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Ask for: Mathew Wilde
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PURPOSE OF LETTER:

Braintree District Council response to Non-Statutory consultation on the Bramford to Twinstead Reinforcement Project

Dear Mr Stevens

Thank you for consulting Braintree District Council as a Host Authority on the Bramford to Twinstead Reinforcement Project non-statutory consultation.

1. Project Background

- 1.1. Bramford to Twinstead Reinforcement Project proposals were first developed between 2009 and 2013 but were put on hold at the end of 2013. It is understood following consultation during this initial period, National Grid agreed that undergrounding the cables in the Stour Valley was the most appropriate option. The project has now recommenced.
- 1.2. The Bramford to Twinstead Reinforcement Project Background Document clearly sets out the wider context of how the UK is seeking to achieve Net Zero carbon emissions by 2050 and in particular the way in which energy projects on the east coast will contribute towards meeting this aim. For example through the increase of wind energy to 40GW by 2030, increase in nuclear power and other renewable sources of power generation. Within this context, Braintree District Council declared a Climate Emergency in July 2019 and is preparing a strategy to help the district tackle the climate change challenge.
- 1.3. The Project Background Document continues to explain how in East Anglia, over the next decade and beyond, the increase in the amount of electricity set to come from offshore wind, interconnectors and nuclear power will result in the need for additional reinforcement in the network. The Network Options Assessment (NOA) (an annual report published by National Grid ESO) has outlined that the reinforcement between Bramford and Twinstead is critical in all scenarios and needs to be in place by 2028.

2. Need for the Project

- 2.1. Page 7 of the Project Background Document sets out how National Grid must have regard to the Electricity Act 1989 in development transmission network proposals.

Schedule 9 of the Act requires National Grid 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 shall do what [it] 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”

- 2.2. Pages 24 and 25 of the Project Background Document describe why the network between Bramford to Twinstead is in need of reinforcing. Essentially, this section of the network ‘is a significant bottleneck’ which constrains future increases to power flows. The reason for this is that there are currently three double circuit overhead transmission lines carrying power into Bramford but only one from Bramford out to Twinstead Tee.
- 2.3. Page 26 of the Project Background Document describes that despite ongoing offshore coordination work by the Government, the network reinforcement between Bramford and Twinstead Tee will still be required.

3. What the Project Involves (emerging proposals)

- 3.1. The current proposal as shown in the consultation documentation includes: constructing approximately 27 km 400 kV electricity transmission connection between Bramford substation in Suffolk to Twinstead Tee in Essex, comprising approximately 19 km of overhead line and 8 km of underground cable along the entire route, including associated infrastructure such as cable sealing end points and a new substation.
- 3.2. The project will also enable the removal of 25 km of existing 132 kV overhead line operated by UK Power Networks across the route.

4. Proposals in Braintree District

- 4.1. Specifically within Braintree district, the current proposals largely relate to ‘Section G – Stour Valley’ and would involve:
 - A new 400 kV overhead line roughly parallel to the existing 400 kV overhead line from the east of the area until just south of Sawyers Farm.
 - West of Sawyers Farm approximately 3.8 km of underground cables through the Stour Valley also with a capacity of 400 kV.
 - A Cable Sealing End (CSE) compound would be built at the end of each underground cable section where it transitions to an overhead line section.
 - A new substation at Butlers Wood. The substation would contain transformers to change the voltage level back to 132 kV in order to feedback into the existing network. The substation would also include, cooling fans, a diesel generator, water tank and switching devices. Further details of this have not been provided at this stage.
 - Remove of the existing 132 kV line overhead line up to the ‘diamond crossing’ to the south west of Sparrows Farm. However, it is currently unclear why the existing section of overhead line between the diamond crossing and the proposed new sub-substation would also not be removed.
- 4.2. The current proposals are relatively high level and we expect that much more detail would be made available for comment as the project progresses, particularly around the substation and CSE compound elements.

5. Stour Valley

- 5.1. Page 41 of the Background Document provides an overview of ‘Section G – Stour Valley’. Under ‘considerations’ the document states:

‘Although recognised as a landscape of value and with links to famous artists, the Stour Valley (Section G) is not formally designated as an Area of Outstanding Natural Beauty and the review has identified this area as requiring further work to understand whether the additional cost of an underground cables (£118m) in this location is justified. We are therefore seeking views from stakeholders and consumers as to whether the previous decision to underground this section still provides value for money.

