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Volume 6: Environmental Statement

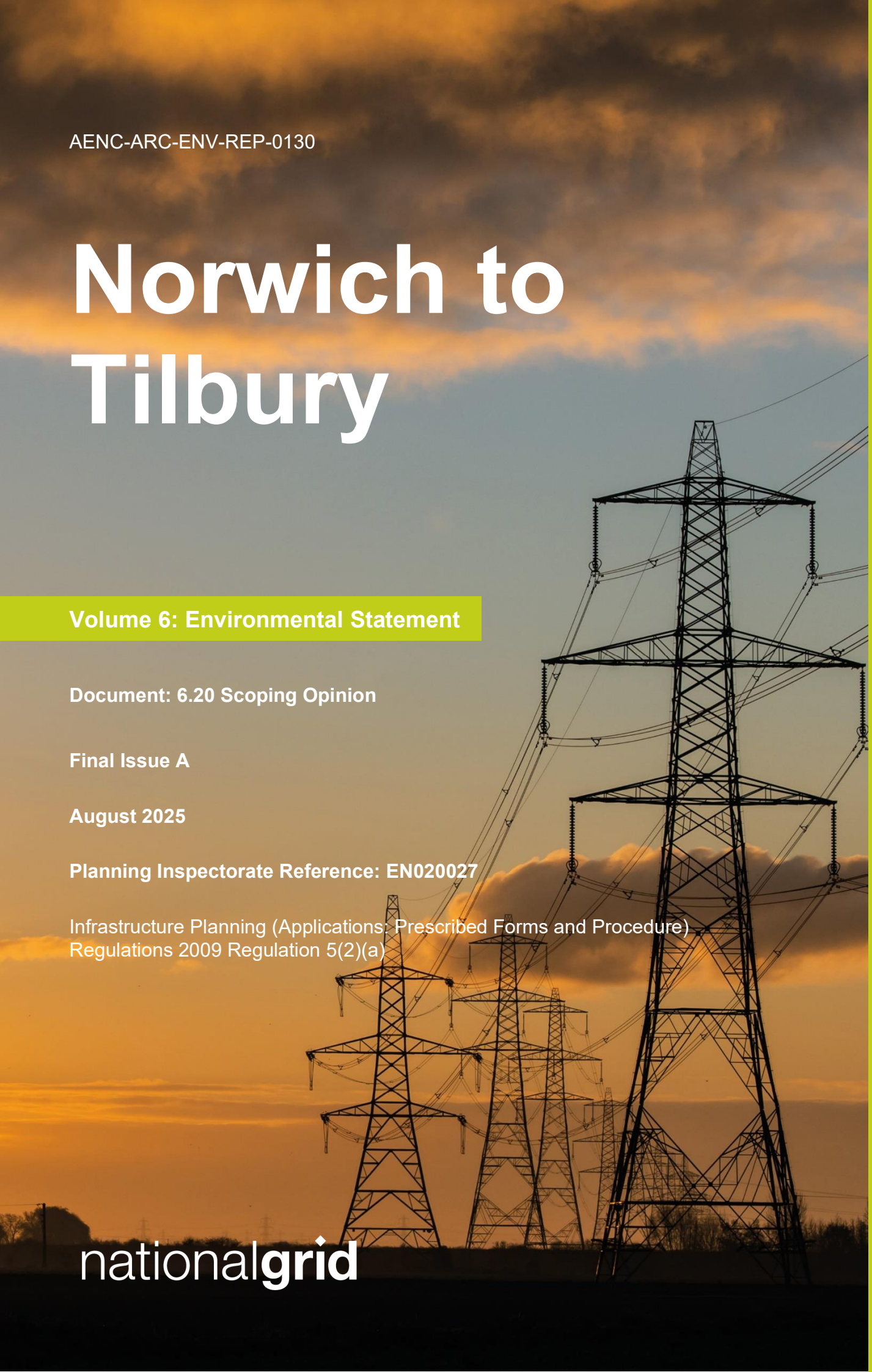
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nationalgrid

The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed East Anglia Green Energy Enablement (GREEN)

Case Reference: EN020027

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

14 December 2022

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APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

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1. INTRODUCTION

1.0.1 On 04 November 2022, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from National Grid Electricity Transmission (NGET) (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed East Anglia Green Energy Enablement (GREEN) (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

- Scoping Report (including Appendices B to K): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000012
- Scoping Report (Appendix A - Part 1 of 8 - Figures 1.1 to 6.5): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000013
- Scoping Report (Appendix A - Part 2 of 8 - Figures 7.1 to 8.2): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000014
- Scoping Report (Appendix A - Part 3 of 8 - Figures 8.3 to 8.4): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000015
- Scoping Report (Appendix A - Part 4 of 8 - Figures 9.1 to 9.2): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000016
- Scoping Report (Appendix A - Part 5 of 8 - Figures 9.3 to 9.4): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000017
- Scoping Report (Appendix A - Part 6 of 8 - Figures 10.1 to 12.1): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000018
- Scoping Report (Appendix A - Part 7 of 8 - Figures 12.2-13.2): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000019
- Scoping Report (Appendix A - Part 8 of 8 - Figures 14.1 to 16.1): http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000020

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as

currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Chapter 4)

ID	Ref	Description	Inspectorate's comments
2.1.1	n/a	Project description	The Scoping Report presents a 'Scoping Report Corridor' within which elements of the Proposed Development would be located and has provided a high-level description of what the Proposed Development would comprise. At this stage the only specifically defined locations for works are at the existing Norwich Main, Tilbury and Bramford substations. This has limited the Inspectorate's ability to provide meaningful comments on the project description at this time. For the avoidance of doubt, the ES should provide a clear description of the physical characteristics of all elements of the Proposed Development (including any necessary removals/ diversions/ modification of existing National Grid infrastructure), so that the likely significant effects from their construction and operation can be ascertained. The Applicant should make effort to fix the siting of each component and reduce uncertainty; where this is not possible, the Applicant should ensure that the ES assesses a worst-case scenario adopting a parameters based approach.
2.1.2	Paras 4.4.2, 4.4.3 and 13.8.3 and Table 4.2	Pylons	The Scoping Report refers to the potential use of alternative pylon designs (T pylons/ low height steel lattice pylons) as an embedded design measure. The pylon designs should be confirmed in the ES and committed to through the draft DCO (dDCO). The ES should provide dimensions of the pylons to be constructed. This should include maximum heights and widths of the steel work itself,

ID	Ref	Description	Inspectorate's comments
			along with details of the foundations that would be required at each pylon location. The Inspectorate acknowledges that some flexibility may be required for micro-siting of pylons but would expect the proposed locations to be identified within the ES along with any limits of deviation (LoD) required (both laterally and vertically, i.e. in terms of the depths of foundations). All surveys and assessments should be of sufficient spatial scale to incorporate any LoD for all permanent infrastructure.
2.1.3	Paras 4.4.4, 4.4.10 and 4.5.31	Proposed landscape planting	Broad locations for proposed landscape planting are identified in the Scoping Report, including around the Cable Sealing End Compounds (CSECs) and at the new Tendring substation. The ES should confirm the locations and details of proposed landscape mitigation planting (including where this forms part of reinstatement proposals), with reference to accompanying plans.
2.1.4	Paras 4.4.5 to 4.4.6	Underground cables	The ES should identify the number of underground cables to be laid within each trench and confirm the number of trenches required within the corridor. The Scoping Report states that the cables would be laid within a permanent swathes of approximately 65m wide, potentially wider in some locations. It is not clear why the assessment corridor of 200m to up to 500m is therefore required. The corridor presented within the ES should reflect the temporary and permanent land take sought within the dDCO.
2.1.5	Paras 4.5.3 and 4.5.4	Site compounds	The ES should confirm the locations and sizes of the Main Works Compounds and satellite compounds and where possible, show detailed layouts. Descriptions of compounds should explain how the sustainability of such compounds has been optimised and any proposed mitigation

ID	Ref	Description	Inspectorate's comments
			measures implemented to avoid or minimise impacts relating to their use.
2.1.6	Para 4.5.7	Temporary crossings	The locations of temporary crossings eg over watercourses, streams and field ditches and the specific crossing methodology for each location should be identified within the ES.
2.1.7	Paras 4.5.11 and 4.5.23	Percussive piling	The Scoping Report states that percussive piling may be required at some pylon locations and would be confirmed following ground investigation. The ES should assess the foundation design to be used, or where this is still to be determined, a worst case scenario should be adopted to identify any likely significant effects.
2.1.8	Paras 4.5.23 and 8.8.1	Trenchless installation	The location of any trenchless crossings should be identified within the ES. Where trenchless installation is relied upon to mitigate potential significant effects (for example, crossing the River Stour), the Applicant should ensure this construction method is demonstrably secured.
2.1.9	Para 8.9.15	24 hour working	The Scoping Report indicates the potential for 24-hour working. The locations and types of such activities should be identified and any likely significant effects from these works assessed within the ES.
2.1.10	Para 12.8.2 and Initial Outline Code of Construction Practice (CoCP)	Depth of trenchless crossings	The Scoping Report and Initial Outline CoCP indicate that a minimum depth of 1m below the hard bed level of the river is currently proposed for trenchless crossings of main rivers. The ES should provide a justification for this depth, and the Applicant is directed to the Environment Agency's scoping consultation response which notes that the conditions of a Flood Risk Activity Permit may require a deeper target depth of the trenchless crossing. The ES should also provide information as to whether this 1m depth is to be assumed for all trenchless crossings (as other waterbodies are not referenced), and the data sources used to determine the riverbed depth.

ID	Ref	Description	Inspectorate's comments
2.1.11	n/a	Heights of structures	The ES should state whether the heights of structures are above Ordnance Datum (AOD), or above ground level. Terminology should be consistent throughout the ES and should correspond with any heights detailed within the dDCO.
2.1.12	n/a	Road levels	Proposed finished levels of any permanent access roads AOD should be identified within the ES (along with any necessary LoDs).
2.1.13	n/a	Employment	The ES should set out the expected number and nature of employment opportunities during each phase of the Proposed Development. This should be described in the context of the workforce availability in the area at a time when numerous other major projects are anticipated to be constructed. The ES should detail how any mismatch between supply and demand will be addressed and consider the origins of its workforce in all relevant aspect assessments (notably socio economics and traffic and transport). All assumptions made in this regard should be set out in the ES.
2.1.14	n/a	Vehicle movements	The ES should detail the number of anticipated vehicle movements during all phases of the Proposed Development (including diverted traffic) and explain the assumptions upon which these have been established.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Chapter 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
2.2.1	Paras 5.7.14 to 5.7.15 and 18.2.2	Impacts from decommissioning	The Scoping Report anticipates that the transmission of electricity would continue for as long as there is a business case for doing so and states that decommissioning would be subject to separate consenting procedures. The Inspectorate agrees that decommissioning can be scoped out of the ES on that basis that a high-level summary of potential effects for each environmental topic would be included in an appendix to the Project Description chapter within the ES. The Inspectorate expects this to include a description of likely methods for decommissioning.

ID	Ref	Description	Inspectorate's comments
2.2.2	Image 1.1 and Section 1.3	Geographical context	The ES should clearly identify the locations of existing, as well as proposed, pylons along the proposed route, in order to aid understanding of the relationship between existing and proposed infrastructure.
2.2.3	Section 3	Alternatives	The description of reasonable alternatives in the ES should include a comparison of environmental effects. It should include the specific locations considered for the change from overhead line (OHL) to underground cables, particularly in terms of impacts on the setting of the Dedham Vale Area of Outstanding Natural Beauty (AONB) and on

ID	Ref	Description	Inspectorate's comments
			archaeological remains. Explanations should be provided for the rejection of offshore solutions, the extent of the OHL and underground sections and the locations of the substations and CSECs.
2.2.4	Para 5.1.2	Significance of effect	The ES should explain why some assessments, such as the cumulative effects assessment, will use a different approach to conclude on the significance of effects from the remainder of the ES. The assessment methodology should be clearly described.
2.2.5	Para 5.2.5	Duration of effects	Paragraph 5.2.5 of the Scoping Report states that the assessment methodology will assume short term effects would be those during construction plus one-year reinstatement, unless otherwise stated in aspect specific methodology. The Inspectorate considers that care should be taken when considering the duration of effects to avoid the potential down playing of the significance of effects. For example, construction noise impacts on receptors for a five year duration is unlikely to be perceived as short term by those affected. In this regard, the Inspectorate welcomes the intention for the ecological assessment to ascribe short term impacts as being those up to 1 year in duration (paragraph 8.10.19 of the Scoping Report).
2.2.6	Para 5.2.6 and Table 8.5		The Scoping Report proposes to assess effects during the phase within which the impact arises. The Scoping Report acknowledges there would be some permanent habitat loss at the new substation, cable sealing end compounds and pylon bases. The Applicant should ensure that assessing such impacts solely during the construction phase does not underplay the potential duration and consequently, the significance of effect. For example, in terms of effects from vegetation loss, the ES should differentiate between that to be lost temporarily (ie to be reinstated) and that to be permanently lost.
2.2.7	Table 5.1	Significance matrix	The Inspectorate notes that for a number of aspect chapters, the same terminology has been applied for the levels of impact

ID	Ref	Description	Inspectorate's comments
			magnitude as for the levels of significance in Table 14.9 (ie major, moderate, minor and negligible). The Applicant is advised to take caution with this approach to avoid confusion for readers.
2.2.8	Appendix D	Transboundary impacts	Appendix D of the Scoping Report concludes that the Proposed Development would not have a significant effect either alone or cumulatively on the environment in a European Economic Area State. Following the adoption of this Scoping Opinion, the Inspectorate will undertake a transboundary screening, on behalf of the Secretary of State, under Regulation 32 of the 2017 EIA Regulations. The Secretary of State's duty under Regulation 32 continues throughout the application process.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Major accidents and disasters

(Scoping Report paragraphs 5.7.1 to 5.7.4)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.1.1	Paras 5.7.4 and 18.2.2	Major accidents and disasters	The Scoping Report states that individual aspect chapters would assess the likely risks (where relevant), including: ▪ flood risk, within ES Chapter 12: Hydrology and Land Drainage and the Flood Risk Assessment (FRA); and ▪ Unexploded Ordnance (UXO), historic ground contamination, landfill gases and asbestos, within ES Chapter 9: Geology and Hydrogeology and ES Chapter 12: Hydrology and Land Drainage. The Inspectorate considers that the potential for the Proposed Development to be vulnerable to or cause major accidents at crossings of watercourses and transport infrastructure, and at buried gas pipelines, should also be assessed in the relevant aspect chapters. On the basis of the above, the Inspectorate is content that a standalone ES chapter covering major accidents and disasters is not required. The EIA Approach and Method ES chapter should provide clear cross-referencing to where the likely risks are considered.

ID	Ref	Description	Inspectorate's comments
3.1.2	Paras 5.7.1 to 5.7.4	National Grid Standards and a *"comprehensive risk management framework"*	There are references within this section of the Scoping Report to adherence to relevant National Grid Standards and a *"comprehensive risk management framework"* to minimise risk of accidents. The description of the Proposed Development in the ES should describe any standards/ measures which are relied upon to exclude likely significant effects and explain how they would be secured and implemented as part of the DCO.

3.2 Material assets (and waste)

(Scoping Report paragraphs 5.7.5 to 5.7.9)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.2.1	Paras 5.7.9 and 18.2.2	Material assets (and waste)	The Scoping Report states that information regarding materials and waste would be included within the ES project description chapter and that individual aspect chapters would assess impacts from waste (where relevant), including: ▪ transport effects from the management of waste arisings, within ES Chapter 16: Traffic and Transport. A draft Site Waste Management Plan (SWMP) is also proposed to be included within the DCO application. On this basis, the Inspectorate is content that a standalone ES chapter covering material assets (and waste) is not required. The EIA Approach and Methodology ES chapter should provide clear cross-referencing to where the relevant impacts are considered.

3.3 Climate

(Scoping Report paragraphs 5.7.10 to 5.7.13)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.3.1	Paras 5.7.11 to 5.7.13 and 18.2.2	Climate	The Scoping Report explains that OHLs are designed to withstand extreme weather conditions. It is proposed that vulnerability of the Proposed Development to climate change in terms of flood risk is considered in ES Chapter 12 (Hydrology and Land Drainage) and in the FRA. On this basis, the Inspectorate is content that no further assessment of the Proposed Development's vulnerability to climate change is required in the ES. The Scoping Report states that details of the likely construction materials and a *"simple estimate"* of the Green House Gas (GHG) emissions associated with construction of the Proposed Development would be included within the ES Project Description chapter, but there is no indication of how/ if the significance of effects would be determined. The ES should provide an assessment of GHG emissions during construction (and operation, where relevant) where significant effects are likely to occur. This should include embodied carbon emissions from materials required.

3.4 Agriculture and Soils

(Scoping Report Chapter 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Para 6.9.5	Maintenance or repair works required which would result in disturbance to soils – operation (inc. maintenance)	Given the nature of the operational phase of the Proposed Development and that maintenance of the project would be undertaken in accordance with best practice methods for soil handling, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out. The ES should however identify the best practice methods relied upon to reach this conclusion.
3.4.2	Para 6.9.6 and Table 6.5	Impact on soil ecosystem functions – operation (inc. maintenance)	The Scoping Report states that the majority of the land required for construction would be returned to its pre-construction land use (as agreed with the landowner) and that impacts on soil ecosystem functions are likely to be limited. The Inspectorate agrees that impacts on soil ecosystem functions during operation are unlikely to be significant and that this matter can be scoped out.
3.4.3	Para 6.9.9 and Table 6.5	Impacts to agricultural operations - operation (inc. maintenance)	The Inspectorate agrees this matter can be scoped out on the basis that the ES confirms the amount of agricultural land to be permanently lost and explains why this is considered 'limited' and not likely to lead to significant effects. Reinstatement of land, and the proposed soil management and handling measures, should be clearly described in the ES and secured through the dDCO.
3.4.4	Para 6.9.10 and Table 6.5	Economic effects on landowners and farmers - operation	The Applicant proposes to scope out the economic effects of the Proposed Development on individual landowners and farmers on the basis of compensation agreements that would be made outside of the EIA process. The Inspectorate agrees that significant effects are

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			unlikely and is therefore content that this matter can be scoped out of further assessment.
3.4.5	Para 6.9.11	Impacts from Electric and Magnetic Fields (EMF) on land use - operation	The Inspectorate notes that paragraph 2.10.8 of National Policy Statement (NPS) EN-5 states that, in relation to EMFs, "*there is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequence*". The Scoping Report states that the Proposed Development would be designed in accordance with Government guidance and precautionary policies (and a compliance report will be submitted with the application for development consent). The Inspectorate agrees that this matter can be scoped out on this basis.

3.5 Air Quality

(Scoping Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Paras 7.9.3 to 7.9.5 and Table 7.3	Construction dust	A number of standard measures to reduce construction dust are identified in the Initial Outline CoCP (Appendix B of the Scoping Report). The Scoping Report states that with these measures in place, significant effects resulting from construction dust are unlikely to occur. A Dust Risk Assessment, identifying any further standard measures, would be appended to the Outline CoCP (to be submitted with the DCO application). The Inspectorate considers that measures to reduce construction dust along the temporary haul route should be included within the Outline CoCP and/ or Dust Risk Assessment. On the basis of the above, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
3.5.2	Para 7.9.6 and Table 7.3	Construction generators	Limited information has been provided in the Scoping Report regarding the likely use of generators and other non-road mobile machinery. Specifically, no information has been provided as to the type, number, location or operational hours of such machinery and likely emissions other than brief references within the Initial Outline CoCP to plant being switched off when not in use and being located away from sensitive receptors *"where practicable".* On this basis the Inspectorate is unable to exclude a likely significant effect and does not agree that this matter can be scoped out of the ES.
3.5.3	Para 7.9.9 and Table 7.3	Vehicle emissions - construction (if relevant Institute of Air Quality	If the predicted numbers of construction traffic movements generated by the Proposed Development alone or cumulatively would demonstrably not exceed the relevant indicative criteria for air quality

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Management (IAQM) indicative criteria are not exceeded)	assessment set out in the IAQM guidance[1], as relevant to each of the affected roads used for construction traffic (once the route has been confirmed), the Inspectorate agrees that this matter can be scoped out of the ES. Where predicted construction traffic flows meet the criteria, the Scoping Report confirms that this matter will be scoped into the ES.
3.5.4	Para 7.9.10 and Table 7.3	Diverted traffic – construction	The Inspectorate agrees that vehicle emissions associated with diverted traffic can be scoped out of the ES, provided it can be demonstrated that the predicted volumes of diverted traffic would not exceed the relevant indicative criteria for air quality assessment set out in the IAQM guidance[1.]
3.5.5	Para 7.9.11 and Table 7.3	Vehicle emissions - operation (inc. maintenance)	Having regard to the nature and characteristics of the Proposed Development, the Inspectorate agrees that vehicle emissions to air during operation (including maintenance) are not likely to result in significant effects. Subject to the ES Project Description Chapter providing an explanation of the number, type and frequency of operational vehicle movements, this matter can be scoped out of the ES.

[1] Institute of Air Quality Management (IAQM) (2017) Land-Use Planning & Development Control: Planning for Air Quality

3.6 Ecology and Biodiversity

(Scoping Report Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Para 8.1.7 and Table 8.9	Great crested newt (GCN)	The Applicant intends to offset the effects of the Proposed Development on GCN by obtaining a licence through the Natural England (NE) District Level Licence (DLL) scheme. It has provided a letter of comfort setting out NE's agreement with this approach in principle (Appendix K) and does not consider GCN further in the Scoping Report. The Inspectorate agrees that detailed consideration of GCN can be scoped out of the ES. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN. NE will undertake an impact assessment and inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the Proposed Development's impact on GCN and the appropriate compensation required.
3.6.2	Para 8.9.6	Collision of nocturnal species with machinery - construction	The Scoping Report states that injury or mortality due to collision with machinery is not expected to affect nocturnal species since construction is assumed not (in the main) to be undertaken at night. However, the Inspectorate notes that there might be potential for some activity to occur throughout the night, eg trenchless crossings.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate considers that there is insufficient information about the location, nature and duration of night-time working to conclude that significant effects will not occur. Therefore, potential effects of collision of nocturnal species with construction machinery should be scoped into the assessment.
3.6.3	Para 8.9.13	Habitat loss – operation (inc. maintenance)	The Inspectorate agrees that effects from habitat loss during operation are unlikely to be significant and that this matter can be scoped out of the ES. As noted in Section 2.2 of this Opinion, the ES should however assess the significance of any permanent habitat loss from the construction phase that would continue into the operational phase.
3.6.4	Para 8.9.15	Disturbance of protected/ notable fauna from lighting - construction	In the absence of a defined location for the proposed new substation and CSECs compounds, and until there is certainty on the extent and presence of certain species, the Inspectorate does not agree that this matter can be scoped out.
3.6.5	Para 8.9.16 and Table 8.5	Disturbance of protected/ notable fauna from noise, vibration or visual stimuli – operation (inc. maintenance)	Table 8.5 states that there would be no changes to noise or vibration during operation. The Applicant has proposed to scope out noise impacts from operation of the substation in the Noise chapter (see Section 3.12 of this Opinion). The Inspectorate does not consider sufficient information has been given to scope out operational noise impacts. Operational noise and vibration effects on ecological receptors from the new substation, the substation extensions and the CSECs should be scoped into the assessment where significant effects are likely to occur. In respect of lighting, the Scoping Report identifies the potential for limited lighting "*at the new substation for occasional maintenance visits"* and at CSECs. Given the limited scale of these works, the Inspectorate agrees that it is unlikely that significant effects would

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			occur from operational lighting; however, there is insufficient information regarding the type, location and hours of lighting at this stage to confirm this conclusion. The Inspectorate also notes that Table 8.5 identifies the potential for operational lighting to impact nocturnal fauna and states that this would require further assessment. Therefore, where significant effects are likely to occur, these should be assessed in the ES. In the absence of a defined location for the proposed new substation and CSECs, and until there is certainty on the extent and presence of certain species, the Inspectorate does not agree operational disturbance impacts can be scoped out.
3.6.6	Para 8.9.18	Air quality changes (resulting in habitat loss/ modification): Dust - construction	The Inspectorate notes that dust during construction would be subject to a Dust Risk Assessment and controlled through the CoCP and considers that dust effects are unlikely to be significant; therefore this matter can be scoped out of the ES.
3.6.7	Para 8.9.20	Air quality changes (resulting in habitat loss/ modification): Vehicle emissions – operation (inc. maintenance)	Due to the low predicted number of vehicle movements in operation, the Inspectorate agrees that vehicle emissions during operation are unlikely to result in significant effects on biodiversity receptors; therefore this matter can be scoped out of the ES.
3.6.8	Para 8.9.22	Hydrological changes in surface water - construction	The Scoping Report acknowledges the potential for direct impacts on watercourses where open cut trenches are necessary to cross them. It considers that impacts on surface water changes can be controlled with existing good practice measures to be set out in the Outline CoCP to avoid significant effects. The Inspectorate is unclear which measures within the Initial Outline CoCP the Applicant is relying upon, and also notes that impacts on hydromorphology during the construction phase have been scoped in to the Hydrology and Land Drainage chapter (paragraph 12.9.7 of the Scoping Report). As such,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			the Inspectorate does not agree sufficient information has been provided at this stage to demonstrate that significant effects are not likely and considers this matter should be scoped in.
3.6.9	Para 8.9.23	Hydrological changes in surface water – operation (inc. maintenance)	The Inspectorate agrees that given the nature of the development, significant effects on biodiversity receptors during operation are unlikely and therefore agrees this matter can be scoped out of the ES.
3.6.10	Paras 8.9.26 to 8.9.27	Introduction and/ or spread of Invasive Non-Native Species (INNS) - construction and operation	Whilst the Inspectorate agrees that the effects of INNS are unlikely to be significant with the proposed control measures in place, this cannot be confirmed until an up-to-date baseline position is known. This matter should therefore be scoped into the ES where significant effects are considered likely to occur following confirmation of the baseline position.
3.6.11	Para 8.10.15	Biodiversity receptors of less than 'Local' importance	The Inspectorate agrees that impacts on biodiversity receptors of less than 'Local' importance can be scoped out of the ES.
3.6.12	Table 8.9	Norfolk Valley Fens Special Area of Conservation (SAC) – operation (inc. maintenance)	Table 8.9 (page 105) has duplicate entries for this site, with the first scoping in impacts and the second scoping them out. The Inspectorate assumes the first row entry is a typographical error and notes the commentary in the second row entry that suggests there are no perceivable operational impact pathways on the Norfolk Valley Fens SAC. Table 8.3 states that the site is located 0.18km south-east of the Scoping Report Corridor. Noting the qualifying features of the Norfolk Valley Fens SAC and the lack of perceivable impact pathways during operation, the Inspectorate is content this matter can be scoped out of the ES. This does not preclude any assessment required under the Conservation of Habitats and Species Regulations 2017.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.13	Table 8.9	Redgrave and South Lopham Fens Ramsar site and Waveney and Little Ouse Valley Fens SAC – construction and operation (inc. maintenance)	The Scoping Report states that these designated sites are located 1.84km and 1.87km west of the Scoping Report Corridor, respectively. Noting the qualifying features of these sites and the lack of perceivable impact pathways, the Inspectorate is content these matters can be scoped out of the ES. This does not preclude any assessment required under the Conservation of Habitats and Species Regulations 2017.
3.6.14	Table 8.9 and Appendix E	National and local (statutory) sites designated for biodiversity – operation (inc. maintenance)	The Inspectorate notes that some of the national and local sites identified in Appendix E are located within the Scoping Report Corridor. However, it is content that there are no perceivable impact pathways to the majority of these sites during operation and therefore agrees this matter can be scoped out of the ES subject to the exceptions below. The Inspectorate notes that Mucking Flats and Marshes Site of Special Scientific Interest (SSSI) and South Thames Estuary and Marshes SSSI are located 0.34km east and 1.98km south of the Scoping Report Corridor, respectively. Both sites have ornithological interest features. At this stage, insufficient information has been provided to confirm that likely significant effects from collision mortality with OHLs can be excluded. The Inspectorate considers that operational phase impacts on the national sites which underly European sites scoped in for operation (ie Stour and Orwell Estuaries Ramsar and SPA, and Thames Estuary and Marshes Ramsar and SPA) should be scoped in, in line with the internationally designated sites.
3.6.15	Table 8.9	Operational impacts (inc. maintenance) on: • Ancient woodland;	The Scoping Report states that there are no perceivable pathways to impact these biodiversity receptors during operation. Subject to previous comments about consideration of operational stage effects arising from activities during construction, the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• Habitats of Principal Importance in England (HPIE); • 'Important' hedgerows'; • Vascular and nonvascular plants, fungi and INNS; • Protected species (fish, invertebrates, reptiles; breeding birds; badgers; hazel dormouse; otter; water vole; white-clawed crayfish; and amphibians (excluding GCN).	Inspectorate is content that impacts during operation are unlikely to result in significant effects; therefore these matters can be scoped out of the ES.
3.6.16	Table 8.9	Groundwater Dependent Terrestrial Ecosystems (GWDTEs) – operation (inc. maintenance)	Table 8.9 states that there are no perceivable pathways to impact GWTDEs during operation. This conflicts with paragraph 8.9.24 of the Scoping Report which identifies the potential for direct or indirect effects on GWTDEs, including wetlands, fens and wet woodland. The Inspectorate does not agree this matter can be scoped out of the ES.
3.6.17	Table 8.9	Other notable mammals (brown hare (*Lepus europaeus*), hedgehog (*Erinaceus europaeus*), and harvest mouse (*Micromys minutus*)) – construction and operation (inc. maintenance)	The Scoping Report acknowledges the likely presence of these species within the Scoping Report Corridor and that negative impacts could occur. However, it anticipates impacts during construction and operation to be largely temporary and that habitats would be reinstated to equal or better condition, therefore impacts would not be significant. On the basis that potential negative impacts have been identified, the Inspectorate does not agree that this matter can be scoped out. Reinstatement of habitats is not sufficient justification to scope out the matter as this does not enable the decision maker to understand the potential impact on these species prior to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			reinstatement. Any likely significant effects on these species should be assessed within the ES (or example habitat loss, fragmentation and disturbance).
3.6.18	Appendix F	Invertebrate surveys	The Inspectorate is content that large populations, or presence of protected invertebrates and/ or notable invertebrate assemblages would be restricted to distinct areas/ habitats that would be identified during the preliminary assessment. As such, it agrees that invertebrate surveys are unlikely to be required, but is reassured that targeted surveys would be undertaken subject to agreement with consultees (if the potential for a significant negative effect on invertebrates is identified in particular locations).

ID	Ref	Description	Inspectorate's comments
3.6.19	Table 8.5	Zone of Influence (ZoI)	Table 8.5 provides a defined ZoI for habitat loss and air quality changes only. ZoIs should be defined and explained within the ES for all potential impact pathways (eg disturbance) and supported by figures where possible.
3.6.20	Paras 8.9.10 to 8.9.11 and Table 8.9	Habitat loss and fragmentation - construction	The Inspectorate notes the Applicant's intention to reinstate habitats as far as possible, however the ES should confirm if there are any habitats along the underground cable route that cannot be reinstated due to operational requirements. The Inspectorate further notes that paragraph 8.9.11 scopes in impacts from habitat fragmentation at the underground cable sections for 'relevant biodiversity receptors'. Table 8.9 states that negative impacts to foraging/ commuting bats from habitat removal are not expected to be significant, however also indicates that all impacts on

ID	Ref	Description	Inspectorate's comments
			bats are scoped in. For the avoidance of doubt, the Inspectorate considers this matter should be scoped in for bats.
3.6.21	Para 8.9.13	Habitat fragmentation or severance - operation	The Scoping Report has not stated whether habitat fragmentation or severance during operation would be assessed. The Inspectorate considers that any likely significant effects from the OHL sections should be assessed.
3.6.22	Table 8.6 and para 8.10.9	Survey areas and timings	The ES should confirm what the 'immediately adjacent habitat' comprises for the proposed preliminary assessment field survey and habitat survey. The ES should also explain how the 'targeted locations' for habitats and species surveys have been determined. Efforts should be made to agree these locations with relevant consultation bodies.
3.6.23	Figure 8.3	Legend	The Legend to Figure 8.3 includes *"No main habitat but additional habitats present".* The ES should explain what is meant by this statement.
3.6.24	n/a	Horizontal Directional Drilling (HDD) breakout	Any likely significant effects from HDD breakout on river habitat and downstream designated sites should be assessed.
3.6.25	n/a	Priority species	Table 8.7 notes that species or habitats listed in accordance with the requirements of Section 41 of the NERC Act 2006 would be ascribed 'medium' or 'low' value; it is not clear why they have been assigned two separate values. No priority species have been identified within the Scoping Report, nor is there a commitment to identify them. These should be identified within the ES and any likely significant effect on them assessed.
3.6.26	n/a	Nature Recovery Network project	The ES should assess any impacts from the Proposed Development on the Nature Recovery Network project which aims to create a habitat

ID	Ref	Description	Inspectorate's comments
			corridor along the Waveney and Little Ouse to the west of Diss (as identified by NE in its consultation response).
3.6.27	n/a	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.7 Geology and Hydrogeology

(Scoping Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Para 9.9.2 and Table 9.7	Geohazards and ground instability – construction and operation (inc. maintenance)	On the basis that geohazards and ground instability would be considered during the engineering design of the Proposed Development, the Inspectorate is in agreement that this matter can be scoped out of the ES.
3.7.2	Para 9.9.3 and Table 9.7	Geological SSSIs – construction and operation (inc. maintenance)	NE has confirmed that Newney Green Pit SSSI is a site of geological interest located within the route corridor. On this basis, the Inspectorate does not agree that this matter can be scoped out. Any likely significant effects on the Newney Green Pit SSSI should be assessed within the ES.
3.7.3	Para 9.9.8 and Table 9.7	Disturbance and mobilisation of existing contaminants – operation (inc. maintenance)	The Inspectorate considers that significant effects from the disturbance and mobilisation of existing contamination during the operational phase are unlikely and agrees that this matter can be scoped out.
3.7.4	Para 9.9.9 and Table 9.7	Discovery of unexpected contaminants – construction and operation (inc. maintenance)	The Scoping Report states that the risk from the discovery of unexpected contamination during construction would be mitigated by measures to be set out in the Outline CoCP; the Inspectorate notes that the Initial Outline CoCP proposes a protocol for dealing with unexpected contamination. Given the nature of the operational activities, the Inspectorate considers it unlikely that unexpected contaminants would be discovered.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate is in agreement that these matters can be scoped out of the ES.
3.7.5	Para 9.9.10 and Table 9.7	Introduction of new contamination – construction and operation (inc. maintenance)	The Inspectorate notes that the Outline CoCP would contain measures to reduce the risk of pollution, and for operation, standard control measures and best practice would be implemented resulting in a low risk of likely significant effects. However, the Environment Agency has highlighted recent problems with breakouts from HDD works under estuaries and inland alluvial soils. As the exact locations and designs for watercourse crossings are yet to be determined, the Inspectorate considers it premature to scope out this matter in respect of trenchless crossings. Any likely significant effects should be assessed within the ES.
3.7.6	Para 9.9.13 and Table 9.7	Dewatering – operation (inc. maintenance)	On the basis that dewatering would not be required during operation, the Inspectorate agrees that this matter can be scoped out of the assessment. Should this position change during further design work, the ES should assess any likely significant effects from dewatering.
3.7.7	Para 9.9.14 and Table 9.7	Discharge of water – construction and operation (inc. maintenance)	As noted above, the Scoping Report states at paragraph 9.9.13 that dewatering would not be required during operation. However, paragraph 9.9.14 refers to both construction and operation stages, stating that any discharges of pumped groundwater would be managed in accordance with relevant permits and agreements with the relevant authorities. The Inspectorate is in agreement that this matter can be scoped out of the ES on this basis.
3.7.8	Para 9.9.16 and Table 9.7	Connection of aquifer units – operation (inc. maintenance)	Assuming there would be no works that would have the potential to create new connections between aquifers during operation and maintenance, the Inspectorate is in agreement that this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.9	Paras 9.9.17 to 9.9.20	Groundwater flow - construction and operation (inc. maintenance)	The Inspectorate acknowledges that the overall dimensions of any foundations and cable ducts are small compared to the groundwater body as a whole. However, the Inspectorate does not consider that sufficient information has been presented in the Scoping Report to conclude that excavations or installation of new structures would not give rise to significant effects. The Inspectorate also notes there is an identified interrelationship between this matter and Chapter 11 (Historic Environment) as stated in paragraph 11.1.2 of the Scoping Report and specifically that paragraph 11.9.6 identifies potential impacts on archaeological remains as a result of changes in groundwater flow and quality. The Inspectorate is therefore not in a position to scope this matter out of the ES. Impacts to groundwater flow, including impacts on archaeological remains, should be assessed in the ES where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
3.7.10	Para 9.2.5	Guidance to be used	The Inspectorate considers that the ES and any accompanying ground investigation information should additionally be informed by BS5930: Code of practice for ground investigations.
3.7.11	Table 9.1 and Para 9.9.11	Site specific dewatering assessments - construction	In respect of dewatering, paragraph 9.9.11 of the Scoping Report proposes that significant effects are unlikely to occur where certain criteria are met. The Environment Agency scoping consultation response indicates that these are not recognised criteria. The Applicant should seek to agree criteria with the Environment Agency in order to determine where further assessment is required.
3.7.12	Figure 9.4 (with	Mineral resources	The information presented on Figure 9.4 is inconsistent with that detailed in paragraphs 9.6.18 to 9.6.21, as follows:

ID	Ref	Description	Inspectorate's comments
	reference to paras 9.6.18 to 9.6.21)		• Paragraph 9.6.18 states that the Scoping Report Corridor passes through multiple Mineral Safeguarded Areas for sand and gravel, which are not shown on Figure 9.4; and • Paragraph 9.6.19 states that there is no safeguarded mineral infrastructure or allocated sites, however page 1 of Figure 9.4 shows an entry for an adopted site at the northern extent of the Scoping Report Corridor. Figure 9.4 shows Mineral Consultation Areas and waste sites in Essex, however there is no equivalent data represented for Norfolk and Suffolk.
3.7.13	Paras 9.6.26 to 9.6.28	Source Protection Zones (SPZ1)	The Scoping Report Corridor crosses several areas designated as a SPZ1. Where it is not possible to avoid such areas, the ES should detail any protective and emergency measures that would be required to safeguard drinking water supplies and agree these with the relevant local water company, where possible.
3.7.14	Para 9.10.5	Assessment methodology	The Inspectorate notes that a Tier 0 assessment will be undertaken as a first stage screening and that "*where a very low or low risk rating is assessed, these areas will not be taken forward for further assessment in the ES on the basis they have a low likelihood of significant effects*". The Inspectorate considers that the standard Land Contamination Risk Management approach should be adopted unless otherwise agreed with relevant consultation bodies, such as the Environment Agency.
3.7.15	n/a	Water Framework Directive (WFD) Assessment	Paragraph 12.10.5 of the Scoping Report indicates that a WFD Assessment will be provided. For clarity, the WFD assessment (and therefore the ES) should include relevant receptors for both hydrology and hydrogeology, including groundwater bodies (as listed on the Environment Agency Catchment Data Explorer). The WFD status of groundwater bodies is also relevant to the assessment of

ID	Ref	Description	Inspectorate's comments
			Groundwater Dependent Terrestrial Ecosystems within the Ecology chapter.

