 significant permanent negative effects are identified to: 119 Listed Buildings, 1 Scheduled Monument, 2 Conservation Areas and 1 Registered Park and Garden.
5.7.11	Significant permanent negative effect is summarised as an impact which ‘would affect an element of their setting that makes a notable contribution to their value.’
5.7.12	An additional 178 designated assets will experience ‘not significant’ permanent negative effects: 167 Listed Buildings, 4 Scheduled Monument, 7 Conservation Areas.
5.7.12	There will be ‘not significant’ permanent positive effects to 14 Listed Buildings and 1 Scheduled Monument. This is due to undergrounding/ movement of existing pylons further away.
5.7.13-14	Re. the Waveney Valley Alternative: it is concluded that there will be no additional significant effects if the alternative is used. If taken forward, the alternative will include the reinstatement of historic field boundaries, which reduce the effect from significant to neutral. Further information is required on this matter particularly how field reinstatement can truly negate the impact of new cable routes.

Appendix 11.1 Historic Environment Baseline Report

Within this document a 'baseline’ chronological description is provided for the Project area, broken into eight geographical regions (A-H). The location, topography, geology, historic landscape, archaeological and built heritage assets of each section are described. This is split into time periods and includes brief descriptions of some listed buildings or non-designated buildings and their settings.

Section C includes Babergh District, Colchester City and Tendring District Councils; Section G contains both Brentwood and Basildon Borough Councils. Whilst it is appreciated that these districts may share similarities in terms of their topography and geology, for example, for ease of assessment by the LPAs it is recommended that each section relates to a single local planning authority only.

Non-designated heritage assets described within this document appear to be largely taken from HER data, and as a result the non-designated heritage assets identified and

described are primarily archaeological sites or find spots. It is unclear if the walkover survey identified any buildings which could be considered non-designated heritage assets; this information must be included as part of the ES chapter (as per para. 1.5.4). The document states that LPA websites have been viewed for information on Locally Listed Buildings, yet in the baseline document and the gazetteer (Annex B) it is unclear which non-designated heritage assets are on a local list.

If it is agreed that all designated heritage assets are of high value (see comments above relating to the PEIR document), the Baseline Historic Environment Report will require amendment to reflect this. Re-assessment of non-designated buildings described in the text is also required; there may be some non-designated buildings which can be considered of medium significance, due to their regional importance.

Appendix 11.1 Historic Environment Baseline Report: Annex B Gazetteer

As per comments above, Sections A-H should be divided by individual district and not grouped.

The Gazetteer should also be updated to include a column which specifies if a building is locally listed.

A further column which differentiates between each type of non-designated heritage asset (e.g. find spot, crop mark, building, pill box) etc is also required.

Appendix 11.1 Historic Environment Baseline Report: Annex C Cultural Heritage EIA Methodology Document

Decommissioning effects have been scoped out of this assessment, due to the length of time in which the Project is expected to operate, and because decommissioning is expected to seek appropriate consent when it occurs. This approach is considered acceptable subject to the provision of a guarantee within the DCO that decommissioning of the project will require appropriate assessment.

The study areas have been agreed previously. The scoping out of heritage assets from assessment requires re-assessment itself, as per previous comments, particularly due to changed to the proposed route.

It is unclear if conservation area appraisals have been considered. These are not included in the list of consulted sources outlined in paragraph 3.3.2. Local lists are also not included in the list of reference sources.

At paragraph 3.4.2, it is stated that the Baseline Report has been split based on archaeology, built heritage and historic landscape characterisation. This is incorrect; the baseline report is split between time period, with sub-categories of designated and non-designated heritage assets. The methodology or baseline report should be updated to ensure the documents reflect each other. A split as per the methodology (between archaeological, built and landscape features) is recommended.

Table 3.1 indicates Proposed Gazetteer Headings, which includes a column for Monument Type and Asset Group – neither of which are included in the submitted Gazetteer. Inclusion of these columns would address comments given above.

The Walkover Survey (section 3.6.4 and 3.7) is archaeologically focused. Consideration must be given to the potential for built non-designated heritage assets to be present throughout the order limits and particularly in districts where there is no Local List. As per comments on the main PEIR text, there is concern that non-designated built heritage assets are likely to be missed and not assessed based on the current methodology.

Table 1.2: This will require amendment, if agreed, to place Grade II listed buildings in the High, rather than Medium, category.