In particular, National Grid would like to understand views on:

- *the landscape and cultural value of the Stour Valley*
- *progress on proposals to extend the Dedham Vale AONB boundary in the Stour Valley towards Sudbury*
- *the construction effects of undergrounding in the Stour Valley (on ecology, archaeology and traffic)*
- *anything else National Grid should consider.’*

- 5.2. In response to National Grid seeking views on the above issues, Braintree District Council would like to make a number of points.

- 5.3. National Grid are required to have regard to The Countryside and Rights of Way Act (2000) when considering any impacts upon the AONB and its setting.

- 5.4. In 2009, The Dedham Vale AONB and Stour Valley Partnership resolved to pursue a boundary extension to the AONB with a desire to extend the boundary westwards into the Stour Valley Project Area. In March 2021, Natural England confirmed that a boundary review is being considered.

- 5.5. Also of note, on Monday 28th September, the Prime Minister committed to protect 30% of the UK’s land by 2030 – an additional 400,000 hectares. In July 2020, the adjacent AONB (Suffolk Coast and Heaths) received confirmation that its proposed extension was approved by the Secretary of State. Although the boundary extension has been a longer term project running for a number of years, these recent developments indicate a real prospect that an extension to the Dedham Vale AONB is a realistic possibility. The AONB team will be able to provide the latest information regarding the proposed extension.

- 5.6. Although the Stour Valley Project Area is not formally designated as AONB, it forms part of the Dedham Vale Management Plan in recognition of its natural beauty and special qualities. The Project Area is managed to a level consistent to that of the formally designated AONB area. The AONB partnership have also commissioned evidence including the Alison Farmer Associates study in 2016, which demonstrate that the Stour Valley proposed extension area contains the special qualities needed to be formally designated as AONB.

- 5.7. The Braintree District Landscape Character Assessment (2006) also shows that the landscape character area A2 – Stour River Valley is of a high quality and has a high sensitivity to change. Paragraph 8.27 of Section 2 of the emerging Local Plan (set to be examined July 2021) makes reference to the importance of the Stour Valley Project Area stating:

‘The upper Stour Valley, adjoining the AONB, is partly located along the north and east boundary of Braintree District and is an important and sensitive rural landscape, recognised by the fact that it is part of the wider project area covered by the Dedham Vale AONB and Stour Valley Project. The impact of development proposals in the upper Stour Valley will be particularly carefully assessed in light of the sensitive nature of this landscape. Proposed developments here should support the wider environmental, social and economic objectives as set out in the Dedham Vale AONB and Stour Valley Management Plan, and should not prejudice the long term aim to enlarge the area included within the AONB designation.’

- 5.8. Subject to further work being undertaken to fully assess the impact of the development, Braintree District Council remain of the view that any proposals to over ground the new lines within the Stour Valley and its project area would likely have a significant detrimental impact on its special landscape character and visual interest. Indeed, slightly further south along the Stour Valley project area, a Planning Application (reference APP/Z1510/W/18/3207509) was dismissed at appeal for 98 dwellings in part due to the significant landscape harm which would have arisen from the development.
- 5.9. It is also essential that considerations around ecology and arboriculture play a key role in informing the detailed project route and operations to reduce impacts upon trees, hedges and ecology as far as possible. Where the project will have an impact on ecology and arboriculture which cannot be avoided, substantial mitigation packages should be provided to offset any adverse impacts.

6. National Policy Statements on Undergrounding

- 6.1. Decision on NSIPs are made based on the relevant National Policy Statement (NPS). In the case of Bramford to Twinstead, the relevant NPS are the Overarching NPS for Energy (EN-1) and the NPS for Electricity Networks (EN-5).
- 6.2. Both EN-1 and EN-5 contain guidance on the undergrounding of electrical cables. In particular, section 2.8 of EN-5 provides guidance on Landscape and Visual issues. Paragraph 2.8.9 within this section provides details on the use of undergrounding to minimise landscape and visual impacts, we would draw particular attention to the section of the paragraph which states:

‘The impacts and costs of both overhead and underground options vary considerably between individual projects (both in absolute and relative terms). Therefore, each project should be assessed individually on the basis of its specific circumstances and taking account of the fact that Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or sub-sea line if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable. In this context it should consider:

- *the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads)’*

- 6.3. The above sections of paragraph 2.8.9 of EN-5 make it clear that decisions on when to overhead or underground cables should be assessed at the project level, taking into

account specific circumstances and *'that Government has not laid down any general rule about when an overhead line should be considered unacceptable'*.