3.8 Health and Wellbeing

(Scoping Report Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paras 10.1.5, 10.10.2 to 10.10.6 and Table 10.2	Health related environmental change - construction and operation	The Scoping Report notes that likely significant effects from contributory factors would be considered by other environmental chapters; namely air quality, noise and vibration, geology and hydrogeology, traffic and transport. A discrete Health and Wellbeing chapter is therefore not proposed within the ES, although a specific section on health and wellbeing is proposed within Chapter 17: Cumulative Effects, as part of the intra-project cumulative effects assessment. The Inspectorate considers that a separate ES chapter covering Health and Wellbeing is required to ensure that the overall impacts of the scheme are not overlooked. Consideration should be given to direct and indirect impacts to both physical and mental health of receptors, as well as the potential for particular effects on any vulnerable populations. However, the ES should avoid duplication of assessment and, where relevant, the Health and Wellbeing aspect chapter should cross refer to information contained in other aspect chapters. The Health and Wellbeing chapter should take into account recent guidance such as the Institute of Environmental Management and Assessment (IEMA) 2022 guidance 'Determining Significance For Human Health In Environmental Impact Assessment'.
3.8.2	Para 10.10.11 and Table 10.2	EMFs – construction	The Inspectorate agrees that an assessment of EMFs during construction can be scoped out on the basis that they are associated with power distribution.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.3	Para 10.10.12 and Table 10.2	EMFs – operation	On the basis that the Proposed Development would be designed in accordance with cited Government guidance and precautionary policies (and that a compliance report will be submitted with the application for development consent), the Inspectorate agrees that an assessment of effects from EMFs during operation can be scoped out of the ES. However, the Inspectorate considers that the ES should contain a summary of the compliance report.

ID	Ref	Description	Inspectorate's comments
3.8.4	n/a	Impacts on transport links to healthcare facilities - construction	The ES should assess impacts on transport routes to and between healthcare facilities, where significant effects are likely. This should consider access by the public users of such facilities, as well as by the healthcare providers themselves. Appropriate cross reference should be made to the Traffic and Transport chapter of the ES.

3.9 Historic Environment

(Scoping Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Para 11.9.8 and Table 11.8	Physical impacts on archaeological remains - operation (inc. maintenance)	The Scoping Report states that no physical impacts on archaeological remains are anticipated during operation of the Proposed Development. On the basis that maintenance or repairs on sub-surface features would be restricted to areas previously disturbed and mitigated during construction and that this commitment is secured through the dDCO (or other legal mechanism), the Inspectorate considers that significant effects are unlikely to occur. Physical impacts on archaeological remains during operation (including maintenance) can be scoped out of the ES.
3.9.2	Paras 11.9.10 and 11.9.11 and Table 11.8	Direct physical impacts and indirect physical impacts (from vibration or subsidence) on designated and non-designated historic buildings – construction and operation (inc. maintenance)	On the basis that the Proposed Development is routed to avoid direct physical impacts on historic buildings, the Inspectorate agrees that significant effects are unlikely to occur. Direct physical impacts on designated and non-designated historic buildings during construction and operation (including maintenance) can be scoped out of the ES. In terms of indirect physical impacts, the Scoping Report states that no adverse impacts through vibration or subsidence caused by changes to groundwater are anticipated. The detailed route alignment and locations of associated infrastructure are yet to be defined. As a consequence, the Inspectorate does not agree that indirect physical impacts through vibration or subsidence (during construction and operation including maintenance) can be scoped out of the ES at this time.
3.9.3	Para 11.9.16	Physical impacts on designated historic landscapes (including registered parks and gardens) and	The Inspectorate agrees that physical impacts on designated and non-designated historic landscapes during operation (including maintenance) are not likely to result in significant effects and can be

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		non-designated historic landscapes – operation (inc. maintenance)	scoped out of the ES. However, where there is permanent loss of vegetation or other features that contribute to the historic landscape character arising from maintenance activities for the Proposed Development, consideration of this matter should be scoped into the assessment where significant effects are likely to occur.
3.9.4	Paras 11.10.11 and 11.10.12	Areas from the walkover survey	The Inspectorate is content that a walkover survey is not required for the areas described within the five bullet points listed under *"Areas scoped out of survey".* The areas scoped in for walkover survey should include military remains, including former airfields and pillboxes. The ES should describe any limitations to the walkover survey relating to land access and explain how these have been addressed.
3.9.5	Para 11.10.17	Impacts of the setting of listed buildings and non-designated historic buildings located beyond the 250m study area and outside the Zone of Theoretical Visibility (ZTV)	The Scoping Report states that for listed buildings and non-designated historic buildings located beyond the 250m study area that are outside the ZTV, a lack of visibility of the Proposed Development would mean that no change to setting would occur. As set out in Section 3.11 below (Landscape and Visual), the Inspectorate considers that the study area and ZTV should represent the extent of the likely impacts from all phases of the Proposed Development, including construction, maintenance and decommissioning. The methodology for the ZTV should be agreed with the relevant local authorities. The Inspectorate agrees that any impacts on the setting of listed buildings and non-designated historic buildings located beyond the 250m study area and outside of the ZTV are not likely to result in significant effects. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate understands from paragraph 11.3.1 of the Scoping Report that listed buildings within the 2km and 3km study areas and ZTV will be considered in the assessment.
3.9.6	Paras 11.10.17 and 11.10.18	Impacts on the setting of listed buildings and non-designated historic buildings as set out in bullet points 2 to 7 in paragraph 11.10.17 of the Scoping Report	Paragraph 11.10.18 of the Scoping Report states that the assumptions listed would be *"…kept under review to establish whether there is a need to alter the scoping out thresholds and approach taken".* Based on this statement and the limited information and justification provided in terms of individual heritage assets, the Inspectorate is not in a position to scope these matters out of the ES at this stage without further consideration of the significance of heritage assets and the contributions made by their setting on a case-by-case basis.
3.9.7	Table 11.8	Impacts on inter-tidal and marine archaeology – construction and operation (inc. maintenance)	On the basis that the Proposed Development would not interact with intertidal or marine areas, the Inspectorate agrees that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.9.8	Para 11.1.2	Interrelationships	Paragraph 11.1.2 identifies interrelationships with other Scoping Report Chapters including Chapter 9 (Geology and Hydrogeology) and Chapter 12 (Hydrology and Land Drainage). However, neither Chapter 9 or 12 (paragraphs 9.1.2 and 12.1.2 respectively) identify interrelationships with Chapter 11 (Historic Environment). Clear cross-referencing and explanation should be provided between interrelated chapters in the ES. In addition to the chapters listed in paragraph 11.1.2, the Inspectorate considers that there would also be a relationship with

ID	Ref	Description	Inspectorate's comments
			the Traffic and Transport Chapter, for example in terms of impacts on protected lanes.
3.9.9	Sections 11.6 and 11.10	Non-designated heritage assets	The Applicant's attention is drawn to consultation responses from the local planning authorities (Appendix 2) including Chelmsford City Council and Essex County Council which highlight additional sources for obtaining data on non-designated heritage assets. The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.
3.9.10	Sections 11.9 and 11.10	Construction impacts	The temporary haul road/s should be included within the Geophysical Survey proposed in paragraph 11.10.22 of the Scoping Report. Impacts on designated and non-designated heritage assets from the temporary haul road/s should be assessed where significant effects are likely.
3.9.11	Para 11.9.6	Physical impacts on archaeological remains	Impacts on archaeological remains from the movement of contaminants or pollutants should be assessed where significant effects are likely.
3.9.12	Para 11.9.6	Physical impacts on archaeological remains	Impacts on archaeological remains from permanent changes to groundwater flows and levels as a result of the underground cabling should be assessed where significant effects are likely.
3.9.13	Section 11.10	Assessment methodology – historic landscapes	The ES should describe the methodology for assessment of impacts on historic landscapes (with reference to relevant guidance) as this has not been specifically and separately addressed in Section 11.10 of the Scoping Report.

ID	Ref	Description	Inspectorate's comments
3.9.14	Paras 11.10.7 and 11.10.29	Intrusive archaeological surveys	The Scoping Report states that intrusive fieldwork would be undertaken *"at the earliest available time".* Where necessary intrusive investigations and trial trenching should be completed prior to submission of the DCO application. The Applicant should make effort to discuss and agree the timing, scope and methodology for intrusive investigations and trial trenching with relevant consultation bodies.

3.10 Hydrology and Land Drainage

(Scoping Report Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Para 12.9.4 and Table 12.4	Water quality – operation	The Inspectorate agrees that pollution impact pathways to surface watercourses during operation would be limited as land would be reinstated following construction and there would be no operational discharges to surface watercourses, other than surface water drainage. On this basis, the Inspectorate agrees this matter can be scoped out subject to confirmation that there are no issues arising from aquifer connections created during construction that could have the potential to impact on surface water bodies during operation. Table 12.4 further justifies scoping out this matter on the basis that surface water drainage from operational infrastructure would be managed using suitable Sustainable Drainage Systems (SuDS). Details of the SuDS should be provided within the ES as there is no previous mention of them within the Scoping Report.
3.10.2	Para 12.9.5 and Table 12.4	Surface water interests (surface water abstractions and discharges) - construction	The Inspectorate notes that the Proposed Development may not require large scale consumptive water uses at any single location. However, given the size of the Proposed Development, the need for welfare facilities and potential water requirements for mixing of drilling fluids, it considers that insufficient information has been provided to demonstrate that significant effects would not occur. The Inspectorate also notes that an abstraction licence would be applied for, if required, for construction activities. As such, the Inspectorate does not agree that this matter can be scoped out at this stage.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.3	Para 12.9.6 and Table 12.4	Surface water interests (surface water abstractions and discharges) – operation	Given the nature of the Proposed Development, the Inspectorate is content that there would be no large scale consumptive water uses or discharges during the operational phase. The Inspectorate agrees this matter can be scoped out of the ES.
3.10.4	Para 12.9.8 and Table 12.4	Hydromorphology – operation (inc. maintenance)	On the basis that the design of any crossing points would be discussed with the Environment Agency and Lead Local Flood Authorities (LLFAs) and that watercourses would be reinstated following construction, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES. However, the ES should confirm the measures that would be in place to ensure the reinstated condition of any affected watercourses is either the same as or better than their pre-construction condition.
3.10.5	Para 12.9.12	Flood risk to and from other sources (sewers and reservoirs) – construction and operation.	The Inspectorate agrees that the Proposed Development would be of low vulnerability to flooding from sewers and reservoirs and that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.10.6	Para 12.9.3	Water quality - construction	An assessment of the potential for effects on ground water quality from disturbance and mobilisation of existing contamination has been scoped in (paragraph 9.9.6 of the Scoping Report). The Inspectorate considers the same potential impact on surface water should be assessed within the ES, where significant effects are likely.
3.10.7	Para 12.9.9	Flood risk – construction phase	The Scoping Report proposes to assess construction phase flood risk from rivers and the sea only. The ES should confirm the risk from all sources of flooding (fluvial/ tidal, pluvial, groundwater, sewer and

ID	Ref	Description	Inspectorate's comments
			reservoir flooding) and assess any source where significant effects are likely.
3.10.8	n/a	Agricultural drainage - construction	The ES should include an assessment of any likely significant effects on retained existing agricultural drainage or the removal of this as a result of the construction of the Proposed Development.
3.10.9	n/a	Tilbury Flood Storage Area	The ES should include an assessment of any likely significant effects on Tilbury Flood Storage Area, should the final route fall into the area, with reference to the Environment Agency's Thames Estuary 2100 Plan.
3.10.10	n/a	Agricultural boreholes	Any likely significant effects on boreholes used for agricultural irrigation systems should be assessed.

3.11 Landscape and Visual

(Scoping Report Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Paras 13.9.6, 13.9.11 and 13.9.19 and Table 13.4	Night-time effects on designated landscapes, landscape character and visual amenity - construction and operation (inc. maintenance)	The Scoping Report proposes that measures in the Initial Outline CoCP would avoid any significant effects from night-time lighting during construction. The Scoping Report states that operational (including maintenance) lighting would be located at the proposed substation and CSECs and would be designed to minimise intensity and light spill as far as practicable. Given the limited scale of these works, the Inspectorate agrees that it is unlikely that significant effects would occur from operational lighting; however, there is insufficient information regarding the type, location and hours of lighting at this stage to confirm this conclusion. In the absence of a defined location for the proposed new substation and CSECs, the Inspectorate does not agree that this matter can be scoped out. Therefore, night-time effects on designated landscapes, landscape character and visual amenity (during construction and operation (inc. maintenance) should be assessed in the ES where significant effects are likely.
3.11.2	Para 13.9.12 and Table 13.4	Effects on visual receptors located outside the ZTV - construction and operation (inc. maintenance)	The Scoping Report explains that the identification of visual receptors would be informed by ZTV mapping, ground truthed by field work. The Scoping Report states that visual receptors located wholly outside the ZTV are highly unlikely to have views of the Proposed Development. The Inspectorate considers that the study area and ZTV should represent the extent of the likely impacts from all phases of the Proposed Development (including construction, maintenance and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			decommissioning) and should encompass long views from within the Dedham Vale AONB. The Applicant should make effort to agree the methodology for the ZTV with relevant consultation bodies including local authorities. On this basis, Inspectorate agrees that any impacts on visual receptors located outside of the ZTV, once ground truthed by field work, are unlikely to result in significant effects. This matter can be scoped out of the ES.
3.11.3	Para 13.9.13 and Table 13.4	Effects on private views for individual properties – construction and operation (inc. maintenance)	The Scoping Report explains that the routing process has sought to avoid residential areas as far as practicable. Effects on the visual amenity of local residents would be considered as part of the assessment of visual effects on settlements and communities, from representative viewpoints at publicly accessible places. Appendix H of the Scoping Report sets out 41 indicative preliminary viewpoints, including representative viewpoints. The Inspectorate considers this is a relatively low number, given the nature and scale of the Proposed Development. There is also a lack of viewpoints to support the assessment of impacts on heritage assets. The number and location of viewpoints (representative, specific and illustrative), as well as the locations for wireframes and photomontages, should be agreed with relevant consultation bodies including local authorities, Historic England, NE and the AONB Partnership and be in line with relevant guidance, where possible. On this basis, the Inspectorate agree that effects on private views for individual properties can be scoped out of the ES.
3.11.4	Para 13.9.18 and Table 13.4	Visual effects on rail travellers - construction and operation (inc. maintenance)	Taking account of the nature and characteristics of the Proposed Development, the Inspectorate agrees that any visual impacts on rail travellers (during construction and operation including maintenance)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			are not likely to result in significant effects and that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.11.5	Para 13.8.6	Mitigation	The ES should demonstrate that the choice of mitigation measures for the purposes of reducing landscape and visual impacts is appropriate to the prevailing landscape character. For example, tree belt screening planting may not be appropriate in open landscapes.
3.11.6	Appendix I	LVIA methodology	Sequential effects are mentioned in a broad context in Appendix I of the Scoping Report (LVIA Methodology), but there is no specific reference to any assessment methodology for this matter. Given the scale and repetitive nature of the Proposed Development, combined with varying visibility of pylons, this is likely to be an important matter for users of Public Rights of Way (PRoW) networks and should be addressed in the ES.
3.11.7	Appendix J	Arboricultural Impact Assessment (to be appended to the ES LVIA Chapter)	The Inspectorate acknowledges that some flexibility may be required for micro-siting of pylons but would expect the ES to provide clarity on the maximum extent of tree loss and demonstration that the design of the Proposed Development has sought to avoid or minimise loss of high grade trees.
3.11.8	Appendix J	Arboricultural Impact Assessment	The ES should identify any limitations to the assessment approach and explain how these have been addressed. For example, the use of LIDAR data for initial gathering of information may not detect the presence of low hedges or tree or hedge features that have recently been managed through coppicing or hedge laying at the time that the LIDAR data was captured.

3.12 Noise and Vibration

(Scoping Report Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Para 14.9.7	Vibration effects on structures - construction	Vibration effects on structures from construction activities are proposed to be scoped out of the ES on the basis that all such activities would be located sufficient distance away from structures to avoid significant impacts (ie >10m). Given that vibration effects are influenced by a range of factors including ground conditions and the precise nature of the works, the Inspectorate does not consider that it is appropriate to apply an arbitrary distance threshold to consideration of vibration. The ES should assess the potential for peak particle velocity from construction works to exceed thresholds set out in relevant British Standards e.g. BS7385-2:1993 Evaluation and measurement for vibration in buildings. The assessment should give particular consideration to effects on heritage assets.
3.12.2	Para 14.9.10	Vibration effects on the public highway from traffic - construction	The Scoping Report states that vibration is only generated when there are irregularities in the road surface. The Inspectorate considers it reasonable to assume that public highways road surface would be maintained and therefore significant effects are unlikely to occur. The Inspectorate agrees this matter can be scoped out.
3.12.3	Para 14.9.11	Noise effects from substations – operation	The Scoping Report proposes to scope out operational noise impacts from the proposed new substation and extensions to the existing substations on the basis that they will include noise mitigation by design. Paragraph 14.8.5 of the Scoping Report identifies these as possibly including "…*plant selection, siting, screening and enclosures, as appropriate".* Paragraph 14.9.11 also states that these works would be subject to separate local planning applications, however these works are started

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			to form part of the Proposed Development at paragraphs 1.1.7, 4.1.2, 4.4.9, 4.4.13 and 4.4.14. In the absence of information on the specific design measures, and as the location of the proposed new substation is yet to be determined, the Inspectorate does not consider sufficient information has been presented to provide confidence that significant effects would not occur. An assessment of operational noise consistent with the requirements of BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound should be provided.
3.12.4	Para 14.9.12	Noise effects from OHLs – operation	The Scoping Report states that the Proposed Development would use 'triple araucaria' conductors. The Inspectorate agrees that operational noise generated from OHLs and pylons is unlikely to give rise to significant effects and is therefore content to scope this matter out on the basis that this conductor type is used. The Inspectorate welcomes that the Applicant would consider an assessment within the ES should alternative designs be employed.
3.12.5	Para 14.9.13	Noise effects from fittings (eg insulators, dampers, spacer and clamps) – operation	The Inspectorate is content that pylon fittings designed to National Grid Technical Specifications are unlikely to result in significant noise effects and therefore this matter can be scoped out of the ES.
3.12.6	Para 14.9.15	Noise effects from CSECs – operation	The Scoping Report proposes to scope out the effects of operational noise generated from CSECs on the basis that the source of the noise is the same as that of OHLs. The Inspectorate agrees that operational noise generated from CSECs is unlikely to give rise to significant effects and is therefore content to scope this matter out.
3.12.7	Para 14.9.16	Noise effects from underground cables – operation	The Inspectorate agrees that operation of the underground cables are unlikely to generate noise on a scale that would result in significant effects. This matter can therefore be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.8	Para 14.9.17	Vibration – operation	The effects of operational vibration are proposed to be scoped out of the ES on the basis that all plant with moving parts capable of generating vibration is to be mounted on anti-vibration mounts. The Inspectorate does not consider sufficient information has been presented at this stage to provide confidence that significant effects would not occur. The ES should provide sufficient information regarding the design specifications to demonstrate that significant vibration effects will not arise.
3.12.9	Para 14.9.18	Maintenance activities	The Inspectorate agrees that noise and vibration from short term maintenance activities can be scoped out of the ES. However, the ES should consider the potential that more substantial activity is required as part of maintenance, eg replacement of components of the Proposed Development, which would be more akin to the impacts described during the construction stage. The ES should include an assessment of any likely significant effects.
3.12.10	Para 14.10.8	Baseline noise surveys	The Scoping Report states that baseline surveys would only be undertaken where there is a justifiable reason for a particular Noise Sensitive Receptor (NSR). The Inspectorate is content with this approach but considers that baseline noise surveys should be carried out at proposed substation locations consistent with the requirements of BS 7445-1:2003 Description and measurement of environmental noise: Guide to quantities and procedures. The Applicant should seek to agree the need for, and locations of, any such NSRs for which baseline surveys are considered necessary with relevant local authorities.
3.12.11	Table 14.3	Lowest Observed Adverse Effect Level (LOAEL) for night-time effects	The Inspectorate assumes that the night-time LOAEL level identified in Table 14.3 of 50dB LAeqT is a typographic area, since the Significant Observed Adverse Effect Level (SOAEL) threshold is set at

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			45dB LAeqT. The LOAEL value should be set with reference to the SOAEL value and informed by reference values for daytime resting.

3.13 Socio-Economic, Recreation and Tourism

(Scoping Report Chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Para 15.8.3 and Table 15.9	Financial effects on individual businesses - construction	The Inspectorate agrees this matter can be scoped out on the basis that this may be the subject of landowner negotiations and may result in compensation payments to offset effects. The Inspectorate also notes that construction phase impacts on farm businesses would be assessed within the agriculture and soils assessment.
3.13.2	Para 15.8.3 and Table 15.9	Effects on property values – construction and operation	The Inspectorate notes that construction activities would be transitory and therefore does not consider that significant effects are likely; effects on property values during construction can be scoped out of the ES. With regards to operation, the Scoping Report does not provide a detailed route or confirm the likely receptors and consequences of the impact. The Inspectorate does not consider there is sufficient information to rule out the potential for significant effects. An assessment of likely significant effects should be provided.
3.13.3	Para 15.8.4 and Table 15.9	Employment and economy – operation (inc. maintenance)	The Inspectorate agrees that this matter can be scoped out of the ES on the basis that the Proposed Development would not generate a significant number of additional jobs, and that significant indirect employment ie to supply chains is unlikely.
3.13.4	Para 15.8.5 and Table 15.9	Effects on business's ability to function – operation (inc. maintenance)	In the absence of a detailed route and confirmation of likely receptors, the Inspectorate does not consider there is sufficient information to rule out the potential for significant effects at this stage. An assessment of likely significant effects should be provided.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate's comments in respect of land in agricultural use are provided in Section 3.4 of this Scoping Opinion.
3.13.5	Paras 15.8.9 to 15.8.10 and Table 15.9	Community facilities – operation (inc. maintenance)	In the absence of a detailed route and confirmation of likely receptors, the Inspectorate does not consider there is sufficient information to rule out the potential for significant effects at this stage. An assessment of likely significant effects should be provided.
3.13.6	Para 15.8.14 and Table 15.9	Tourism accommodation – operation (inc. maintenance)	The Inspectorate considers that significant effects on tourism accommodation from routine inspection and maintenance workers are unlikely. This matter can therefore be scoped out of the ES. However, the Inspectorate considers there may be potential for tourism accommodation to be affected by the presence of OHL infrastructure where it is in very close proximity to receptors. In the absence of a detailed route and confirmation of likely receptors, the Inspectorate does not consider there is sufficient information to rule out the potential for significant effects at this stage - an assessment of likely significant effects should be provided.

ID	Ref	Description	Inspectorate's comments
3.13.7	Section 15.3	Study area	The study area should not be limited to solely the local authority spatial areas through which the Order Limits would pass; it should take into account the workforce profile and supply chain area (see ID 2.1.13 of this Opinion for the Inspectorate's comments in this regard) and be informed by the ZoI of other aspect assessments (eg landscape and visual, traffic and transport). The Applicant should seek to agree the study area with the relevant local authorities.

ID	Ref	Description	Inspectorate's comments
3.13.8	Section 15.8	Economy and employment	Consideration should be given to the availability and origin of the workforce in the context of the numerous projects proposed in the region. Any assumptions around workforce origins within the socio-economic assessment should be used to inform the study area and also be reflected in the assessment of transport impacts.
3.13.9	Para 15.8.6	Planning and development	Areas with planning permission and site allocations should be mapped on figures within the ES to aid understanding of the effects of the Proposed Development on planning and development. Any likely significant effects on the delivery of housing should be assessed within the ES.
3.13.10	Paras 15.9.4 to 15.9.5	Assessing significance	The Inspectorate is content that a qualitative approach can be applied. However, the Inspectorate expects some qualification of terms (eg 'small in scale' and 'large number of people'). The assessment methodology should be clearly described within the ES.
3.13.11	Table 15.9	Potential disruption to future and existing businesses – construction	Table 15.9 states that "*Businesses reasonably likely to be affected by a Project of this type would be scoped into the ES"*. The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities.
3.13.12	Table 15.9	Tourism and recreation – operation (inc. maintenance)	The Inspectorate is content that a proportionate approach be undertaken whereby the assessment focuses on areas where there is potential for significant effects, rather than assessing all PRoW and tourism and recreation assets within the study area. However, at present there is insufficient information provided as to where this focus would be. The ES should explain the criteria used to determine where to focus the assessment. The selection of PRoW for further

ID	Ref	Description	Inspectorate's comments
			assessment should be agreed with relevant local authorities where possible.
3.13.13	n/a	Airfields	Any likely significant effects on users of airfields should be assessed within the ES.

3.14 Traffic and Transport

(Scoping Report Chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Para 16.9.6 to 16.9.7	Traffic and transport effects – operation (inc. maintenance)	The Inspectorate agrees that the number of vehicle trips generated by the operation and maintenance of the Proposed Development are unlikely to result in significant effects, it is therefore considered acceptable to scope this matter out. The ES description of the development should clearly set out the likely number and type of operation and maintenance vehicles.

ID	Ref	Description	Inspectorate's comments
3.14.2	Para 5.7.9	Impacts from management of waste	Paragraph 5.7.9 of the Scoping Report states that transport effects from the management of waste would be considered within ES Chapter 16: Traffic and Transport, although this is not mentioned in Scoping Report Chapter 16. For the avoidance of doubt, this matter should be addressed within ES Chapter 16: Traffic and Transport.
3.14.3	Para 16.3.1	Thresholds used to determine construction phase study area	The Scoping Report adopts construction stage traffic assessment thresholds consistent with the Guidelines for Environmental Assessment of Road Traffic 1993. The Applicant should seek to agree the relevant 'sensitive areas' that inform the 10% increase criteria with the relevant local highways authorities.
3.14.4	Para 16.7.2	Additional traffic flow data	The Applicant should seek to agree the locations where additional traffic flow data is required using Automatic Traffic Counts and Manual Classified Counts with relevant local highways authorities.

ID	Ref	Description	Inspectorate's comments
3.14.5	Para 16.7.13	Abnormal Indivisible Loads (AIL) - construction	Where AILs are required during the construction of the Proposed Development, their associated effects should be assessed in the ES. The assessment should consider impacts on bridges, culverts and Strategic Road Network (SRN) junctions, as well as potential cumulative effects on the road network with other committed developments.
3.14.6	Para 16.10.5	Construction traffic assessment of potential effects - engineering estimates	Rationale should be provided for any estimates made within the assessment of potential effects in respect of the quantity of plant, equipment, materials to be brought on to site and excavated material be removed from site.
3.14.7	n/a	Access to Norwich Main substation	Norfolk County Council has highlighted that the Sheringham Shoal Extension Project and Dudgeon Extension Project seeks to utilise the same access arrangements to Norwich Main substation. The ES should explain how these projects will overlap and identify any necessary measures to mitigate potential effects. Any likely significant cumulative effects should be assessed.

3.15 Cumulative Effects

(Scoping Report Chapter 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Para 17.2.3	Intra-project cumulative effects - receptors with negligible effects	The Inspectorate agrees that where a negligible effect on a receptor has been concluded as a result of the Proposed Development alone, the receptor can be scoped out of the intra-project cumulative effects assessment.
3.15.2	Para 17.3.8	Inter-project cumulative effects - minor planning applications	The Inspectorate considers that small scale developments are unlikely to give rise to significant cumulative environment effects over and above the Proposed Development in isolation and agrees that this matter can be scoped out of further consideration.

ID	Ref	Description	Inspectorate's comments
3.15.3	Paras 17.3.3 and 17.3.5 and Table 17.1	ZoI	The Scoping Report states that "*The study area within which to search for other developments that have the potential to have cumulative effects with the Project is based on the ZOI for environmental effects.*" ZoIs have not been presented for each environmental aspect. In particular, transport and traffic is not identified in Table 17.1, however the Inspectorate considers construction traffic to be a potential source of cumulative effects. For the avoidance of doubt, the Inspectorate considers cumulative effects should be assessed for all aspects and that ZoIs should be clearly identified. A 5km ZoI should be applied to consideration of cumulative LVIA effects to AONBs, unless cables are to be undergrounded, particular

ID	Ref	Description	Inspectorate's comments
			consideration should be given to cumulative effects with Bramford to Twinstead OHL.
3.15.4	n/a	Projects for inclusion	The Inspectorate appreciates that the projects for inclusion within the assessment are yet to be determined. Numerous consultation bodies have highlighted that the Proposed Development is one of a number of major projects proposed or recently consented in the region. Projects noted by consultation bodies include, but are not limited to: • A12 Chelmsford to A120 Widening Scheme; • Anglian Water Strategic Pipeline from Bexwell to Bury St. Edmunds; • Bramford to Twinstead OHL project; • Chelmsford Garden Community; • Dunton Hills Garden Village; • East Anglia One North Offshore Wind Farm; • East Anglia Two Offshore Wind Farm; • East Anglia Three Offshore Wind Farm; • EuroLink Project; • Five Estuaries Offshore Wind Farm; • Longfield Solar Farm; • Lower Thames Crossing; • National Grid Bramford to Twinstead; • National Grid Tilbury – Gravesend tunnel upgrade; • Nautilus project; • North Falls Offshore Wind Farm;

ID	Ref	Description	Inspectorate's comments
			• North Thames Estuary & Marshes potential designation of an enlarged SSSI in the Tilbury area; • SeaLink project; • Sizewell C; • Sunnica solar farm; • Thames Freeport; • Thurrock Flexible Generation Plant; and • Tilbury 2 project. The Inspectorate expects the ES to consider these projects. In particular the effect of multiple developments impacting on PRoW and the quality of user experience through multiple permanent closures and or diversions should be addressed.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[2]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Integrated Care Board	NHS Mid and South Essex Integrated Care Board
	NHS Norfolk and Waveney Integrated Care Board
	NHS Suffolk and North East Essex Integrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Essex County Fire and Rescue Service
	Norfolk Fire and Rescue Service
	Suffolk Fire and Rescue Service
The relevant police and crime commissioner	Norfolk Police and Crime Commissioner
	Essex Police, Fire and Crime Commissioner
	Suffolk Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Ringshall Parish Council
	Battisford Parish Council
	Stowmarket Town Council
	Barking Parish Council

[2] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Badley Parish Council
	Stowupland Parish Council
	Mendlesham Parish Council
	Cotton Parish Council
	Finningham Parish Council
	Gislingham Parish Council
	Great Bricett Parish Council
	Offton and Willisham Parish Council
	Somersham Parish Council
	Bramford Parish Council
	Needham Market Town Council
	Creeting St. Peter Parish Council
	Creeting St. Mary Parish Council
	Earl Stoneham Parish Council
	Old Newton with Dagworth and Gipping Parish Council
	Wickham Skeith Parish Council
	Thornham Magna Parish Council
	Wortham and Burgate Parish Council
	Mellis Parish Council
	Flowton Parish Council
	West Horndon Parish Council
	Herongate & Ingrave Parish Council
	Mountnessing Parish Council
	Ingatestone & Fryerning Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Great Bromley Parish Council
	Ardleigh Parish Council
	Lawford Parish Council
	Little Bromley Parish Council
	Great Waltham Parish Council
	Little Waltham Parish Council
	Great & Little Leighs Parish Council
	Margaretting Parish Council
	Roxwell Parish Council
	Writtle Parish Council
	Chignal Parish Council
	Broomfield Parish Council
	Great Tey Parish Council
	Wormingford Parish Council
	Little Horkesley Parish Council
	Great Horkesley Parish Council
	Boxted Parish Council
	Langham Parish Council
	Dedham Parish Council
	Marks Tey Parish Council
	Aldham Parish Council
	Eight Ash Green Parish Council
	Fordham Parish Council
	West Bergholt Parish Council
	Kelvedon Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Coggeshall Parish Council
	Terling & Fairstead Parish Council
	White Notley & Faulkbourne Parish Council
	Cressing Parish Council
	Witham Town Council
	Rivenhall Parish Council
	Feering Parish Council
	Silver End Parish Council
	Little Burstead Parish Council
	Bressingham & Fersfield Parish Council
	Winfarthing Parish Council
	Heywood Parish Council
	Forncett Parish Council
	Ashwellthorpe & Fundenhall Parish Council
	Aslacton Parish Council
	Tharston and Hapton Parish Council
	Roydon Parish Council
	Shelfanger Parish Council
	Carleton Rode Parish Council
	Tibenham Parish Council
	Bunwell Parish Council
	Tacolneston Parish Council
	Flordon Parish Council
	Wreningham Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Bracon Ash and Hethel Parish Council
	Newton Flotman Parish Council
	Swardeston Parish Council
	Stoke Holy Cross Parish Council
	Mulbarton Parish Council
	Swainsthorpe Parish Council
	Stoke by Nayland Parish Council
	East Bergholt Parish Council
	Capel St Mary Parish Council
	Hintlesham and Chattisham Parish Council
	Copdock and Washbrook Parish Council
	Sproughton Parish Council
	Stratford St Mary Parish Council
	Higham Parish Council
	Holton St Mary Parish Council
	Raydon Parish Council
	Elmsett Parish Council
	Burstall Parish Council
The Environment Agency	The Environment Agency
The Marine Management Organisation	Marine Management Organisation (MMO)
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Thurrock Council
	Suffolk County Council
	Norfolk County Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Essex County Council
The relevant strategic highways company	National Highways
Transport for London	Transport for London
The relevant internal drainage board	East Suffolk Internal Drainage Board
	Norfolk Rivers Internal Drainage Board
	Waveney Lower Yare and Lothingland Internal Drainage Board
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
Relevant statutory undertakers	See Table A2 below
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	The Forestry Commission
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[3]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Mid and South Essex Integrated Care Board
	NHS Norfolk and Waveney Integrated Care Board
	NHS Suffolk and North East Essex Integrated Care Board
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Essex Partnership University NHS Foundation Trust

[3] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Affinity Water
	Anglian Water
	Essex and Suffolk Water
	Northumbrian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Grid Gas Plc
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Eastern Power Networks Plc
	London Power Networks Plc
	UK Power Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operator Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))[4]

LOCAL AUTHORITY[5]
Gravesham Borough Council
Norwich City Council
Ipswich Borough Council
South Cambridgeshire District Council
Brentwood Borough Council
Rochford District Council
Epping Forest District Council
Tendring District Council
Uttlesford District Council
Chelmsford City Council
Colchester Borough Council
Maldon District Council
Braintree District Council
Basildon Borough Council
Castle Point Borough Council
Dartford Borough Council
Great Yarmouth Borough Council

[4] Sections 43 and 42(B) of the PA2008

[5] As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY[5]
South Norfolk District Council
Breckland District Council
East Suffolk Council
Babergh District Council
West Suffolk Council
Mid Suffolk District Council
Broadland District Council
Broads Authority
Thurrock Council
London Borough of Havering
London Borough of Bexley
Medway Council
Essex County Council
Kent County Council
Southend-on-Sea Borough Council
Enfield Council
Waltham Forest Council
London Borough of Redbridge
Cambridgeshire County Council
Lincolnshire County Council
Suffolk County Council
Norfolk County Council
Hertfordshire County Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Great Wenham (Magna) Parish Meeting
Little Wenham (Parva) Parish Meeting

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Affinity Water
Aldham Parish Council*
Anglian Water
Ardleigh Parish Council*
Babergh and Mid Suffolk District Council
Barking Parish Council
Battisford Parish Council
Braintree District Council
Brentwood Borough Council
Broomfield Parish Council
Burstall Parish Council
Capel St Mary Parish Council
Chelmsford City Council
Chignal Parish Council
Colchester City Council
Dedham Parish Council
East of England Ambulance Service NHS Trust
East Suffolk Council
Eight Ash Green Parish Council
Environment Agency
Essex County Council
Essex County Fire and Rescue Service
Feering Parish Council

Finningham Parish Council
Forestry Commission
Forncett Parish Council
Gislingham Parish Council
Great Horkesley Parish Council
Great Tey Parish Council
Great Waltham Parish Council
Great Wenham (Magna) Parish Meeting
Health and Safety Executive
Heywood Parish Council
Historic England
Ingatestone & Fryerning Parish Council
Ipswich Borough Council
Langham Parish Council
Little Bromley Parish Council
Little Horkesley Parish Council
Little Waltham Parish Council
Little Wenham (Parva) Parish Meeting
Marine Management Organisation
Marks Tey Parish Council
Medway Council
Mendlesham Parish Council
Mellis Parish Council
Mid and South Essex Integrated Care Board
Ministry of Defence
NATS En-Route Safeguarding

Natural England
National Grid Gas Plc
Norfolk County Council
Northern Gas Networks
Offton & Willisham Parish Council*
Raydon Parish Council
Roxwell Parish Council
Royal Mail
Roydon Parish Council
South Norfolk Council
Stoke by Nayland Parish Council
Stratford St Mary Parish Council
Suffolk and North East Essex Integrated Care Board
Suffolk County Council
Swainsthorpe Parish Council
Tacolneston Parish Council
Tendring District Council
Terling and Fairstead Parish Council
Thurrock Council
Transport for London
UK Health Security Agency
Water Management Alliance (on behalf of Norfolk Rivers IDB, Waveney Lower Yare and Lothingland IDB and East Suffolk IDB)
West Bergholt Parish Council
West Horndon Parish Council
White Notley and Faulkbourne Parish Council

Winfarthing Parish Council
Wortham and Burgate Parish Council

A number of the consultation bodies (as denoted by a * in the list above) appended the same document from the 'Essex Suffolk Norfolk Pylons' group to their consultation response. This document has been included once, at the end of Appendix 2, to avoid duplication.

Affinity Water
Taking care of your water

Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol,
BS1 6PN

Reference Number: EN020027

01 December 2022

Dear Madam/Sir

DESCRIPTION: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for notification of the above scoping request. Applications are referred to us where our input on issues relating to water quality or quantity may be required.

You should be aware that parts of the proposal may be located close to our pumping stations or/and within Environment Agency defined groundwater Source Protection Zones (SPZ) 1 and 2, corresponding to our Pumping Stations. These are for public water supply, comprising a number of abstraction boreholes, operated by Affinity Water Ltd.

We ask that where the proposal occurs within these zones, that these are included as part of your assessment. This should also include where the proposal occurs on sensitive areas, such as histrocial landfill and other contaminated sites within these zones. Situations such as this may require intrusive investigations for our review to ensure the protection of public water supply.

Issues airising from construction works can cause critical abstractions to switch off resulting in the immediate need for water to be sourced from another location, which incurs significant costs and risks of loss of supply during periods of high demand.

