

Burstall Parish Council
24 Church Crescent
Sproughton
Suffolk
IP8 3BJ

10 June 2022

Dear East Anglia Green, Community Relations Team

Burstall Parish Council Response to East Anglia Green

National Grid Electricity Transmission (NGET) proposes to construct an overhead line, comprising 65 m high lattice towers and electricity conductors from Bramford substation, south towards Colchester. This line would form the southern part of a 112-mile-long transmission reinforcement named East Anglia Green. The southern section is also known as AENC. The village of Burstall lies on the western side of the indicative purple swathe and several properties lie directly beneath the darkest shaded area that are said to indicate the preferred route.

Summary

- NGET has failed to make a robust need case and the integrity and validity of the consultation process is undermined by not including feasible offshore options. As demonstrated by the region's MPs, it has not considered a strategic offshore network solution. Elements of an offshore solution have been presented as feasible options in the Network Options Assessment (NOA) and a revised assessment methodology will be used in the imminent Holistic Network Design (HND). NOA will be updated in June. NGET has stated it will take account of any material considerations and revise its plans if necessary. This statement undermines the basis of its need case. Either EAG is required irrespective of potential changes in NOA or there is the potential for other options that should have been considered.
- NGET relies on Least Worst Regret analysis to help justify its approach. In addition to an error in the report it is likely this analysis is flawed. It may also be misapplied.

- The indicative route fails to record or take account of key features in the Burstall area. Burstall is an ancient village with valued heritage and historical buildings. The setting of the village and neighbouring buildings has been considered of sufficient importance to warrant undergrounding existing power lines. NGET seems to have been unaware of this fact when considering route options, making no mention of it in its reports.
- NGET's proposal recognizes the exceptional cumulative impact of existing and proposed infrastructure in the area of the Bramford substation but fails to suggest options for mitigation. If the area cannot be avoided the only suitable mitigation is undergrounding.

Need Case

NGET's need case for EAG is based on the recommendation to Proceed in NOA, a limited set of comparative financial data and LWR analysis. Flaws in this analysis have been exposed in other submissions. The absence of important financial data and of key scenarios casts doubt on the quality of this information. Neither has a sufficiently robust case been made for using this method to support the EAG proposal. This failing is highlighted in a recent report commissioned by Ofgem:

Long-term planning should consider many more scenarios and sensitivities and considerably greater analysis of the robustness of conclusions against departures from these scenarios.¹

Against this background it is impossible to see how Ofgem could support the need case on the basis of the information provided in the EAG consultation.

In light of the imminent publication of a revised NOA and the Holistic Network Design, the consultation is also premature.

¹ Recommendation from *Decision making for future energy systems* – Ofgem December 2020
<https://www.ofgem.gov.uk/publications/decision-making-future-energy-systems>

History and listed buildings

Burstall is recorded in the Domesday Book as Burgestala / Burghestal. Its lands formed part of various manors and estates and there are several highly valued listed buildings. The setting of the following would face impacts of varying degree if the proposed route is adopted:

Grade 1:

St Mary's Church

Grade 2:

The Barn at White House Farm

Mulberry Hall

Half Moon

Fenn Farmhouse

The village retains its attractive rural identity with a linear layout, working farm buildings of vernacular form at its centre and sympathetically designed modern housing. The attractive Memorial Hall is an exceptional Tudor style building constructed over 100 years ago, an endowment from Lillian Cranfield whose family had an important role in the commercial development of Edwardian Ipswich. Their elegant former country house is on the other side of the road.

Baseline and visual overview

The village of Burstall lies directly to the southwest of Bramford substation and cannot avoid the impact of developments in the vicinity of the substation. Transmission and distribution lines radiate from the substation like the spokes on a wheel. The proposed Bramford to Twinstead power line would add to the significant impact on the northern section of the village. The EAG line would therefore effectively encircle the village in a 50m high wire fence. Substantial harm would be inflicted on many individual dwellings.

The central, eastern, and southern sections of the village have been shielded from the adverse visual harm of transmission and distribution lines by the use of underground cables. These run from the substation, past Burstall Hall, Hill Farm, across Burstall Lane, The Street

and the A1071 to Fenn Farm where they join overhead lines running east towards Twinstead and south, joining UKPN lines to Lawford.

The significant impact that all overhead lines have on the village has thus been recognized and respected for several decades. The transmission line proposed by NGET would have a far greater impact than the much smaller line previously considered unsuitable in overhead form.