Table 2.1: Criteria for quantifying the magnitude of impact to heritage assets. The descriptions and magnitude of impact are agreed.

In Section 5: Mitigation, no proposals for mitigation are given, it is only stated that mitigation 'will be proportionate'. Examples would be beneficial – for example has the alignment taken into consideration the setting of heritage assets, is there scope for the relocation of pylons, or would additional planting or screening be beneficial?

Appendix 11.2 – Historic Environment Assessment Tables

As per comments above it is recommended that Sections A-H are divided by individual LPA.

The inclusion of the address (either the full address or post code, as a minimum) for all assets would be beneficial. Whilst the Easting and Northing are included in the Gazetteer, the assessment tables simply refer to an asset by name.

The assessment tables require updating to reflect an updated value for all heritage assets, if the approach recommended above (that all designated heritage assets are of high value) is agreed.

As a general note, it would be preferred if all thematic meetings occur with Historic England present, as well the local authorities' conservation officers. There may also be occasions when it would be beneficial for other statutory consultees, such as National Landscapes, to also be present, particularly in instances where impacted landscapes form part of the setting of a designated heritage asset, for example.

Babergh District

The route of the new power lines passes through Babergh district, extending from the district's boundary with Mid Suffolk to Colchester. The line largely avoids larger settlements and villages, however Chattisham is within the 1km buffer zone of the Proposed Order Limits. Higham and Stratford St Mary Conservation Areas are also within this 1km buffer zone (although along the underground route). Within 3km of the order limits are numerous other settlements including Bramford, Sproughton, Hintlesham, and Capel St Mary.

All designated heritage assets within the 3km buffer zone are outlined in Appendix 11.1 Annex B – Gazatteer.

No direct impacts are anticipated to any built heritage assets as a result of the proposal. There will be indirect impacts to numerous designated and non-designated heritage assets through change to their setting. The level of impact is influenced by factors such as proximity to the new overhead cable route, visual receptors, noise and/or construction impacts. It is unclear from the documents provided to date what mitigation, if any, will be afforded to the setting of heritage assets.

There are 326 identified designated heritage assets (scoped in) in Section C. Separate data sets have not been provided for individual districts within this section. Within Babergh district, the highest ‘significance of effect’1 identified to a heritage asset is ‘significant permanent negative effect’ (to non-designated heritage assets) although no significant permanent negative effects have been identified to any designated heritage assets. However, this is likely to change, should the methodology and categorisation of heritage value be amended as per the comments above, and in the event of any project design changes.

Of the identified non-designated heritage assets, the incomplete Gazetteer does not currently allow for easy differentiation between built and archaeological heritage assets. There will, nevertheless, be an impact on the setting of non-designated built heritage assets – the assessment tables indicate the highest level of harm identified by National Grid is ‘significant permanent negative effect’.

At this stage, further comments on individual heritage assets are not considered appropriate, due to the requirement for amendments to the methodology and information provided to date.

Yours sincerely,

Samantha Pace

Senior Built Heritage Consultant

Historic Environment Team

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Ref: Norwich to Tilbury PEIR Consultation
Date: 21/05/2024

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	agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. Consequently, some non-designated heritage assets should be considered of medium value as may be of regional importance. The baseline report should be amended to reflect this categorisation of all designated heritage assets as 'high value'.
11.1.1	No reference is made to conservation areas in this paragraph (however it is noted that conservation areas are referred to in 11.6.6 and have been assessed in Appendix 11.2). For clarity, conservation areas should also be referenced in this paragraph.
11.1.3	The Historic Environment Baseline Report and, consequently the PEIR, are based on preliminary project design information and survey data gathered to the end of September 2023. It is understood from 'alignment briefings' provided by National Grid throughout March 2024, that the project design has evolved since this time, and so the 'Historic Environment Study Area' will need to be refined. As such, it is possible that not all heritage assets which have the potential to be impacted through change within their setting have been identified to date. It is therefore noted that the Historic Environment Baseline Report will require review and is likely to change.
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A thorough and detailed setting assessment based on up-to-date and relevant project design information is critical to understanding the contribution the setting of a heritage asset makes to its significance, how and to what degree the development project will impact on that setting and significance, and to informing any mitigation strategy.

A review of the survey, assessing if any change has occurred which alters the conclusions, would be beneficial.