If we can be provided with a shapefile of the proposed route, we would be able to provide a more detailed response.

Affinity Water
Taking care of your water

Infrastructure connections and diversions
There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (https://affinitywater.custhelp.com/) or aw_developerservices@custhelp.com.

Thank you for your consideration.

Yours sincerely

Laurence Chalk
Catchment Officer
Catchment Management
[redacted]

Aldham Parish Council

Aldham

Colchester Essex

2 December 2022

[redacted]

Dear Planning Inspectorate

Response to the EIA Scoping Report for East Anglia Green Pylon proposals

Aldham Parish Council are responding to the recent publication of the National Grid EIA Scoping Report as these proposals on East Anglia GREEN have a very direct impact on our community.

Aldham Parish council were not directly invited to respond but given the potential impact on our parish we would be grateful if you considered our views. We have viewed the published documents here but we have been unable to find the context in which they were being shared or whether there were any specific questions you were looking to find answers to.

Aldham village background

Aldham is a village and civil parish situated in Essex approximately 4.5 miles to the west of Colchester with the A12 running to the south approximately 1.5 miles away. The village lies between the River Colne and Roman river valleys. There are two main village areas the conservation area of Fordstreet and the village centre around the Church. There are many other scattered properties (mainly linked to old farmsteads) typical of ancient countryside. The majority of the land is gently rolling arable farmland with a number of semi ancient woodlands scattered across the parish. The village is some 1847 acres in size.

The village is also recorded in the Domesday Book of 1086 but has an earlier history as there have been Iron Age finds in the area and pottery which may indicate a Roman settlement. Today the village no longer has a shop school or pub.

In the current Colchester Local Plan Spatial Hierarchy the lack of facilities left Aldham outside the Sustainable Settlement category in the Other villages grouping. Other Villages are defined by “tightly drawn settlement boundaries which reflect the core community focus of each village and protect the intrinsic character and beauty of the countryside”. This sums us up fairly.

From the 2011 census the village has a population of 490 residents and 210 properties. Please see annex 1 for more details. Our population tends to be stable

not migratory so those who live here have a deep connection to their local environment.

EIA Scoping document

Aldham falls within Colchester Borough (now City) Council local authority as described on page 45. This covers a 21.7 km length of overhead pylons. Aldham is facing around 3km of pylons and as the section corridor is currently drawn it will have to pass though our village. The description correctly identifies the topography and mix of ancient woodlands scattered communities and the adjacent habitats and SSSIs in the village (but not currently under the purple swath scoping corridor). We are pleased to see the scoping report extends the study area beyond the scoping report corridor

Aldham Parish Council wish to note that the impacts of the project will not be limited to the purple swath scoping corridor area so the impacts on the bordering environment and historical features should be in scope.

We have considered the following section 6 to 17 s of the report and have provided comments against each section that we have initial views on. We have based our comments on the summary table "Proposed scope of ES" in each section

Section 6 Agricultural Soils	National Grid proposals	Aldham Parish council view
Table 6.5	Scoped out The majority of land required for construction would be returned to its pre-construction land use during operation therefore, impacts on agricultural landholdings across the Project are likely to be limited and not significant.	Future cropping is likely to be very different to current agricultural practices. New crops are emerging and the role of tree planting will increase. Future operations will impact on land use and should be **scoped in**
	The majority of land required for construction would be returned to its pre-construction land use and so impacts on soil ecosystem functions are likely to be limited and not significant.	The construction of the haul road is likely to have lasting effects this should be **scoped in**, particularly if novel soil stabilisation is to be used
	The economic effects on landowners would be addressed through agreements which lie outside the scope of the ES.	Outside scope of the EIA but current rates are woefully dated and narrow in scope

Section 7 Air quality	National Grid proposals	Aldham Parish council view
	No likely significant effects are expected following the implementation of standard measures set out in the outline CoCP	We question whether a haul road of the scale anticipated could be built without an impact on air quality so this should be **scoped in**
		Pleased to see construction traffic **scoped in**

Section 8 Ecology and Biodiversity	National Grid proposals	Aldham Parish council
	There are no perceivable pathways to impact 'Important' hedgerows during operation.	How we manage hedgerows is changing future operation impacts should be **scoped in**
	There are no perceivable pathways to impact breeding birds during operation.	This should be **scoped in** as impacts are unknown

Section 10 Health and Welbeing	National Grid proposals	Aldham Parish council
		General comment. Outside EIA maybe but the health benefits from the environment are well documented so should be covered as environmental impacts will unquestionably impact health and wellbeing

Section 11 Historic Environment	National Grid proposals	Aldham Parish council
This is a hugely significant aspect for Aldham; of the 225 listed buildings along the entire length of the scoping corridor Aldham has 19 or some 8 % of the buildings NG have identified in the Scoping Report . The 3km of corridor in our village (out of 180 total) is only 1.66% of the route length. In addition there are a further 20 listed buildings in the village just outside the scoping corridor. This includes a number of grade 1 properties and the conservation area of Fordstreet. We are clearly very disproportionately affected Annex 2 has the extract of listed properties in our parish		
	There are no anticipated likely impacts to the physical fabric of	**Scope in**. The concentration of listed building in Aldham is

	built heritage assets. The Project does not currently propose to remove or modify any built heritage assets and effects from vibration are highly unlikely to result from the Project for built heritage during construction and operation. This would be kept under review as the Project evolves.	significantly higher that the project average. It will not be possible to construct a project of this size without impacting the listed buildings give the density that have to be circumnavigated. The scoping corridor also weaves around several on the boundary which gives a misleading representation of the impacts

Section 12 Hydrology and land drainage	National Grid proposals	Aldham Parish council
	No likely significant effects as no operational discharges would be generated and surface water drainage from operational infrastructure would be managed using suitable SuDS.	Suds and their construction may have lasting impact on our village. Severe weather events are increasingly frequent so the future operation of SUDs should be **scoped in**

Section 13 Landscape and Visual	National Grid proposals	Aldham Parish council
	It would be highly unlikely for receptors located in places outside the ZTV to have views of the Project – the digital ZTV maps would be ground truthed to ensure that likely visibility from sensitive receptors is fully considered.	**Scope in.** Highly unlikely means they could still occur so needs assessing in the EIA.
	Representative viewpoints	The current from NG are un acceptably limited. There are none that cover our parish. Great scrutiny will be require on this part of the EIA. See appendix of current visual receptor point from Marks Tey railway station – an area NG already say in section will not impact by the proposal see next comment below

	No likely significant effects on people using rail travel.	The Marks Tey Sudbury line (marketed as The Gainsborough line by the train operators, previously the Lovejoy line) is both a commuter and tourist line. The Chappel Viaduct, railway museum and recently re opened Gainsborough House in Sudbury provide a unique link of attractions. The impact on those using the line should be **scoped in**
	Assessment of visual effects on individual private views (with regard to the 'right to a view') is not within the remit of EIA.	It may not be but views are a key aspect of people attraction and interaction with the environment

Section 14 Noise and vibration	National Grid proposals	Aldham Parish council
	Construction traffic vibration	**Scope in** given the density of properties in the village, the haul road is a major part of this project and will impact both in its construction its deconstruction and its operation

Section 15 Socio economic recreation and tourism	National Grid proposals	Aldham Parish council
	During operation the project would not affect businesses ability to function. Routine inspections and maintenance would not lead to significant disruption	**Scope in.** Business have to evolve and this project will prevent a number of very real opportunities that those in the village may be looking to develop. This includes tourism and environmental activities
	Local economy and employment: Financial effect on individual businesses or property prices	Not in EIA scope but a major impact causing much concern

Section 16 traffic and transport	National Grid proposals	Aldham Parish council
		No comments

Section 17 cumulative effects	National Grid proposals	Aldham Parish council
		Pleased to see no matters being scoped out

The 406 page scoping report plus appendices is a considerable document. Aldham Parish Council have reviewed this as well as we can in the limited time and expertise at our disposal. As drafted the National Grid project will change our village for ever so we are disappointed that the off shore under sea route has not been properly assessed by National Grid.

We recognise wind power from the North Sea must be transmitted to consumers but this should be via a coordinated offshore grid. Such a grid has been shown by National Grid ESO (in 2020) not only to be deliverable but hugely beneficial. 50% less infrastructure will be required for a coordinated grid than the current piecemeal approach. That results in cost savings for consumers of £6billion and benefits the environment and communities.

We are gravely concerned that National Grid are using the scale of the project (NSI) , the current energy crisis and the complexity of the DCO process to steam roller this through. The planning inspectorate has the capability and duty to represent the public from this heavy handed approach from National Grid so we trust you will take our comments into full consideration.

As a separate item we have also included the views of Essex Suffolk Norfolk Pylon Group who have outlined some of the wider concerns of the approach National Grid are taking to the consultation with communities that we also share as a parish.

Yours sincerely

Aldham Parish Council

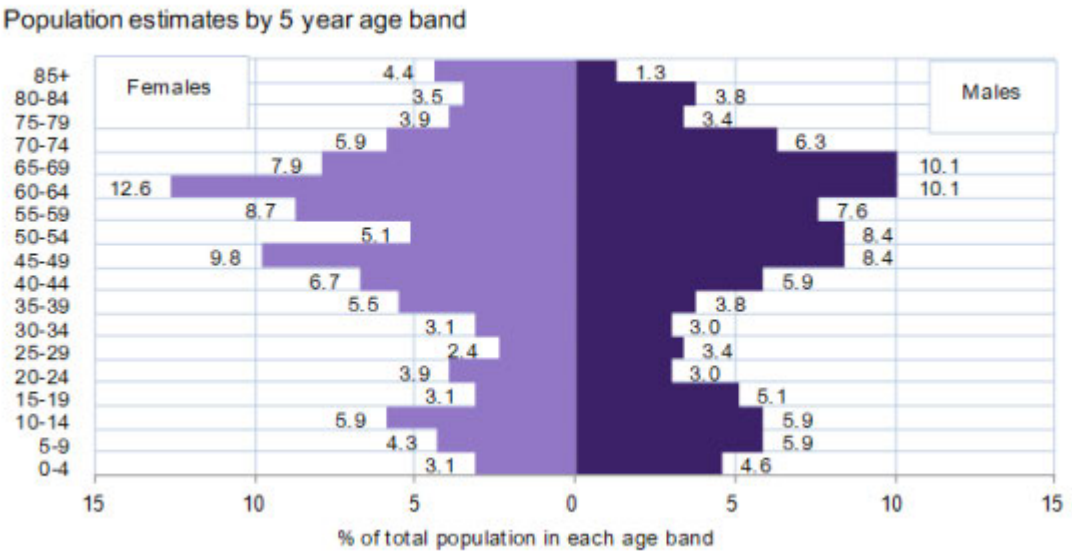
Annex 1

RCCE Community Profile of Aldham Village

https://cbccrmdata.blob.core.windows.net/noteattachment/Aldham%20Parish%20Profile.pdf

Population of Aldham as of 2011 Census compared to the national average.

How many people live locally?	How many households?	Children under 16	Working age adults	Older people over 65
490	210	75	290	125
48.3% male; 51.7% female		15.7% (England average = 18.9%)	59.1% (England average = 64.7%)	25.3% (England average = 16.3%)
Lone parent families with children	**Single pensioner households**	**People from Black or Minority ethnic groups**	**People born outside the UK**	**Dependency Ratio**
10	30	20	25	0.69
17.0% of all families with dependent children (England average = 24.5%)	15.4% of households (England average = 12.4%)	4.1% (England average = 20.2%)	5.3% (England average = 13.8%)	England average = 0.55

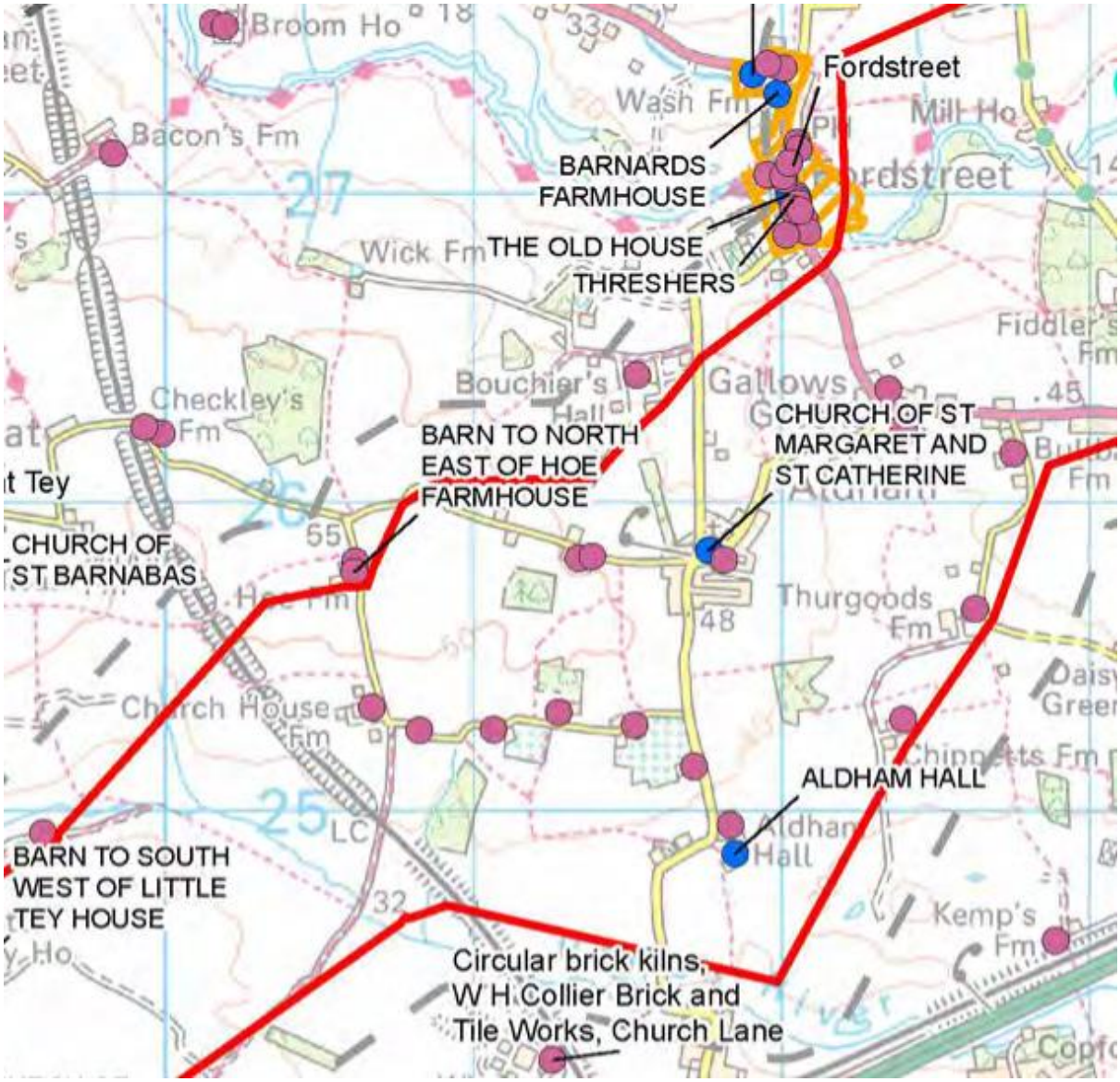


. The village contains the parish church: St Margaret and St Catherine and a and a number of farms as the surrounding area is agricultural. The village does not contain any primary or high schools and children requiring education will have to travel outside the village.

Annex 2

Historic Buildings extracted from Scoping report Appendix A part 6 of 8

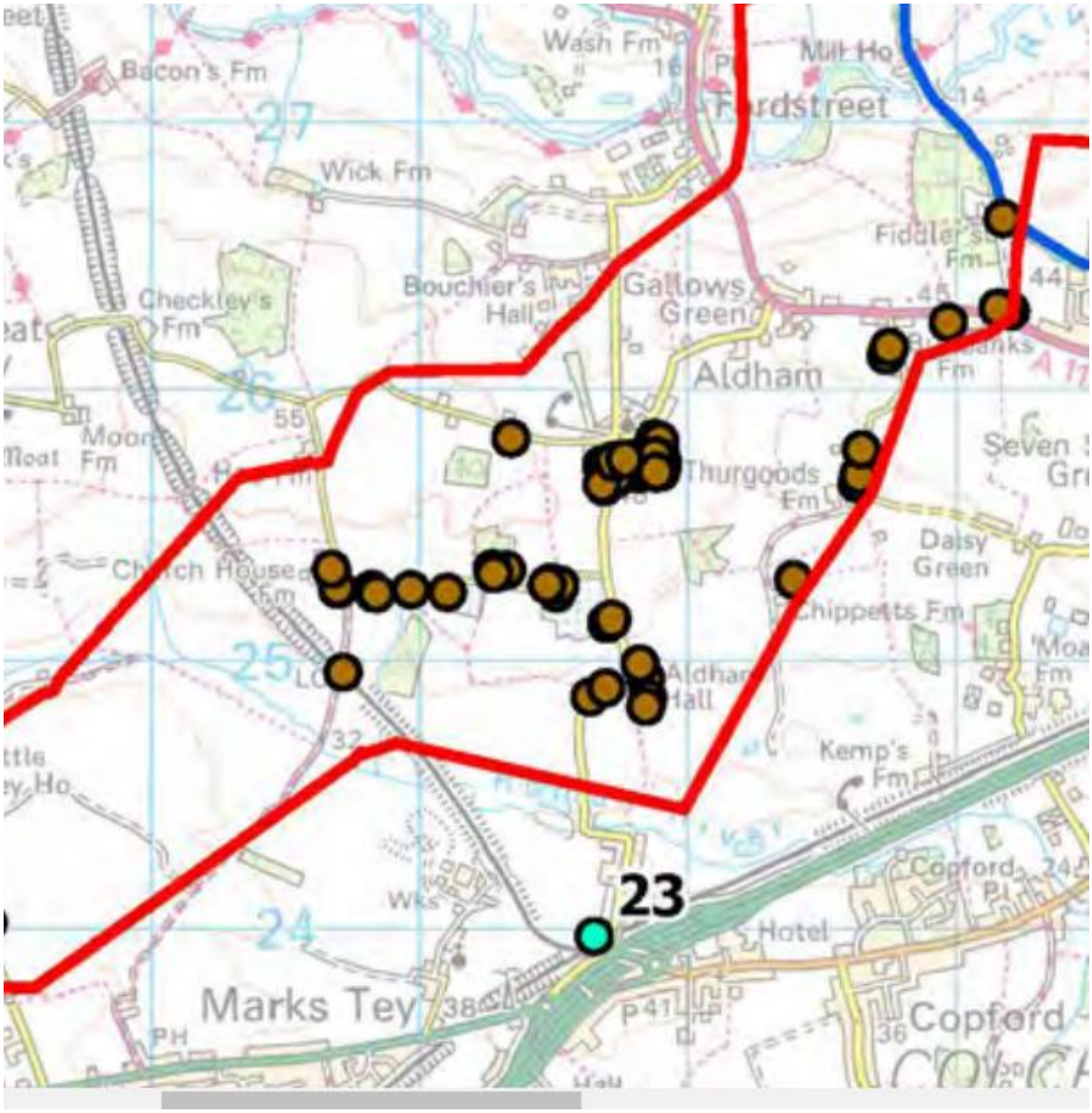
Highlighting listed buildings across the village including string along Rectory road and the dense cluster in Ford street are of the village – this is also a conservation area



Annex 3

Scoping report part A section 7 of 8

Viewpoints proposed by National Grid



Anglian Water Services
Thorpe Wood House
Thorpe Wood
Peterborough
PE3 6WT

[redacted]
Our ref ScpR.EAG.NSIP.22.ds

Jack Patten
EIA Advisor
The Planning Inspectorate

5 December 2022

Dear Jack

East Anglia Green
EIA Scoping Report consultation

Thank you for the opportunity to comment on the scoping report for the above project which runs through South Norfolk and Mid Suffolk districts then to Babergh, Colchester & Tendring and then on through Braintree, Chelmsford, Brentford, Basildon and Thurrock.

Anglian Water is the appointed sewerage undertaker for the chosen route NB1 shown on Image 3.3 page 22, selected route BE5 illustrated on Image 3.4 page 24 and preferred route ET1 shown Image 3.6 on page 28. With regard to potable water and water supply assets, Anglian Water is also the statutory undertaker, for the majority of the NB1 route other than the section between Diss and Gipping which is served by Essex and Suffolk Water. Essex and Suffolk Water are also serve the sections of the BE5 route east of Langham and the ET 1 route south of Great Notley.

The following response is submitted on behalf of Anglian Water in its statutory capacity and relates to water resources, water supply network, water wastewater and water recycling assets. Given the potential impacts on water resources the promoter would be advised to consider the recently published Water Resources East draft Regional Plan which sets out the collective water companies position. The two water companies own Plans are due to be published in the new year.

- The Scheme – Existing infrastructure

There are significant existing Anglian Water water supply, water recycling and network assets which serve towns and villages along the route including Forncett St Mary, Needham Market, Capel St Mary, Stratford St Mary, West Bergholt, Kelvedon, Writtle and Chadwell St Mary. The assets include the network connecting to the Tilbury Wastewater Recycling Centre which serves locations including the Orsett Hospital. There are also multiple abstraction locations along the northern two thirds of route including at Bramford and in the Dedham Vale. In view of the multiple locations for potential diversions and where changes to project asset locations could

avoid impacts and diversions the project is advised to start liaison with our Asset Diversions team. We would urge that early consideration and assessment is given to minimising the need to disrupt or divert utility assets which has a carbon impact and increases the risk of service disruption. Maps of Anglian Water's assets are available to view at the following address:

http://www.digdat.co.uk/

We note that other than a reference to a legislation and Environment Agency permits (5.2.11) the promoter makes very limited reference to the water supply, waste water network or capacity. The promoter does include groundwater resources (5.6.2) in the report and references hydrological changes (Table 8.5, page 94) all be it the later with reference to habitat impacts.

We note that the promoter has engaged with the Environment Agency on hydrogeology and groundwater impact assessment (Table 9.1) but not with water companies on abstraction. At Table 9.2 the promoter summaries the aquifers present along the route. With reference to Table 9.4, Anglian Water recommends that we are added to the further data sources at 9.7.1 to inform the first stage of the ES and so enable early route and design changes to be considered. Anglian Water is currently working with the EA on a programme of abstraction licence reviews which may change the nature of the receptor and the potential impact of the project in those locations where abstraction and licences change take place over the next five years or more. The project may find, for example, that the assumption implicit in bullet 6, 9.8.2, page 124 does not hold to be true.

Anglian Water would want to ensure the location and nature of assets is identified, potential pollution avoided, and disruption minimised, and so services protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure. This approach would accord with Code of Construction Practice approach (bullet 2, 3 and 7 in 6.8.2 and 6.9.7).

Anglian Water notes that dewatering may be required (9.9.11) and so we would welcome discussion on the use of drainage hierarchy including Sustainable Drainage Systems (SuDS) with by the promoter with the respective LLFA (12.10.2) to avoid the need to utilise the public sewer network. The use of SuDS would – as the promoter references at 12.2.2 – follow guidance in NPS EN-1.

As the promoter considers that health impacts for people (Chapter 10) are considered in Chapter 9 on Hydrogeology but does not scope in the potential impact of the project on public water supplies, we recommend that this is either covered in Chapter 10 or added into Table 9.7 Chapter 9. Anglian Water welcomes that the potential effects of the project during construction on the water environment are scoped in (Table 12.4) and request that this includes haul roads and construction traffic damaging water and sewer pipes. This is separate to the flood risk from sewers which is scoped out (page 186) by the promoter in relation to the OHL and buried cable itself. This scoping out may be justified on the basis of the CoCP and CTMP (14.8.2)

The Scoping Report refers to the use of trenchless methods (4.5.21 et al). Anglian Water would ask that the following standoff distances are applied for working each side of the medial line of pipes.

(a) 4 metres where the diameter of the pipe is less than 250 millimetres;
(b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
(c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

The Construction Management Plan should include steps to remove the risk of damage to Anglian Water assets from plant and machinery including haul roads. We recommend that the project follow the same approach as the Bramford to Twinstead project and provide a plan and GIS layer showing all Anglian Water asset interactions. This can for example enable pylons and works areas to be amended to remove any interactions. Further advice on minimising impacts and then relocating Anglian Water existing assets can be obtained from:

connections@anglianwater.co.uk

A template set of Protective Provisions including the above will be sent to promoter with a view to establish the bespoke distances for any pipes that exceed 400 millimetres should design and route iteration prove unable to avoid work in the vicinity of Anglian Water pipes.

- New infrastructure

We note at 7.8.2 and 8.8.2 that a 'supply of water' will be required for construction. Although the report states at 12.9.5 'there would be no new large scale consumptive water uses', given the size of the project that this water supply as well as that for construction and welfare facilities could be significant. Anglian Water welcomes the reference of NPS EN-1 in 12.2.1 and specifically paragraph 5.15.6 of EN-1 that the project should consider the interaction with Water Resources Management Plans (WRMP). As we identify above Anglian Water's own draft WRMP is due to be published in the next six weeks. Again, we note that the promoter has engaged with the EA (Table 12.1) and so we would welcome early engagement on water supply assessment and protection and confirmation – after discussions with the LLFAs – that all surface water drainage will be via SuDS and there will be no connection to the public sewer network.

With regard to the provision of alternative water supply, to replace private supplies (bullet 13 and 14, 12.8.2, page 178) the availability of supply from Anglian Water should not be assumed. The projects own abstraction (as suggest in 12.8.4) may be the most sustainable solution for construction or replacing private supplies lost as a result of the project. Anglian Water requests that construction stage water impacts are scoped in and not scoped out as the report proposes (12.9.5)

Subject to confirmation that all surface water will be managed following the drainage hierarchy including Sustainable Drainage Systems (SuDS), Anglian Water would want to clarify bullet 7, 12.8.2 so that it is clear that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and

Requirements to ensure any connections did not compromise the wastewater services of existing customers. Commitment GG15 could then be amended to reflect this clarification. Anglian Water will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

Anglian Water would welcome the progression of discussions with National Grid as the prospective applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in delays to the project. We would recommend discussion on the following issues:

1. Impact of development on Anglian Water's water and water recycling assets
2. The design of the project to minimise interaction with Anglian Water assets and specifically to avoid the need for diversions which have carbon costs
3. Requirement for water supply connections (if any)
4. Requirement for water recycling connections (if any)
5. Confirmation of the project's cumulative impacts (if any) with Anglian Water projects
6. Draft Protective Provisions and Requirements

Further advice wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at:

planningliasion@anglianwater.co.uk

The application will be one which is managed by my colleague Tessa Saunders and so please do not hesitate to contact Tess should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,



Darl Sweetland DMS MRTPI
Spatial Planning Manager

Cc EastAngliaGREEN@nationalgrid.com

Ardleigh Parish Council Response to National Grid (NG) Scoping Report

1. Introduction and general observations

1.1. Ardleigh Parish Council responded in full to the NG East Anglia GREEN consultation in June 2022, this document provides our comments to the Planning Inspectorate on the National Grid request for a Scoping Opinion for an Environmental Statement.

1.2. As stated in our June 2022 response *'given the proposed position of the substation(s) within our Parish, and the overhead line and/or underground cabling required to connect to that substation, it is clear* ***that Ardleigh would be uniquely and profoundly affected by these proposals****, should they go ahead. There would be cables crossing our Parish in two directions, with a double line/ pinch point through Ardleigh approaching the proposed substation. In effect three sides …of Ardleigh village, would be skirted or crossed. These lines/ cabling would be close to the Ardleigh conservation area, many homes and our village primary school and pre-school. The lines/ cables would cut through valued prime farmland and landscape and any pylons (up to 27 are proposed in our parish) would visible from nearly all parts of our beautiful, rural and relatively 'flat' parish adjoining the Dedham Vale Area of Outstanding Natural Beauty*.'

1.3. Ardleigh Parish Council endorses the position of the **Essex Suffolk Norfolk Pylons campaign** group. The group's response to the Scoping Report is attached to this document and we ask that it forms part of our own response. The report makes specific reference Ardleigh '*It is imperative, too, that the ES will consider the impact of the doubling back effect of pylons at Ardleigh, which leaves residents living in a 'V' of pylons*'

1.4. As the Local Council representing residents within Ardleigh, we are concerned that our communities, landscape and wider environment would be changed forever, and for the worse, by the proposals. We therefore believe that the environmental scoping exercise needs to ensure a more forensic examination of **the impacts in and around Ardleigh** and the wider Tendring peninsular, given the combination of pylons, multiple substations and underground cabling, to connect to off-shore wind farms, which are proposed.

1.5. The description of the section of the route p33 of Scoping Report, in our view, underplays the significance of the **impact on Ardleigh** and misses key features- including Ardleigh Reservoir, Local Green Spaces and barely mentions the historic settlement of Ardleigh itself. '*From the Colchester and Tendring boundary southeast of Langham, the Scoping Report Corridor heads east crossing the B1029 at Dedham road. The underground cabling would likely transition back to OHL lines at this point. It then continues between Foxash and Ardleigh, crossing the A137 at Harwich road. Shortly after it crosses a railway line. The Scoping Report Corridor then enters the area where the proposed Tendring 400kv connection substation would be situated. The Scoping Report Corridor then heads west back the same way where it re-crosses the railway line, A 137 and B 1029, but this time head straight west, and crosses an unnamed river connected to the Ardleigh reservoir before exiting the section at the boundary between Tendring and Colchester*.'

1.6. It is inevitable that the proposed **pylons would be close to housing in the heart of Ardleigh** village and visible from almost all of our parish, including within the conservation area. The maps included in the report seem not clearly show Ardleigh (eg images 3.4 and 3.5 show the proposed site of the proposed substations closer to Lawford/ 'Foxash Estate'- which is a scattered rural development of former Land Settlement Association smallholdings in both Ardleigh and Lawford parishes). The legend 'Ardleigh' showing somewhat to the north and west of our centre of population/ village centre. The position of Ardleigh Reservoir looks to be to the south/east of the A137 yet it is actually located to the north/west. This is very confusing and

misleading and it gives the impression that the proposed substation area is more 'remote' than it actually is.

1.7. Further, a number of important heritage and tourism assets in our Parish have not been included in the report (eg Green Island Gardens).

1.8. As previously stated in recent consultations impacting our Parish (including those of wind farm operators), we support the calls for a **strategic off shore solution** and continue to call on all parties (including off shore windfarm providers, battery storage providers, local authorities and the government) to work together and, if necessary, to update the regulatory framework, to enable a genuinely strategic and collaborative approach to the issue of energy supply and to ensure that future consultations provide a full range of considered and costed options.

1.9. Since the original NG East Anglia (GREEN) consultation, both Five Estuaries and North Falls windfarms have consulted on their own proposals. It is clear from the level of detail provided in their consultation documents that they expect the NG substation to be situated on the edge of Ardleigh and that they are expected (and expecting) to connect to it! Once decisions are made for these windfarms to make landfall in Tendring (which is the only option under consideration), then it appears that NG will have to push ahead with its EA GREEN plans. **Alternatives do not appear to have been considered** properly at any stage, let alone consulted on. No changes that we can discern to proposals for the areas around Ardleigh appear to have been made following the summer 2022 consultation.

1.10. Furthermore, despite the widespread and strong opposition to the initial consultation, the scoping report suggests that NG is pushing ahead with the original proposals- permitting offshore-generated power to be brought onshore a considerable distance from where it is ultimately needed, building new huge transmission substations on agricultural land, then connecting to 180km of new and unsightly pylons. The full environmental impact has not been calculated, the project, despite its name, **is anything but 'green'**.

1.11. There is not public confidence that NG is conducting its consultations fairly, openly and with all the legal requirements in place. In fact, many residents feel that the East Anglia GREEN project is largely a *fait accompli*. It is therefore imperative that the Planning Inspectorate **ensure that the Environmental Scoping exercise includes all of the relevant considerations** and that this exercise is seen to consider the full and wide environmental and social implications of the proposals incorporating the Pylons, all Substations and associated infrastructure.

1.12. We will not repeat general points in our submission, but will focus below on some specific issues affecting Ardleigh which we feel should form part of the Environmental Scoping process.

2. Specific issues and concerns for Ardleigh which should be included in the scope

2.1. Full consideration of the **cumulative environmental impacts for our Parish**, and its residents, of two lines of Pylons, multiple substations, new battery storage and links to off-shore windfarms.

2.2. Impact on **views into and out of the Ardleigh** conservation area and to and from Local Green Spaces, including those within the emerging **Ardleigh Neighbourhood Plan**. These must include, but not be limited to, the public footpaths around the village centre/ conservation area, site of ancient monument, Ardleigh Reservoir- including approved extension- and the lake and footpaths behind Ardleigh Primary School.

2.3. Full consideration of **the short, medium and long term implications in Ardleigh** including the construction phases of noise, traffic and disruption to residents, visitors and local businesses as well as wildlife, water and drainage. This would involve scoping back in several areas proposed to be out of scope (see below),

2.4. Full consideration of the impact and **siting of the proposed substations**.

2.4.1. For example, details of the choice of location for substation is given in 3.6 of the report. '*While Zone A as a whole was considered **less preferable from a landscape and visual perspective** compared to Zone C when considering the substation in isolation, when account was taken of the 400kV OHLs, Zone A would require the shortest length of connection. The cost for a substation at Zone A would be between approximately £16 million and £20 million less than that for a substation at any of the other zones*.'

2.4.2. This strongly suggests that **cost, rather than environmental impact, was the driver** in the choice of substation locations. The overhead lines, which this proposal would provide the '*shortest length of connection'* to, will take two lines of pylons directly through and around the heart of our Parish. This needs proper impact assessment.

2.4.3. It is worth noting that an **offshore grid** would negate the need for additional substations as well as the double row of pylons, although probably beyond the scope of the current consultation, this option has not been properly considered.

2.5. The scoping report refers to the topography of the wider geographical area as '*predominantly flat and low-lying comprising of large-scale arable fields with clusters of urban and rural settlements'* and '*The majority of the Project would be located in land that is categorised on provisional ALC mapping as Grade 3 agricultural land or higher quality*'. (Scoping report 1.3) Ardleigh Parish and the contiguous areas proposed for substations could be described in exactly this way. We would ask for the scope to include whether the **visual impact in such a low lying area and loss of agricultural capacity** can be justified/ mitigated.

2.6. Our proximity to the Dedham Vale Area of Outstanding Natural Beauty was noted in earlier consultation, the single viewpoint, selected by NG in the scoping report for our Parish, is at the edge of the AONB. Further consideration needs to be given to **extending the underground elements to beyond the AONB** and to avoid a double row of pylons right through Ardleigh. The fact that no changes to the original proposals for Ardleigh are discernable since the original consultation in June is of particular concern. Why is only one option still on the table? Other options and variants must be scoped in. For the connections between the windfarm landfall and the proposed Tendring substation all cabling would be underground. Why has NG not included at least some additional underground cabling (and the associated environmental implications) in the options under consideration?

2.7. **Ardleigh Reservoir** should be included in sites designated for biodiversity and all relevant diversity and habitat assessments, regardless of its technical/statutory status (we don't understand why it is not already on the list). It is a wildlife haven with many resident and migrating birds, plus bats, newts etc. Regular and/or seasonal sightings include osprey, bittern and great crested newts. The purple swathe passes directly over the northern edge of the reservoir (not over an 'unnamed river' as suggested on p33 of the scoping report, the swathe appears to cross the reservoir itself). Further, the site of the approved new reservoir and Public Open Space should be included (see 2.8 below).

2.8. The development would have a substantial detrimental **impact on planned Public Open Space** / Country Park (per approved application ESS/57/04/TEN) due to be located in very close proximity of the proposed pylons (potentially crossing the site). In c. 2010, planning permission was granted by Essex County Council for a major extension of Ardleigh Reservoir. A new area of Public Open Space - in conjunction with new habitat creation - was proposed as a fundamental part of this application. As part of the planned Public Open Space, a new circular footpath link would be introduced around the perimeter of the reservoir, accessible from the adjacent car

park. This would be designed to facilitate safe public access to the reservoir by all residents, including disabled people and those with mobility restrictions. This need to be scoped in!

2.9. Much of Ardleigh is designated for potential **minerals extraction** and has various active sites including several close to the proposed routes. It is important that the relevant authorities and operators are included in discussions about the potential impacts of the scheme in our area.

2.10. Several areas of potential environmental impact are proposed to the scoped out of the project as a whole, as a minimum, we would like to **see the following scoped back in for Ardleigh** and the areas around the proposed sub-stations (if not for the whole project) since the impact of a concentrated area of activity (overground and underground cabling, construction and delivery of additional substations) is likely to be greater around Ardleigh than in other locations.

- Agriculture and Soils
  - Effects on soil quality associated with ecosystem services during operation.
- Air Quality
  - Effects from construction dust.
  - Effects from generators during construction.
  - Effects of operational vehicle emissions.
- Ecology and Biodiversity
  - Effects of ancient woodland, important hedgerows protected species etc close to the substations and Ardleigh Reservoir during construction and operation.
- Geology and Hydrogeology
  - All areas currently scoped out should be scoped back in for Ardleigh, including sites of minerals extraction and site of new reservoir.
- Health and Wellbeing.
  - We consider that separate health and wellbeing ES chapter should be required. alongside consideration within the relevant other headings. Specific consideration to the area around Ardleigh including cumulative effects.
- Historic Environment
  - Physical effects on archaeology and built heritage in and around Ardleigh during construction and operation.
- Hydrology and land Drainage
  - All areas currently scoped out should be scoped back in for Ardleigh.
- Landscape and Visual
  - Effects on visual receptors and landscape within the settlements of Ardleigh, and its neighbouring parishes, and in other parishes close to the Dedham Vale AONB.
- Noise and Vibration
  - Effects from traffic vibration during construction
  - Effects of noise from substations, overhead lines, CSEC and underground cables during operation.
  - Effects of vibration during operation.
  - Effects of noise and vibration associated with maintenance activities during operation.
- Socio-economic, Recreation and Tourism
  - Effects on the local economy and employment during operation.
- Traffic and Transport
  - Effects of traffic and transport during operation.

Date: December 2022

The Planning Inspectorate by email

INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS, 2017: EAST ANGLIA GREEN ENERGY ENABLEMENT SCOPING REPORT

This document sets out a joint response on behalf of Babergh and Mid Suffolk District Councils (BMSDC) to the Scoping Report dated November 2022 produced by National Grid in respect of the proposed East Anglia Green Energy Enablement NSIP.

The comments have been set out using the headings and numbering contained within the report. In commenting upon the content of the Scoping Report BMSDC recognise the early stage of the project and the limitations of the report in respect of the indicative alignment. These comments are therefore not exhaustive and BMSDC reserve the right to provide additional comments later in the engagement process.

It should also be noted any comments made here do not infer agreement with or acceptance of any or all of the supporting documents that National Grid refers to in the Scoping Report.