NGET accepts that EAG would have a harmful impact in this location:

Section A North (common to corridors A & B)

'There is high potential for the development of a 400kV OHL within this section to give rise to significant adverse effects on local landscape character in combination with the existing NG and DNO assets that converge at Bramford substation. This is because it is possible that this landscape has reached its capacity to accommodate such infrastructure. Development of a 400kV OHL within this section would be in conflict with saved policies CR04 and CR05 (Special Landscape Areas) of the Babergh Local Plan 2006 as approximately the northernmost 3.5km of this section within Babergh District is within an area identified as an SLA.'

Page B4

Cumulative impact is recognised in several sections of NGET's reports:

*'Some of the **cumulative effects on landscape character and the visual amenity** of residents and effects on the Babergh SLA **may not be mitigated through normal routeing and siting practices** and may require mitigation through the rationalisation of 132kV assets or by the undergrounding of part the proposed connection'*

*'Development of a 400kV OHL within this section would be in **conflict with saved policies CR04 and CR05 (Special Landscape Areas) of the Babergh Local Plan 2006** as approximately the northernmost 3.5km of this section within Babergh District is within an area identified as an SLA'*

*'Potential **significant cumulative effects** in combination with 4YL and BTNO for residents of Burstall and in combination with 132kV OHL for scattered properties within the section'.*

Despite recognising the degree of impact, NGET proposes no options for mitigation.

To the north it accepts the substation area has “reached its capacity to accommodate [additional] infrastructure”.

To the south NGET notes the potential harmful effects but fails to record accepted mitigation already in place.

Policy and guidance

National Policy Statements

Currently the National Policy Statements include the following:

EN1 5.8.14 There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.*

5.9.8 Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.

EN5 2.8.2 Government does not believe that development of overhead lines is generally incompatible in principle with developers' statutory duty under section 9 of the Electricity Act to have regard to amenity and to mitigate impacts (see paragraph 2.2.6 above). In practice new above ground electricity lines, whether supported by lattice steel towers/pylons or wooden poles, can give rise to adverse landscape and visual impacts, dependent upon their scale, siting, degree of screening and the nature of the landscape and local environment through which they are routed. For the most part these impacts can be mitigated, however at particularly sensitive locations the potential adverse landscape and visual impacts of an overhead line proposal may make it unacceptable in planning terms, taking account of the specific

*local environment and context. New substations, sealing end compounds and other above ground installations that form connection, switching and voltage transformation points on the electricity networks can also give rise to landscape and visual impacts. **Cumulative landscape and visual impacts can arise** where new overhead lines are required along with other related developments such as substations, wind farms and/or other new sources of power generation.*

The draft National Policy Statements will be subject to further revision. At present draft NPS 2 includes:

*2.11.20 The Secretary of State should also have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be inverted to favour undergrounding. Away from these protected landscapes, and where there is a high potential for widespread and significant landscape and/or visual impacts, **the secretary of State should also consider whether undergrounding may be appropriate, now on a case-by-case basis, weighing the considerations outlined above.***

National Planning Policy Framework (2021)

We would like to draw NGET's attention to the following:

2 Achieving sustainable development

Para 8 - c) an environmental objective – **to protect and enhance our natural, built and historic environment;**

8. Promoting healthy and safe communities

Para 100. Planning policies and decisions should **protect and enhance public rights of way** and access,

11. Making effective use of land

Para 120. Planning policies and decisions should: **a)** encourage multiple benefits from both urban and rural land, including through mixed use schemes and **taking opportunities to achieve net environmental gains**

12. Achieving well-designed places

Para 130. Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting,

15. Conserving and enhancing the natural environment

Para 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside,

Local plans

Saved Policies of the Mid Suffolk District Council Local Plan 1998

Saved Policy GP1. proposals should maintain or enhance the character and appearance of their surroundings and respect the scale and density of surrounding development. Layouts should incorporate important natural landscape features.

Saved Policies CL2, CS05, CR04, CS15 - require the protection or enhancement of the landscape and visual quality of the area. In particular, within Special Landscape Areas development will only be permitted where the special landscape qualities of the area are maintained or enhanced

Saved Policies of the Babergh District Council Local Plan 2006

Saved Policy CR04. Development in Special Landscape areas will only be permitted where they maintain or enhance the special landscape qualities of the area and have been designed and sited to harmonise with the landscape setting

Babergh Core Strategy 2011-2031

Policy CS02. development in the countryside will only be permitted in exceptional circumstances subject to a proven justifiable need

Policy CS15. the new development must respect the local context and character of the area Make a positive contribution to the local character, shape and scale of the area

Protect, enhance and mitigate distinctive local features which characterise the landscape and heritage assets of Babergh including AONBs, Conservation areas, Special Landscape Areas ...

