

14 June 2022

EastAngliaGREEN@NationalGrid.com

Dear Sirs

EastAngliaGREEN – Non-Statutory Public Consultation

1.0 Introduction

I am writing on behalf of the Suffolk Preservation Society (SPS) regarding National Grid's proposals for the proposed new 400KV pylon line from Norwich to Tilbury, known as EastAngliaGREEN currently out to non-statutory public consultation.

SPS is a non-political, independent, self-funding charity with its charitable aims to "*promote the conservation, protection and improvement of Suffolk's physical and natural environment for the public benefit by ensuring any change is undertaken sympathetically and to the highest level of design and sustainability possible*". The Society also represents CPRE, the Countryside Charity, in Suffolk. We campaign on important issues affecting the county's landscape and heritage, working constructively with the county and local planning authorities and other relevant bodies to help achieve better outcomes in planning and the management of our historic natural and built environment.

2.0 SPS Position

- SPS calls for a fully coordinated, offshore solution to protect our countryside and communities and to minimise onshore infrastructure in Suffolk.
- SPS is concerned by the timing of this consultation in advance of the publication of the Holistic Network Design, and an updated Network Options Assessment later this month. We consider that this consultation exercise should be extended to reflect the very real chance of fundamental changes in the policy framework against which this scheme is being consulted on.
- SPS agrees with the Suffolk MPs, Suffolk County Council and Babergh Mid Suffolk Councils and other stakeholders that there is a need for clarity from National Grid around the possible **alternative options** of integrating the objectives of East Anglia GREEN into a proposal for a strategic, coordinated offshore solution. We share the concern of many that alternatives to the proposed pylon line have not been clearly set out, or the reasons that they have been rejected, fully explained.
- SPS considers that the current proposals will result in significant landscape and heritage harm that will impact negatively on communities, tourism and the wider economy of Suffolk.

3.0 Current consultation – overview

Notwithstanding the above, we acknowledge that the purpose of the consultation exercise is to garner comment on the scheme that is before us, and to that we end we offer the following comments on the proposals:

- SPS welcomes the early engagement with the local community and wider organisations which can be beneficial in the long run. However, we are very disappointed with the **extremely limited options in terms of technology and routing options (including routes both on and off shore) provided** in the current consultation. The sole option provided is an over ground 400kv pylon line (except for limited undergrounding in the AONB). Whilst the SPS acknowledges that there is no general requirement to consider alternatives or to establish whether the proposed project represents the best option, the public consultation exercise is of very limited value as it does not give a fair or balanced set of options for communities to consider.
- Furthermore, a **low level of detail is currently provided in terms of the weighting to be applied and the selection criteria for the area of the search corridor**. It is not transparent how the specific preferred corridor has been arrived at as no constraints mapping has been provided.

It is therefore difficult to provide a comprehensive response to the project until significantly more information is made available. The sparsity of technological options, and missing environmental and technical detail gives stakeholders very little chance of making a meaningful comment on this scheme, rendering the exercise little more than a cynical “heads up” to communities about what has already been decided, rather than a meaningful public engagement exercise.

The following comments are therefore made in general terms, but where specific sites or areas are referred to, these have been restricted to the impact on Suffolk. Moreover, whilst the proposals will impact three county wildlife sites, we defer to the Suffolk Wildlife Trust and Natural England on points of ecology and biodiversity.

4.0 Landscape

The Holford Rules specify that when selecting a route for a new pylon line it is important to choose tree and hill backgrounds in preference to sky backgrounds. However, the majority of the landscape affected within the route corridor indicated by the purple swathe in Suffolk is open countryside, sparsely treed and with scattered historic villages and hamlets. **There is very limited topography in which to ameliorate the significant level of visual impacts** that will be experienced by those living and working in this swathe.

National Policy statement EN1 states that *Landscape effects of the project 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...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.* (para. 5.10.9)

In this context, we are deeply concerned by the default position of the proposal of the overground pylon line that has been selected. This reliance upon a primitive technology will have the effect of industrialising the countryside, especially in non-designated areas which are, nonetheless, valued landscapes such as the Waveney Valley and the Gipping Valley.

The Babergh Mid Suffolk Landscape Guidance (2015) states that *The protection and enhancement of both districts landscape is essential not only for the intrinsic aesthetic and historic value that supports tourism and the economy for the area but also to maintain the quality of life for the communities that live in the countryside.*

The draft NPS EN5 Electricity Transmission Networks requires that where there are highly valued local landscapes, local development policies should be paid particular attention (para. 5.10.16). It is unclear how the introduction of a 400kv pylon line, running the length of the county can be reconciled with this policy framework. The consultation does not include a Landscape and Visual Impact report nor a ZTVI for the proposed route corridor. This prevents any meaningful assessment of landscape or visual impacts.

We are also concerned by the inadequate discussion of **cumulative impacts** of this proposal, in conjunction with existing electrical transmission infrastructure and proposed/committed infrastructure. This includes the Bramford to Twinstead upgrade which will have the potential to impact the Dedham Vale AONB.