Introduction

The overview of and need case for the proposal are considered generally sufficient. However, it is noted that the alignment of the scheme is not currently available and that the Scoping Report has been prepared based on a Scoping Boundary. BMSDC therefore question whether the request for a Scoping Opinion is premature and should be delayed until such time as the precise parameters of the project are fully known.

Furthermore, these comments are made notwithstanding the position both leaders have published in favour of a coordinated offshore solution to the delivery of transmission network reinforcement objectives and BMSDC support the Offshore Transmission Network Review.

Transboundary effects

BMSDC accept the conclusion that there will be no trans boundary effects.

Main Alternatives Considered

BMSDC welcome the intention to consider alternatives within the ES, and acknowledges the information that has already been provided. The councils have previously stated an overriding

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preference for a coordinated offshore approach to the delivery of transmission network reinforcement objectives as an appropriate and necessary alternative to this project.

The councils acknowledge the further information and discussion provided on the potential for a feasible offshore strategic option and welcome the statement that, whilst the offshore strategic option is not being progressed, this decision is not final.

BMSDC would expect alternatives to consider opportunities for undergrounding.

Project descriptions

The description of the proposal is generally acceptable. BMSDC do however note that alternative pylon designs will be considered.

BMSDC are engaged in ongoing discussions with National Grid regarding the opportunities for undergrounding within the scheme. BMSDC acknowledge there are both benefits and disbenefits of undergrounding in respect of many aspects including, but not limited to, landscape and visual impact, biodiversity, geology, heritage, socio-economics and health. BMSDC expect to see full evidence to demonstrate the decision on the extent and location of undergrounding.

EIA approach and method

BMSDC have concerns that the recent proliferation of large-scale projects within the region and the expectation of further delivery of sites, including NSIPs and development sites identified in the emerging BMSDC Joint Local Plan, have the potential to have significant effects when considered together and cumulatively with this proposal. Areas of concern include, but are not limited to, the timing of construction, impacts on highway networks, impacts on commercial operations, amenity, skills, and tourism.

BMSDC welcome discussions to agree an appropriate study area for the consideration of cumulative effects and the identification of a long list of other development.

Landscape and Visual Assessment

BMSDC are engaged in ongoing discussions with National Grid and other Local Authority colleagues regarding the opportunities for undergrounding within the scheme. There are several locations where there is considered to be a weight of evidence to suggest undergrounding of the proposed route in addition to undergrounding across the Dedham Vale AONB.

There is a need to review alternative options particularly where they allow for close paralleling.

Please refer to full comments from the BMSDC landscape adviser (Essex Place Services) at appendix 1.

BMSDC also recognise any comments from the Dedham Vale and Stour Valley AONB team.

Biodiversity

We are satisfied that that nationally agreed CIEEM guidelines will be followed for the ecology surveys and all survey work will be undertaken in the appropriate season by appropriately qualified ecological consultants.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement

about the relevant expertise or qualifications of the competent experts involved in its preparation.

We agree with the scoping for likely significant effects on biodiversity after mitigation measures have been embedded into the Project design. We are satisfied with the identification of impact pathways identified for further assessment in the ES to support the DCO submission as shown in Table 8.9.

In addition to the EIA report, it will be necessary to also provide sufficient information on non-significant impacts on protected and Priority species and habitats at submission either in a non-EIA chapter or separate documentation. This is necessary in order that the LPA has certainty of all likely impacts, not just significant ones, from the development and PINS can issue a lawful decision with any mitigation and compensation measures needed to make the development acceptable, secured by DCO requirements

Please refer to full comments from the BMSDC ecology adviser (Essex Place Services) at appendix 2.

Historic Environment

In accordance with Regulation 14 of the EIA Regulations, the ES should provide details regarding the relevant expertise or qualifications of the competent experts involved in its preparation. It is noted that the proposed competent expert(s) for the Historic Environment does not include a Historic Buildings Specialist/Built Heritage Consultant; it is highly recommended that a specialist in historic buildings be appointed to assess the significance of the identified heritage assets and their setting, and the impact of the proposals on that significance.

BMSDC are engaged in ongoing discussion with National Grid and key stakeholders regarding the impacts of the development on heritage assets. Generally, the Scoping Report provides for the assessment of the majority of heritage assets which have the potential be impacted by the scheme, although there are a number of elements which do cause concern. It is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved.

Please refer to full comments from the BMSDC heritage adviser (Essex Place Services) at appendix 3.

BMSDC also recognise the comments submitted by Suffolk County Council regarding archaeology.

Water Environment

BMSDC refer to any comments submitted by the Environment Agency, Suffolk County Council as Lead Local Flood Authority, and the Internal Drainage Board on this topic.

Geology and Hydrogeology

No comments.

Agriculture and Soils

Information should be provided regarding any sterilisation impact of the proposed development on the agricultural and horticulture industry, particularly having regard to the quality of agricultural land and the significance of such to the local economy in Babergh and Mid Suffolk districts.

Traffic and Transport

Much of the scoping boundary area is characterised by minor roads and lanes that are not suitable for large volumes of construction traffic. There is also an extensive and highly-valued public rights of way network across the corridor.

The ES should include adequate information to enable assessment of the effects of the development on the local area in respect of traffic and transport issues.

BMSDC defer to the advice of the relevant local highway authorities.

Air Quality

Officers have had regard to to Chapter 7, Air Quality of the EIA Scoping Report, November 2022 and understand that:

- Construction traffic emissions have been scoped into the assessment. Details of the appropriate assessment will be determined once more information is known about traffic flows.
- Consideration of construction dust is to be addressed through the Code of Construction Practice.
- Construction generators have been scoped out of the assessment.
- The operational phase has been scoped out of the assessment.

BMSDC accept the above conclusions, detailed in Table 7.3, and consider this is an appropriate scope regarding air quality.

Electromagnetic Fields (EMFs)

- EMFs have been scoped out of the construction phase as no EMFs are generated.

- EMFS have been scoped out of the operational phase as the project would be designed and operated in accordance with government guidance and policies ensuring that the project would not generate levels of EMFs to affect health.

- The report states that the project will comply and align with ICNIRP Guidelines and requirements of NPS EN -5 will be provided as a standalone report submitted as part of the DCO.

Noise and Vibration

- We understand that an outline COCP will be submitted with the DCO and will include mitigation in respect of noise, dust and vibration.

- Construction noise and vibration (human impact) remains scoped into the Environmental statement and we understand that a detailed outline Code of Construction Practice will be submitted with the DCO in respect of this aspect. We will review this in respect of specific detail regarding Noise, Vibration and Dust and there should be detailed information with regard to any percussion piling referenced within the Scoping documentation.

- Operational noise (overhead lines) : Noise is stated to be "not significant" at nearby NSRs under any weather conditions due to the design of the lines and is proposed to be scoped out of the ES.

- We understand however that in the event there are changes to the design this would be further assessed within the ES and that a technical note would be submitted as part of the application for development consent to support scoping out noise associated with OHLs from the ES. We would wish to see further details in respect of this aspect.

- Operational noise (substations): The proposed new East Anglia Connection (EAC) Node substation located in the Tendring District, and extensions/works required at the existing Norwich Main, Bramford, and Tilbury Substations would include noise mitigation measures and would be subject to separate local planning applications.

- We would expect further noise assessments to consider any cumulative impacts in relation to the addition or expansion of substations and associated plant and equipment having regard to existing similar installations in these locations.

Socio-Economic, recreation and tourism

When identifying potential impacts as set out in chapter 15.10 and then in table 15.9 we expect the applicant to consider these impacts in more granular detail than presented in the scoping opinion. The applicant has grouped together too many sources of impact and therefore will not correctly assess the impact.

The Councils disagrees with the applicant on the study areas used in the scoping opinion, the spatial scope for extent of effects for all phases of the project is far greater than the applicant is currently using. The Council expects at any future submission that the applicant uses the following:

• Effects on employment and supply chain – bespoke travel to work zones based on the different construction sites using travel to work data to arrive at an informed employment zone for effects on labour. Workers willingness to commute is dependent on an number of factors, time, distance and travel allowances for example, we expect the applicant to consider these and set a realistic daily commute zone to assess the potential for home based workers. This is also applicable to assessing the opportunity for a local supply chain to respond to the opportunities available.

- Effects on local businesses, visitor attraction for tourism & tourism businesses – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below)

- Effects on development land – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below)

- Effects (indirect and direct) on severance – informed by the traffic and transport access plan

- Effects of cumulative impact on all of the above especially where construction phases of combined competencies overlap. i.e. where civils phases of construction coincide and have the potential to exhaust the local labour market and temporary accommodation

All baseline assumptions (employment and labour market, business premises, visitor attractions, open spaces and development land) will then have to be revisited to include this new spatial scope.

The Councils recognise that when considering this project as a single entity there are minor positive opportunities for economic development and employment, skills and education. However, we expect the applicant to consider all the National Grid plc projects located within Suffolk and the wider region to develop an approach that encompasses this project as part of their meta project. This will have a transformational approach when considering the positive impacts of the project.

The Councils expect the applicant to:

- Deliver and fund, in collaboration with the Councils and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project;

- Work collaboratively with the Councils to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment;

- Set an ambition for 5% of the roles required by the project to be filled through ‘earn and learn’ positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the ‘5% club’) including a commitment to a minimum number of apprenticeship opportunities to be created for local people.

- Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally

- Deliver activities with the aim to increase the size and diversity of the labour market pool

- Put into place clear plans (e.g., commitments within contracts) to drive the behaviors of their associated supply chain(s) to achieve skills and employment outcomes

- Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible.

- Clearly set out via a Skills Plan, incorporating, supply chain skills plans a strategic approach to developing and supporting the project's workforce requirements. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of Suffolk's economics, in particular local opportunity that meets skills legacy for the region

- Adopt and fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise and LMI to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat any negative churn effects.

Please refer to full comments from the BMSDC Economic Development team at appendix 4.

APPENDICIES

1. EPS landscape comments
2. EPS ecology comments
3. EPS heritage comments
4. Economic Development comments

Kind regards,

[redacted]

Tom Barker
Assistant Director Planning and Building Control
Babergh and Mid Suffolk District Councils

INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS, 2017: EAST ANGLIA GREEN ENERGY ENABLEMENT SCOPING REPORT

APPENDICIES

1. EPS landscape comments
2. EPS ecology comments
3. EPS heritage comments
4. Economic Development comments

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25/11/2022

For the attention of: Bron Curtis

Ref: DC/21/05611 – East Anglia GREEN

Thank you for consulting Place Services on the EIA Scoping Notification and Consultation for East Anglia GREEN.

This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site. As per the agreed timescale, our comments on the Planning Application as submitted are provided below:

Overall, the proposed scoping report covers the areas that would be required for assessment of landscape and visual matters. That said, there are a number of areas which do cause concern that need to be amended or altered to ensure that a full understanding of the landscape and visual impact of the scheme is achieved. The following table provides specific comments by section:

Section	Comment
13.1 Approach to scoping	The approach to scoping set out at 13.1 is broadly satisfactory. It's also appreciated that the interrelationship between the landscape and visual chapter and other environment topics has been made clear in Para. 13.1.2.
13.3 Study Area	The respective buffer zones identified for the above ground and below ground elements of the project and the substations and sealing end compounds are generally deemed acceptable. We note that more distant viewpoints up to 5km from the Project are to be considered where there is the potential for significant visual effects to arise beyond the 3km study area. If a considerable number of viewpoints beyond the 3km study area are identified, it may be useful to consider a 5km study area instead.
13.4 Data Collection	Para 13.4.2 states that the Scoping Report has been informed by targeted field work undertaken in August 2022. For viewpoint photography visits, we would advise these are taken in the winter months to ensure leaf cover is reduced and therefore representing a 'worst case scenario'. It may be that both summer and winter views are used to help provide representation all year round, however winter views would be the minimum requirement.
13.5 Engagement with Stakeholders	Table 13.5 is a reasonable reflection of engagement with Place Services to date.
13.6 Baseline conditions	The baseline conditions at 13.6 as set out in the scoping report do not appear to recognise the network of promoted routes, that is locally and

Section	Comment
	regionally promoted footpaths and other rights of way, cycle routes, or other identified routes. Landscape Value We welcome the reference to Technical Guidance Note 02-21 'Assessing the Value of Landscapes Outside National Designations', which was published by the Landscape Institute. This builds on the details within GLIVIA3 (Box 5.1) and strengthens the argument that landscape value is not always signified by designation: 'the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value' (paragraph 5.26). In determining value, we would expect to see a critical analysis of landscape value criteria (including cultural and natural heritage) for all chosen landscape receptors. Along with susceptibility, these findings should then inform any sensitivity judgements. Landscape Character (Table 13.2) The landscape baseline is discussed in detail within the document, with reference to the national, regional and district Landscape Character Areas (LCAs), as well as designated Dedham Vale AONB and Stour Valley Project Area. In Suffolk, the primary source of information for the landscape baseline is the Suffolk Landscape Character Assessment. To ensure a consistent baseline throughout, the use of the East of England landscape typology would be welcome. This can then be enhanced and refined by reference to local landscape studies and designations.
13.9 Likely significant effects	Residential amenity We accept that visual effects on individual private views is not within the remit of EIA (Para 13.9.13). However, given that the transmission tower locations have not yet been identified it may be necessary, in specific locations, for the applicant to assess impacts on residential amenity where there is a risk that the "lavender test" principles may be breached. This approach would be consistent with paragraph 16.17 of GLIVIA 3 and the Residential Visual Amenity Assessment Technical Guidance Note (Landscape Institute, 2019). Visual amenity at night The Scoping Report concludes that lighting will be scoped out on the Environmental Statement during both construction and operation. Although the Scoping report highlights that there is no anticipation of significant effects from lighting on designated landscapes or landscape character at night, we are yet to see any information regarding the size, location and operating hours for any construction areas for key sites substations and sealing end compounds, as well as laydown/compound areas, On this basis, we do not consider it appropriate to scope out the impact on visual amenity at night during construction until details of operation are fully understood. Sequential visual effects The methodology does not appear to deal specifically with sequential visual effects. Given the scale and repetitive nature of this project, combined with varying visibility of pylons, this will clearly be a significant matter for users of highways and rights of way networks, where there is a general expectation of higher levels of visual amenity and tranquillity.

Section	Comment
13.9 Viewpoints and Visualisations	Currently there is 41no. proposed preliminary representative viewpoints. Whilst the emerging approach to viewpoint selection may be acceptable for the upcoming s42 Preliminary Environmental Information Report (PEIR) consultation, the overall number of representative viewpoints is considered to be inadequate and therefore BMSDC reserve the right to ask for further or amended viewpoints, prior to preparation of the EIA that will support the DCO application once further site visits and survey work has been undertaken. Similarly, given the extent and complexity of this project, it may be deemed necessary to include both specific viewpoints and illustrative viewpoints (Para 16.19 GLVIA3). As the document suggests, the LI Visual Representation of Development Proposals Technical Guidance Note 06/19 provides best practice for ensuring best practice. We welcome the use of wireframes and photomontages (Type 4 AVR level 3) as visualisation representation. We would advise that an enlargement factor of 150% is used. This is because, for a 50mm FL image printed at A3 and held at comfortable arm's length, the scale of the viewed image is smaller than reality. Whereas, increasing the printed image size by 150% (as if a 75mm FL lens had been used) provides a better impression of scale for most viewers using two eyes (binocular vision).
Cumulative landscape and visual effects	The EAG scheme cannot be considered in isolation. Potential cumulative landscape and visual effects, particularly at and around the Bramford substation site. There is a suite of other energy connection and generation projects coming forward, including Bramford to Twinstead Pylons, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm. All of which should be considered in detail. Schemes of mitigation and offsetting are likely to be required given the accumulation of adverse impacts, and the baseline conditions. Plans should also be appropriately co-ordinated to ensure there are no discrepancies and to ensure the best solutions for the landscape can be secured.
Appendix J	The arboricultural survey will identify impacts to trees potentially subject to significant arboricultural impacts as a result of the project. In addition to this we would expect to see a comprehensive assessment of important hedgerows under the Hedgerow Regulations 1997 to be undertaken. This should identify all hedgerows along the routes that are important under the various historic, ecological and designation related criteria. Furthermore, all hedgerows along the route to be removed to facilitate construction should be surveyed in detail in advance to inform specific and appropriate planting schemes for their restoration.
Figure 13.2 Visual Receptors	As stated in the comments above, there is 41no. proposed preliminary representative viewpoints, which is considered to be inadequate and does not fully represent the impacts that this project will introduce on communities. For example, communities in Stowupland, Bacton (Page 4 of

Section	Comment
	11), Offton, Burstall, Washbrook (Page 5 of 11), Capel St Mary and Great Wenham (Page 6 of 11) have not been represented. We understand that it may be judged that impacts are not significant in locations such as these, however until further details of the project are made available and further site survey work is undertaken, they should be scoped in. We would also expect to see additional viewpoints from PRoWs and Promoted Routes within the Study area. To support NG, suggested viewpoints will be reviewed in detail and recommend as soon as possible to help with the preparation of the ES.

If you have any queries regarding the above matters, please do not hesitate to contact me.

Kind Regards,

Ryan Mills BSc (Hons) MSc CMLI
Principal Landscape Consultant

Place Services provide landscape advice on behalf of Mid Suffolk and Babergh District Council.
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Bron Curtis
Babergh & Mid Suffolk District Councils

By email only

28/11/2022

East Anglia Green Energy Enablement (GREEN) – DC/21/05611 EIA Scoping

These ecology comments relate to the East Anglia Green proposal and the scheme design including corridor options to minimise ecological impacts.

General Comments:

We have reviewed the EIA Scoping Report for East Anglia Green (EAG) Energy Enablement (GREEN) (National Grid, November 2022), particularly Chapter 8 Ecology and Biodiversity, in relation to relating to the likely significant impacts of development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation.

We have also reviewed Appendices E (Sites designated for biodiversity), F (Biodiversity survey methodology) and K (Natural England letter on District Level Licensing) and are satisfied that that nationally agreed CIEEM guidelines will be followed for the ecology surveys and all survey work will be undertaken in the appropriate season by appropriately qualified ecological consultants.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

We agree with the scoping for likely significant effects on biodiversity after mitigation measures have been embedded into the Project design. We are satisfied with the identification of impact pathways identified for further assessment in the ES to support the DCO submission as shown in Table 8.9.

In addition to the EIA report, it will be necessary to also provide sufficient information on non-significant impacts on protected and Priority species and habitats at submission either in a non-EIA chapter or separate documentation. This is necessary in order that the LPA has certainty of all likely impacts, not just significant ones, from the development and PINS can issue a lawful decision with any mitigation and compensation measures needed to make the development acceptable, secured by DCO requirements.

Section Specific Comments:

The following table provides more specific comments by section:

Section	Comment
8.1	8.1.4: We note that separate reports will be available for biodiversity legislation compliance and shadow Habitats Regulations Assessment screening.

Section	Comment
	8.1.5- 8.1.8: We also note that a Biodiversity Legislation Compliance report will be provided and request that any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information. We advise that survey and assessment for protected species should meet the requirements of Natural England Standing Advice. We welcome that the draft European Protected Species licences will support Letters of No Impediment (LONI) to be submitted to PINS by Natural England before the close of the DCO examination. As the applicant intends to use Great Crested Newt District Level Licensing instead of surveys, we note that Natural England have issued a letter of comfort which sets out their agreement to deliver DLL for the Project in principle which is included at Appendix K. **It will therefore be important that best practice methods are secured for construction phases as other mobile species are likely to be present and affected.**
8.2	8.2.4 and 8.2.11: We welcome that the Project is seeking to deliver BNG (in line with National Grid corporate commitment of 10% Net Gain in Environmental value including a minimum 10% biodiversity net gain across all its construction projects. We look forward to discussions on additional biodiversity gain objectives to be incorporated into the Project to deliver 10% BNG on this Project. 8.2.5: We note that potential bird collision risk will be assessed through bird survey work, at areas agreed with Natural England, (such as rivers and green corridors). in line with NPS EN-5 (2011) Section 2.7. We therefore expect details on making the overhead lines more visible as stated in the draft NPS EN5 (2021) Section 2.10. to be included in the ES.
8.3	Table 8.1: We are satisfied with the initial study areas but highlight that Priority species (s41 NERC Act) need to be specifically listed in the ES particularly Table 8.5 to show that these have been adequately considered (in line with Priority habitats listed in 8.6.12 and Appendix A)
8.4	The desktop assessment has been prepared in consultation with Suffolk Biodiversity Information Service and alongside other data sources, these records to support the baseline information and need to inform the surveys which have not yet commenced. We highlight that all ecological records from new or updated surveys undertaken should be shared with the local record centre as required by CIEEM Code of Professional Conduct.
8.6	Tables 8.3 and 8.4: We agree that the sites designated for biodiversity within the 2km from the Scoping Report Corridor are listed 8.6.9 - 8.9.11: We note that the non-statutory sites within 2km of the Scoping Report Corridor are not listed nor referenced in an Appendix and request that this information is provided in the ES. We welcome confirmation that field survey would determine if wooded areas are found to support ancient woodland ground flora and veteran or ancient trees.

Section	Comment
8.8	8.8.2: We welcome the best practice measures to be adopted during the construction phase and look forward to reviewing the Outline Code of Construction Practice (oCoCP).
8.9	Table 8.5: We request that relevant Priority species (s41 NERC Act) are also specifically listed in for further assessment. 8.9.5-8.9.9: We welcome that potential killing/injury of protected species e.g. large birds including swans and geese, has been scoped in for both the construction and post construction phases of this Project. We agree that there is the potential for a significant effect in relation to birds but until there is certainty on the extent and presence of certain species, this impact pathway should be scoped into the ES for relevant species.

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

Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant
Place Services at Essex County Council

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

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FAO: Planning Department,
Babergh / Mid Suffolk District Council

Ref: DC/21/05611
Date: 23/11/2022

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: East Anglia GREEN

Built Heritage Advice pertaining to an application for: Nationally Significant Infrastructure Project - interest into entering a PPA with National Grid for the East Anglia GREEN Project (ATNC/AENC).

The EIA Scoping Report for East Anglia Green (EAG) Energy Enablement (GREEN) (National Grid, November 2022) has been reviewed (in particular Chapter 11: Historic Environment, Appendix C – Competent Experts, and Appendix G – Key Characteristics of Landscape Character Assessment), in relation to the likely significant impacts of the proposed development on built heritage.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide details regarding the relevant expertise or qualifications of the competent experts involved in its preparation. It is noted that the proposed competent expert(s) for the Historic Environment does not include a Historic Buildings Specialist/Built Heritage Consultant; it is highly recommended that a specialist in historic buildings be appointed to assess the significance of the identified heritage assets and their setting, and the impact of the proposals on that significance.

As highlighted within the submission documents, the potential impacts to built heritage have been discussed during two virtual meetings, with most of the recommendations to date having been addressed. Generally, the EIA Scoping Report provides for the assessment of the majority of heritage assets which have the potential be impacted by the scheme, although there are a number of elements which do cause concern. These are highlighted below (against the relevant paragraph number of the submitted EIA Scoping Report), and it is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved.

11.6.6: The Planning Policy Guidance states that 'in comes cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications' (040 Reference ID: 18a-040-20190723). No methodology/criteria for identifying, assessing, and recording potential non-designated heritage assets has been provided. This would be particularly helpful for areas which do not have a current local list or an adopted and publicly accessible criteria.

11.9.10: An increase in construction traffic has the potential to directly impact historic buildings. If heritage assets within the site boundary are to be scoped out, it must first be adequately demonstrated that they are not located in close proximity to any vehicular or access routes and will not be affected by any increase in construction traffic.

11.10.03: It is welcome that the baseline setting of heritage assets will be informed by the Landscape and Visual Impact Assessment (LVIA) and Zone of Theoretical Visibility (ZTV). This is particularly important given the likely associative and historic relationship between heritage assets and the historic landscape.

11.10.15: Reiteration of comments made in response to 11.9.10. An increase in construction traffic has the potential to directly impact historic buildings. If heritage assets within the site boundary are to be scoped out, it must first be adequately demonstrated that they are not located in close proximity to any vehicular or access routes and will not be affected by any increase in construction traffic.

11.10.19: Any heritage assets within the agreed study areas which are scoped out should be listed in an appendix to the Desk-Based Assessment (DBA). A full justification for scoping out must also be provided within the appendix; where there is no adequate justification for scoping out, a full assessment and description within the main body of the DBA will be expected.

Yours sincerely,

Samantha Pace IHBC
Historic Environment Team
Place Services

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

East Anglia Green Scoping Opinion

November 2022

The following response is to the scoping consultation and notification for the East Anglia GREEN Project proposed by National Grid Electricity Transmission plc in relation to its socio-economics and tourism impact. It identifies the further work required to ensure that there is an appropriate understanding of the impacts of the scheme prior to the development being submitted as an application.

The upsurge of energy development in the East of England, making it the epicentre of low-carbon energy developments in the UK, has, and will, create many potential opportunities for growth within the county. These opportunities have been identified in the Government's, Levelling Up the United Kingdom White Paper, specifically with regards to nuclear power, offshore wind power and integrated electricity networks in our region.

For Suffolk, the energy opportunities are due in large part to the geographical benefits the county offers. For example, the shallow seas and the existence of ports, makes it an ideal location for the development of offshore wind. The flat open landscapes and relatively higher rate of sunny weather in the county, also makes it attractive for solar farm installations. Whilst existing nuclear generation, and available grid connections, support new nuclear build.

This attractiveness and suitability of Suffolk for energy development, makes it a critical region for the UK and the Government as it delivers on its Net Zero commitment to cut emissions, decarbonise energy generation, bolster energy security and seize green economic opportunities. Given these conditions, the challenge for Suffolk is to effectively shape these extensive energy developments, extracting the best and most sustainable value from them, for the communities and businesses of the county.

Simultaneously, with numerous protected habitats, SSSIs, AONBs, wildlife reserves, listed buildings and conservation areas, the sensitivity and importance of the natural and built environment of Suffolk in terms of; place, tourism, and ecosystems, needs to be protected and enhanced, and not undermined by the delivery of Net Zero projects.

The challenge for any developer is delivering benefit and enhancing sense of place in a very congested market. National Grid are proposing a construction period between 2027 and 2031, a time where Suffolk alone is expecting to see the construction of offshore wind projects:

- East Anglia Three
- East Anglia One North
- East Anglia Two
- Five Estuaries
- North Falls

Further construction work from National Grid:

- National Grid Ventures Eurolink
- National Grid Electricity Transmission Bramford to Twinstead
- National Grid Electricity Transmission Sealink

Construction of the new nuclear plant Sizewell C, alongside significant rail and road infrastructure projects and house building. The cumulative impact of these Suffolk projects alone, coupled with similar projects in the neighboring authorities of Norfolk and Essex will place significant pressures on workforce availability, supply chain demand and cumulative impact on communities, the local economy and the tourism sector which the Council expect the applicant to reference when conducting their assessment.

- The Sizewell C Project: https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/
- East Anglia One North Offshore Windfarm https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/
- East Anglia Two Offshore Windfarm https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/

A large amount of information and data is available from these projects, and this should be considered as part of the development of the East Anglia GREEN proposals. We would recommend that there is close collaboration between National Grid Plc, ScottishPower Renewables, Sizewell C Co., Babergh and Mid Suffolk District Councils and Suffolk County Council.

Whilst the scoping report provides information on the high-level emerging proposals for the scheme, limited information is provided on socio-economics, particularly the scale of impact and opportunity associated with the workforce. On this basis Suffolk County Council, Babergh District Council and Mid Suffolk District Council are seeking to establish a set of principles that will be used to guide impact assessment ensuring all impacts are fully analysed and mitigated appropriately. Alongside expectations of information to be provided and the details that we would encourage the Applicant to provide as part of future submissions, and comments on the proposed assessment methods.

Once specific details are available, we must reserve the right to alter, amend and add to any comments made herein. The additional details that are requested would help in our ability to comment and to address our concerns. The comments below should be considered together with those from the following topic areas due to the interaction of impacts:

- Traffic and Transport
- Landscape and Visual
- Noise and Vibration
- Air Quality
- Cultural Heritage

When considering traffic and transport impacts it is considered that substantial consideration needs to be given to the availability of a workforce, the origin of the workforce and therefore its traffic impact. Any assumptions around workforce origins within the socio-economic assessment should be reflected in the assessment of transport impacts. Consideration should also be given to non-commercial access impacts (severance) to services including community services, medical or education/training.

Due also to the interaction with the topic areas above the Council expects the final agreed study areas for impacts relating to those areas to be reflected in the socio-economic recreation and tourism effects to include issues such as wider visual impact, severance from key services/employment/education, disruption to operation of businesses and reduction in trade linked to construction.

There will also need to be additional study areas identified to address the following different conditions:

- Areas accommodating the transition between underground and pylon routes
- The impact of substations and supporting infrastructure on the surrounding communities for the construction, commissioning and lifetime of the facility, including maintenance and decommissioning for both pylons and undergrounded sections of the route.
- The AONB forms a significant ecological and visitor amenity to the region – the study area should reflect the impact of construction and of maintaining the route for the lifetime of the infrastructure noting potential for permanent scarring, the impact of the undergrounding process and the impact on the connectivity of the AONB area

The modelling for impact across all levels of study area need to consider cumulative impact of developments, not be limited to impact linked directly to this scheme.

Chapter 15 of the EIA Scoping Report considers the potential significant socio-economic, recreation and tourism effects of the project during construction, operation, maintenance and decommissioning.

Baseline Data

Following publication of the 2021 Census, we would expect the data used within the baseline assessment to be updated with the most recent data.

The aggregated data on socioeconomic indicators mask some of the significant challenges that are faced by communities in our Districts, the economic activity rate in Babergh is 70.2% as opposed to the wider study area average of 80%. Mid Suffolk is more consistent with this average at 80.9%. Within the wider programme area, Tendring has an economic activity rate of only 67.9%.

Similarly, the data for qualifications is presented in a way that masks the variation at a District level. The national data used as part of this comparison is also inaccurate and needs to be reviewed – 39.6% of the population in the East have an NVQ4 or above as opposed to the 9% shown in the baseline assessment.

Community and tourism Facilities

These sections of the assessment only take into account facilities located directly in the local study area and not those whose access would be restricted by construction activities or where residents, employees or visitors would be unable to access them. This will need to be explored in more detail and a wider assessment of impact carried out.

The tourism and recreation assets list neglects to include businesses within the hospitality or retail sectors which rely on the tourism industry e.g. pubs, cafes, restaurants, retail. This impact assessment will need to be expanded to include all relevant businesses.

Tourism Accommodation

The assessment of bedspaces needs to be expanded to include Air B&B type accommodation, which is not monitored by VisitBritain, to provide a complete picture of the potentially available bedspaces.

Employment, workforce and supply chain

At this point in the process workforce numbers and phasing spatially and construction type are unconfirmed and therefore, any areas that workforce will interact or impact upon cannot be scoped out of the Environmental Statement as there is not enough information to make an informed decision. This will include:

- Effects on Tourist Accommodation During Construction
- Effects on the Local Economy During Construction
- Effects on Local Businesses, Jobs and Employment During Construction
- Effects to Planning and Development During Construction
- Effects to Community Services During Construction and Operation
- Effects on Tourism and Recreation During Construction

As part of future submissions, a workforce profile should be provided outlining:

- Peak workforce numbers
- Average daily workforce numbers
- Broad competencies of workforce (i.e. civils, mechanical, electrical etc)
- Anticipated split of home-based and non-home-based workforce

These profiles will need to be set against the construction timeline and spatial context.

The Environmental Statement will also need to consider the impact and opportunities the development may have on the local labour market. It should set out clearly the expected number and nature of employment opportunities during each phase of the development. It should relate this to the availability of labour in the area and identify how any mismatch between supply and demand will be addressed.

Furthermore, the applicant has defined two study areas, a local study area defined as the scoping report corridor and a wider study area defined as the spatial area of the Local Authority that the scoping report corridor travels through from which it will consider socio-economic, recreation and tourism effects.

The applicant has recognised that socio-economic, recreation and tourism effects occur at different spatial scales, however, the defined study areas are not appropriate and will not ensure that all effects of construction, operation and decommissioning.

When considering workforce effects as part of any future submissions the Council expect a new study area to be defined using relevant and evidenced travel to work data for the appropriate locations to arrive at an employment zone of influence that will reflect where home-based workers are located and will be most likely to travel from and where non-home-based workers are most likely to be distributed.

This is alongside a supply chain assessment, that would identify propensity and opportunity for local supply for construction and decommissioning, being conducted over a far greater geography ensuring areas such as Ipswich and Lowestoft, where a significant supply chain supporting other infrastructure

builds, is located. Maximising the use of local and regional supply chains should be a priority for the applicant, this is consistent with SCC corporate objectives as set out in Suffolk County Councils Energy Infrastructure Policy and the applicants own corporate objectives.

Consideration needs to be given to the potential impact of a mobile workforce on the availability of tourist accommodation. The spending patterns of a transitory labour force are fundamentally different to those of a static workforce and benefits do not accrue in a normal manner. Spending patterns are also vastly different to visitors that may be displaced, thus this might jeopardise trade for other related tourist businesses, such as restaurants, retail and visitor attractions.

In all cases, the impact of this project must be considered alongside others in the region – particularly other Nationally Significant Infrastructure Projects, for example, ScottishPower Renewable East Anglia Hub onshore construction and Sizewell C.

It is acknowledged that the likely demands on the workforce and the supply chain are likely to be less than those of other infrastructure projects in the region. However, it is vital that the workforce assessment considers the different skill and competency demands on the different phases of the project and assess these cumulatively with other potential major construction projects.

The project is also likely to be in construction at the same time as other Nationally Significant Infrastructure Projects, such as, Sizewell C and ScottishPower Renewable East Anglia Hub, will be reaching the peak of their construction employment. There is a very high likelihood that achieving any substantial home-based labour will be extremely difficult as these projects will be well established. We expect the applicant to take this into consideration when developing a workforce profile and its origins and will need to strongly evidence all their assumptions. SCC, BDC and MSDC also expect the applicant to reflect these findings within all topic areas where workforce origin will have an impact, such as:

- Traffic and Transport
- Communities
- Accommodation

Tourism

A large proportion of tourist trips are associated with the natural and historic beauty of the area as a whole. Therefore, it is more relevant to consider the extent to which the impact of construction in the landscape detracts from the environmental quality for recreational activity more broadly and the perception and propensity of people to visit the area.

The Environmental Statement needs to consider the perception and propensity of negative impact upon tourism from the negative cumulative impact set out in chapters:

- Landscape and Visual
- Historic Environment
- Traffic and Transport
- Air Quality
- Noise and Vibration

- Socio-Economics, Recreation and Tourism

Perception and propensity for people to not visit due to construction

First time visitors to Suffolk may be unaware (or be able to distinguish) between different areas of the county. If they are aware of large-scale capital developments in Suffolk, there is the possibility that they will simply assume that Suffolk is "one big building site" and this could result in them going elsewhere. Sizewell is the most high-profile example of a large construction project, but a variety of other construction schemes taking place simultaneously will undoubtedly have a negative effect on Suffolk

Noise impacts on tranquil tourism offer

A large amount of Suffolk's appeal to urban visitors is its 'peace and tranquility'. Visit Suffolk's website describes the county as follows**:**

"***A county filled with natural beauty situated on the east coast of England, bordered by 50 miles of glorious coastline and topped with breathtakingly beautiful open skies, it's the perfect holiday and short break destination. Whether you are looking for a quiet 'get away from it all holiday' or one that's full of adrenaline and adventure, Suffolk will not disappoint. Here you will discover quaint villages and medieval towns that for centuries have drawn in artists and writers."***

Any large-scale infrastructure works are clearly going to have an impact, or will be presumed to have an impact, on many of these elements. In addition to deterring people from visiting, they may result in a negative experience for people who do come to Suffolk and leave them with a lasting impression that deters them from returning or recommending the county to others.

Visual impact during construction

Similar to many of the points raised above, Suffolk's large open skies are a key selling point, along with Constable Country, beaches, countryside etc. People visiting the county for these may be deterred by the thought of construction hoardings, road closures, cables etc. We live in a world where images count and where everything is instantly shared online via social media. The long-term damage that a single negative image of a building site (for example) can do would be significant.

Long term visual impact

Suffolk is renowned for its scenery and wide open skies etc. If this is to be impacted by permanent or semi-permanent construction, then mitigation measures will need to be put in place to ensure that adverse effects are kept to a minimum, that any environmental damage to the natural environment is prepared for (eg removals of trees, hedgerows etc).

Traffic delays

A combination of construction traffic and the natural increase in visitor numbers is inevitably going to lead to a greater use of Suffolk's highways and result in delays and diversions. Short-term events such as the Latitude festival at Henham are signposted in advance and local residents have learnt to work around the dates or make alternative arrangements where possible. Similarly longer-term projects such as the Gull Wing Bridge require significant road closures and diversions. Again, people adapt over time. The problem from a visitor economy point of view is that people will either arrive unaware of this or will be deterred by word of mouth and the perception that Suffolk is "just one big building site". It could

require sufficient mitigation/ traffic management measures, plus an effective social media/ media campaign to reassure potential visitors that their trip will not be adversely affected by traffic jams and diversions

AIL effects

Abnormal Indivisible Loads have the potential to be slow and disruptive and often require effective media/social media campaigns to warn of delays along the routes used. In cases where vehicles will be using single carriageways or B-roads, there is the possibility of serious disruption and potential damage to natural environment. It could also lead to street furniture/lighting having to be temporarily removed to avoid damage. There is also the possibility of noise, air pollution and long-term damage to road surfaces, all of which will need to be mitigated.

Use of accommodation

Large scale infrastructure projects such as this will require accommodation for the workforce. It is unlikely that all labour will be sourced locally. Given that some of this work could be occurring at the same time as the construction of Sizewell C and other large infrastructure projects, this will place an enormous strain on the both the local labour market and the accommodation sector. The latter will be even more pronounced if works are taking place during the peak summer months and could result in visitors being unable to find accommodation.

If works were to take place outside of the main season however, it could extend the opportunities for accommodation providers and increase revenue. Whilst Suffolk benefits from a healthy year-round weekend breaks market, it could be enormously advantageous if accommodation could be occupied during the week by visiting labour etc.

This would need to be balanced against the negative perception that *"all the accommodation is full*" because of the capital works (necessitating a "Suffolk is open for business"-type campaign) as well as energy costs. Some self-catering properties are simply not opening over the winter because of prohibitively high heating/ electricity costs. Whilst all year-round demand would be beneficial, providers need to ensure that it is financially viable too. Some providers have concluded that passing the costs onto customers would make the accommodation costs prohibitively high.

Economic Development

Impacts on businesses

Traffic delays changing spending

Some businesses will be affected by road closures or diversions. It will require adequate signage and publicity to ensure that businesses are still able to trade effectively and to advertise the fact that businesses are still open

Impact on deliveries (JIT)

This requires careful planning and co-operation with contractors to ensure that delivery routes remain open. If delivery times need to change to work around capital works, then this needs to be adequately prepared and communicated. This has the potential to affect the hospitality sector, particularly where food deliveries are concerned and particularly where fresh food is concerned

Worker spend – The catering and hospitality sector could benefit enormously, as could other sectors such as fuel, takeaway/fast food etc. Although this has to be balanced against the change in spending behavior when compared to visitor spend, if non home based labour displaces visitors then SCC/BDC and MSDC expect the applicant to consider this change in spending and mitigate accordingly.

