

Bramford to Twinstead 400kV Overhead Line Project  
Consultation Response  
Freepost RRKX/EBGK/XXHT  
PO Box 5689  
London  
W1A 4FG

25<sup>th</sup> February 2010

Dear Sirs,

### **Bramford to Twinstead 400kV Overhead Line Project**

1. On behalf of the Suffolk Preservation Society ('the Society') I set out our response regarding the proposed strategic reinforcement of the Electricity Grid between Bramford and Twinstead.

2. Our Society has more than 1500 members in Suffolk, including approximately half of the town and parish councils. The Society has campaigned for the past eighty years to ensure that the natural and built heritage of the county is protected from harmful development by promoting informed stewardship. Our Chairman, Dr Mike Coleman, has a relevant technical background, having worked for many years for the CEBG and its successors, and our submission is founded upon his understanding of the industry and the challenges it faces.

### **Consultation methodology flawed**

3. The Society has major concerns about the validity of this consultation, and in particular, the format used. This seeks to isolate issues concerning the route from the technology to be used. We believe that the choice of route is inextricably linked to technology employed. We do not accept the validity of the premise upon which this consultation is grounded. Namely, that this is simply an 'overhead line project' but rather a project to reinforce the electricity grid. We believe that this must include a scoping of the alternative transmission technologies, together with a consideration of possible routes. We believe only this methodology offers a responsible, balanced approach to seeking the most appropriate design solution.

4. The Society believes that in an increasingly urbanised society, our remaining areas of undeveloped land are an important source of amenity, not simply for local residents, but as refuges for the adjacent centres of population to enjoy. We note that even the Government does not discount the need to afford consideration to undergrounding as reflected in the *Draft NPS for Electricity Infrastructure (En-5)*. We believe that this is reflected in the Government's commitment to protect the countryside for its own sake enshrined in national policy (PPS7), as a resource for all.

### **Adverse impact on the natural and historic environment**

5. The Society contends that this approach is inconsistent with the statutory duties of the Industry under Schedule 9 of the Electricity Act 1989. It believes that the current approach is unlawful, in so far as it fails to demonstrate due regard has been paid to preserving these statutory interests. We remind Nationalgrid that our concerns for the natural and historic environment are firmly founded in statute. Section 85(1) of the CROW Act 2000:

*'(1) In exercising or performing any function in relation to, or so as to effect, land in an area of outstanding natural beauty, a relevant authority shall have due regard to the purpose of conserving or enhancing the natural beauty of the area of outstanding natural beauty'*

6. The Department of Energy and Climate Change has confirmed that Nationalgrid is a 'relevant authority' for the purposes of this section. This duty extends both to the AONB and to its setting, in so far as the designated area would be affected. Accordingly, the Society believes that undergrounding is essential to preserve the landscape and setting of the AONB and elsewhere, the special landscape areas within the proposed corridors.

7. All of the proposed routes affect areas with a rich built heritage, containing many important listed buildings, including parish churches of national importance, farmsteads and cottages. In addition, all of the routes would directly affect the setting of conservation areas for which the area is famed. Both listed buildings and conservation areas have statutory protection, benefiting both the asset itself and its wider setting. In our opinion, the direct and demonstrable harm associated with the proposed overhead lines would be contrary to sections 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and national

policy set out at PPG15. The protection of these statutory interests is reflected in Schedule 9 of the Electricity Act 1989.

This approach is also in conformity with the ‘saved’ policies of the Babergh District Local Plan (Alteration No.2 2006) that seek to protect the landscape quality and character of the countryside (CR01) and safeguard the landscape of the AONB (CR02).

### **The Need to embrace new technologies to mitigate impact**

8. We do not pretend to know all of the advantages and disadvantages of DC over AC connection, but do believe this is a technology that should be explored. Furthermore, by exploring alternative technologies, such as the potentially innovative options for High Voltage DC transmission, rather than the more normal 400kV AC technology, some of the routes might prove more acceptable. For example, the pylons associated with the former would not necessarily be so robust and therefore less intrusive. Equally, many objections would be silenced should you accede to our request that where the line affects the AONB directly or indirectly, it should be buried underground in conformity with the national policy of the CPRE.

9. We appreciate that the underground option can be between 10 (para 2.7.6, Draft NPS for Electricity Networks) and 17 times more expensive (generally within the lower order of cost within open agricultural land), but we believe in this case it would be a price well worth paying. It would preserve some of the most beautiful landscape, conservation areas and listed buildings in Suffolk in conformity with Schedule 9 of the 1989 Act. In short, it could demonstrate a genuine lasting commitment to preserving environmental quality and reflect the value of these areas to the wider community and nationally.

### **The alternative routes**

10. In terms of routes, we contend that in principle all of the current proposals are unacceptable, if they are to employ pylons or overhead lines. However, the Society does accept that reinforcement of the grid is necessary. However, we do not believe that the introduction of additional blight along corridors 3 and 4 should ever be contemplated and we urge as forcibly as possible that neither of these options is pursued in any circumstances. We appreciate these routes do not cross the AONB, but they would be visible from it and so would do much to negate the wonderful landscape and adversely impact upon important historic buildings and areas along these corridors. Furthermore, there is also much

concern over these routes and due note should be afforded to local opinion.

11. Corridors 1 and 2 potentially more closely relate to the Holford Rules, but only if underground technology is employed. As you will be aware, the Holford Rules (1959, as reviewed by NG in the 1990's and set out in the recent Draft EN-5 at paragraph 2.7.4) sets out guidance for routeing new overhead lines. In particular, we emphasise:

- *avoid altogether, if possible, the areas of highest amenity value....*
- *where country is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes...so as to avoid a concentration of lines or 'wirescape'*

12. The Society believes that these aims are incompatible with further above ground installations along either corridor 1 or 2 since these would inevitably adversely impact upon the AONB and create further harm by exacerbating the landscape intrusion and adverse impact upon receptors caused by the existing network.

13. Paragraph 2.7.2 of the draft NPS-5 also reminds us that "*sometimes positive landscape and visual impacts can arise through the reconfiguration or rationalisation of existing electricity network infrastructure*". We believe that this project presents an opportunity to deliver a positive outcome for the communities suffering blight from the existing 400kV pylons, especially around Hintlesham, by upgrading and rationalisation of the existing network through the introduction of an underground line. This approach would facilitate the removal of the existing overhead line. We believe only this approach is in conformity with the statutory planning framework and Schedule 9 of the Electricity Act 1989. The Society believes this would be a win: win option for all concerned and we exhort you to adopt this approach.

Yours faithfully

**Simon Cairns**  
**MRTPI IHBC**  
Director

CC: Dedham Vale Society, The Groton Pylon Alliance, Hadleigh Town Council, Boxford PC, Great Waldingfield PC, Little Waldingfield PC, Bildeston PC, Monks Eleigh PC, Chelsworth PC, Groton PC, Sudbury TC, Lavenham PC, Kersey PC,

Elmsett PC, Lindsey PC, Nedging PC, Acton PC, Capel St Mary PC, Stoke by  
Nayland PC, Polestead PC, Lavenheath PC, Cornard PC, Assington PC, Hintlesham  
PC, Suffolk Acre, Suffolk The Greenest County, CEO Babergh District Council, CEO  
Suffolk CC, The Editor EADT, CEO Braintree District Council, Tim Yeo MP.