11.5.26 It is recommended that the consultation of historic maps is not limited to those listed; other local and regional maps are likely to be available.

It is recommended that the use of historic photography to inform the ES is not limited to historic aerial photography.

The inclusion of protected lane data is welcome; these also have the potential to be impacted by noise and vibration.

11.5.29 It is unclear if the assessment of setting (and the contribution it makes to the value [significance] of heritage assets) includes views towards, from and including heritage assets. This would be difficult to assess without a site visit.

If so, for scoped in Listed Buildings and Conservation Areas (where the setting of the asset extends to the Draft Order Limits), relevant viewpoints should be taken forward for assessment as part of the LVIA (or ideally, a Heritage and Townscape Visual Impact Assessment).

11.5.31 It is acknowledged that any assessments are an iterative process which is subject to change and updates as the project design evolves. In this instance that process may require undertaking Steps 1, 2 and 3 of the assessment set out in Historic England's guidance GPA3: The Setting of Heritage Assets (2017), when design changes are considered; design changes may affect the accuracy of the Historic Environment Baseline Report.

11.5.34 Re-assessment should include any heritage assets which may have previously been scoped out due to distance etc. but have the potential to be impacted due to project design changes.

NB: some designated heritage assets will not require new or re-assessment e.g., letter boxes, milestones, telephone kiosks, as they do not have settings that will be impacted. The typologies not requiring re-assessment can be agreed with National Grid.

11.5.35 It should be noted that neither low heritage value nor a low magnitude of impact will negate the requirement for mitigation.

The assessment of impact (expressed as Significance of Effect) should be translated into harm to significance in terms of the Department for Energy Security and & Net Zero's Overarching National Policy Statement for Energy (EN-1).

Where less than substantial harm is found to the significance of a designated heritage asset, the level of less than substantial harm should be assessed and stated on a scale ranging from e.g., very low to high. The scale of any harm or loss to the significance of non-designated heritage assets (NDHAs) should also be assessed and stated.

11.5.36	The commitment to consider any effects on the Historic Environment associated with mitigation proposals for other environmental receptors is welcome.
11.6.1	It is noted that the baseline conditions may not be accurate and are thus subject to change.
11.6.9	No narrative is provided as to how non-designated heritage assets (NDHAs) have been identified. Are those identified based on the HER and/or local lists only, or have further NDHAs been identified as part of the DBAs, site walkovers, and setting assessments? This will require clarification; further NDHAs may be identified throughout the NSIP process.
11.6.17	Due to the evolution of the project design since September 2023, there may be known and anticipated changes to the baseline. It is noted that the conclusions are subject to change at all times as a result of alignment or design changes.
11.7.4	*Re: Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.* This should not be in lieu of mitigation measures that wholly eliminate risk or harm. Additional mitigation (beyond embedded and standard mitigation) should be targeted and site-specific and should be clearly evidenced to be as such.
11.7.5 H03:	The impact of loss of any vegetation within 3km of the DoL should be carefully assessed. The loss of any vegetation that is cited as a justification for scoping out heritage assets for further assessment should be wholly avoided. Where it cannot be avoided, the relevant heritage asset must be re-assessed and steps 2, 3 and 4 of the Historic England's guidance GPA3: The Setting of Heritage Assets (2017) should be undertaken.
11.8.4	Construction Effects: The assessment of the contribution of setting to the significance of non-designated heritage assets should be carried out as part of completion of the Environment Statement.
11.8.10	There is scope for further significant temporary negative effects on non-designated heritage assets to be identified once the contribution of setting to significance and the effects of the construction phase of development have been assessed.
11.8.15	The level of identified harm to the significance of each of the designated heritage assets should be expressed in terms of the Department for Energy Security and & Net Zero's Overarching National Policy Statement for Energy (EN-1). Where less than substantial harm is found to the significance of a designated heritage

asset, the level of less than substantial harm should be assessed and stated on a scale ranging from e.g., very low to high.

11.8.18 The preliminary assessment identified 14 ‘not significant’ permanent positive effects to listed buildings (in sections B, C, E and G) and one to a scheduled monument (in section B, Offton Castle 1006049). This is the result of removal of an existing overhead lines and replacement either with underground cable or the placement of the 2024 proposed draft alignment further away from the asset than the existing overhead line.

Are these to be identified as public (heritage) benefits arising from the scheme?