SCC, BDC and MSDC considers that this approach to Socio-Economics, Recreation and Tourism is entirely consistent with their experience of infrastructure projects in similar sensitive landscapes where the visitor economy is economically significant.

Detailed Comments on scoping

When identifying potential impacts as set out in chapter 15.10 and then in table 15.9 we expect the applicant to consider these impacts in more granular detail than presented in the scoping opinion. The applicant has grouped together too many sources of impact and therefore will not correctly assess the impact. As a minimum the Councils will expect the applicant to consider, separately, the impacts upon the following sources:

- Employment – local opportunity
- Economic Development – Local investment
- Economic Development – Non home based spend
- Economic Development – Investor perception
- Economic Development – Workforce and churn
- Economic Development – Journey time delays (including those that would effect a tourism asset carrying out its day to day activities)
- Tourism – Visual Impact
- Tourism – Visitor perception
- Tourism – Journey time delays (of a visitor to the region the actual and perceived impact)
- Tourism – Accommodation displacement

The Councils disagrees with the applicant on the study areas used in the scoping opinion, the spatial scope for extent of effects for all phases of the project is far greater than the applicant is currently using. The Council expects at any future submission that the applicant use the following:

- Effects on employment and supply chain – bespoke travel to work zones based on the different construction sites using travel to work data to arrive at an informed employment zone for effects on labour. Workers willingness to commute is dependent on an number of factors, time, distance and travel allowances for example, we expect the applicant to consider these and set a realistic daily commute zone to assess the potential for home based workers. This is also applicable to assessing the opportunity for a local supply chain to respond to the opportunities available.

- Effects on local businesses, visitor attraction for tourism & tourism businesses – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below)
- Effects on development land – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below)
- Effects (indirect and direct) on severance – informed by the traffic and transport access plan
- Effects of cumulative impact on all of the above especially where construction phases of combined competencies overlap. i.e. where civils phases of construction coincide and have the potential to exhaust the local labour market and temporary accommodation

All baseline assumptions (employment and labour market, business premises, visitor attractions, open spaces and development land) will then have to be revisited to include this new spatial scope.

The Councils recognise that when considering this project as a single entity there are minor positive opportunities for economic development and employment, skills and education. However, we expect the applicant to consider all the National Grid plc projects located within Suffolk and the wider region to develop an approach that encompasses this project as part of their meta project. This will have a transformational approach when considering the positive impacts of the project.

The Councils expect the applicant to:

- Deliver and fund, in collaboration with the Councils and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project;
- Work collaboratively with the Councils to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment;
- Set an ambition for 5% of the roles required by the project to be filled through 'earn and learn' positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be created for local people.
- Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally
- Deliver activities with the aim to increase the size and diversity of the labour market pool

- Put into place clear plans (e.g., commitments within contracts) to drive the behaviors of their associated supply chain(s) to achieve skills and employment outcomes
- Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible.
- Clearly set out via a Skills Plan, incorporating, supply chain skills plans a strategic approach to developing and supporting the project's workforce requirements. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of Suffolk's economics, in particular local opportunity that meets skills legacy for the region
- Adopt and fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise and LMI to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat any negative churn effects.

Barking Parish Council

Initial comments are the tight timescale for a Parish Council to make a response on reading over 500 pages of highly detailed and complex wording not in Plain English for general public to be able easily understand. The invitation to comment was obscured in the wording i.e. 3 of us looked and still don't understand what is required. If this is a tick box exercise as a forerunner to a full environmental impact study we hope that any study is worded in plain English with clear guidance otherwise it is not fit for purpose as a consultation.

BATTISFORD PARISH COUNCIL

Battisford Parish Clerk
69 Gardeners Road
Debenham
STOWMARKET
IP14 6RX
[redacted]
http://www.battisfordpc.org.uk

1st December 2022

Dear Planning Inspectorate Team,

RE: EN020027 – National Grid East Anglia GREEN

I write to set out the details of Battisford Parish Council concerns for the Planning Inspectorate's Scoping Opinion.

Firstly Battisford Parish Council wish to put forward their initial local specific concerns for Hascot Hill, Wattisham Air Base, Waterlands of Gibons farm and the areas of special landscape as noted on the Babergh Mid Suffolk District Council planning mapping tool.
Battisford Parish Council would also like to ensure that the Holford Rules will be referred to and adhered to, eg: rules 4 & 5 on avoiding crests and 7 on minimising effects on landscape. Hascot Hill is recognised as a view of special significance and sits within this special landscape area, Hascot Hill is precious to it's parishioners, we cannot see that this has been included within the information given by National Grid to the Planning Inspectorate in their entire report. There are also areas designated SSSI's within the special landscape areas, which are protected by law. The impact areas of the SSSI's have been mapped yet still sit within a 'purple swathe' and the swathe has not been moved or amended. It is also important to recognise that Wattisham Air Base is a diversion base for the RAF, it is a very active base. The proposal crosses the flight paths.
Battisford Parish Council, in light of the previous information above seeming to have been ignored at initial consultation by National Grid when preparing their report to the Planning Inspectorate, would ask the Planning Inspectorate to widen the scope for Environmental Impact to include the above information specific to Battisford Parishioners as well as the following:-

1. Being such a nationally significant project, will incur overshadowing of smaller projects in the regions eg: East Anglian Water Pipeline, it's effects and this cumulative impact over many years will need to be taken into account in a quantifiable way – the report proposed by National Grid does not seem to have included this.
2. The flexibility of project design for unexpected risks arising needs to be addressed in more detail, as well as the unexpected consequences of huge changes in behaviour of society eg: in energy use and self sufficiency. No other proposals have been put forward for this level of scrutiny and a second or third option not been used for comparative impact and irreversible change within the National Grid report.
3. Clear indication of when parts of the project will fail to mitigate. It is not possible to mitigate ancient woodland and the surrounding ecosystem it supports. This is not clear in the report given by National Grid to the Planning Inspectorate and we would ask that permanent harm to the biological and physical natural capital of the country

Correspondence sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. Battisford Parish Council will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested. For more information on how we do this and your rights in respect of your personal information and how to access it, visit our website or contact the Parish Clerk.

are confirmed by the Planning Inspectorate as untenable and that clear amendments to the project are made to ensure permanent scarring does not take place following evaluation.

4. A step by step human survey of route rather than via a desk. Although satellite data is voluminous, this project will affect many individual and detailed unique sites, new businesses, farming and residents along the way – this information will only be found during person to land and person to person review. Some have already been relayed in the public consultation to National Grid, however these have not been included in the report given to the Planning Inspectorate and we therefore ask for all surveys to be geographically specific and detailed to the route and take in the original and existing concerns raised by the public.
5. Transport & access. The project cuts through rural areas and therefore must evaluate the impact of use of single track roads and their suitability of use for the project.
6. Existing land use and current biodiversity projects taking several years. The project will need to ascertain current information from landowners, not just from registers of old data, to ensure real time evaluation of land, biodiversity and resource are collated accurately. Many charity trusts are now involved in maintaining the land in conjunction with private landowners, eg: Suffolk Wildlife Trust information of this nature may well conflict with data held.
7. Population, Pollution, Health. The growing needs for population over time and the impact of the project on this natural expansion will need to be investigated. Proximity of pylons and the effects to human and wildlife long term health has had investigation and would warrant further investigation due to the proximity of existing and planned housing.
8. Cumulative study and combination of study results along with presentation of results. The report should ensure a clear, detailed, pictorial outcome which gathers cumulatively from each appendices to form one evaluation of the route to show clear 'no go' environmental areas and 'green light' environmental areas of the 'purple swathe'. This results sensitive interactive route will be both easy to use for the public and connect to all evidence accumulated through study on any geographical location along the route. Once faced with public scrutiny, any errors can be quickly amended. The current report outlined to the Planning Inspectorate is over many hundreds of pages and neither makes things user friendly for the layman or easily understood. This 'pictorial mapped results interface' will also enable the public with hidden disability, eg autism, a **reasonable adjustment**.

Battisford Parish Council would like to thank the Planning Inspectorate for the invitation to consult on the Scoping opinion and feel that the Planning Inspectorate will ensure the scope for the National Grid's Environmental Impact Study is sufficient to meet the needs of the country to attain an open and honest view of the impact of this project.

Yours sincerely



Parish Clerk
Battisford PC

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Our ref: BDC/NSIP/GREEN
Direct Dial: 01376 552525 ext. 2577
Ask for: Alan Massow
Date: 30th November 2022

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PURPOSE OF LETTER:	Braintree District Council's response to the Scoping Consultation of National Grid Electricity Transmission (NGET) EA GREEN development

Dear Ms Cottam

Thank you for consulting Braintree District Council (BDC) as a Host Authority on the East Anglia Green Energy Enablement (GREEN) in respect of the scoping opinion in regard of information to be provided in its Environmental Statement, relating to the proposed GREEN development.

The response is supported by the following appendices;

- Appendix 1 – Air Quality
- Appendix 2 – Ecology and Bio-diversity
- Appendix 3 – Geology and Hydrogeology
- Appendix 4 – Historic Environment
- Appendix 5 – Landscape and Visual
- Appendix 6 – Noise and Vibration

1. Procedural Context

1.1. The Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11 state inter alia that a person who proposes to make an application for an order granting development consent may ask the Secretary of State to state in writing their opinion as to the

scope, and level of detail, of the information to be provided in the environmental statement.

1.2. The Secretary of State or the relevant authority must not adopt a scoping opinion in response to a request under paragraph (1) or (2) of Schedule 10 until they have consulted the consultation bodies, but must, subject to paragraph (7), within 42 days beginning with the date of receipt of that request, or where they have notified the person making the request that they require additional information in order to adopt an opinion, within 42 days of receiving that information, adopt a scoping opinion and send a copy to the person who made the request.

1.3. In this case, BDC as Host Authority are considered a "Consultation Body" for the purpose of the regulations. In accordance with the above legislation, BDC set out its assessment of the Scoping Report for consideration of the Planning Inspectorate in the response set out below.

2. EIA Scoping Context

2.1. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) are relevant to NSIP applications and set out several schedules to determine whether development would require an Environmental Impact Assessment or not.

2.2. The development in this case would be within Schedule 1 as it fulfils the following criteria 'Construction of overhead electrical power lines with a voltage of 220 kV or more, and a length of more than 15 km.'

2.3. The project comprises a new 400kV electricity line, majority being overhead lines (OHL), of approximately 180km, new undergrounding of 400kV cabling (Approximately 10km) is also proposed in particular through the Dedham Vale Area of outstanding Natural Beauty (AONB), new Cable Sealing End Compounds (CSEC) to connect the OHLs to the underground cables, a new 400kV connection substation, works at Norwich Main, Bramford and Tilbury Substations, and temporary works associated with construction of the project. Not all this proposal falls within Braintree District, however it would still fall under Schedule 1 and requires a statutory EIA.

2.4. Regulation 5(2) states that the EIA must 'identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors–

a) population and human health;

b) biodiversity, with particular reference to species and habitats protected under Directive 92/43/EEC and 2009/147/EC;
c) land, soil, water, air and climate;
d) material assets, cultural heritage and landscape; and,
e) the interaction between the factors referred to in sub-paragraphs (a) to (d).'

2.5. In addition, Regulation 5(4) states that the EIA should include, where relevant, 'the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.'

2.6. Schedule 4(5)(e) states that a description should be included, of the significant effects arising from 'the accumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources'

2.7. The submitted Scoping Report sets out the following areas of focus for scoping;

- Agriculture and Soils
- Air Quality
- Ecology and Biodiversity
- Geology and Hydrogeology
- Health and Wellbeing
- Historic Environment
- Hydrology and Land Drainage
- Landscape and Visual
- Noise and Vibration
- Socio-Economic, Recreation and Tourism
- Traffic and Transport
- Cumulative Effects

2.8. BDC will not be commenting on all aspects of the Scoping Report as topics such as land drainage, archaeology and traffic and transport are the purview of Essex County Council.

2.9. BDC has also provided comment on the Arboriculture Strategy at Appendix J of the Scoping Report

2.10. BDC considers that the topics identified above are appropriate from inclusion within the EIA. The applicant needs to ensure that the details of the proposed methodologies that underpin each EIA topic are agreed prior to the final submission of the ES with all relevant consultees. Examples include agreeing any baseline survey locations and study areas, as

well as agreeing any viewpoint locations or any further mitigation measures developed as the project progresses. This should form part of the on-going consultation into the EIA.

2.11. In any case, BDC have reviewed the submitted Scoping Report and have the following comments.

3. Air Quality

3.1. BDC instructed Wardell Armstrong for Air Quality (Chapter 7) advice on the submitted Scoping Report. Their full comments are provided as Appendix 1 to this response. For the purposes of their response, they have focused on the areas within Braintree District. The Council endorses the comments made by Wardell Armstrong and ask that they are taken into consideration. As the comments are listed in Appendix 1, we will not repeat the comments in full. In general, the scope of the assessment as presented by National Grid, subject to the application of appropriate criteria for determining the required scope of assessment, and to appropriate conditions for the implementation of standard mitigation measures where these are being used to scope matters in or out of the assessment.

4. Ecology and Biodiversity

4.1. BDC instructed Place Services for Ecology and Biodiversity (Chapter 8) advice on the scoping report including Appendices E (Sites designated for biodiversity), F (Biodiversity survey methodology) and K (Natural England letter for DLL). Full comments are provided at Appendix 2 to this response and will not be repeated verbatim here. The main points raised are that the scoping identification of likely significant effects on biodiversity after mitigation measures is agreed with. In addition to the EIA report, it will be necessary to also provide sufficient information of non-significant impacts on protected and priority species and habitats at submission either in a non-EIA chapter or separate documentation, in order for BDC to have certainty of all likely impacts not just significant ones, from the development and PINS can issue a lawful decision with any mitigation and compensation measures needed to make the development acceptable.

5. Geology and Hydrogeology

5.1. BDC instructed Wardell Armstrong for Geology and Hydrogeology (Chapter 9). As above, the comments are not listed in full as they can be found in Appendix 3. It is accepted that some aspects covered by Chapter 9 are outside of Braintree District Council's remit such as effect on water receptors and mineral resources which are dealt with by the Environment Agency and Essex County Council respectively. Some of the comments provided seek clarification in respect of sensitivity receptors during construction, and that desk study work is supported by walkover inspections to verify site conditions. In addition, ground gas should be mentioned in Table 9.7 (Matters scoped in or out of the ES). The comments of Wardell

Armstrong are supported by the Council.

6. Health and Wellbeing

6.1. Chapter 10 of the Scoping Report considers the likely significant effects on Health and Wellbeing.

6.2. This section intersects with several other chapters in the plan and as such any response should be considered as a whole.

6.3. It is generally agreed that most of the effects relating to health and wellbeing would be restricted to the construction period of the project, however it is not proposed to include a chapter on health and wellbeing in the Environmental Statement.

6.4. This section also looks at Electric and Magnetic Fields (EMF). We agree that these would only need consideration when the scheme was operational. A 200m study area would be considered appropriate as the distance in which overhead powerlines impact is 150m when normal background EMF levels return. Depending on where within the buffer the line was to be located this could mean that parts of Silver End and White Notley, could be within the 200m area. Several dwellings are also within the route and could potentially be within the 200m depending on the final route. In total there are at least 761 address points within the search area albeit some of these would not be residential dwellings. Underground cables have a significantly lower impact and typically produce no electrical fields and magnetic fields only up to 20m. Therefore, it may be more appropriate for underground cables in more restricted areas.

6.5. It is acknowledged that during construction that there would be noise, dust and emissions, and that these issues are covered in separate chapters.

6.6. In terms of health-related environmental change during the construction and operation phase this has been scoped out, primarily as these have been considered under other sections. If the cumulative effects assessment identifies any effects on receptors, then this assessment would include a separate section on health and wellbeing.

6.7. It is also proposed to scope out EMF during the operation of the scheme as the project is to be designed as per Government guidance and policies, meaning that EMF should not affect health. As this is done during the project design it is unlikely that any further assessment for EMFs would be required within the EIA, subject to the project design complying with all relevant Government guidance and policies. Whilst this approach is generally supported BDC consider it would be dependent on the final route and its proximity

to residential dwellings.

7. Historic Environment

7.1. BDC has appointed Place Services to provide advice on the historic environment in particular on Chapter 11: Historic Environment, Appendix C – Competent Experts, and Appendix G – Key Characteristics of Landscape Character Assessment) in relation to the likely significant impacts of the proposed development on built heritage within the Braintree District. The response does raise a number of concerns, and it is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved. The full response is available at Appendix 4 of this letter.

7.2. The key concerns are in accordance with Regulation 14 of the EIA Regulations, the ES should provide details regarding the relevant expertise or qualifications of the competent experts involved in its preparation. It is noted that the proposed competent expert(s) for the Historic Environment does not include a Historic Buildings Specialist/Built Heritage Consultant; it is highly recommended that a specialist in historic buildings be appointed to assess the significance of the identified heritage assets and their setting, and the impact of the proposals on that significance.

7.3. Other concerns include that no methodology/criteria for identifying, assessing, and recording potential non-designated heritage assets has been provided, and that any heritage assets within the agreed study areas which are scoped out should be listed in an appendix to the Desk-Based Assessment along with a full justification within the appendix.

8. Landscape and Visual

8.1. BDC appointed Wynne-Williams Associates to undertake an assessment of Landscape and Visual parts of the EIA scoping report. They have also considered Chapter 17 Cumulative Effects which is set out in that section of this letter, Appendix A, Appendix G, Appendix H and Appendix I.

8.2. Generally speaking, the proposed approach is supported. It is however considered that a Residential Amenity Assessment (RAA) should be considered for private residences which are likely to experience the most significant visual effects. When considering Appendix G reference should be made to the Councils Landscape Character Assessment produced in 2006 as well as the relevant Settlement Fringes Landscape Area from 2007 and in 2015 these documents are available for Coggeshall, Silver End, Kelvedon and Witham and offer a finer grained assessment of landscape capacity around these settlements.

9. Noise and Vibration

9.1. BDC appointed Wardell Armstrong to undertake an assessment for noise and vibration (Chapter 14) on the submitted Scoping Report. The full comments are available to view in Appendix 6. To summarise the approaches set out are generally agreed. It should be noted that where work could disturb historic monuments and scientific laboratories, then these should be included as sensitive receptors. The approach is also supported subject to any relevant management plans being reviewed, and that this should be secured through a planning condition.

10. Socio-Economics, Recreation and Tourism

10.1. Chapter 15 of the Scoping Report considers likely significant effects on socio-economic, recreational and tourism.

10.2. There are a wide array of scheduled monuments within the study area, as illustrated within the Scoping Report. Any impacts upon these monuments including recreation and tourist industry should be carefully considered.

10.3. BDC anticipates that the proposed development, given its location which is located across the rural areas of the District, has importance to the tourism economy including the visitor attraction, Cressing Temple Barns, could have significant impacts upon visitor accommodation (in the construction phase), visitor perception and ultimately visitor numbers, both during construction and during operation, hence financial support to offset the detrimental impact of construction upon, should be agreed.

10.4. There is an extensive network of public rights of way (PRoW) within the study area as stated within the Scoping Report. Any impacts upon PRoW, other known footpaths, cycle ways and bridleways should be reduced as far as possible and rerouted for the shortest possible time.

10.5. National Grid should use local labour, business and materials as much as possible during the project as well as providing upskilling opportunities for local workers. This will provide benefits to the local economy but also help reduce impacts of the projects. For example, reducing the distance workers equipment and materials need to travel.

10.6. As acknowledged in the Scoping Report, the impacts of the project on Socio-Economics, Recreation and Tourism are unlikely to be significant if mitigated appropriately. However, the East Anglia GREEN Project is only one of a number of major projects to be taking place in the region. The cumulative impacts of all these projects as a whole must be carefully considered. For example, the requirement on specific skilled labour, materials, equipment

and services (including public sector) is likely to be substantial and may impact upon other construction sectors such as the delivery of new homes.

11. Arboricultural Strategy

11.1. The Arboricultural Strategy identifies the key areas of concern when assessing the impact of the proposals on the tree canopy cover along the route: The proposals within this part of the scoping document appear to be comprehensive in their approach and within the expectations for a standard Arboricultural Impact Assessment (The principles of British Standard 5837 2012: Trees in relation to design, demolition, and construction – Recommendations, would be followed with information collected to provide guidance to designers and inform tree protection during the construction phase.) The approach identified within Appendix J is noted and I would make the following points for comment and consideration as part of your consultation response:

11.2. Methodology - It is noted that the approach within the strategy has been developed such that it remains appropriate for later stages of design and refinement which presumably includes the provision of suitable Tree Protection Plans arising from the Arboricultural Impact Assessment. Provided the tree protection plan is used as a guide for construction and other site operations, including access requirements this should ensure that any proposed works will not harm trees. Concern identified in point 3 below about access to site works along the project corridor need to be adequately addressed.

11.3. Desk Study - should include request to access local authority safeguarding maps which in the case of Braintree would include the location and reference for individual trees and woodlands covered by tree preservation orders – and include locations of ancient semi-natural woodlands within the project corridor.

11.4. Arboricultural Constraints Reporting - concern that this inadequately covers the extents of temporary haul routes for construction and possible impact on hedgerow linkage between woodland blocks; it is noted that appropriate weight and consideration should be given to ancient hedgerows with further assessment where identified and suitable consideration should be made for the future growth of retained trees.

11.5. Mitigation – there does not seem to be any indication of the approach to replacement of trees removed as part of the project proposals and what the methodology will be adopted in this respect to enhance the landscape setting and provide suitable augmentation for the loss of trees within the project corridor.

12. Cumulative Effects

12.1. The methodology proposed within the ES for considering cumulative effects is considered to be robust and is in line with the relevant guidance. The Scoping Report correctly scopes in the construction and operation phases of any development that has the potential for cumulative effects. Although the report states that NSIPs will be included as part of the assessment, it does not name any specific developments that will be considered. We assume that this will include the Longfield Solar Farm development and the A12 Widening Scheme, which both have the potential for cumulative effects within the proposed pylon corridor. It should also be considered if there are any cumulative effects between this NSIP and the Bramford to Twinstead proposals.

12.2. It may also be necessary to include consideration of the proposals for the dualling of the A120 between Galleys Corner in Braintree and the A12. The area of search for the GREEN project covers the likely route option.

Summary

I trust this letter adequately provides Braintree District Council's views on the Scoping Report. This consultation response is made with regard to the Scoping Report in the context provided by the Town and Country Planning (Environmental Impact Assessment) Regulation 2011 (as amended) and does not prejudice the Braintree District Council's consideration of the other planning matters relating to the development of this site.

Yours sincerely,



Cllr Gabrielle Spray
Cabinet Member for Planning and Infrastructure
On behalf of Braintree District Council

Technical Note – 001

CLIENT:	Braintree District Council
PROJECT:	East Anglia Green Energy Enablement (GREEN)
SUBJECT:	Comments on the EIA Scoping Report in terms of Air Quality (Chapter 7)
JOB NO.:	GM12443
DATE:	22nd November 2022
PREPARED BY:	Dr Paul Sanderson (MIEnvSc, MIAQM)
APPROVED BY:	M Walton (MCIEH AMIOA)

1 SCOPE OF REVIEW

1.1 These review comments relate to the scoping methodology which will be used for the air quality assessment for the East Anglia Green Energy Enablement (GREEN) Development Consent Order (DCO) which will be prepared by National Grid (NG). The methodology has been set out in the EIA Scoping Report dated November 2022 and prepared by NG. This review is concerned only with Chapter 7 – Air Quality.

1.2 In brief, the proposed development comprises the construction and operation of 180km of 400kV electricity cabling between the existing substations at Norwich Main in Norfolk, Bramford in Suffolk and Tilbury in Essex. The cabling is proposed to be predominately overhead via pylons.

1.3 This technical note comments upon the scoping report for the proposed scheme in terms of air quality (Chapter 7).

2 REVIEW COMMENTS

2.1 As stated above, the scheme is 180km in length, however, for the purposes of this review and document we have considered only the central part of the scheme which falls within the jurisdiction of Braintree District Council BDC.

2.2 This review considers each section of the proposed scoping.

Approach to Scoping – Section 7.1

2.3 The approach to the scope of the assessment is set out in the report and is agreed. Consideration is also given to potential interrelationships with two further chapters, namely Chapter 8 (Ecology and Biodiversity) and Chapter 10 (Health and Wellbeing).

Regulatory and Planning Policy Context – Section 7.2

2.4 National Grid (NG) have identified the relevant technical guidance and policy which is considered to be appropriate to assess the potential impact of the scheme. The guidance which has been identified is agreed.

Study Area – Section 7.3

2.5 The study area has been identified and is agreed. It is noted that traffic data and construction traffic routes were not available at the time the Scoping Report was prepared. The ES will present refined study areas for construction dust, traffic emissions and traffic impacts on designated habitat sites when this data is available, using the screening criteria within the appropriate guidance documents from the Institute of Air Quality Management (IAQM) and Natural England.

Data Collection – Section 7.4

2.6 The baseline data collection has been drawn from the following sources:

- Defra Background Air Quality Archive (2018-base year) (Defra 2021);
- Defra AQMA dataset (Defra, 2022); and
- Local Air Quality Management Reports.

2.7 This approach is considered to be appropriate and is therefore agreed.

Engagement with Stakeholders – Section 7.5

2.8 The list of stakeholders set out by NG is agreed. It is noted that the stakeholder responses were generally in agreement with the proposed methodology. Responses outlined that construction dust should be assessed fully in the Code of Construction

Practice (CoCP); Construction traffic emissions have therefore been scoped into the assessment and construction dust will be addressed through the outline CoCP.

Baseline Conditions (inc. future baseline) – Section 7.6

2.9 The assumptions made regarding the expected baseline conditions are considered to be appropriate, and robust. This approach is agreed.

Further Data to be Gathered / Processed in the ES – Section 7.7

2.10 The additional information which would be used to inform the ES is agreed.

Measures Adopted as Part of the Project – Section 7.8

2.11 The proposed air quality mitigation measures appear to be appropriate for the scheme to control both dust and road traffic emissions arising as a result of the construction phase of the proposed development. It is also noted that further mitigation measures will be developed as the project design evolves.

2.12 It is considered that the standard measures proposed would reduce impacts of air quality on identified receptors.

Likely Significant Effects – Section 14.9

2.13 The likely significant effects which are set out by NG are agreed. It is noted that the exact scope of the assessment will be determined based on traffic data, using the IAQM criteria.

Proposed Assessment Methodology – Section 14.10

2.14 The proposed assessment methodology follows current technical guidance and policy and is agreed.

2.15 The use of professional judgement to determine the overall significance of effect is noted, in particular in regard to air quality impacts on ecological receptors, which would require evaluation by a professional ecologist.

Proposed Scope of the ES – Section 14.11

2.16 The proposed scope of the assessment is agreed, subject to appropriate measures to ensure that embedded mitigation measures are provided.

3 SUMMARY

3.1 Therefore, in general, we agree with the scope of the assessment as presented by National Grid, subject to the application of appropriate criteria for determining the required scope of assessment, and to appropriate conditions for the implementation of standard mitigation measures where these are being used to scope matters in/out of the assessment.

24 November 2022

Braintree District Council
Causeway House
Bocking End
Braintree, CM7 9HB

By email only

Thank you for requesting advice for this scoping opinion from Place Services' ecological advice service. This service provides advice to planning officers to inform Braintree District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Dear Sir / Madam

Thank you for requesting comments from Place Services Ecology on the East Anglian Green Nationally Significant Infrastructure Project.

General Comments:
We have reviewed the EIA Scoping Report for East Anglia Green (EAG) Energy Enablement (GREEN) (National Grid, November 2022), particularly Chapter 8 Ecology and Biodiversity, in relation to relating to the likely significant impacts of development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation.

We have also reviewed Appendices E (Sites designated for biodiversity), F (Biodiversity survey methodology) and K (Natural England letter for DLL) and we are satisfied that that nationally agreed CIEEM guidelines will be followed for the ecology surveys and all survey work will be undertaken in the appropriate season by appropriately qualified ecological consultants.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

We agree with the scoping for likely significant effects on biodiversity after mitigation measures have been embedded into the Project design. Furthermore, we are satisfied with the identification of impact pathways identified for further assessment in the ES to support the DCO submission as shown in Table 8.9.

In addition to the EIA report, it will be necessary to also provide sufficient information on non-significant impacts on protected and Priority species and habitats at submission either in a non-EIA chapter or separate documentation. This is necessary in order that the LPA has certainty of all likely impacts, not just significant ones, from the development and PINS can issue a lawful decision with any mitigation and compensation measures needed to make the development acceptable, secured by DCO requirements.

Section Specific Comments:
The following table provides more specific comments by section:

Section	Comment
8.1	8.1.4: We note that separate reports will be available for biodiversity legislation compliance and shadow Habitats Regulations Assessment screening. 8.1.5- 8.1.8: We also note that a Biodiversity Legislation Compliance report will be provided and request that any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information. We advise that survey and assessment for protected species should meet the requirements of Natural England Standing Advice. We welcome that the draft European Protected Species licences will support Letters of No Impediment (LONI) to be submitted to PINS by Natural England before the close of the DCO examination. As the applicant intends to use Great Crested Newt District Level Licensing instead of surveys, we note that Natural England have issued a letter of comfort which sets out their agreement to deliver DLL for the Project in principle which is included at Appendix K. **It will therefore be important that best practice methods are secured for construction phases as other mobile species are likely to be present and affected.**
8.2	8.2.4 and 8.2.11: We welcome that the Project is seeking to deliver BNG (in line with National Grid corporate commitment of 10% Net Gain in Environmental value including a minimum 10% biodiversity net gain across all its construction projects. We look forward to discussions on additional biodiversity gain objectives to be incorporated into the Project to deliver 10% BNG on this Project. 8.2.5: We note that potential bird collision risk will be assessed through bird survey work, at areas agreed with Natural England, (such as rivers and green corridors). in line with NPS EN-5 (2011) Section 2.7. We therefore expect details on making the overhead lines more visible as stated in the draft NPS EN5 (2021) Section 2.10. to be included in the ES.
8.3	Table 8.1: We are satisfied with the initial study areas but highlight that Priority species (s41 NERC Act) need to be specifically listed in the ES particularly Table 8.5 to show that these have been adequately considered (in line with Priority Habitats listed in 8.6.12 and Appendix A)
8.4	The desktop assessment has been prepared in consultation with Essex Field Club and alongside other data sources, these records to support the baseline information and

Section	Comment
	need to inform the surveys which have not yet commenced. We highlight that all ecological records from new or updated surveys undertaken should be shared with the local record centre as required by CIEEM Code of Professional Conduct.
8.6	Tables 8.3 and 8.4: We agree that the sites designated for biodiversity within the 2km from the Scoping Report Corridor are listed 8.6.9 - 8.9.11: We note that the non-statutory sites within 2km of the Scoping Report Corridor are not listed nor referenced in an Appendix and request that this information is provided in the ES. We welcome confirmation that field survey would determine if wooded areas are found to support ancient woodland ground flora and veteran or ancient trees.
8.8	8.8.2: We welcome the best practice measures to be adopted during the construction phase and look forward to reviewing the Outline Code of Construction Practice (oCoCP).
8.9	Table 8.5: We request that relevant Priority species (s41 NERC Act) are also specifically listed in for further assessment. 8.9.5-8.9.9: We welcome that potential killing/injury of protected species e.g. large birds including swans and geese, has been scoped in for both the construction and post construction phases of this Project. We agree that there is the potential for a significant effect in relation to birds but until there is certainty on the extent and presence of certain species, this impact pathway should be scoped into the ES for relevant species.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson **ACIEEM BSc (Hons)**
Senior Ecological Consultant
[redacted]

Place Services provide ecological advice on behalf of Braintree District Council
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Technical Note

CLIENT:	Braintree District Council
PROJECT:	East Anglia Green Energy Enablement (GREEN) Geology & Hydrogeology: Environmental Health Support
SUBJECT:	Review Comments on East Anglia Green Energy Enablement (GREEN) Scoping Report Chapter 9
JOB NO.:	GM12443
DATE:	22 November 2022
PREPARED BY:	Matt Woodcock
APPROVED BY:	Gavin Campbell

1. SCOPE OF REVIEW

1.1 This review relates to Chapter 9 (Geology and Hydrogeology) of National Grid's Scoping Report (dated November 2022) for the East Anglia Green Energy Enablement (GREEN) project.

1.2 The following aspects of Chapter 9 are outside the remit of Braintree District Council so have not been reviewed. Comments from the relevant regulators / consultees should be sought on these matters:

1. Effects on Controlled Waters receptors (other than Private Water Supplies), including groundwater and surface water. These receptors are regulated by the Environment Agency.
2. Effects on mineral resources. These are regulated by the relevant County Councils.

1.3 In the review comments below, all references to chapters, paragraphs, tables and section numbers relate to the Scoping Report unless otherwise stated.

2. REVIEW COMMENTS

Policy Context

2.1 Paragraph 9.2.4 states that it lists "relevant regional and local policy". However, this does not list Braintree District Council's local policy documents, such as *Braintree District Local Plan (2022)*. It is requested that all relevant local planning documents are considered in the Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES).

Engagement with Stakeholders

2.2 Table 9.1 summarises the engagement carried out to date. This table does not mention pre-scoping correspondence sent by the Applicant to Braintree District Council in August 2022, specifically a letter from Arcadis (working on behalf of National Grid) dated 17 August and titled East Anglia Green Energy Enablement (GREEN) Geology & Hydrogeology. This letter was labelled 'draft for discussion with stakeholders and subject to ongoing review'. It explained the Applicant's proposed approach to assessing the effects of the East Anglia GREEN project that relate to Geology & Hydrogeology.

2.3 Braintree District Council provided a reply to National Grid on this pre-scoping consultation. However, it appears that the majority of the comments provided have not been accommodated within the EIA Scoping Report. Therefore, much of the content of our comments below repeats comments already provided informally to the Applicant in advance of the Scoping Report.

Data Collection

2.4 Paragraph 9.4.1 explains the baseline information that has been used to date and Section 9.8 explains the further data that will be gathered to inform the ES. The proposed use of National Library of Scotland maps dated 1885-1970 to identify historical contaminative land uses is unlikely to give sufficiently complete baseline data for the ES (or the PEIR). This is because it does not include a complete set of Ordnance Survey map revisions and, for example, does not capture the 52 years of land use that has occurred after 1970. It is recommended that consideration is given to obtaining a more complete set of baseline historical mapping, for example including from 1970 onwards, as data from after 1970 is no less relevant than that from before 1970.

2.5 Paragraph 9.7.1 states that further data collection will include "details of private domestic wells". It is recommended that this data collection extends to all private water supply wells, rather than just domestic ones.

Proposed Assessment Methodology

2.6 Paragraph 9.10.5 explains the use of a screening approach to land contamination assessments based on previous land use. We support this approach, but have some concern over the proposal to screen sites that fall within the Low category in Table 9.3 out of assessment in the ES. The definition of Low in Table 9.3 states that it includes "recent small scale industrial and light industry" that has the potential for "local slightly elevated concentrations". These definitions are quite vague and it is not clear what "slightly" elevated concentrations are or how this could be ascertained from desk study information. It is recommended that the PEIR and/or ES provides brief justification on a case-by-case

basis for any Low classification sites that are screened out of assessment in relation to land contamination effects.

2.7 Paragraph 9.10.3 explains that the assessment will be based on desk study information, using reasonable worst case assumptions. We agree with this approach. It is recommended that the desk study is supported by targeted walkover inspections if necessary to verify site conditions.

Sensitivity of Receptors

2.8 The sensitivity of human health receptors in relation to contamination risks in Table 9.4 is linked to the land use. It is not clear how this will relate to construction phase receptors such as construction workers, adjacent workers (including farm workers) and adjacent recreational land users (walkers etc.). It is recommended that this is clarified in the PEIR / ES.

Impact Magnitude

2.9 The "contamination adverse" criteria in Table 9.5 are based on the levels of contamination relative to "human health and environmental assessment criteria". It is not clear how such criteria could be applied to an assessment that is based on desk study information, because the levels of contamination will not be known.

2.10 For the avoidance of doubt, we have no objection to the assessment being based only on desk study information, but suggest that the impact magnitude criteria wording is reviewed by the Applicant to ensure that it is compatible with this approach.

Significance

2.11 It is noted that the assessment system will be supported by professional judgement. We support this approach and note its importance, as EIA matrices always carry a risk of counter-intuitive outcomes. For example, under the system described in this Scoping Report, a "temporary significant change" to water quality (moderate impact) in a private water abstraction feeding fewer than 10 properties (low sensitivity) would be classified as a "minor/negligible" effect, which would in turn be classified as non-significant. However, professional judgement in such a situation would presumably clearly show such an impediment to the quality of water that is being directly used for human consumption to be significant.

Proposed Scope of the ES

2.12 Table 9.7 summarises the proposed scope of the assessment for the EIA. We provide the following comments on this table:

- Table 9.7 does not mention ground gas. It is recommended that ground gas risks associated with the Project are considered, for example in relation to the possible disturbance of gas generating ground and / or the risk of gas migration into existing buildings or to new buildings associated with the Project (e.g. the substation and construction compounds).
- Table 9.7 states that any contamination would be "dealt with" (it is assumed that this means removed / remediated?) during construction. However, in many cases construction on such land proceeds with suitable precautions (e.g. PPE, dust suppression etc.) rather than requiring removal or remediation of the contamination, in which case the contamination would remain in the operational phase. It is recommended that this possibility is considered in the PEIR and ES as / if relevant to the specific circumstances of this Project.

Data Presentation

2.13 The Scoping Report includes figures showing superficial geology, solid geology, groundwater Source Protection Zones, geological conservation sites and mineral sites. It is requested that, in the PEIR and ES, these figures are added to or additional figures provided to show further relevant information identified from the desk study (e.g. locations potentially affected by contamination, locations of private water abstractions etc.).

2.14 There may be a typographical error in paragraph 9.9.3 i.e. should "River Tay" read "River Ter"? This is noted for information, in case there is further reference to this river in the PEIR or ES.

Appendix B

2.15 It is recommended that dust suppression and stockpile management measures for potentially contamination soils are included, or cross-referred to, within the Geology & Hydrogeology section in the Construction Code of Practice.

Unexploded Ordnance

2.16 Paragraph 5.7.3 states that unexploded ordnance (UXO) will be considered in Chapter 9 and Chapter 12. However, neither of these chapters mentions UXO. It is recommended that suitable details in relation to UXO risk are provided in the ES.