- 6.4. Bullet point one of paragraph 2.8.9 describes how decisions to underground cables should consider *'the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads)'*. Although this paragraph makes specific reference to *'National Parks, AONBs and the Broads'* the use of the phrases 'in particular' and 'such as' make it clear that these areas are not an exhaustive list and that undergrounding in other areas of natural beauty or historic importance may well be justified and this is best placed to be decided upon at the project / local level.
- 6.5. On this point, paragraphs 1.7.3 – 1.7.5 of NE-5 considered *'the adoption of a presumption that electricity lines should be put underground (generally, or in particular locations, such as Areas of Outstanding Natural Beauty (AONBs)'* when assessing reasonable alternatives as required by the SEA directive. Paragraph 1.7.5 explains how this approach was rejected due to it being *'considered preferable to adopt the policies in EN-5 because the range of factors to be taken into account means that decisions on undergrounding are best taken within a more flexible policy framework using case by case evaluation.'*
- 6.6. Within this context and having regard to all of the above, Braintree District Council considers that the additional cost of undergrounding cables in the Stour Valley is justified and that National Grid should undertake further evidence, with the involvement of relevant stakeholders, to assess the natural beauty and special qualities of the Stour Valley Project Area including cultural heritage.
- 6.7. Alongside the proposed section of undergrounding in the proposed AONB extension area, it is considered likely that extending the undergrounded section to include the wider Stour Valley Project Area will be the most appropriate option.

7. Substation

- 7.1. In association with the Bramford to Twinstead Project a new substation at Butlers Wood is proposed. The substation would contain transformers to change the voltage level, protection isolation, cooling fans, a diesel generator, water tank and switching devices.
- 7.2. Pages 30 – 32 of the consultation 'Options Report' document explain why 'Study Area C' at Butlers Wood is considered the most appropriate location.
- 7.3. This location has the benefit that very little additional underground cable is needed to connect the substation to the existing network. However the impacts in terms of landscape and visual amenity in particular will be severe and concentrated on very rural parts of the District, away from any urban centres and in an important rural landscape valued for its beauty and its historical and cultural significance.
- 7.4. Very little detail is currently available on the proposed sub-station. The Council will therefore provide more detailed comments as more information becomes available including discussions around the extensive screening which will likely be required. The Ecological impact will also be of particular importance as will the impact upon existing trees and hedgerows in Arboricultural terms in addition to the impact upon existing residents in the locality.

7.5. The Council also consider that the substation element of the wider Bramford to Twinstead scheme should be progressed in a coordinated way within the Development Consent Order (DCO) process which will enable all impacts of the scheme to be considered alongside a full range of mitigation packages.

8. Other comments

8.1. The Networks Options Assessment (NOA) identifies that reinforcement additional to the Bramford to Twinstead project may be required in the region. Details of any further planned network reinforcement projects should be made available to provide a comprehensive overview and ensure schemes are considered in a joint up, holistic way and not in isolation.

8.2. It is noted that National Grid have an ambitious timetable for the Bramford to Twinstead Project which will have a subsequent impact upon the resources of Braintree District Council as a Host Authority as well as other stakeholders. National Grid's ambitious timetable should not be progressed at the expense of robust and meaningful input from stakeholders.

8.3. These stakeholders should include the Host Authorities in their general Planning capacity, but also their relevant and interlinked specialisms including Heritage, Landscaping, Arboricultural, Archaeological, Highways, Contamination; Noise; Water, Ecology, Socio-economic and Health. Reports should be completed and submitted outlining the implications of the development on all of these specialisms and these should be informed in part by professional engagement between the relevant parties.

8.4. We trust that the above high level response to the National Grid's non-statutory consultation will prove informative and we look forward to providing more detailed comments on various issues as the project progresses.

8.5. We would like to thank you again for the opportunity to respond and for the engagement to date. As a Host Authority we look forward to continuing to play an important role as the project progresses.

8.6. This consultation response is made with regard to the Non Statutory Consultation only and does not prejudice Braintree District Council's consideration of future planning matters relating to the proposed development.

Yours Sincerely,



Mathew Wilde MRTPI (Senior Planner)
for Planning Development Manager