PEIR Non-Technical Summary: Chapter 5.7: Historic Environment

The non-technical summary condenses the results of the baseline report, providing key facts and points. These are noted below.

Paragraph No.	Comments
5.7.2	The study area used is: 250m for non-designated assets, 2km for all designated assets, 3km for Scheduled Monuments, Grade I and GII* Listed Buildings and Registered Parks and Gardens.
5.7.4	Mitigation to avoid and reduce significant effects are included in Table 4.2, Chapter 4 of Volume 1 of the PEIR. It is worth noting that the table makes no explicit reference to mitigation measures which change the impact of the proposal on the setting of heritage assets.
5.7.5	Standard mitigation is in Appendix 4:1, Draft Outline Code of Construction Practice. It is noted that this mitigation appears to only relate to archaeological assets. The document references informing the LPA if new heritage assets are discovered, or found to be more significant than thought, however this makes no reference to buildings, and is assumed to only refer to the uncovering of new archaeological finds, or if known find spots or features are larger/more significant that thought, when works occur.
5.7.7	A summary of findings is given: the construction phase will have significant temporary negative effects on 215 Listed Buildings, 5 Schedule Monuments, 6 Conservation Areas, 1 Registered Park and Garden.
5.7.8	There will be 223 ‘not significant’ negative temporary effects to designated heritage assets.
5.7.10	During operation and maintenance 123 significant permanent negative effects are identified to: 119 Listed Buildings, 1 Scheduled Monument, 2 Conservation Areas and 1 Registered Park and Garden.
5.7.11	Significant permanent negative effect is summarised as an impact which ‘would affect an element of their setting that makes a notable contribution to their value.’

5.7.12	An additional 178 designated assets will experience ‘not significant’ permanent negative effects: 167 Listed Buildings, 4 Scheduled Monument, 7 Conservation Areas.
5.7.12	There will be ‘not significant’ permanent positive effects to 14 Listed Buildings and 1 Scheduled Monument. This is due to undergrounding/ movement of existing pylons further away.
5.7.13-14	Re. the Waveney Valley Alternative: it is concluded that there will be no additional significant effects if the alternative is used. If taken forward, the alternative will include the reinstatement of historic field boundaries, which reduce the effect from significant to neutral. Further information is required on this matter particularly how field reinstatement can truly negate the impact of new cable routes.

Appendix 11.1 Historic Environment Baseline Report

Within this document a 'baseline’ chronological description is provided for the Project area, broken into eight geographical regions (A-H). The location, topography, geology, historic landscape, archaeological and built heritage assets of each section are described. This is split into time periods and includes brief descriptions of some listed buildings or non-designated buildings and their settings.

Section C includes Babergh District, Colchester City and Tendring District Councils; Section G contains both Brentwood and Basildon Borough Councils. Whilst it is appreciated that these districts may share similarities in terms of their topography and geology, for example, for ease of assessment by the LPAs it is recommended that each section relates to a single local planning authority only.

Non-designated heritage assets described within this document appear to be largely taken from HER data, and as a result the non-designated heritage assets identified and described are primarily archaeological sites or find spots. It is unclear if the walkover survey identified any buildings which could be considered non-designated heritage assets; this information must be included as part of the ES chapter (as per para. 1.5.4). The document states that LPA websites have been viewed for information on Locally Listed Buildings, yet in the baseline document and the gazetteer (Annex B) it is unclear which non-designated heritage assets are on a local list.

If it is agreed that all designated heritage assets are of high value (see comments above relating to the PEIR document), the Baseline Historic Environment Report will require amendment to reflect this. Re-assessment of non-designated buildings described in the text is also required; there may be some non-designated buildings which can be considered of medium significance, due to their regional importance.

Appendix 11.1 Historic Environment Baseline Report: Annex B Gazetteer

As per comments above, Sections A-H should be divided by individual district and not grouped.

The Gazetteer should also be updated to include a column which specifies if a building is locally listed.

A further column which differentiates between each type of non-designated heritage asset (e.g. find spot, crop mark, building, pill box) etc is also required.

Appendix 11.1 Historic Environment Baseline Report: Annex C Cultural Heritage EIA Methodology Document

Decommissioning effects have been scoped out of this assessment, due to the length of time in which the Project is expected to operate, and because decommissioning is expected to seek appropriate consent when it occurs. This approach is considered acceptable subject to the provision of a guarantee within the DCO that decommissioning of the project will require appropriate assessment.