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FAO: Planning Department,
Braintree District Council

Ref: DC/21/05611
Date: 25/11/2022

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: *East Anglia GREEN*

This letter provides built heritage advice regarding a scoping opinion request for the Nationally Significant Infrastructure Project - East Anglia GREEN (ATNC/AENC).

The EIA Scoping Report for East Anglia Green (EAG) Energy Enablement (GREEN) (National Grid, November 2022) has been reviewed (in particular Chapter 11: Historic Environment, Appendix C – Competent Experts, and Appendix G – Key Characteristics of Landscape Character Assessment), in relation to the likely significant impacts of the proposed development on built heritage within the Braintree District.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide details regarding the relevant expertise or qualifications of the competent experts involved in its preparation. It is noted that the proposed competent expert(s) for the Historic Environment does not include a Historic Buildings Specialist/Built Heritage Consultant; it is highly recommended that a specialist in historic buildings be appointed to assess the significance of the identified heritage assets and their setting, and the impact of the proposals on that significance. As highlighted within the submission documents, the potential impacts to built heritage have been discussed during two virtual meetings, with most of the recommendations to date having been addressed. I was not present at the meetings; however, this letter is written in collaboration with my colleague Sam Pace who has been involved with the scheme previously.

Generally, the EIA Scoping Report references appropriate planning policy and guidance (paragraph 11.2.6-7) and proposes that the assessments will utilise a standardised study area of the Scoping Report Corridor, plus 250m for non-designated heritage assets, plus 2km for Grade II listed buildings and plus 3km for Grade II* and Grade I buildings. This study area may be increased, subject to the findings of the LVIA assessment (section 11.3).

There are, however, aspects of the proposed methodology which raise concern. These aspects are highlighted below (against the relevant paragraph number of the submitted EIA Scoping Report), and it is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved.

11.6.6: The Planning Policy Guidance states that 'in somes cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications' (040 Reference ID: 18a-040-20190723). No methodology/criteria for identifying, assessing, and recording potential non-designated heritage assets has been provided. Braintree do not currently have a current local list or an adopted and publicly accessible criteria; discussions should be undertaken between the local authority and the application which agree the criteria for non-designated built heritage assets.

11.9.10: I agree that it is unlikely that any direct physical impact to designated heritage assets will occur as a result of the construction period. However, an increase in construction traffic does have the potential to indirectly impact historic buildings, changing their setting or perhaps having indirect effects caused by vibration and noise, for example. If construction impacts upon heritage assets within the site boundary are to be scoped out of the assessment, it must first be adequately demonstrated that no designated heritage assets are located in close proximity to any vehicular or access routes, and that they will not be affected by any increase in construction traffic.

11.9.11 As per the section above, further justification must be provided to understand why the operational effects of the development in regard to the physical fabric of designated heritage assets are to be scoped out of the ES, as the route is not yet confirmed.

11.10.03: It is welcome that the baseline setting of heritage assets will be informed by the Landscape and Visual Impact Assessment (LVIA) and Zone of Theoretical Visibility (ZTV). This is particularly important given the likely associative and historic relationship between heritage assets and the historic landscape.

11.10.15: Reiteration of comments made in response to 11.9.10. An increase in construction traffic has the potential to directly impact historic buildings. If heritage assets within the site boundary are to be scoped out, it must first be adequately demonstrated that they are not located in close proximity to any vehicular or access routes and will not be affected by any increase in construction traffic.

11.10.17: The proposed methodology used to scope out buildings which will not be affected by the development is sound; justification should be provided for all buildings that are scoped out of the assessment using the identified criteria. This information should be presented as part of a table within the ES. See below.

11.10.19: Any heritage assets within the agreed study areas which are scoped out should be listed in an appendix to the Desk-Based Assessment (DBA). A full justification for scoping out must also be provided within the appendix; where there is no adequate justification for scoping out, a full assessment and description within the main body of the DBA will be expected.

11.11: The proposed descriptions of heritage value are considered acceptable, following standard industry best practice guidance. Similarly, I have no concerns regarding the criteria proposed to quantify the magnitude of impact.

11.12.2: Please note that it would be expected that the applicant's built heritage advisor contacts myself in regards to the scheme.

Yours sincerely,

[redacted]
Historic Environment Team
Place Services

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

WWA Response to the East Anglia Green Energy Enablement EIA Scoping Report

Prepared for: Braintree District Council

Date: November 2022

wynne-williams associates
landscape architects & arboricultural consultants

1 Introduction

This response has been compiled following an initial review of the East Anglia Green Energy Enablement EIA Scoping Report compiled by the National Grid in November 2022. The chapters and figures reviewed include:

- Chapter 13 Landscape and Visual
- Chapter 17 Cumulative Effects
- Appendix A Figures 13.1 and 13.2
- Appendix G – Key Characteristics of Landscape Character Assessment
- Appendix H – Preliminary Viewpoints
- Appendix I – Landscape and Visual Impact Assessment Methodology

In addition to reviewing the EIA Scoping Report, WWA have also been out to assess the potential overview landscape and visual effects on the proposed pylon corridor through the Braintree District. Our summary responses are provided below under the relevant headings.

2 Chapter 13 Landscape and Visual

The Scoping report cites the relevant guidance specific to considering the landscape and visual effects of pylons:

- Landscape Institute and Institute for Environmental Management and Assessment (IEMA) (2013) Guidelines for Landscape and Visual Impact Assessment – 3rd Edition (GLVIA3)
- Planning Inspectorate Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects
- Landscape Institute (2021) Technical Guidance Note 02/21 Assessing landscape value outside national designations
- Landscape Institute (2019) Technical Guidance Note 06/19 Visual Representation of Development Proposals
- Scottish Natural Heritage (2017) Visual Representation of Wind Farms – Version 2.2
- The Holford Rules: Guidelines for the Routeing of New High Voltage Overhead Transmission Lines (NGC plc) 1992 and Scottish Hydro-Electric Transmission plc (SHETL) 2003 Notes)12
- The Horlock Rules: NGC Substations and the Environment: Guidelines on Siting and Design (2006)

The proposed study area comprises a 3km buffer on either side of the Scoping Report Corridor. We agree that this should be sufficient to identify any significant landscape or visual effects.

The Scoping Report refers to the relevant local landscape character assessments for Braintree, as well as the correct national and regional studies.

The National Grid intend to produce an outline landscape and ecological management plan (LEMP) as part of the DCO application. This will include important information about landscape mitigation and restoration.

When considering the likely significant landscape effects that may arise from the development, the scoping report identifies a number of matters that have been scoped into the subsequent EIA. The areas that will affect the Braintree District are:

- Landscape character
- Representative viewpoints
- Visual receptors at settlements/communities/groups of properties
- Receptors travelling on roads
- Recreational receptors, including PRoW and long-distance routes and visitor attractions

We are in agreement with the matters scoped in. However, we would also recommend that a Residential Amenity Assessment (RAA) should be considered for private residences which are likely to experience the most significant visual effects. This is not currently included within the proposed EIA methodology. It is difficult to determine which specific properties should be considered for an RAA until the proposed pylon route is known in greater detail.

3 Chapter 17 Cumulative Effects

The methodology proposed within the EIA for considering cumulative effects is robust and is in line with the relevant guidance. The Scoping Report correctly scopes in the construction and operation phases of any development that has the potential for cumulative effects. Although the report states that NSIPs will be included as part of the assessment, it does not name any specific developments that will be considered. We assume that this will include the Longfield Solar Farm development and the A12 Widening Scheme, which both have the potential for cumulative effects with the proposed pylon corridor.

4 Appendix A Figures 13.1 and 13.2

Figure 13.1 is a collection of maps showing the national and regional landscape character areas and designations. The maps relevant to Braintree are Pages 7 and 8. Although the maps refer to the correct landscape character areas from the Essex LCA, they do not identify the relevant areas from the Braintree LCA (Chris Blandford Associates 2006).

Figure 13.2 is a similar collection of maps, but this set identify potential residential receptors and preliminary viewpoint locations. The maps relevant to Braintree are Pages 7 and 8. In general, proposed viewpoints are too sparse to fully assess potential visual effects in our opinion. There are only 3 proposed viewpoints within the Braintree District; 24, 25,

and 26. We propose a workshop meeting with the National Grid's landscape consultant to agree appropriate viewpoints within the Braintree District.

5 Appendix G – Key Characteristics of Landscape Character Assessment

Once again, the identified key characteristics relevant to the Braintree District are only taken from the Essex LCA, and do not include characteristics from the 2006 Braintree LCA. More localised studies are referred to for other areas such as the Tendring District LCA, for example. We suggest that the subsequent EIA considers character effects against characteristics identified by the finest grain local LCA, the 2006 Braintree LCA by Chris Blandford Associates.

6 Appendix H – Preliminary Viewpoints

Table H1 gives text narrative for the 3 viewpoints proposed within the Braintree District; 24, 25, and 26. This identifies the grid references for each viewpoint and the receptor group represented. We reiterate the request for a workshop to determine appropriate viewpoints with the National Grid's landscape consultant team.

7 Appendix I – Landscape and Visual Impact Assessment Methodology

A detailed methodology for the subsequent LVIA, within the EIA, is outlined in Appendix I. IN general, this is robust and in line with GLVIA3. The section relating to landscape value does not reference the latest technical guidance from the Landscape Institute for assessing value outside of designated landscapes (TGN 02/21). This is, however, referred to within Chapter 13 earlier in the report. We strongly support the use of TGN 02/21 and would expect it to be used when assessing the baseline landscape value of the study area.

Technical Note – 001B

CLIENT:	Braintree District Council
PROJECT:	East Anglia Green Energy Enablement (GREEN)
SUBJECT:	Comments on the EIA Scoping Report in terms of Noise and Vibration (Chapter 14)
JOB NO.:	GM12443
DATE:	22nd November 2022
PREPARED BY:	R Calvert, MIOA
APPROVED BY:	S Urquhart, MIOA

1 SCOPE OF REVIEW

1.1 These review comments relate to the scoping methodology which will be used for the noise and vibration assessment for the East Anglia Green Energy Enablement (GREEN) Development Consent Order (DCO) which will be prepared by National Grid (NG). The methodology has been set out in the EIA Scoping Report dated November 2022 and prepared by NG. This review is concerned only with Chapter 14 – Noise and Vibration.

1.2 In brief, the proposed development comprises the construction and operation of 180km of 400kV electricity cabling between the existing substations at Norwich Main in Norfolk, Bramford in Suffolk and Tilbury in Essex. The cabling is proposed to be predominately overhead via pylons.

1.3 This technical note comments upon the scoping report for the proposed scheme in terms of noise and vibration (Chapter 14).

2 REVIEW COMMENTS

2.1 As stated above, the scheme is 180km in length, however, for the purposes of this review and document we have considered only the central part of the scheme which falls within the jurisdiction of Braintree District Council BDC.

2.2 This review considers each section of the proposed scoping.

Approach to Scoping – Section 14.1

2.3 The approach to the scope of the assessment is set out in the report and is agreed.

Regulatory and Planning Policy Context – Section 14.2

2.4 National Grid (NG) have identified national, regional, and local policy which will be considered when assessing the potential noise and vibration impacts of the scheme. Furthermore, relevant technical guidance specific to noise and vibration have also been identified. The policies and guidance identified is agreed.

Study Area – Section 14.3

2.5 The study area for the assessment of noise impacts has been identified by NG as receptors within 300m of the construction works.

2.6 Further, the study area for vibration impacts is defined as within 100m of the works.

2.7 These study areas are considered to be suitable and are agreed.

2.8 However, it is possible that the works could disturb historic monuments and scientific laboratories. These sensitive receptors should also be considered.

Data Collection – Section 14.4

2.9 NG propose to use the Defra noise maps to determine the baseline. This noise mapping data is not normally appropriate to use to support a planning application. However, the assessment will utilise the ABC method stated in *BS 5228-1:2009+A1:2014. Code of practice for noise and vibration control on construction and open sites – Part 1: Noise* (BS5228). The ABC method seeks to identify the baseline noise level at receptors; the lowest category (Category A) is an ambient noise levels which is less than 65dB(A) during the daytime.

2.10 The receptors are predominantly in rural areas and are therefore likely to have an ambient sound level which is 65dB(A) or less.

2.11 Therefore, in this case, the Defra mapping is considered appropriate, and this approach is agreed.

Engagement with Stakeholders – Section 14.5

2.12 The list of stakeholders set out by NG is agreed.

Baseline Conditions (inc. future baseline) – Section 14.6

2.13 The assumptions made regarding the expected baseline conditions are appropriate and robust. This approach is agreed.

Further Data to be Gathered / Processed in the ES – Section 14.7

2.14 The additional information which would be used to inform the ES is agreed.

Measures Adopted as Part of the Project – Section 14.8

2.15 The adopted noise and vibration mitigation measures appear to be appropriate for the scheme to control noise and vibration emissions from the development during the construction and operational phases.

2.16 However, it is recommended that the relevant management plans are reviewed in terms of noise and vibration and should be secured through a planning condition.

Likely Significant Effects – Section 14.9

2.17 The likely significant effects which are set out by NG are agreed, subject to appropriate measures to ensure that embedded mitigations are provided.

Proposed Assessment Methodology – Section 14.10

2.18 The proposed assessment methodology follows current technical guidance and policy and is agreed.

Proposed Scope of the ES – Section 14.11

2.19 The proposed scope of the assessment is agreed, subject to appropriate measures to ensure that embedded mitigation measures are provided.

3 SUMMARY

3.1 Overall, we agree with the scope of the assessment as presented by National Grid.

3.2 However, we would recommend that controls are put in place to ensure that the embedded mitigation to reduce construction and operational phase noise and vibration are used.

Brentwood Borough Council response to the East Anglia Green Energy Enablement (GREEN) Project, by National Grid Electricity Transmission (NGET): Environmental Impact Assessment Scoping, November 2022

1. Brentwood Borough Council (BBC) welcomes the opportunity to engage with National Grid on the East Anglia GREEN project to build a new high voltage network reinforcement between Norwich, Bramford and Tilbury. This is a complex project and one which as proposed, has a direct impact upon Brentwood borough, with part of the preferred route for the new high voltage overhead transmission line proposed to go through the east and southeast of the borough.

2. Please note, this response forms only part of the council's representation to the Scoping Report. In addition to this response a joint consultation response, coordinated by Essex Place Services on behalf of the affected Local Authorities, has been produced with a focus on Landscape, Urban Design, Arboriculture, Ecology, Archaeology and Heritage impacts.

3. Its noted Scoping has been undertaken to identify issues which are likely to give rise to significant effects and therefore should be included within the scope of the Environmental Statement (ES). BBC's response to the Scoping Report is set out as follows:

Health and Wellbeing

4. The Scoping Report refers to relevant guidance that has informed the document including Public Health England (PHE) (2020) 'Health Impact Assessment in spatial planning'. BBC wishes to inform of its own local policy on HIA's (Policy MG04), which requires a HIA to be prepared in accordance with best practice as published by PHE and locally through the Essex Planning Officer Association (EPOA) HIA Guidance Note.

5. BBC wishes to highlight the continued need for engagement with the council as the application progresses, to identify opportunities for positive health impacts and potential negative impacts and how they might be mitigated. This will include understanding the effect on the health of the local population as a result of the Project.

Historic Environment

6. **Appendix A (Figure 11.1, Designated Heritage Assets)**: The study area for the historic environment is shown on Figure 11.1 at Appendix A. It's noted from review of this document how close the proposed route passes through

the grounds of Ingatestone Hall (Grade I listed) and passes within close proximity to Heron Hall (Grade II listed). BBC wishes to highlight this section as being one of historic sensitivity. The preferred route as proposed will pose a significant impact on the setting of these listed buildings and potentially have a direct impact for significant Ancient Monuments and archaeological deposits. BBC stresses the importance of a full assessment of the impact of the proposal on the historic, architectural, and associative value of these heritage assets (above and below ground) and all other effected heritage assets across the route. On this matter, BBC request NGET seek detailed advice with the regional team at Historic England Cambridge.

Landscape and Visual

7. **Appendix B:** Lists the preliminary viewpoints for discussion and agreement with Natural England, AONBs and local planning authorities. These locations are further illustrated in mapped form in Appendix A (Figure 13.2, Visual Receptors). It's noted there are only 4 preliminary viewpoint locations spanning the route within Brentwood borough and its further noted there are no proposed viewpoints within Local Plan strategic allocation R01 'Dunton Hills Garden Village', an allocation for 4,000 dwellings (together with necessary community, retail, educational and employment development), which is dissected by the Scoping Report Corridor.

8. BBC has strong concerns that the significant effects of the proposed route are not being adequately identified, particularly in relation to the Local Plan's strategic allocation. The preliminary viewpoints identified within Brentwood borough are insufficient and do not relate to planned development, site allocations and locally sensitive receptors including residential and public rights of way. BBC request to be directly involved in the identification and final agreement of viewpoints within Brentwood borough.

Socio-Economic, Recreation and Tourism

9. **Section 15.2.1:** Sets out the overarching policy relevant to the Project relating to socio-economics. It states EN-1 contains the following at Paragraph 5.12.4 – "*Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies*".

10. The Scoping Report Corridor, through which the preferred route of the transmission line is proposed, passes directly through Brentwood Local Plan's strategic allocation R01 'Dunton Hills Garden Village'. Following years of extensive consultation, the Brentwood Local Plan was adopted on 23 March 2022. The Local Plan strategic allocation R01 has an indicative capacity for around 4,000 homes together with necessary community, retail, education and employment development and comprehensive infrastructure to support a self-sustaining, thriving and healthy garden village.

11. The preferred route of the transmission line has the potential to seriously undermine the delivery of the adopted Dunton Hills Garden Village allocation (which is to provide 21% of the boroughs total housing provision to 2033), and in doing so will have clear negative implications for housing delivery in the borough and across the South Essex Housing Market Area. An area of acute housing need and affordability pressures, coupled with strong projected population growth. Additionally, the strategic allocation is projected to deliver approximately 5.5 hectares of employment development, providing a significant amount of new economic development opportunities to fulfil local need. Considering the above, the delivery of this allocation is considered to be a matter of public interest.

12. The current status of Brentwood's strategic allocation R01 is that an active planning application for the majority of the garden village has been received (validation date 13 September 2021) by the council as local planning authority and is in the process of being determined. Furthermore, it is expected that this application for the garden village will have progressed to either a resolution by BBC Planning Committee, or a full decision, by the time that the EIA for the East Anglian GREEN Project is formally submitted. Highlighting a potential need to update the EAI at a late stage to reflect the advancing status of this strategic allocation.

13. In light of the above, BBC raises strong concern to the lack of consideration demonstrated in how the proposed development's socio-economic impacts correlate with Brentwood's Local Plan policies, namely strategic allocation R01 'Dunton Hills Garden Village'.

14. **Section 15.8.6:** States, "*The proposed Order Limits would cross areas with planning permission and site allocations and this has the potential to affect development land…The potential effect of the Project on planning and development is therefore proposed to be scoped into the ES*".

15. It's noted Appendix A within the Scoping Report, sets out in mapped format (Figure 15.2), the Socio-economic, Tourism and Recreation Receptors; the limited scope of the material presented in this regard is considered insufficient, as unhelpfully the Report does not present mapped information setting out the areas with planning permission and site allocations that will likely experience significant effects. In order to comprehensively assess the effects of the proposed on planned development, it's considered necessary and transparent to present this information in similar mapped form; required to adequately consider the cumulative effects from all planned developments. This is of particularly significance for strategic allocation R01 'Dunton Hills Garden Village', given its scale and the fact it includes community, retail, education and employment development.

16. BBC wishes to stress the importance of continued dialogue with NGET in understanding and agreeing the potential effect of the Project on the strategic allocation at 'Dunton Hills Garden Village', which will need to be scoped out in the ES. BBC requests to be directly involved in work which informs this understanding.

17. **Section 15.10.1:** Sets out the matters proposed to be scoped in and out of the ES for Socio-economics, Recreation and Tourism. BBC seeks reassurance that each 'Matter' identified to be scoped in or out of the ES, will apply to areas with planning permission and site allocations, in the same way they will apply to those areas containing existing development.

General remarks

18. In the eventuality that changes are made to the Scoping Report Corridor, for example to circumvent the 'Dunton Hills Garden Village' strategic allocation, BBC wishes to stress the continued need to assess whether there may be significant impacts on the allocation site.

Future Engagement

19. The council requests further ongoing engagement with NGET on the scheme to address the concerns identified within this response. BBC is expecting that the EIA for the Project forms part of the emerging PPA and the council looks forward to continued dialogue as part of this process.

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RESPONSE BY BROOMFIELD PARISH COUNCIL, ESSEX to:

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development): Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.

1. Introduction

Broomfield Parish Council ('the Council') welcomes the opportunity to contribute to the Scoping Opinion and Environmental Statement (ES). We trust this will assist NGET in its duties under Section 38 and Schedule 9 of the Electricity Act 1989 in relation to preserving the amenity of the environment and in mitigating effects.

2. Background - East Anglia Green Energy Enablement Consultation – June 2022

It is deeply regrettable that NGET have yet to carry out a full, fair and open consultation on all the options for transferring electricity from the North Sea to London, the South-East and other parts of England. The relevant points are set out in the Council's response to that consultation. In short, the development of the project to date has been deficient because:

- It has failed to consult on the case for an offshore grid
- It has imposed artificial boundaries between EAG and other relevant projects (such as SEALink) and has failed to consider alternative options for offshore generators to the grid in a holistic way
- With regard to onshore routes, it has presented only one routing option for public debate, with flexibility limited to minor amendments within a relatively narrow 'swathe'.

And, in relation to the proposed onshore route around Chelmsford:

- It has failed to take account of Holford Rules, particularly in relation to topography, length of route and sharp changes of direction
- It has failed to investigate potential for rationalisation of existing power lines, which would reduce environmental impact overall
- It has failed to provide clarity about the extent of the area affected by costal bird habitats, preferring instead a vague 'inland is best' principle.

The Council therefore believes that this Scoping Opinion request is premature but makes the following comments without prejudice to that position.

2.1 Impact of these Failures on the Scoping Opinion and ES

'Regulation 14(d) in conjunction with Schedule 4, paragraph 2 of the EIA Regulations states that an ES should include a description of reasonable alternatives studied by the promotor and an indication of the main reasons for selecting the chosen option, ***including a comparison of the environmental effects****' (Scoping Report, para 3.1, emphasis added).* It is clear from the Corridor and Preliminary Routeing and Siting Study (CPRSS) in June 2022 that the preferred option was chosen mostly on the basis of high level, desk-top study; and without the opportunity for local knowledge about environmental impacts to be supplied before decision-making. It is therefore critical that the Scoping Opinion requires NGET to provide full and thorough '**comparisons of the environmental effects**' of all the options, including offshore options and alternative onshore routes.

It is quite clear that NGET is someway off being in a position to do this based on its current work, even though it seems to be trying to provide *post facto* rationalisation to its flawed selection process. This *post facto* process must be replaced by proper consideration of the relative environmental impact of all options, which should have happened at the initial stage.

Therefore, in summary, the **Scoping Opinion must be sufficiently robust and rigorous to lead to a full and open evaluation of the environmental impact of all potential options.** The evidence and decision-making used to support the CPRSS is very inadequate in this regard.

3. Whole Topics Proposed to be Scoped Out

3.1 Major Accidents and Disasters

Scoping Report, para 5.7.3 bullet point 7, notes the *'risk that a third party might disturb and damage the infrastructure in error, which may lead to serious harm to third-parties such as electrocution.'*

To the north-west of Chelmsford, the graduated swathe is less than 500m from the boundary of Broomfield Hospital, which is a major general hospital serving the whole of mid-Essex. It is also the site of St. Andrew's Burns Unit, which is a major specialist unit for the region. The helipad is therefore an important feature both for the Essex Air Ambulance and helicopters from outside the area. These are often seen circulating above the area awaiting landing.

Safety for aircraft must be an overriding consideration. With greater specialization as the heath economy develops, it is likely that the number of helicopter visits will increase over the lifetime of an overhead line (OHL). Clearly, the installation of OHL cannot be allowed to constrain the efficient development of hospital services on this site in the future and thereby limit exploitation of the huge capital invested in redevelopment of the site in recent years. Night-time lighting on pylons and other high-vis markings on pylons and cables would, by definition, increase the visual impact of pylons on receptors, which would also need to be considered in the ES.

Whilst the risk of a major accident may be small provided that proper procedures are always followed and no human error occurs, it should be assessed as part of the ES against alternative routes without any such risk. **It should therefore be scoped in to the ES.**

3.2 Climate Change – Carbon Emissions from Construction

Scoping Report, para. 5.7.11 argues the impact of carbon emissions from construction can be scoped out because of the overall benefits of the green energy that the Project would deliver. This entirely misses the point that there are other ways of delivering the project aims (such as an offshore grid) which NGET has not seriously considered and which may (or may not) create lower carbon emissions during construction. Clearly, this should be considered, therefore **the impact of potential construction methods on carbon emissions should be scoped in to the ES.**

3.3 Climate - Vulnerability

Para. 5.7.12 states that OHL are not vulnerable to climate problems, such as ice and intense wind gust, and that flooding problems can be addressed elsewhere. However, it does not refer to the effects of extreme heat. Given the impact of extreme heat on infrastructure such as railway lines and (last summer) on cabling, **the Council believes the impact of climate change and extreme heat should be scoped into the ES.**

4. Agriculture and Soils

This is a very important issue, so the Council fully supports the inclusion of ALC Grades 1 and 2 as a 'very high' receptor (Table 6.2). The claim in para. 6.8.1 that the 'Corridor has been designed to avoid as far as possible to avoid sensitive agriculture and soils features ..' is therefore all the more puzzling. Map B (attached) shows that this is simply not true with regard to the Chelmsford area, where the preferred route crosses higher-grade, more sensitive Grade 2 land to the north-west of Chelmsford, when it could have followed an alternative route on Grade 3 land to the south-east. The Scoping Opinion must therefore ensure that the ES is sufficiently robust to challenge such decisions, which it appears have been taken mainly for operational ease and because 'inland is best' rather than any comprehensive evaluation of environmental factors.

As noted in para. 6.9.2, the loss of high-grade agricultural land during construction may have significant effects, particularly as '*the baseline is not fully understood*'. The difficulty in ensuring that stripped and stockpiled soils can be reinstated in a way that causes ecosystem functions to recover fully and quickly is an additional concern; and a further reason for avoiding the highest-grade soils, where the damage would have greater effect.

The Council also believes that the impact of the operation of the project should be included in the Scoping Opinion and ES. This is because:

a) The localised impact of siting pylons is difficult to predict. In some situations (depending on specific site constraints), it could lead to parcels of high-grade land becoming difficult to access with modern machinery;
b) Woodland planting required for mitigation might result in permanent loss of high-grade land to crop production;
c) General loss of agricultural efficiency, particularly if the optimum size of farm machinery continues to increase, may lead to less effective agricultural production.

Whilst the economic effects on individual landowners could be addressed through compensation, this would not address the overall loss of important food-producing land. **The Council therefore believes that the impact of the ongoing operation of the project on Agricultural Landholdings and on Soil Quality (Table 6.5) should be scoped in.**

5. Ecology and Biodiversity

5.1 Impact of Operation on Breeding Birds

Para.271 of the draft EN-5 identifies the risks of collision and electrocution for a range of birds, particularly in poor visibility. It notes that '*even perching birds can be killed as soon as their wings touch energised parts*'. The **Council therefore believes that the potential impacts on all bird species (including breeding birds) should be scoped in to the ES**, due to the risks of collision and electrocution; and through damage to habitats during maintenance.

5.2 Great Crested Newts (GCN)

The Council believes that impacts on GCN during construction should be scoped in. The fact that mitigation measures are possible does not negate the potential harm to habitats during construction. For completeness, impact should be scoped in rather than scoped out and treated separately.

5.3 Other Notable Mammals

Table 8.9, final row, lists the potential adverse impacts during construction including through habitat removal/fragmentation and, for nocturnal species, through operational lighting. Though temporary, these impacts may still lead to long-lasting effects on these species. Therefore, **the Council requests that construction impacts on other notable mammals should be scoped in to the ES.**

6. Health and Wellbeing

The Council believes these are important issues and they should not only be considered as intra-project and cumulative effects. The health-related environmental change impacts mentioned in tobale 10.2 (such as air quality, noise, traffic and transport) can have a significant and direct impact on residents that is distinct from their impacts on ecology, biodiversity and climate change (for instance). Planning issues arising from these sorts of impacts frequently lead to stress in individuals and communities.

Given the presence of alternative ways of delivering the project aims (such as an offshore grid) that would not have the same direct impact on people, it is vital that that impacts on people's health and well-being are

assessed fully and in their own right, as opposed to merely as part of cumulative impacts. **The Council therefore requests that Health and Wellbeing forms a specific chapter in the ES.**

7. Landscape and Visual

7.1 Opportunities for Rationalisation of Existing Infrastructure

EN-5 notes at Paragraph 2.8.3 that:

'Sometimes positive landscape and visual benefits can arise through the reconfiguration or rationalisation of existing electricity network infrastructure.'

It is very regrettable that the CPRSS, whilst noting the opportunities for rationalisation with existing OHLs south-east of Chelmsford, did not investigate possibilities further, choosing instead a greenfield route north-west of Chelmsford which (it appears) would be operationally simpler.

The Council considers that opportunities for rationalistaion should be fully considered as a positive means of landscape enhancement/mitigation. **The Council therefore requests that this be scoped in as an additional matter to table 13.4:**

Matter: Rationalisation of Existing Infrastructure

Phase: Construction and Operation

Scoped: In

Justficiation: EN-5 states that 'Sometimes positive landscape and visual benefits can arise through the reconfiguration or rationalisation of existing electricity network infrastructure'.

7.2 Topography

Holford Rule 4 states:

Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.

Holford Rule 5 states:

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.

This is extremely important in terms of visual impact. However, this does not seem to have been factored into environmental study to date in the Chelmsford area, as illustrated in Map A attached; and in Map E (which shows section of the swathe west of Broomfield in more detail). These demonstrate how the Preferred Route ignores the open valley with a hill background to the south-east of Chelmsford, preferring higher plateaus with sky backgrounds to the north-west.

The Council therefore requests that this be scoped in as an additional matter to table 13.4:

Matter: Topography

Phase: Construction and Operation

Scoped: In

Justification: Holford Rules 4 and 5 emphasise the importance of siting infrastructure in open valleys with tree or hill backgrounds wherever possible to reduce the visual impact of pylons. Ridges with sky backgrounds, where the full height of pylons is clearly visible, should be avoided.

7.3 Sharp changes of direction

Holford Rule 3 states:

'Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers.'

This is extremely important in terms of visual impact. However, it does not seem to have been factored into environmental study to date in the Chelmsford area, as illustrated in Map A attached. This shows how the Preferred Route performs two almost 90-degree angles around the village of Writtle (west of Chelmsford).

The Council therefore requests that this be scoped in as an additional matter to table 13.4:

Matter: Sharp changes of direction

Phase: Construction and Operation

Scoped: In

Justification: Holford Rule 3 encourages OHL to follow a direct line wherever possible and to avoid sharp changes of direction. This tends to reduce visual impact by reducing the need for larger angle towers and broadly keeping OHL in one plane.

7.4 Further data to be gathered (Scoping Report para. 13.7)

7.4.1 The Broomfield Neighbourhood Plan is currently under Regulation 14 Consultation and is expected to be adopted in Summer 2023. The following 2 landscape study documents have been produced by Alison Farmer Associates to support the Plan; and their findings are reflected in Plan policies:

Broomfield Neighbourhood Plan Landscape Appraisal

Review of Local Green Space, Valued Landscape and Key Views.

Both can be accessed at: https://www.broomfieldnp.org.uk/EVIDENCE__and__DOCS_38228.aspx

The Council requests that these documents are added to the lists in para. 13.7.1 and Appendix G; and are used to inform the ES, alongside similar professional studies produced to support neighbourhood plans. Such documents often provide more detailed, granular evidence about landscape character and sensitivity than higher level regional or district-wide studies.

7.4.2 Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessments' (Chris Blandford Associates, September 2006)

This is an important document for landscape study in Chelmsford district, adding rather more detail than the Essex Landscape Assessment. **The Council requests that it is added to the lists in para. 13.7.1 and Appendix G; and is used to inform the ES.**

7.5 Locally designated landscapes – at night

The 'graduated swathe' and Broomfield Hospital are adjacent to the Valued Landscape 'West of Church of St Mary with St Leonard, Broomfield', designated as Valued Landscape in the Broomfield Neighbourhood Plan ('Review of Local Green Space, Valued Landscape and Key Views', p. 10-12). As indicated in Section 3 above, it seems quite possible that OHL so close to the Hospital helipad would require night-time lighting.

At dawn and dusk, particularly in summer months, lighting would likely be operational whilst receptors (people using footpaths and PRoW) are present, thus introducing a further visual instrusion to this sensitive landscape. **The Council therefore requests that 'Designated landscapes, landscape character and views – at night' be scoped in (construction and operation) where OHL are required to have safety lighting.**

7.6 Views

7.6.1 Important views identified in the Broomfield Neighbourhood Plan 'Review of Local Green Space, Valued Landscape and Key Views'

29 important views were identified by Alison Farmer Associates and are described in text and photographs in Section 4 of the Review (https://www.broomfieldnp.org.uk/EVIDENCE__and__DOCS_38228.aspx). All of these lie within the 3km ZTV, as defined for OHL assessment purposes. Of these, 15 look towards the graduated swathe' or are located within it. They are:

Viewpoint 1: Lt Waltham (south-west corner of Merefields towards Woodhouse Lane)

Viewpoint 6: Elevated view from the permissive path north of Mill Lane

Viewpoint 7: Elevated view from Little Waltham Road looking southwest towards Broomfield

Viewpoint 13: Felsted Field looking west

Viewpoint 14: Parsonage Green looking southwest out of Broomfield to wider rural landscape

Viewpoint 18: Church Green across Night Pasture

Viewpoint 19: From public footpath through meadow churchyard looking west

Viewpoint 20: Public footpath across former open space associated with Chelmer Valley High School

Viewpoint 23: View northwest towards Bushey Wood from Hollow Lane

Viewpoint 24: View south from public right of way on Pleshey Plateau

Viewpoint 25: From Pleshey Plateau towards Broomfield

Viewpoint 26: Looking northwest towards Tufnell Mere

Viewpoint 27: View north across Tufnell Mere

Viewpoint 28: View towards Woodhall Farm from copse, beside footbridge on Footpath 9

Viewpoint 29: View north-east from entrance gate to Bedford Fields, Woodhouse Lane.

The exact position and direction of these key views are shown on Drawing 5: Valued Landscape and Views on page 13 of the 'Review' (also attached as Map C). As indicated, they have all been professionally assessed in terms of description and sensitivity and have also, through surveys, been shown to be highly valued by the local community. They form part of the evidence base to support Policy BFD2 – Protecting Broomfield's Landscape Character in the Neighbourhood Plan.

The Council requests that these 15 views are added to Appendix H and used in the ES to assess the impact of Project.

7.6.2 Other important local views

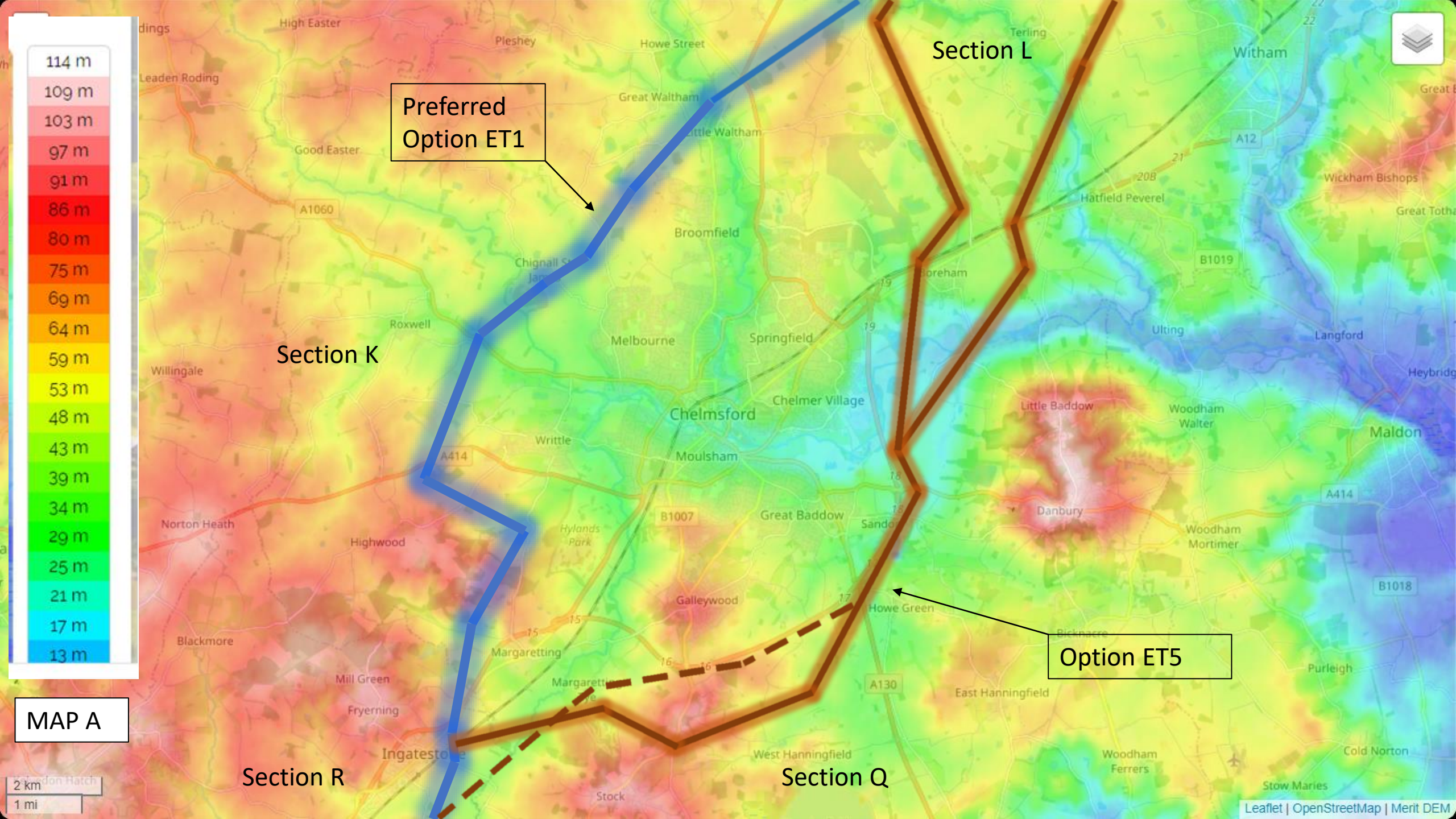
The Council also requests that the following views are added to Appendix H and used in the ES to assess the impact of Project.