5.0 Dedham Vale Area of Outstanding Natural Beauty

It is acknowledged that undergrounding is the starting point for delivery of energy transmission through a designated landscape (NPSEN5). It is therefore important to stress that undergrounding of pylons in the AONB should not be seen as a public benefit. In fact, it is mitigation via embedded design, in accordance with the Holford Rules, and therefore should not be seen in terms of making an unacceptable scheme acceptable.

Moreover, it is understood that undergrounding involves a much larger construction footprint and disruption of soil. **The associated harm of undergrounding to the archaeological resource, together with permanent damage to biodiversity and visual amenity in terms of loss of trees, hedgerows, ditches and banks will be deeply detrimental to the core principles which underlie the designation of the AONB.** Dedham Vale is rich in archaeological sites, primarily identified as cropmarks, with areas of prehistoric funerary activity particularly evident. Some of these assets are scheduled. The landscape structure and historic features are irreplaceable and their loss will result in material damage to the protected landscape.

The draft EN5 states that *There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their placement in the local landscape. In particular, the applicant should consider such characteristics as the local topography and/or the possibilities for screening of the infrastructure.* (para. 2.2.4). Yet the consultation provides no details on where the **substations and sealing end compounds** will be located.

The SPS has major concerns about the opacity of the consultation in regard to the setting of the Dedham Vale and the Project Area in particular. The extent of the proposed undergrounding

within the Dedham Vale AONB must be clarified as it is not clear from the documentation whether the proposed undergrounding relates to the whole of the Project Area. The setting of the Dedham Vale AONB must be fully taken into account as well as the setting of the Coast and Heaths AONB on the south western edge which also has the potential to also be blighted by infrastructure.

This consultation fails to address these key issues and the SPS considers that any onshore transmission scheme must give significant weight to protecting the entire visual envelope of the AONB.

6.0 Historic Environment

The majority of the landscape affected within Suffolk by the scheme is open, flat countryside with scattered historic villages and hamlets, characterised by its strong agricultural heritage of farmsteads and barns with many of East Anglia's internationally important medieval churches dominating the wide, open Suffolk skies.

The overgrounding proposals have the potential to industrialize the countryside, along with the setting of a significant number of designated heritage assets including farmhouses, Suffolk vernacular buildings, churches and conservation areas.

The consultation documentation does not attempt to identify or quantify the level of harm, but it is clear that a scheme of this magnitude has the potential to cause significant harm in this rural Suffolk landscape. In many areas, this scheme will result in pylons becoming the defining feature, in what is an otherwise rural landscape characterised by scattered and sporadic rural settlements.

Our parish council members and household members have raised significant levels of concern about the likely impacts on a number of individual heritage assets. By necessity, this is not a comprehensive list of examples, but highlights the wide range of impacts that will flow from this scheme. For example, the conservation areas at Badley, Wickham Skeith, Finningham, Mellis, Mendlesham, Needham Market, Higham and Stratford St Mary are shown to be within or close to the purple swathe. In addition, the historic villages of Offton, Great Wenham, Little Wenham, Holton St Mary, Chattisham, Burstall, Cotton and Barking are all rich with designated assets and will potentially be impacted by the proposals.

Accordingly, the potential for significant harm to the setting of heritage assets, both designated and non-designated, needs to be fully and clearly, identified, assessed and mitigated. This consultation does nothing to indicate that Suffolk's outstanding historic environment has been paid due regard. This is unacceptable.

7.0 Mitigation

This project is of a scale unprecedented for many decades, and as such it is essential that the project has sufficient resources to provide effective, comprehensive, and robust mitigation of residual impacts on Suffolk's landscapes and precious historic environment. Currently there is no reference to mitigation at all. Accordingly, provision must be made within the regulatory

framework to allow appropriate community benefits to properly compensate for the legacy of high levels of environmental harm that such a scheme will leave in its wake.

SPS had expected this consultation to include a clear indication of pylon options including shorter lattice towers, or T pylons, a willingness to consider the rationalisation of existing 132kv lines within and adjoining the purple swathe and along with clear proposals for the mitigation of any impacts. The absence of this level of detail is a serious omission that is currently causing a significant level of avoidable stress and disquiet amongst many individuals and communities in Suffolk.

We trust that you will find these comments helpful.

Yours sincerely



Robert Townshend
Chairman

James Cartlidge MP

Dr Dan Poulter MP

Jo Churchill MP

Cllr James Finch, Suffolk County Council

Cllr Andrew Stringer, Suffolk County Council

Cllr Richard Rout, Cabinet Member for Environment and Public Protection - Suffolk County Council

Cllr David Burn, Cabinet Member for Planning, Mid Suffolk District Council

Cllr Clive Arthey, Deputy Leader and Cabinet Member for Planning, Babergh District Council

Phil Watson - Strategic Energy Projects Lead, Suffolk County Council

Bronwen Curtis - Principal Planning Officer, Strategic Projects and Delivery, Babergh Mid Suffolk

Simon Amstutz, AONB Partnership

President Suffolk Preservation Society, Geoffrey Probert

Chairman Suffolk Preservation Society, Robert Townshend

CPRE Norfolk

CPRE Essex