The study areas have been agreed previously. The scoping out of heritage assets from assessment requires re-assessment itself, as per previous comments, particularly due to changed to the proposed route.

It is unclear if conservation area appraisals have been considered. These are not included in the list of consulted sources outlined in paragraph 3.3.2. Local lists are also not included in the list of reference sources.

At paragraph 3.4.2, it is stated that the Baseline Report has been split based on archaeology, built heritage and historic landscape characterisation. This is incorrect; the baseline report is split between time period, with sub-categories of designated and non-designated heritage assets. The methodology or baseline report should be updated to ensure the documents reflect each other. A split as per the methodology (between archaeological, built and landscape features) is recommended.

Table 3.1 indicates Proposed Gazetteer Headings, which includes a column for Monument Type and Asset Group – neither of which are included in the submitted Gazetteer. Inclusion of these columns would address comments given above.

The Walkover Survey (section 3.6.4 and 3.7) is archaeologically focused. Consideration must be given to the potential for built non-designated heritage assets to be present throughout the order limits and particularly in districts where there is no Local List. As per comments on the main PEIR text, there is concern that non-designated built heritage assets are likely to be missed and not assessed based on the current methodology.

Table 1.2: This will require amendment, if agreed, to place Grade II listed buildings in the High, rather than Medium, category.

Table 2.1: Criteria for quantifying the magnitude of impact to heritage assets. The descriptions and magnitude of impact are agreed.

In Section 5: Mitigation, no proposals for mitigation are given, it is only stated that mitigation ‘will be proportionate’. Examples would be beneficial – for example has the alignment taken into consideration the setting of heritage assets, is there scope for the relocation of pylons, or would additional planting or screening be beneficial?

Appendix 11.2 – Historic Environment Assessment Tables

As per comments above it is recommended that Sections A-H are divided by individual LPA.

The inclusion of the address (either the full address or post code, as a minimum) for all assets would be beneficial. Whilst the Easting and Northing are included in the Gazetteer, the assessment tables simply refer to an asset by name.

The assessment tables require updating to reflect an updated value for all heritage assets, if the approach recommended above (that all designated heritage assets are of high value) is agreed.

As a general note, it would be preferred if all thematic meetings occur with Historic England present, as well the local authorities' conservation officers. There may also be occasions when it would be beneficial for other statutory consultees, such as National Landscapes, to also be present, particularly in instances where impacted landscapes form part of the setting of a designated heritage asset, for example.

Mid Suffolk District

The route of the new power lines passes through Mid Suffolk district, extending from the district's boundary with South Norfolk to Babergh. The line largely avoids larger settlements and villages, however Gislingham is almost entirely within the 1km buffer zone of the Proposed Order Limits. Parts of Melis and Finningham Conservation Areas are also within this 1km buffer zone. The north-east boundary of Badley Conservation Area abuts the DCO Limits.

Within 3km of the order limits are numerous other settlements including Thornham Magna and the Palgrave, Thrandeston, Wickham Skeith, Mendlesham, and Needham Market Conservation Areas. All designated heritage assets within the 3km buffer zone are outlined in Appendix 11.1 Annex B – Gazatteer.

No direct impacts are anticipated to any built heritage assets as a result of the proposal. There will be indirect impacts to numerous designated and non-designated heritage assets through change to their setting. The level of impact is influenced by factors such as proximity to the new overhead cable route, visual receptors, noise and/or construction impacts. It is unclear from the documents provided to date what mitigation, if any, will be afforded to the setting of heritage assets.

There are 411 identified designated heritage assets (scoped in) in Mid Suffolk district (Section B). Within Mid Suffolk district, the highest 'significance of effect'1 identified to a heritage asset is 'significant permanent negative effect' (to non-designated heritage assets) however no significant permanent negative effects has been identified to any designated heritage assets. However, this is likely to change, should the methodology and categorisation of heritage value be amended as per the comments above, and in the event of any project design changes.

Of the identified non-designated heritage assets, the incomplete Gazetteer does not currently allow for easy differentiation between built and archaeological heritage assets. There will, nevertheless, be an impact on the setting of non-designated built heritage assets – the assessment tables indicate the highest level of harm identified by National Grid is 'significant permanent negative effect'.

At this stage, further comments on individual heritage assets are not considered appropriate, due to the requirement for amendments to the methodology and information provided to date.

Yours sincerely,

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Place Services