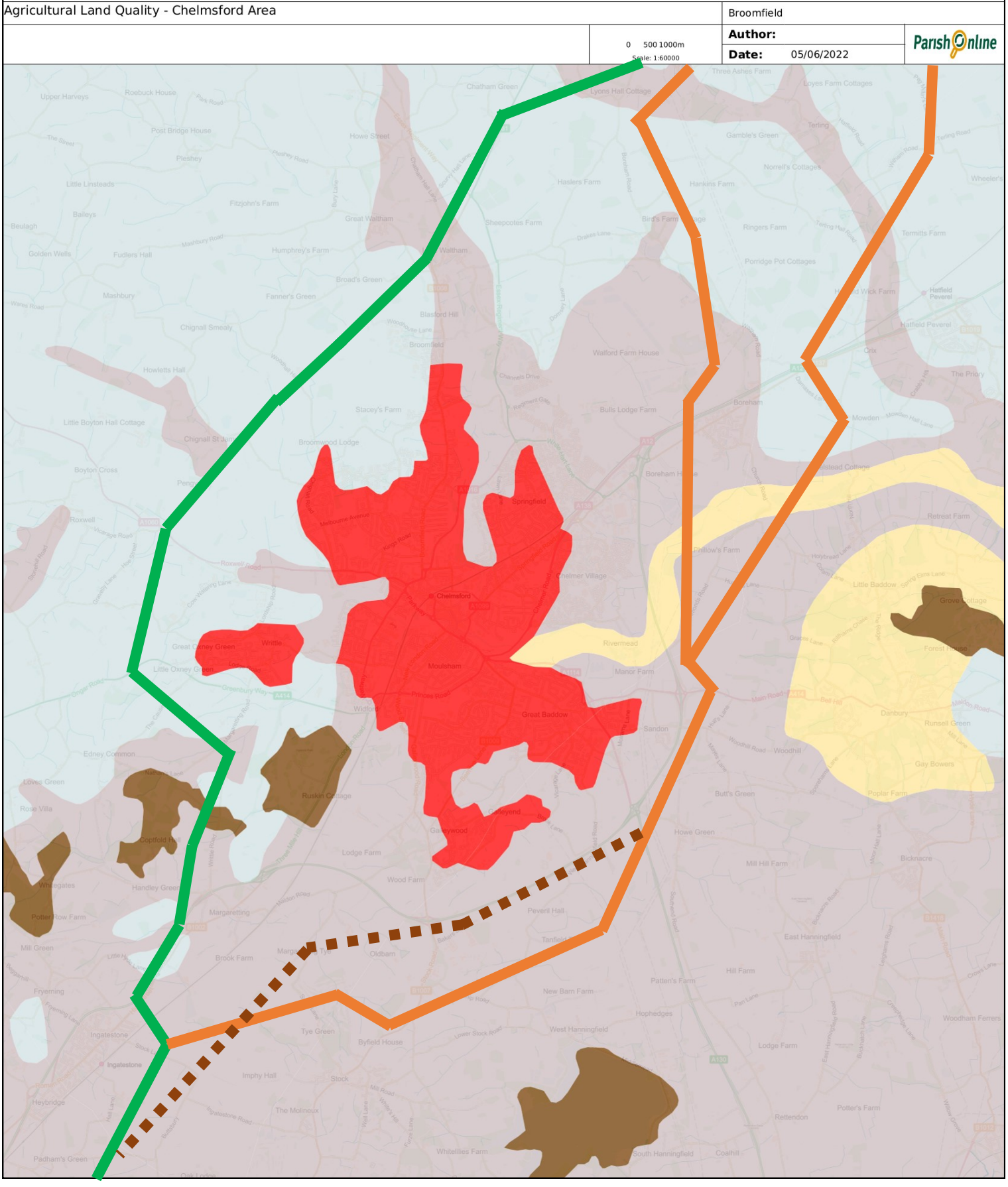
VP Name	X*	Y*	Reason for inclusion
Sparrowhawk Wood, Larks Lane, Gt Waltham	700	123	Recreational receptor on PRoW, overlooking protected lane, towards River Chelmer below
Essex Way at Langleys, Gt Waltham	700	138	Recreational receptor on Essex Way, within Langleys Registered Park and Gardens of Special Historic Interest (which lie within CA), looking towards River Chelmer and Little Waltham
Chatham Hall Lane, Little Waltham	707	135	Recreational receptor on a country lane, forming part of PRoW network, overlooking River Chelmer
Channels Drive (near junction with A130)	720	108	Elevated viewpoint within expanding Channels/Beaulieu (currently c. 4,000 dwellings), looking west across lakes and Chelmer Valley
Hylands Park	682	044	Part of Hylands Estate is a grade II* listed country park encompassing 574 acres of historic parkland, looking west towards Writtle.

*Co-ordinates are shown as marked on OS Map 183, Chelmsford and The Rodings rather than as full co-ordinates.

Broomfield Parish Council

December 2022

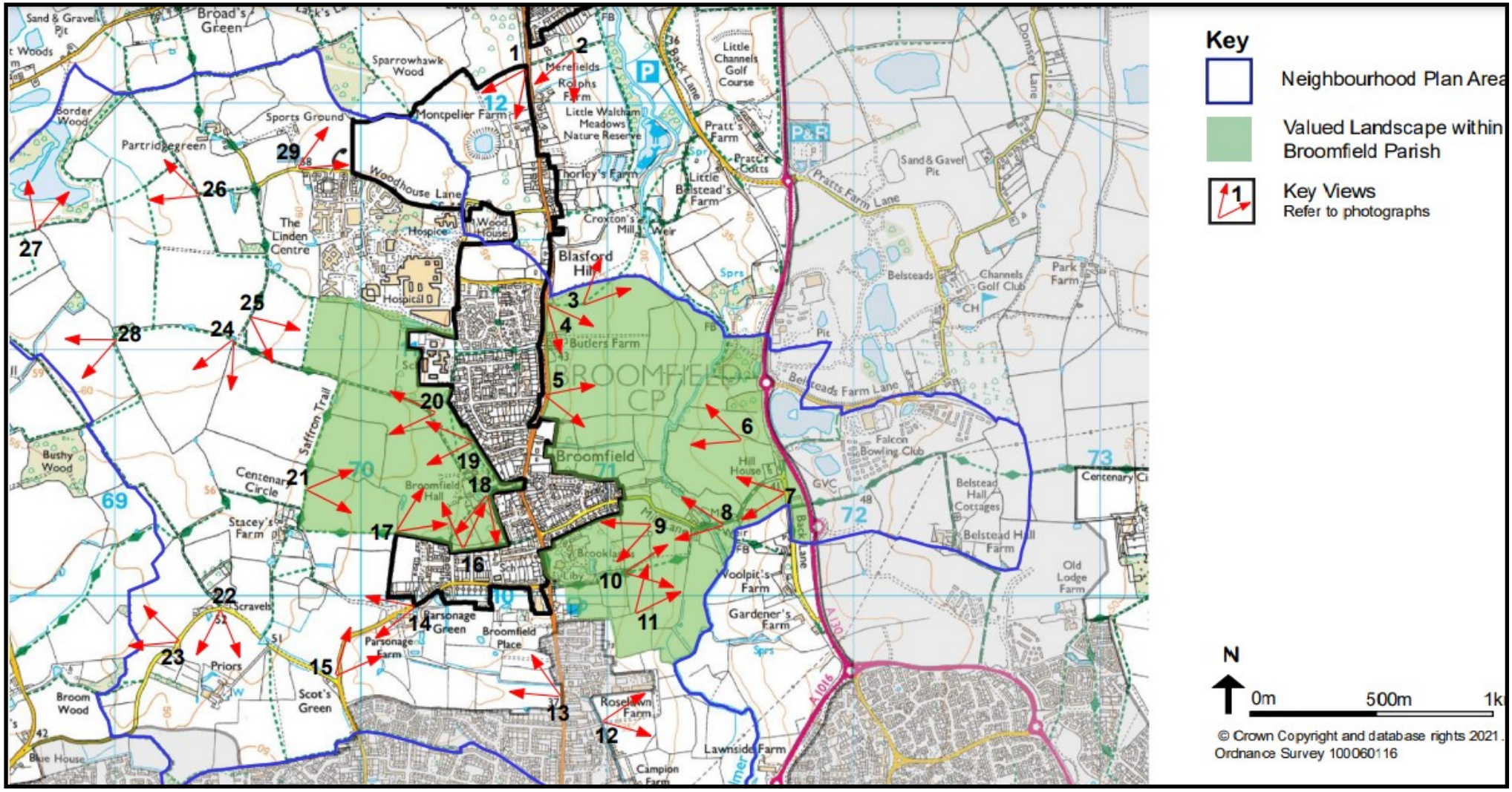

114 m
109 m
103 m
97 m
91 m
86 m
80 m
75 m
69 m
64 m
59 m
53 m
48 m
43 m
39 m
34 m
29 m
25 m
21 m
17 m
13 m
Preferred Option ET1
Section L
Section K
Section R
Section Q
Option ET5
MAP A
Chelmsford
Broomfield
Melbourne
Springfield
Moulsham
Writtle
Chelmer Village
Great Waltham
Little Waltham
Howe Street
Pleshey
Good Easter
Leaden Roding
High Easter
Roxwell
Willingale
Norton Heath
Highwood
Blackmore
Mill Green
Fryerning
Margaretting
Galleywood
Great Baddow
Hylands Park
Howe Green
East Hanningfield
West Hanningfield
Stock
Ingatestone
Witham
Terling
Hatfield Peverel
Ulting
Langford
Maldon
Little Baddow
Woodham Walter
Danbury
Woodham Mortimer
Purleigh
Woodham Ferrers
Cold Norton
Stow Maries
Wickham Bishops
A12
A1060
A414
B1007
B1019
B1018
A130
2 km
1 mi
Leaflet | OpenStreetMap | Merit DEM



MAP B - Agricultural Land Classification Chelmsford

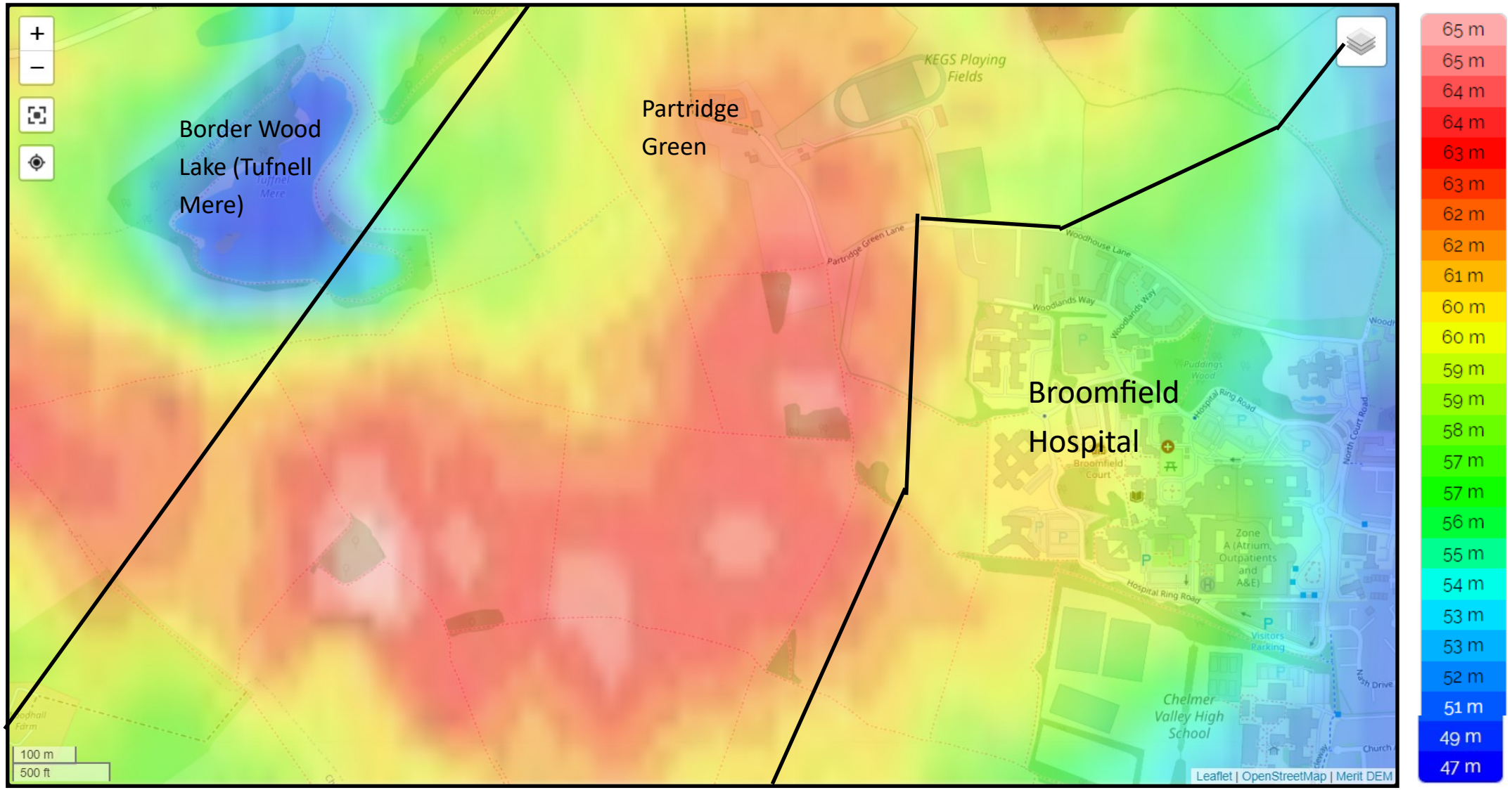
- Grade 2
- Grade 3
- Grade 4
- Urban
- Non Agricultural
- Preferred Option ET1 (Sections K & R)
- Option ET5 (Sections L & Q)
- Broomfield PC—suggested variation to Section Q

BROOMFIELD PARISH COUNCIL—MAP C



Map E. Pleshey Farmland Plateau—Topography

Black lines denote the edge of the 'Graduated Swathe'



Burstall Parish Council
[redacted]

The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Sent by email to: eastangliagreen@planninginspectorate.gov.uk

1 December 2022

Your ref: EN020027

Dear Sir / Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11
Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)
Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

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Summary
In its informal consultation NGET has admitted that the landscape in the Burstall parish area – where the sub-station is sited - may have reached its capacity to accommodate energy infrastructure.

Despite this admission NGET's Scoping Report fails to accurately describe the baseline in this area.

Potential impact should also be considered against the need for the project and the evidence provided to support that need. We support claims that alternative infrastructure options are preferable.

13 Landscape and visual

Landscape character
We agree with the comments of Suffolk County Council and Place Services that it remains unclear how the baseline wire-scape will be considered (Scoping Report table 13.5 page 194):

> *It is not clear, despite the operation of the Holford and Horlock rules, to what extent the existing baseline wire-scape, consisting of both 400kV and 132kV overhead lines, will be*

considered in any landscape assessment. It is likely that in some sections of the route this Project, in combination with the baseline (other proposed projects in particular Bramford to Twinstead), may create an unacceptable wire-scape. Therefore, this will need to be part of any assessment and inform the approach to mitigation.

The scoping report omits significant detail in and around our parish. It states:

13.6.15 The Scoping Report Corridor continues south from Bramford substation where a number of existing overhead lines converge. Just south of the A1071 the Scoping Report Corridor crosses one existing 132kV overhead line which is proposed to be removed as part of the Bramford to Twinstead Reinforcement Project. There is an existing 132kV overhead line to the east within the AONB and there are also sections which run to the north of the AONB, parts of which cross into the northern extent of the AONB.

On its west side, south of the A1071 the scoping report corridor crosses a short length of overhead 132 kV line that may be removed as part of the Bramford to Twinstead reinforcement. A related section of the line on the east side does not form part of the scheme for removal. We are not aware of any plans to remove this section (see map in Appendix below).

Moreover, at this location, the 132 kV line is over a mile from the Bramford to Twinstead 400 kV line and therefore provides minimal mitigation if removed.

In short, the wire-scape would be significantly increased by the addition of the East Anglia Green line.

The connection from the substation to these 132 kV overhead lines is underground in recognition of the high value of the landscape throughout the Burstall valley. The valley's merits have long been recognized and recorded:

Burstall and Belstead Brook valleys *- The landscape to the east of the Brett Valley and Hadleigh retains much of the older field patterns and has particular value. It is proposed in the Babergh Local Alteration No.2 as a Special Landscape Area. The topography is more varied, and attractive small valleys with considerable area of pasture run in an easterly direction. Woodland cover is generous and hedgerow provision is excellent.[1]"*

In its informal consultation documents for East Anglia Green NGET accepts this degree of sensitivity and states:

"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****." (our emphasis)*

[1] Babergh District Council Landscape Assessment and Action Programme, 6.19 Burstall and Belstead Brook Valleys, April 2000, Revised June 2002 and August 2004.

The plan in the Appendix shows the large number of overhead lines radiating from the sub-station and which create a wire-scape from several locations. However, despite the number of existing lines there are high and medium value landscape receptors and a high susceptibility of visual receptors which would be negatively impacted by the East Anglia Green proposals. For example, there are popular recreational footpaths on high and low ground throughout the parish.

Despite this degree of sensitivity, NGET's list of preliminary viewpoints in Appendix H of its Scoping Report contain no viewpoints for the Burstall area. It is essential this omission is rectified in the EIA.

Burstall Parish Council therefore requests that the cumulative impact of the many energy and infrastructure proposals be given the full and thorough consideration it deserves.

Flawed consultation means flawed scoping report

Charles Banner KC, in opinion provided to amenity group ESN Pylons, concluded that the non-statutory consultation was deficient due to 'after-the-event rationalisation of alternatives' and failure against two of the Gunning Principles. Mr Banner warned that unless remedied, the consultation risked infecting later stages, such as the Scoping Report. It is a continuation of a deficient process. It addresses none of the issues raised relating to selection of, or consultation on, alternatives. NG now breaches a third Gunning principle – the requirement to give conscientious consideration to consultation responses.

Mr Banner stated:

> *Further, there is a real risk that the legal deficiencies in the current consultation will, if left uncorrected, infect the later statutory consultation (which would in turn mean that the intended DCO application cannot lawfully be accepted by the Planning Inspectorate). As a minimum, the options which have already been improperly foreclosed would need to be revisited and consulted upon with a demonstrably open mind, providing the public with sufficient information to have a fair opportunity to advocate the alternatives discussed above.*

Specifically, Mr Banner noted that the rationale given so far for discounting the alternatives would not justify excluding them from the category of "reasonable alternatives" for the purposes of the EIA Regulations. Under this reasoning the contents of the Scoping Report cannot be relied upon.

NGET may argue that scoping can proceed without prejudice to a final project decision. We believe the EIA for an onshore scheme should be considered against an EIA for an offshore alternative. Failure to do so prejudges the outcome and influences the content of the Scoping Report. There are grounds for rejecting the entire Scoping Report on this basis.

Yours faithfully

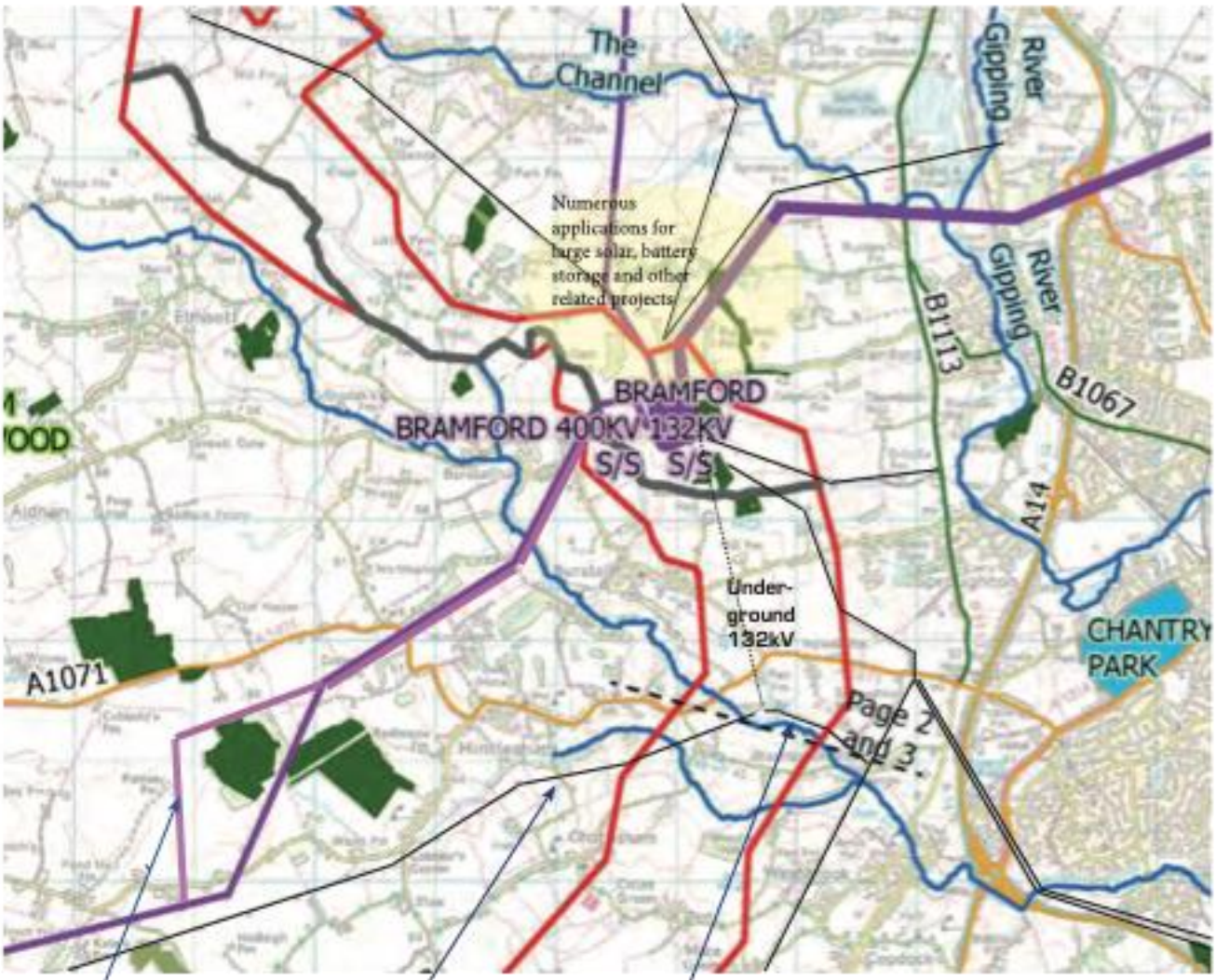
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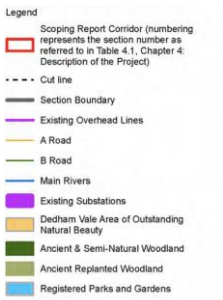
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Clerk to the Parish of Burstall

Appendix – the Burstall/Bramford wire-scape

From Scoping Report Appendix A Fig 4.1 page 3





Capel St Mary Parish Council

Clerk: [redacted]
Tel Fax: [redacted]
e mail: [redacted]

Chairperson: Mrs Christine Matthews
Tel: [redacted]
web site: capelstmary.onesuffolk.net

National Grid's East Anglia GREEN Proposals

1st December 2022

RESPONSE OF CAPEL ST MARY PARISH COUNCIL: OBJECTION

This is the response of Capel St Mary Parish Council to the informal public consultation ending on 5th December 2022 to the non-statutory pre-application consultation undertaken by National Grid Electricity Transmission for the proposed National Grid East Anglia GREEN NSIP.

We are concerned that National Grid decided, prior to this consultation, to choose a land route for ATNC rather than the undersea route. It has been proved by James Cartlidge MP that there been no public consultation on cables being placed undersea and we would ask that the undersea route be revisited.

Regarding the village of Capel St Mary, we are informed that a pylon will be within our BUAB and within 50 metres of Churchford Hall which means that it will be in close proximity to Little Wenham Castle, a grade 1 listed building, and also Castle House which is one of the oldest houses in Suffolk. This is also very close to our Nature Reserve which is a haven for wildlife and well used by our residents.

We appreciate that Dedham and Flatford are in an Area of Outstanding Natural Beauty and the lines there will be underground but many of the villages in Suffolk have wonderful scenery which should not be spoilt by these towering pylons.

Many feel that this is a 'fait accompli', and maybe it is, but we would ask that further consideration is given to other methods of transmission rather than inflicting these towering pylons on our beautiful countryside and villages.

Yours sincerely

[redacted]

Christine Matthews

Chair Capel St Mary Parish Council

Planning and Development Management
P.O. Box 7544, Civic Centre,
Duke Street, Chelmsford,
Essex, CM1 1XP

The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your ref:	EN020027
My ref:	22/02067/SCOPE
Please ask for:	[redacted]
Telephone:	[redacted]
Date:	30 November 2022

Dear Sir/Madam

LOCATION:	**The Planning Inspectorate Temple Quay House 2 The Square Bristol BS1 6PN**
PROPOSAL:	**East Anglia Green**
APPLICATION NO:	**22/02067/SCOPE**
DRAWING NO(s):	**Scoping Report/;**
DATE RECEIVED:	**7 November 2022**

I am writing on behalf of Chelmsford City Council to your letter dated 7th November 2022 regarding the Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development) Scoping consultation and notification.

I am writing to advise you that the draft Scoping Report relating to the above proposal submitted on 7th November 2022 is agreed subject to the following:

The Scoping Report is agreed subject to the items as raised being incorporated into the Environmental Statement:

1. Alternatives

The City Council notes the consideration and assessment of strategic options, route corridor and alignment options that has already been undertaken to date. However, it considers that further and full consideration should be given to the use of a fully offshore High Voltage Direct Current (HDVC) route (sea route) to deliver the project and or a fully underground High Voltage Direct Current (HDVC) cabling route.

The ES should provide full and through details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

In relation to historic environment, it is not clear if or how consultation comments have been considered and options reconsidered. It remains the case that from a heritage perspective, that although the inland Route P would pass through the Chelmer and Blackwater Navigation Conservation Area, this impact could be mitigated through below grounding and it has not been demonstrated through detailed assessment which of the various options would have the least heritage (and other impacts) with or without mitigation measures.

There remain serious concerns about the preferred route and its impact on the historic environment and its setting within the landscape. From the information to date the preferred route has not been adequately justified.

2. Flexibility

It is noted that the final route of the OHL has not yet been defined.

National Grid should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons, e.g. the number of new and replacement pylons and their locations, and the Limits of Deviation (LoD) for the installation of the new overhead line and underground cable. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters should be clearly defined in the DCO and in the accompanying ES.

3. Relevant Planning Policies

The EIA Scoping Opinion should refer to the following Policy documents and where relevant the following specific policies.

The Chelmsford Local Plan (2013-2036) was adopted in May 2020. Within that document there are a number of tailored policies, below are the most relevant policies which should be referred to within the ES.

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 would also be relevant in respect of all designated heritage assets. Alongside Strategic Local Plan Policy S3 (Conserving and Enhancing the Historic Environment) and Policies DM13 (Designated Heritage Assets) and DM14 (Non-Designated Heritage Assets).

Strategic Policy S11, Policy DM6 and DM8 to assess the visual and spatial impact of the proposed overhead line in the Metropolitan Green Belt and Rural Areas where it passes through the countryside.

The ES should also refer to Strategic Policy S1 (Spatial Principles), S9 (Infrastructure Requirements) and S10 (Securing infrastructure and impact mitigation in relation to transport impacts). There is also the Chelmsford Climate and Ecological Emergency Action Plan (2020).

Within the arboricultural scoping, surveying and reporting strategy (Appendix J) the Project seeks to minimise the impact on protected species, trees and ancient woodland. The ES should refer to Strategic Policy S4 in relation to the Natural Environment and Local Plan Policies DM16 and DM17 in relation to Ecology and Biodiversity and Trees, Woodland and Landscape Features. A number of protected trees (TPOs) and ancient Woodlands are potentially affected by the proposed project, and these are contained within the documents attached.

The proposed project would potentially impact upon Community Facilities and Assets. The ES should refer to Strategic Policy S5 which relates to protecting and enhancing community assets and Local Plan Policy DM21 which relates to protecting community facilities.

The proposed route would impact on a number of strategic site allocations. The sites which are affected are North of Broomfield (Strategic Growth Site Policy 8), North East Chelmsford (Strategic Growth Site Policy 6) and West Chelmsford (Strategic Growth Site Policy 2). The masterplans for North of Broomfield and West Chelmsford are approved and a material planning consideration. The masterplan for North East Chelmsford (Chelmsford Garden Community) is currently in progress and likely to be approved in early 2023 so would

also be a material planning consideration. There is also the Writtle Neighbourhood Plan 2021 which should be referenced.

The other key Policy documents which are a material planning consideration are the Making Places SPD 2021 in particular it references Green Infrastructure, Planning Obligations SPD in particular its Chapters (8 and 9) on Green and Blue Infrastructure, and the Solar Farm Development SPD.

4. Agriculture and Soils

The agricultural land survey must be undertaken of the entire route corridor to inform the grading of the land and in particular to inform and distinguish between Grade 3a and Grade 3b land.

The assessment should be based on the maximum Limits of Deviation (LoD) as defined in the DCO and should not just extend to the physical location of pylons and other physical features, but also the land extending underneath and to the side of the OHL (overhead lines) and proposed access roads.

5. Ecology and Biodiversity

It is concerning that the assessment of Great Crested Newts is proposed to be scoped out, given the City Council is aware of their presence close to the proposed route corridor, particularly within Broomfield/Little / Great Waltham area. Essex County Council Place Services will be providing comments on the acceptability of the ecology and biodiversity methodology as set out in the Scoping Report on behalf of Chelmsford City Council.

6. Health and Well Being

The decision to scope out Health and Well Being and Electro Magnetitic Fields is disagreed with and the approach to consider them in the cumulative impacts section of the ES and as a separate EMF report is not agreed.

Health and wellbeing, and the effect of Electromagnetic Fields must be considered holistically, as a chapters in their own right to enable a strategic assessment of the likely significance and harm that the proposal would have in ES terms. Piecemeal consideration on a theme-by-theme basis would not allow this assessment to take place.

Further, given the potential for public concern regarding EMFs and therefore the need for comprehensive information on EMFs and compliance of the proposed Project with the ICNIRP guidelines and requirements of NPS EN-5, it is considered that the findings of any EMF report should be reported within the Health and Well Being section, with a standalone report being appended to the ES.

The assessment on the level of significance/harm will need to be considered within the planning balance of the proposal and should be undertaken by relevant and appropriately qualified experts and professional personnel.

7. Built Heritage

Only 1 non designated heritage asset is identified within Chelmsford within the preliminary assessment. When the more detailed assessment is completed there are likely to be significantly more identified. The evidence base should include reference to the Chelmsford Register of Buildings of Local Value (local list), although it should be noted that this does not cover all parishes at present. The WWII Defence Survey and Register of Designed Landscape of Essex should also be referred to. The lack of any listing re-survey in Chelmsford means that there are occasional sites of national interest which are undesignated.

The grading of heritage significance, magnitude of impacts and significance of effects is based on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, 2011), which is standard approach for assessing major schemes. It should however by noted that a tabulated form of assessment cannot fully reflect heritage impacts, so professional judgement is an essential component to the assessment.

Appendix H sets out identified viewpoints to be assessed. This only includes 5 views points from public footpaths within Chelmsford. The assessment of views should be far more extensive, to include the key views that contribute to landscape character and the setting of heritage assets. For instance, but not limited to, views from/to designed landscapes and of/from parish churches. The LVIA should scope in views relating to historic landscape and heritage assets.

Mitigation options are described as embedded, standard and additional mitigation. Below ground routing is only proposed at Dedham Vale AOB at present. It is important that below grounding remains an option for other areas where the environmental impacts dictate that this level of mitigation is required. Low height or T pylons are noted as an option for mitigation. Landscaping is only proposed in the context of substations.

Potential mitigation measures should be extensive to reflect the scale and impact of the scheme. Landscape restoration, landscaping and tree planting should also be included, with adequate land take factored in at an early stage. Enhancement opportunities should also be fully explored, for instance with existing lower voltage power lines routed below ground in the immediate setting of listed buildings, heritage interpretation, and potentially a repair fund for heritage assets at risk all considered as part of the mitigation strategy.

Appendix A includes mapping to identify designated heritage assets, The conservation area at Writtle is not identified, but other relevant Conservation Areas are shown.

8. Landscape and Visual

Essex County Council Place Services will be providing comments on the acceptability of the landscape and visual impacts of the proposal as set out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts.

However, Chelmsford City Council is concerned that the scoping out of the Assessment of visual effects on individual private views (with regard to the 'right to a view') is not within the proposed remit of EIA.

Although it is recognised that there is no private 'right to a view', it is considered that a methodological approach is undertaken as suggested above identify to group those receptors that have potential to significantly and adversely particularly affected by private views. This could include and not be limited to those properties sited immediately adjacent or neighbouring the route corridor where the impact and the scale of the proposal is likely to be greater.

9. Cumulative Effects

Chelmsford City Council does not agree with the proposal to include Health and Wellbeing within the cumulative effects section of the scoping report as proposed above.

Health and Wellbeing should comprise a standalone section within the ES.

10. Corrections

Within paragraph 13.6.21 the report refers to the boundary with Brentford. This is incorrect and should be Brentwood.

Table 15.8 is also incorrect. Ingatestone Hall is located within Brentwood District Council's administrative area and not Chelmsford. The George at Kelvedon is also located within Braintree District Council's area and not Chelmsford. Manna's Ark in Witham is also located in Braintree District and not Chelmsford.

Yours faithfully

[redacted]

[redacted]
Senior Planning Officer

For

[redacted]
Director of Sustainable Communities

DECISION MADE BY THE DIRECTOR OF SUSTAINABLE COMMUNITIES

Application No	:	22/02067/SCOPE EIA Scoping Opinion
Location	:	East Anglia Green Energy Enablement
Proposal	:	**East Anglia Green**
Applicant	:	National Grid Electricity Transmission
'Agent'	:	The Planning Inspectorate
Date Valid	:	7 November 2022
Development Type	:	D94 - EIA Screening Opinion or Scoping Opinion
Drawing No(s)	:	Scoping Report;
Target Date	:	5 December 2022
Consult Expiry	:	5 December 2022

The proposed development

The formal request for an Environment Impact Assessment (EIA) Scoping Opinion relates to the proposed development of a new 400 kilovolt (kV) electricity transmission line from Norwich to Tilbury, a distance of approximately 180km. The proposal would facilitate the transfer of power from the East Anglia region to the rest of the Main Interconnected Transmission System (MTS) enabling the connection of offshore wind generation, nuclear power generation and interconnectors which are expected into East Anglia by 2035.

Approximately 500 – 550 steel lattice pylons would be installed along the route, these are on average approximately 50 metres in height. Associated cabling sealing and compounds (including permanent access roads) would be provided route side.

The proposal also includes temporary use of land to facilitate construction, including compounds, haul routes and laydown areas and temporary amendments to the highway network to facilitate construction access.

Environmental mitigation and enhancement, including tree planting would also be provided.

Proposal Background

The need for the project is to facilitate the transfer of additional energy into the network to support the Government's target of tackling the climate emergency and achieving net zero by 2050. This includes the ambition of achieving 50 Gigawatts of (GW) plus of offshore wind power by 2030.

National Grid Electricity System Operator has concluded that the existing high voltage electricity network into East Anglia does not have the capability needed to reliably and securely transport all the energy that will be connected whilst meeting the National electricity Transmission System Security and Quality of Supply Standard (NETS SQSS).

As a result, National Grid needs to reinforce the electricity network to all power to be imported to and exported from East Anglia and to provide additional capability to allow power flows into and out of the south east area to connect with areas of demand and interconnectors in Europe.

Site Context

Within Chelmsford City Council's administrative area, the section would extend for approximately 19.6km north-east of Great Leighs in a south-westerly direction crossing arable fields towards the A131 Braintree Road towards the B1008 to the crossing of the River Chelmer to the west of Little Waltham. From there the route continues southbound, on the western side of Chelmsford towards the A1060 at Roxwell, before extending south-east towards the A414 Ongar Road, before heading due south, skirting Hylands House, and Writtle. From Writtle, it would continue south through arable fields before crossing the A12 and B1008 at Margaretting into the border with Basildon.

The land through which the route would pass is generally agricultural in nature, bounded by trees, woodland and vegetation. The route would cross roads, rivers and brooks. No built form would be sited underneath the route, although in places it would pass near to isolated houses, farmsteads and employment buildings. It would also pass between the villages of Great and Little Waltham and would be sited upon features including King Edward VI Grammar School (KEGS) school playing fields to the north west of Broomfield Hospital.

Public Rights of Way would cross the site as well as a series of roads. Listed buildings, historic parks and gardens would be sited nearby, alongside Local Wildlife Sites and other features of historic and ecological interest. With the exception of rivers and brooks, most of the preferred route corridor would be within flood zone one.

Other relevant applications

None.

Consultations

The proposal is a Nationally Significant Infrastructure Project (NSIP) and will be considered through the national Development Consent Order process (DCO). As such, the scoping request is managed and determined by the Planning Inspectorate on behalf of the Secretary of State.

Chelmsford City Council is a Host Authority and a statutory consultee on the proposal but does not have any consultation obligations itself. Other bodies and organisations such as Parish Councils would be notified by the Planning Inspectorate directly.

EIA Process & Methodology

Scope of Assessment

General

The Scoping Report requests a Scoping Opinion from The Planning Inspectorate pursuant to Regulation 15 of the EIA Regulations.

The proposal is classified as Environmental Impact Assessment under Schedule 1, paragraph 20 as the construction of overhead electrical power lines with a voltage of 220kV or more and a length of more than 15 km under the Environmental Impact Assessment (EIA) infrastructure Planning Regulations 2017.

The Project includes installation of a 400kV electricity transmission line over a distance of approximately 180km, of which the majority is overhead lines (OHL). It therefore falls under Schedule 1 and requires a statutory EIA.

The assessment of the Environmental Impact Assessment (EIA) would include the consideration of relevant policy and legislation as well as considering comments received by consultees during the pre-submission period.

The assessments within the Environmental Statement (ES) would evaluate and identify the likely significant environmental effects arising from the Project for both the construction and operational phases following a receptor-based assessment approach.

Mitigation methods and residual effects would also be identified for each topic.

Interrelationship of effects and cumulative effects would be identified for each environmental topic within a separate cumulative effects chapter.

Geographical scale and effect

The proposed Order Limits would encompass the land required permanently and temporarily to build and operate the Project.

The assessments within the Environmental Statement (ES) would be based on the maximum Limits of Deviation (LoD) as defined in the Development Consent Order (DCO).

The study areas to be presented in the ES are based on the distance over which an impact is likely to occur. Study areas are defined in each of the topic chapters and vary between topics.

Duration of effects

The EIA would consider separately the effects that are expected to arise during the construction and operation phases and compare them with the current and future baseline within each topic chapter.

Mitigation measures

A number of measures would be adopted in the project to avoid and reduce the likely significant effects that would be experienced during implementation of the project; which fall into one of three categories: embedded measures, standard mitigation and additional mitigation measures. These would ensure the project's compliance with legislative and regulatory regimes.