Emerging JLP for Babergh and Mid Suffolk

Places the emphasis on the use of landscape character assessment as the basis for identifying and protecting sensitive or valued landscapes - This does not affect the position that this land has been recognised as being special.

Policy SP09. The Council will require development to support the enhancement and management of the natural and local environment and networks of green infrastructure, including: landscape...

Policy LP19. to protect and enhance landscape character development must: Integrate positively with the existing landscape character of the area and reinforce the local distinctiveness; be sensitive to their landscape and visual amenity impacts; enhance and protect landscape character and values and heritage assets; consider the topographical cumulative impact on landscape sensitivity.

Holford Rules

This parish is firmly of the view that better solutions are available in place of the proposed East Anglia Green line. Although outdated, the Holford Rules are used to guide alignment and positioning of towers. If applied in the Burstall area it is apparent that the proposed route does not meet these rules and that an overhead line cannot be constructed in the vicinity that would meet them.

Note on Rule 2

Where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.

Rule 5:

Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees.

Note on Rules 4 & 5

Utilise background and foreground features to reduce the apparent height and domination of towers from pan viewpoints.

Rule 6:

In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'.

Note on Rule 6:

In all locations minimise confusing appearance.

Supplementary Notes

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.

Visual impact appraisal

A methodology for assessing the impact of new infrastructure on a landscape is set out in *Guidelines for Landscape and Visual Impact Assessment (Third Edition)*. GLVIA3 states within paragraph 1.1 that "Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of - and the effects of - change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity."

We will expect NGET to conduct a full assessment as part of its EIA. In the meantime, using LVIA principles, we believe the magnitude of visual effect would be highly adverse to a relatively large number of highly sensitive receptors.

In simple terms, the towers would dominate the village and its setting. Approaching the village from the A1071, the landscape between this main road and Burstall lane is largely devoid of hedges or trees. There is a gradual slope to The Street. Using the valley (Holford Rule 5) would result in a pylon-lined avenue to the village. Placing towers higher up the hill would increase the visual impact over a very wide area. Whichever alignment was used, when the lines crossed the A1071 heading south, there are so many distribution lines the wirescape would be exceptional (Holford Rule 6). The view from the junction of public footpaths and permissive paths between the A1071 and Burstall Lane – a popular local amenity area – is highly valued. The proposed route would dissect this view along its axis.

From Burstall Lane to the sub-station there is a similar issue. Placed lower down the hill the towers would dominate the village which would be in their shadow. Whatever alignment is

selected an overhead line would pass very close to several dwellings causing real harm for residents.

Clearly a substantial re-organisation and mitigation of the sub-station, overhead line and related assets is required. To the south the only feasible mitigation is undergrounding as for the effectively redundant 132 kV line.

Biodiversity and Ecology

Land around the village teams with wildlife including thriving populations. These have been recorded in surveys associated with the first Bramford to Twinstead transmission reinforcement project and data is being updated by NGET. Data that is available should have been published for the East Anglia Green consultation.

Conclusions

One reason cited for building a new onshore line such as EAG is that it costs much less than an offshore transmission alternative.

In reality the financial advantages of creating an integrated offshore grid instead are well documented and run into £billions.

Perhaps better than most parishes we understand the arguments concerning the need to maintain a balanced onshore network and the potential benefits associated with utilising the Lawford substation to link offshore windfarms.

Nevertheless, we believe the scale of impact from EAG on communities and countryside tilts the balance in favour of 'avoidance', or at the very least highlights the need for extensive mitigation not present in the current proposal. The proposed line from Bramford to Tilbury – named ATNC in NOA – can be avoided using an offshore solution that integrates the relevant windfarms. Should the onshore link be required, the only suitable mitigation is undergrounding along a similar route to the existing underground cables.

Because NGET has insisted on maintaining a response deadline of 16 June 2022, we have been forced to submit this paper ahead of the anticipated publication of the Holistic Network Design and updated NOA.

There seems little benefit in second guessing the implications of these announcements but we can at least point out the inputs to be used for the Holistic Network Design (HND) Methodology.

In addition to being economic and efficient, with technically deliverable outcomes, the initial design of the HND must consider both environmental and community impacts.

We believe that at Burstall and for its surrounding area these require a complete re-evaluation of the current East Coast reinforcement strategy and the EAG proposal

Yours sincerely

Mrs Susan Frankis

Clerk to the Parish of Burstall

Highly valued views from footpath near Burstall Lane towards the A1071. In its current form EAG would cause substantial harm to this landscape.





Even at this distance and with full summer screening, the Grade 1 Listed village church is clearly visible to the right. The impact of a transmission line on its setting would be significant.