The embedded mitigation measures which form an intrinsic part of the project design would be described within the ES.

Standard mitigation measures to address construction-related impacts would be described within the ES and detailed in the outline Code of Construction Practice (CoCP) (submitted with the DCO application). In addition, licenses through separate regimes may also be required. For example, ecological licences and assents granted by Natural England and various permits relating to water and waste granted by the Environment Agency. On the presumption that the regulatory authorities would not permit the works unless the potential impacts have been appropriately managed, it is assumed that these licensable activities are considered measures adopted as part of the project.

Additional mitigation measures would be described within the ES and secured through the DCO or through other statutory agreements.

Embedded, standard and additional mitigation measures are assumed to be in place or at least achievable prior to undertaking the scoping of likely significant effects, in accordance with guidance from the Institute of Environmental Management and Assessment IEMA Guide to Shaping Quality Development. (IEMA, 2016).

Assessment of residual effects and determination of significance

The ES would include an assessment of any direct and indirect residual effects and an assessment of significance. The assessment of significance would include the reasoned argument setting out the rationale for the value, magnitude and significance of effect. The influence of impact duration on the overall significance of effect would also be considered as part of the determination of magnitude and sensitivity to change.

Monitoring

The ES would include a description of any proposed monitoring arrangements where likely significant effects have been identified. The monitoring of significant effects requirements would be detailed within the ES topic chapters to include clear and proportionate objectives for monitoring, the parameters to be monitored, the methodology for the monitoring, a timescale for implementation, identification of the party who would be responsible for the monitoring, and an outline of the remedial actions to be undertaken should results be adverse

Alternatives

The EIA Regulations require that the applicant, National Grid, to provide 'a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.

The City Council notes the consideration and assessment of strategic options, route corridor and alignment options that has already been undertaken to date. However, it considers that further and full consideration should be given to the use of a fully offshore High Voltage Direct Current (HDVC) route (sea route) to deliver the project and / or a fully underground High Voltage Direct Current (HDVC) cabling route.

The ES should provide full and through details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

In relation to historic environment, the scoping report sets out previous information on the options study, the subject of the non-statutory consultation. It is not clear if, or how, consultation comments have been considered and options reconsidered. It remains the case that from a heritage perspective, that although the inland Route P would pass through the Chelmer and Blackwater Navigation Conservation Area, this impact could be mitigated through undergrounding and it has not been demonstrated through detailed assessment which of the various options would have the least heritage (and other impacts) with or without mitigation measures.

There remain serious concerns about the preferred route and its impact on the historic environment and its setting within the landscape. From the information to date the preferred route has not been adequately justified.

Flexibility

It is noted that the final route of the proposal has not yet been defined.

National Grid should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons, e.g. the number of new and replacement pylons and their locations, and the Limits of Deviation (LoD) for the installation of the new overhead line and underground cable. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters should be clearly defined in the DCO and in the accompanying ES.

Cumulative Effects

The ES will need to consider the cumulative effects arising from the inter-relationship between different impacts arising from the proposed development when considered alongside any other development in the area surrounding the site. The objective is to identify any combined impacts from the development or impacts from several developments; and recognising that whilst individually the impacts may be insignificant, they could, when considered together, cause a further significant direct or indirect impact requiring mitigation.

Best practice dictates that cumulative assessments should have regard only to those schemes which are 'reasonably foreseeable' (i.e. usually those under construction or with planning permission).

Further consideration to cumulative effects are considered below.

Relevant Planning Policies

The EIA Scoping Opinion should refer to the following policy documents and where relevant the following specific policies.

The Chelmsford Local Plan (2013-2036) was adopted in May 2020. Within that document there are a number of tailored policies, below are the most relevant policies which should be referred to within the ES.

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 would also be relevant in respect of all designated heritage assets. Alongside Strategic Local Plan Policy S3 (Conserving and Enhancing the Historic Environment) and Policies DM13 (Designated Heritage Assets) and DM14 (Non-Designated Heritage Assets).

Strategic Policy S11, Policy DM6 and DM8 to assess the visual and spatial impact of the proposed overhead line in the Metropolitan Green Belt and Rural Areas where it passes through the countryside.

The ES should also refer to Strategic Policy S1 (Spatial Principles), S9 (Infrastructure Requirements) and S10 (Securing infrastructure and impact mitigation in relation to transport impacts). There is also the Chelmsford Climate and Ecological Emergency Action Plan (2020).

Within the arboricultural scoping, surveying and reporting strategy (Appendix J) the project seeks to minimise the impact on protected species, trees and ancient woodland. The ES should refer to Strategic Policy S4 in relation to the Natural Environment and Local Plan Policies DM16 and DM17 in relation to Ecology and Biodiversity and Trees, Woodland and Landscape Features. A number of protected trees (TPOs) and ancient Woodlands are potentially affected by the proposed project, and these are contained within the documents attached.

The proposed project would potentially impact upon community facilities and assets. The ES should refer to Strategic Policy S5 which relates to protecting and enhancing community assets and Local Plan Policy DM21 which relates to protecting community facilities.

The proposed route would impact on a number of strategic site allocations. The sites which are affected are North of Broomfield (Strategic Growth Site Policy 8), North East Chelmsford (Strategic Growth Site Policy 6) and West Chelmsford (Strategic Growth Site Policy 2). The masterplans for North of Broomfield and West Chelmsford are approved and material planning considerations The masterplan for North East Chelmsford (Chelmsford Garden Community) is currently in progress and likely to be approved in early 2023 so would also be a material planning consideration. There is also the Writtle Neighbourhood Plan 2021 which should be referenced.

The other key Policy documents which are a material planning consideration are the Making Places SPD 2021 in particular it references Green Infrastructure, Planning Obligations SPD in particular its Chapters (8 and 9) on Green and Blue Infrastructure, and the Solar Farm Development SPD.

Overall comment

With the exception of the comments made to the consideration of alternatives and flexibility, the general approach is considered sound.

Type of Planning Application

The proposed development will come forward as a full Development Consent Order application with all detail submitted.

Characteristics of Potential Impact

The ES outlines a series of topics to be scoped in. The focus on these is the impact of effects on receptors. The main receptors are people and local communities, biodiversity, land use and land quality, landscape/views, and surface and groundwater resources.

The approach to scoping for all topics would include consideration of the following:

- Regulatory and planning policy context
- Defining the study area
- Stating sources of data collected
- Outlining baseline conditions.
- Highlighting further data to be gathered
- Outlining environmental measures
- Predicting likely significant effects
- Drafting the proposed assessment methodology
- Stating the proposed scope of the interrelationships related to the potential effects

Topics to be Scoped In

Agriculture and Soils

The proposed development (including temporary and permanent construction routes and compounds) would be sited on agricultural land.

An agricultural land assessment would be scoped into the ES and is intended to consider the implications of the proposal on agricultural land and soils, both during construction and once it is operational.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on agriculture and soils and other environmental topics. These would include Chapter 8: Ecology and Biodiversity, Chapter 9: Geology and Hydrogeology Chapter 10: Health and Wellbeing and Chapter 12: Hydrology and Land Drainage.

Matters to be scoped in and out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Temporary loss of agricultural land (including BMV land)	Construction	Scoped in
Permanent loss of agricultural land (including BMV land)	Operation	Scoped in
Agricultural landholdings.	Construction	Scoped in
Agricultural landholdings	Operation	Scoped out
Soil quality associated with ecosystem services	Construction	Scoped in
Soil quality associated with ecosystem services	Operation	Scoped out
Economic effects on landowners	Construction and operation	Scoped out

It is considered that the agricultural land survey must be undertaken of the entire route corridor to inform the grading of the land and in particular to inform and distinguish between Grade 3a and Grade 3b land.

The assessment should be based on the maximum Limits of Deviation (LoD) as defined in the DCO and should not just extend to the physical location of pylons and other physical features, but also the land extending underneath and to the side of the OHL (overhead lines) and proposed access roads.

Subject to the above, the approach, as set out in the Scoping Report, is considered acceptable in principle and it is agreed that agricultural land and soils is in scope.

Air Quality

The proposed development would create emissions from construction which would have the potential to significantly affect local air quality, as such the topic is proposed to be scoped into the EIA. There would also be some minor impacts once operational.

An air quality technical assessment would be scoped into the ES and is intended to consider the implications of current and future ambient air quality at the site, both during construction and once it is operational.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 8: Ecology and Biodiversity and Chapter 10: Health and Wellbeing

Matters to be scoped in and scoped out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Construction dust	Construction	Scoped out

Construction generators	Construction	Scoped out
Construction traffic	Construction	Scoped in (if the screening criteria are met or exceeded)
Operational vehicle emissions	Operation	Scoped out

The air quality impact assessment methodology, as set out in the Scoping Report, is considered acceptable and it is agreed that air quality is in scope.

Ecology and Biodiversity

Ecology and Biodiversity is proposed to be scoped into the EIA.

The approach to scoping has drawn from guidance provided in the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2019) (hereafter referred to as 'the CIEEM guidelines'). However, the term 'biodiversity receptor' has been used in preference to 'ecological feature' which is used in the CIEEM guidelines. This is to provide consistency between different discipline sections.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. This would include Chapter 7: Air Quality, Chapter 12: Hydrology and Land Drainage and Chapter 14: Noise and Vibration.

Matters to be scoped in and scoped out relating to Chelmsford are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
National sites designated for biodiversity (see Appendix E)	Construction	Scoped in
National sites designated for biodiversity (see Appendix E)	Operation	Scoped out
Local (statutory) sites designated for biodiversity (see Appendix E).	Construction	Scoped in
Local (statutory) sites designated for biodiversity (see Appendix E).	Operation	Scoped out
Ancient woodland	Construction	Scoped in
Ancient woodland	Operation	Scoped out
Habitats of Principal Importance in England (HPIE)	Construction	Scoped in
Habitats of Principal Importance in England (HPIE)	Operation	Scoped out
'Important' hedgerows	Construction	Scoped in
'Important' hedgerows	Operation	Scoped out
GWDTEs	Construction	Scoped in
GWDTEs	Operation	Scoped out
Vascular and nonvascular plants, fungi and INNS	Construction	Scoped in
Vascular and nonvascular plants, fungi and INNS	Operation	Scoped out
Fish	Construction	Scoped in
Fish	Operation	Scoped out

Invertebrates	Construction	Scoped in
Invertebrates	Operation	Scoped out
Reptiles	Construction	Scoped in
Reptiles	Operation	Scoped out
Breeding birds	Construction	Scoped in
Breeding birds	Operation	Scoped out
Wintering / passage birds	Construction	Scoped in
Wintering / passage birds	Operation	Scoped out
Badgers	Construction	Scoped in
Badgers	Operation	Scoped out
Bats	Construction and operation	Scoped in
Hazel dormouse	Construction	Scoped in
Hazel dormouse	Operation	Scoped out
Otter	Construction	Scoped in
Otter	Operation	Scoped out
Water vole	Construction	Scoped in
Water vole	Operation	Scoped out
White-clawed crayfish (Austropotamobius pallipes)	Construction	Scoped in
White-clawed crayfish (Austropotamobius pallipes)	Operation	Scoped out
Amphibians (excluding great crested newts)	Construction	Scoped in
Amphibians (excluding great crested newts)	Operation	Scoped out
Great crested newt (GCN)	Construction and Operation	Scoped out
Other notable mammals (brown hare (Lepus europaeus), hedgehog (Erinaceus europaeus), and harvest mouse (Micromys minutus))	Construction and Operation	Scoped out

A separate assessment relating to potential likely significant effects to European sites (SPA, SAC and Ramsar sites, including potential sites) has not been completed. This would be required as part of the relevant regulations and would need to be scoped in.

Habitats Regulations Assessment (HRA) screening would be undertaken in parallel with the ES to determine whether the Project would have likely significant effects on European sites and if likely significant effects cannot be ruled out an AA would be prepared to ensure there would be no adverse effects.

Draft European Protected Species (EPS) licences are proposed to be submitted to Natural England before close of the DCO Examination to ensure 'Letters of No Impediment' (LONI) can be submitted to the Planning Inspectorate. These draft licence applications would be submitted to Natural England for review, to satisfy their requirements that a robust assessment has been undertaken and to agree any necessary mitigation measures. Full submission of any necessary protected species licence applications to Natural England would be required prior to construction, if the DCO is granted.

It is currently proposed that great crested newt (GCN) (Triturus cristatus) would be subject to a District Level Licence (DLL) which would cover mitigation for GCN. Under a DLL, there would be no requirement for any

fieldwork for GCN or additional mitigation beyond that included in the DLL agreement, Natural England have confirmed that they would be willing to carry out the Licence.

It is concerning that the assessment of Great Crested Newts is proposed to be scoped out, given the City Council is aware of their presence close to the proposed route corridor, particularly within Broomfield/Little / Great Waltham area.

Essex County Council Place Services will be providing comments on the acceptability of the ecology and biodiversity methodology as set out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts. The comments of Natural England will also be material to the consideration of the proposal.

it is agreed that ecology and biodiversity is in scope.

Arboriculture

The site comprises arable fields with linear tree and hedgerow planting along most field boundaries. Consideration will need to be given to the presence of ancient woodland, trees protected by Tree Preservation Orders and trees within Conservation Areas.

The construction of the proposal would lead to implications on arboriculture.

The impact upon arboriculture will need to be considered as part of the ES and an Arboricultural Impact Assessment and Arboricultural Method Statement should be scoped into the ES to enable further consideration of the construction implications on trees.

Geology, Contamination and Hydrogeology

The proposed development would have geological and hydrogeological implications relating to the construction and operation of the development such that the topic is proposed to be scoped into the ES.

Consideration is also given to contamination, as this would also have construction and operational implications.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 6: Agriculture and Soils, Chapter 8: Ecology and Biodiversity and Chapter 12: Hydrology and Land Drainage

Matters to be scoped in and scoped out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Geology		
Geohazards and Ground Instability	Construction and operation	Scoped out
Sites of Geological Importance	Construction and operation	Scoped out
Mineral Reserves	Construction and operation	Scoped in
Contaminated land		
Disturbance and mobilisation of existing contamination	Construction	Scoped in
Disturbance and mobilisation of existing contamination	Operation	Scoped out

Discovery of Unexpected Contamination	Construction and operation	Scoped out
Introduction of new contamination	Construction and operation	Scoped out
Hydrogeology		
Dewatering	Construction	Scoped in
Dewatering	Operation	Scoped out
Discharge	Construction and operation	Scoped out
Connection of aquifer units	Construction	Scoped in
Connection of aquifer units	Operation	Scoped out

Essex County Council Place Services will be providing comments on the acceptability of the geology and hydrogeological methodology as set out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts.

In relation to contamination, where there is crossover between the consultees, no objections are raised to the assessment methodology, as set out in the Scoping Report.

It is agreed that geology, hydrogeology and contamination are in scope.

Health and Wellbeing

The proposed development would have health and wellbeing implications as well as those relating to Electro Magnetic Fields (EMFs). However, the topic is not proposed to be scoped into the ES as a separate chapter but would be read as part of the cumulative impacts topic.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 7: Air Quality, Chapter 9: Geology and Hydrogeology, Chapter 12: Hydrology and Land Drainage, Chapter 14: Noise and Vibration and Chapter 16: Traffic and Transport.

All matters are proposed to be scoped out as set out in the table below.

Matter	**Phase**	**Scoped In / Out**	**Justification**
Health related environmental change (for example, air quality, noise, geology and hydrogeology, traffic and transport health related impacts)	Construction and operation	Scoped out	The potential for likely significant effects on health and wellbeing resulting from related environmental change (in air quality, noise and vibration, contaminated land (geology and hydrogeology) and traffic and transport) would be assessed and reported elsewhere in related topic chapters of the ES. The cumulative effects assessment would identify any intra-project (and inter-project) cumulative effects on receptors, this assessment would include a separate section on health and wellbeing.
EMFs	Construction	Scoped out	EMFs are associated with power distribution. As no distribution would be taking place during construction, no EMF would be generated

EMFs	Operation	Scoped out	The Project would be designed in accordance with Government guidance and precautionary policies, thereby ensuring the Project would not generate levels of EMF to affect health. A compliance report would be submitted with the application for development consent. As the measures are embedded within the Project design, no further assessment for EMFs is required within the EIA.

National Grid considers that the potential for effects on health and wellbeing would be limited to the construction phase and no potential for operational effects have been identified. Given the type, temporary duration and level of potential construction phase effects, and recognising that any likely significant effects from various topics on health and wellbeing would already be reported within separate chapters, National Grid consider that general health and wellbeing does not require additional separate reporting in the ES.

National Grid consider that where there is an intra-project effect i.e. where a receptor is potentially affected by more than one source of direct environmental impact resulting from the same development during construction, this would be considered within Chapter 17: Cumulative Effects, as part of the intra-project cumulative effects assessment. This assessment would include a specific section on health and wellbeing.

During construction, the proposal would result in noise from machinery and traffic movements, dust from earth moving, and emissions from exhausts and machinery. These could have an effect on health in isolation or in combination.

In relation to Electro Magnetic Fields (EMFs), all equipment that generates, distributes or uses electricity produces EMFs, and these also occur naturally. The UK power frequency is 50 hertz (Hz) which is the principal frequency of the EMFs produced. Electric fields depend on the operating voltage of the equipment producing them and are measured in volts per metre (V/m). The voltage applied to equipment is a relatively constant value. Magnetic fields depend on the electrical currents flowing, which vary according to the electrical power requirements at any given time and are measured in ǵT (microteslas). Both fields diminish rapidly with distance from the source and are present in all areas where electricity is in use (e.g. offices and homes), arising from electric cabling and equipment in the area.

All overhead lines produce EMFs, and these tend to be highest directly under an overhead line and decrease to the sides at increasing distance. Underground cables produce no external electric fields, and the magnetic field falls more rapidly, falling to the levels typically found in UK homes within around 20m compared to around 150m for an overhead line. Substations and CSE compounds do not produce significant EMFs outside their boundaries. As EMFs are only generated when electricity is flowing through the equipment no discernible EMF generation is anticipated during the construction stage. Only the Project's operational phase (when power is being transmitted) has the potential to generate EMFs.

The decision to scope out Health and Well Being and Electro Magnetitic Fields (EMF) is not accepted and the approach to consider them in the cumulative impacts section of the ES and as a separate EMF report is not agreed.

Health and wellbeing, and the effect of Electro Magnetic Fields must be considered holistically, as a chapters in their own right, to enable a strategic assessment of the likely significance and harm that the proposal would have in ES terms. Piecemeal consideration on a theme-by-theme basis would not allow this assessment to take place.

Further, given the potential for significant public concern regarding EMFs and therefore the need for comprehensive information on EMFs and compliance of the proposed project with the International Commission on Non-Ionizing Radiation ICNIRP guidelines and requirements of NPS EN-5, it is considered that the findings of any EMF report should be reported within the Health and Well Being section, with a standalone report being appended to the ES.

The assessment on the level of significance/harm will need to be considered within the planning balance of the proposal and should be undertaken by relevant and appropriately qualified experts and professional personnel.

The City Council disagrees with the approach set out with the ES and considers that health and wellbeing /Electro Magnetic Fields should be scoped in as an ES chapter in their own right.

Historic Environment

The proposed development would have historic environment implications relating to the construction and operation of the development such that the topic is proposed to be scoped into the ES

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 9: Geology and Hydrogeology, Chapter 12: Hydrology and Land Drainage, Chapter 13: Landscape and Visual and Chapter 14: Noise and Vibration

Matters to be scoped in and scoped out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Terrestrial archaeology – physical effects	Construction	Scoped in
Terrestrial archaeology – physical effects	Operation	Scoped out
Terrestrial archaeology – setting and indirect effects	Construction and operation	Scoped in
Built heritage – physical effects	Construction and operation	Scoped out
Built heritage – setting and indirect effects	Construction and operation	Scoped in
Historic landscape	Construction and operation	Scoped in
Inter-tidal and marine archaeology	Construction and operation	Scoped in

Chapter 11 of the report covers the historic environment. Also, of direct relevance is landscape and visual impacts (chapter 13). Geology and hydrogeology (chapter 9), hydrology and land drainage (chapter 10) and noise and vibration (chapter 14) are also of relevance to historic environment impacts.

The historic environment sections covers archaeology, historic buildings and historic landscapes. The assessment would include Grade I and Grade II* listed buildings and Grade I and Grade II* Registered Parks and Gardens within 3km, Grade II listed buildings, Grade II Registered Parks and Gardens and Conservation Areas within 2km. Where designated heritage assets are more than 250m from the final route and outside the ZTV they will be scoped out. Other building types with limited setting, such as milestone and graves, will also be scoped out. Where major infrastructure routes separate the preferred route from heritage assets, thereby curtailing setting, they would be scoped out also. Non designated heritage assets within 250m of the preferred

route corridor will be assessed. For all heritage assets professional judgement and topography will also inform inclusion/exclusion from the assessment. This approach is acceptable and will capture all significant impacts on the historic environment.

The report refers to national and local policy, as well as relevant guidance, which is adequate.

Only 1 non designated heritage asset is identified within Chelmsford within the preliminary assessment. When the more detailed assessment is completed, there are likely to be significantly more identified. The evidence base should include reference to the Chelmsford Register of Buildings of Local Value (local list), although it should be noted that this does not cover all parishes at present. The WWII Defence Survey and Register of Designed Landscape of Essex should also be referred to. The lack of any listing re-survey in Chelmsford means that there are occasional sites of national interest which are undesignated. The ES notes assessment will include review of a range of data sources and site assessment to identify non designated heritage assets, which would be adequate, subject to including the sources noted above.

The grading of heritage significance, magnitude of impacts and significance of effects is based on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, 2011), which is standard approach for assessing major schemes. It should however be noted that a tabulated form of assessment cannot fully reflect heritage impacts, so professional judgement is an essential component to the assessment.

Historic England guidance on understanding the setting of heritage assets (2017) is referred to. This provides a framework to assess the contribution of setting, including a range of factors beyond the visual, for instance in including historic associations, topography, land use, landscape character, remoteness, noise, light etc. and also taking account of diurnal and seasonal changes. Essentially including all factors which influence how a heritage asset is experienced. The five-step approach recommended within the guidance, includes identifying mitigation.

Appendix H sets out identified viewpoints to be assessed. This only includes 5 views points from public footpaths within Chelmsford. The assessment of views should be far more extensive, to include the key views that contribute to landscape character and the setting of heritage assets. For instance, but not limited to, views from/to designed landscapes and of/from parish churches. The LVIA should scope in views relating to historic landscape and heritage assets.

Mitigation options are described as embedded, standard and additional mitigation. Below ground routing is only proposed at Dedham Vale AOB at present. It is important that below grounding remains an option for other areas where the environmental impacts dictate that this level of mitigation is required. Low height or T pylons are noted as an option for mitigation. Landscaping is only proposed in the context of substations. The previous consultation has a clear hierarchy of mitigation, which is not present in the current document:

"For each relevant topic and where applicable, sub-topic, the appraisal considers the nature of identified receptors; receptor value and sensitivity to the Project; how a receptor may be affected by the Project; and whether such effects could be avoided or mitigated. Mitigation is considered in accordance with National Grid's mitigation hierarchy. The mitigation hierarchy is sequential, meaning that measures are not considered unless measures that precede them in the hierarchy have been considered first and deemed to be inadequate. The sequence in which measures should be considered is as follows:

- *Careful routeing;*
- *landscape mitigation planting;*
- *different lattice pylon design / conductor configuration;*
- *alternative pylon design (low height or T-pylon);*

- *reduction of 'wirescape' through distribution network rationalisation / undergrounding;*
- *reduction of 'wirescape' through transmission network rationalisation; and*
- *alternative technology (gas insulated lines, undergrounding).*

Paragraph 3.2.31 of the routing and siting study report (April 2022)"

Potential mitigation measures should be extensive to reflect the scale and impact of the scheme. Landscape restoration, landscaping and tree planting should also be included, with adequate land take factored in at an early stage. Enhancement opportunities should also be fully explored, for instance with existing lower voltage power lines routed below ground in the immediate setting of listed buildings, heritage interpretation, and potentially a repair fund for heritage assets at risk all considered as part of the mitigation strategy.

Construction impacts are defined and temporary impacts, which includes compounds and haul roads. These short term impacts are up to 2032 + 1 year for reinstatement. Operational impacts would be the long term impact of the infrastructure, which in the various options proposed having a design life of 40-80 years.

The ES scopes out physical impact because there are no anticipated direct impacts and any vibration caused during construction will be limited to 100m influence. Impacts on setting are scoped in for construction and operation. Direct and indirect impact on archology and historic landscapes are scoped in. This approach is supported.

Appendix A includes mapping to identify designated heritage assets, Figure 11.1 pages 18-20 show those within Chelmsford. These appear to include all relevant listed buildings, scheduled monument, registered parks and gardens. The conservation area at Writtle is not identified, but other relevant Conservation Areas are shown.

Essex County Council Place Services will be providing comments on the acceptability of archaeology methodology as set out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts.

It is agreed that built heritage is in scope. Regard shall be had to the observations above.

Hydrology and Land Drainage

The proposed development would have hydrology and land drainage implications relating to the construction and operation of the development such that the topic is proposed to be scoped into the ES.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 8: Ecology and Biodiversity and Chapter 9 Geology and Hydrogeology.

Matters to be scoped in and scoped out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Effects on surface water quality	Construction	Scoped in
Effects on surface water quality	Operation	Scoped out
Hydromorphology of watercourses	Construction	Scoped in
Hydromorphology of watercourses	Operation	Scoped out
Flood risk from rivers and the sea	Construction	Scoped in
Flood risk from rivers and the sea	Operation	Scoped in

Flood risk from surface water and effects on the land drainage regime	Construction and Operation	Scoped in
Flood risk from groundwater	Construction and operation	Scoped in
Flood risk from other sources (sewers, artificial waterbodies)	Construction and operation	Scoped out
Existing water interests (abstractions and discharges)	Construction and operation	Scoped out

Essex County Council will be providing comments on the acceptability of the hydrology and land drainage as out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts.

Regard will also need to be had to the comments from the Environment Agency.

It is agreed that hydrology and land drainage are in scope.

Landscape and Visual

The proposed development would have landscape and visual implications relating to the construction and operation of the development such that the topic is proposed to be scoped into the ES. The landscape and visual implications would arise from the siting of 50 metre high pylons and overhead powerlines within the landscape.

A Landscape and Visual Impact Assessment (LVIA) is proposed to be carried out in accordance with the principles of best practice.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 8: Ecology and Biodiversity, Chapter 11 Historic Environment, Chapter 15 Socio-economics, Recreation and Tourism and Chapter 16 Traffic and Transport.

Matters to be scoped in and scoped out that relate to Chelmsford are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Designated landscapes – SLAs	Construction and Operation	Scoped in
Designated landscapes, landscape character and views – at night	Construction and Operation	Scoped out
Landscape character	Construction and Operation	Scoped in
Visual receptors outside of the ZTV	Construction and Operation	Scoped out
Representative viewpoints Note Effects upon visual receptors within the study area, i.e. the people who may be affected by changes in views resulting from the Project. Visual receptors to be considered would include: People within settlements; People travelling on	Construction and Operation	Scoped in

major roads and railways; People using walking routes (PRoW and long distance routes) and cycle routes; and People visiting areas of interest such as visitor attractions, and scenic viewpoints.		
Visual receptors at settlements / communities / Groups of properties	Construction and Operation	Scoped in
Receptors travelling on roads	Construction and Operation	Scoped in
Receptors travelling on railways	Construction and operation	Scoped out
Recreational receptors, including PRoW and long distance routes and visitor attractions	Construction and operation	Scoped in
Private views	Construction and operation	Scoped out

Essex County Council Place Services will be providing comments on the acceptability of the landscape and visual impacts of the proposal as set out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts.

However, Chelmsford City Council is concerned that the scoping out of the Assessment of visual effects on individual private views (with regard to the 'right to a view') is not within the proposed remit of EIA.

Although it is recognised that there is no private 'right to a view', it is considered that a methodological approach is undertaken as suggested above identify to group those receptors that have potential to significantly and adversely particularly affected by private views. This could include and not be limited to those properties sited immediately adjacent or neighbouring the route corridor where the impact and the scale of the proposal is likely to be greater.

It is agreed that landscape and visual impact are in scope. Regard shall be had to the matters raised above.

Noise and Vibration

The proposed development would have noise and vibration implications relating to the construction and operation of the development such that the topic is proposed to be scoped into the ES.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 8: Ecology and Biodiversity, Chapter 11 Historic Environment and Chapter 16 Traffic and Transport.

Matters to be scoped in and scoped out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Construction noise	Construction	Scoped in
Construction traffic noise	Construction	Scoped in
Construction vibration	Construction	Scoped in
Construction traffic vibration	Construction	Scoped out

Operational noise from substations, OHLs, CSE compounds and underground cables	Operation	Scoped out
Operational vibration	Operation	Scoped out
Noise and vibration associated with maintenance activities	Operation	Scoped out

A Construction Environment Management Plan (CEMP) would be submitted as part of the planning application to address any vibration and acoustic matters, which might arise during construction of the proposal.

The noise and vibration assessment methodology, as set out in the Scoping Report, is considered acceptable and it is agreed that noise and vibration is in scope.

Socio-Economic, Recreation and Tourism

The proposed development would have socio-economic, recreation and tourism implications relating to the construction and operation of the development such that the topic is proposed to be scoped into the EIA.

The approach to scoping would stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 7: Air Quality, Chapter 10: Health and well Being, Chapter 13: Landscape and Visual, Chapter 14: Noise and Vibration and Chapter 16: Traffic and Transport.

Matters to be scoped in and scoped out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Local economy and employment: Construction and operation	Construction	Scoped in
Local economy and employment: Construction and operation	Operation	Scoped out
Local economy and employment: Potential disruption to future and existing businesses	Construction	Scoped in
Local economy and employment: Potential disruption to future and existing businesses	Operation	Scoped out
Local economy and employment: Financial effect on individual businesses or property prices	Construction and Operation	Scoped out
Planning and Development: Potential sterilisation of new areas for future development	Construction and Operation	Scoped in
Community facilities; within Scoping Report Corridor including: schools, community centres, libraries, heath (General Practitioners (GPs), dentists, hospitals), sports halls and swimming pools	Construction	Scoped in

Community facilities; within Scoping Report Corridor including: schools, community centres, libraries, heath (GPs, dentists, hospitals), sports halls and swimming pools	Operation	Scoped out
Tourism, Recreation and Open Space: e.g., museums, visitor attractions, stately homes (within the route corridor): Open space and recreation facilities including parks, playing fields, play areas, PRoW; cycle paths, bridleways (within the route corridor)	Construction and operation	Scoped in
Tourism and Recreation: Pressures on local visitor accommodation from influx of construction workers	Construction	Scoped in
Tourism and Recreation: Pressures on local visitor accommodation from influx of construction workers	Operation	Scoped out

The socio-economic, recreation and tourism methodology, as set out in the Scoping Report, is considered acceptable and it is agreed that socio-economics, recreation and tourism are in scope.

Traffic and Transport

The proposed development would have traffic and transport implications relating to the construction and operation of the development such that the topic is proposed to be scoped into the EIA.

The approach to scoping would include stating the proposed scope of the interrelationships related to the potential effects on other environmental topics. These would include Chapter 8: Ecology and Biodiversity, Chapter 11 Historic Environment and Chapter 13: Landscape and Visual.

Matters to be scoped in and scoped out that relate to Chelmsford are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Assessment of traffic and transport impacts	Construction	Scoped in
Assessment of traffic and transport impacts	Operation	Scoped out

It is noted that a separate Transport Assessment and draft Construction Traffic Management Plan would be prepared as part of the proposal.

Essex County Council will be providing comments on the acceptability of the traffic and transport impacts of the proposal as set out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts.

It is agreed that traffic and transport are in scope.

Cumulative Effects

Cumulative effects are the result of multiple actions on environmental receptors or resources. There are two major sources of cumulative effects: 'intra-project' and 'interproject' effects, as outlined in The State of Environmental Impact Assessment Practice in the UK (IEMA, 2011).

Intra-project effects (also referred to as 'inter-relationships between topics',) occur when a receptor, resource or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development (IEMA, 2011). For example, a community may be affected by noise and dust impacts resulting from the construction phase activities of a single development.

Inter-project effects (also referred to a 'cumulative effects', Planning Inspectorate, 2019) occur when a resource or receptor or group of receptors is potentially affected by more than one development at the same time and the impacts act together additively and/or synergistically (IEMA, 2011). For example, the construction traffic effects of a development combined with the construction traffic effects of another development may result in additional cumulative effects on the surrounding highways network

Intra-project Cumulative Effects

There is no standard approach to the assessment of intra-project effects.

National Grid propose using a checklist matrix to scope-in receptors with multiple effects. Representative groups and/or individual receptors, such as people or protected species, would be identified for each topic. These would represent the areas that are most sensitive to impact interactions.

The assessment would consider the receptors which are likely to experience minor, moderate or major significance of residual effects in the individual Environmental Statement (ES) chapters. Receptors with negligible effects would not be included within the assessment. If the same receptor is identified in more than one ES chapter, this would indicate a spatial overlap of effects which would then be checked for a temporal overlap. If both spatial and temporal overlaps exist, then the receptor would be assessed for intra-project cumulative effects. Where significant cumulative environmental effects are identified, additional mitigation measures and monitoring requirements would be considered and outlined, and any residual effects would be described.

Inter-project Cumulative Effects

The methodology of the inter-project cumulative effects is structured using the staged assessment approach detailed in Advice Note Seventeen (Planning Inspectorate, 2019). This is set out below:

Stage 1A: Identify Zone of Influence (ZOI)
Stage 1B: Identify long list of other development
Stage 2: Identify shortlist of other developments
Stage 3: Information gathering
Stage 4: Assessment
Stage 5: cumulative assessment of clusters of other projects

Matters to be scoped in and scoped out are set out in the table below:

Matter	**Phase**	**Scoped In / Out**
Intra-project cumulative effects	Construction / Operation	Scoped in

Inter-project cumulative effects	Construction / Operation	Scoped in

Chelmsford City Council does not agree with the proposal to include Health and Wellbeing within the cumulative effects section of the scoping report as proposed above.

Health and Wellbeing should comprise a standalone section within the ES.

Topics to be scoped out

Topics to be scoped out would comprise:

- Major accidents and disasters
- Material assets (and waste)
- Climate
- Decommissioning

Major accidents and disasters

The report considers that where appropriate, an assessment of the likely risks to the Project in relation to potential areas of vulnerability would be included within separate topic chapters. For example, any flood risk concerns would be considered within Chapter 12: Hydrology and Land Drainage and would be addressed as part of the Flood Risk Assessment

It is agreed that that the proposed development is unlikely to be vulnerable to a major accident or disaster that would result in likely significant effects to the environment. However, regard should be had to whether there are any existing major accident hazard pipelines, are identified by the Health and Safety Executive, which have not been specifically considered within the Scoping Report.

The proposal would be subject to appropriate design measures and compliance with legislation and best practice, and in most instances, there is no source-pathway-receptor linkage to trigger such effects.

It is agreed that matters relating to major accidents and disasters can be scoped out of the ES. The outcome of the scoping exercise should be presented within the ES.

Material assets (and waste)

The report considers that further information regarding materials and waste would be provided within the description of the Project chapter within the ES.

Chelmsford City Council defers to Essex County Council as the statutory Minerals and Waste Local Planning Authority on this matter

Climate

The report considers that in terms of vulnerability to climate change National Grid has previously investigated whether climate change might require overhead lines to be redesigned but found there not to be a need. Flooding would, however, be considered as part of the Flood Risk Assessment (FRA). Details of the likely construction materials would be included within the Project description within the ES together with a simple estimate of the GHG emissions associated with the construction phase of the Project and potential opportunities to save carbon.

Based on the above, and subject to the comments of Essex County Council as the Local Lead Flood Authority no further assessment of likely significant effects in terms of the proposed development's susceptibility to climate change is required in the ES.

It is noted that the Scoping Report does not reference other potential impacts associated with climate change, for example greenhouse gas (GHG) emissions (beyond those forming part of the air quality assessment. The ES should provide an assessment of GHG emissions during construction and operation.

It is agreed that climate change can be scoped out.

Decommissioning

The report states that the ES would include a high-level summary of potential effects as a result of decommissioning for each environmental topic within an appendix to the description of the Project chapter within the ES.

The proposal is not for a temporary period. Once constructed, the proposal is likely to be a permanent feature within the landscape. Pylons, OHL's and other structures would most likely be replaced at the end of their timeframe.

Matters relating to decommissioning would most likely relate to the construction and residual environmental implications resulting from the removal of structures. This could be managed through an appropriately worded requirement relating to the submission of a decommissioning plan if needed.

It is agreed that decommissioning can be scoped out.

Corrections

Within paragraph 13.6.21 the report refers to the boundary with Brentford. This is incorrect and should be Brentwood.

Table 15.8 is also incorrect. Ingatestone Hall is located within Brentwood District Council's administrative area and not Chelmsford. The George at Kelvedon is also located within Braintree District Council's area and not Chelmsford. Manna's Ark in Witham is also located in Braintree District and not Chelmsford.

RECOMMENDATION

The Scoping Report is agreed subject to the items as raised being incorporated into the Environmental Statement:

1. Alternatives

The City Council notes the consideration and assessment of strategic options, route corridor and alignment options that has already been undertaken to date. However, it considers that further and full consideration should be given to the use of a fully offshore High Voltage Direct Current (HDVC) route (sea route) to deliver the project and or a fully underground High Voltage Direct Current (HDVC) cabling route.

The ES should provide full and through details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

In relation to historic environment, it is not clear if or how consultation comments have been considered and options reconsidered. It remains the case that from a heritage perspective, that although the inland Route P would pass through the Chelmer and Blackwater Navigation Conservation Area, this impact could be mitigated through below grounding and it has not been demonstrated through detailed assessment which of the various options would have the least heritage (and other impacts) with or without mitigation measures.

There remain serious concerns about the preferred route and its impact on the historic environment and its setting within the landscape. From the information to date the preferred route has not been adequately justified.

2. Flexibility

It is noted that the final route of the OHL has not yet been defined.

National Grid should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons, e.g. the number of new and replacement pylons and their locations, and the Limits of Deviation (LoD) for the installation of the new overhead line and underground cable. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters should be clearly defined in the DCO and in the accompanying ES.

3. Relevant Planning Policies

The EIA Scoping Opinion should refer to the following Policy documents and where relevant the following specific policies.

The Chelmsford Local Plan (2013-2036) was adopted in May 2020. Within that document there are a number of tailored policies, below are the most relevant policies which should be referred to within the ES.
Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 would also be relevant in respect of all designated heritage assets. Alongside Strategic Local Plan Policy S3 (Conserving and Enhancing the Historic Environment) and Policies DM13 (Designated Heritage Assets) and DM14 (Non-Designated Heritage Assets).

Strategic Policy S11, Policy DM6 and DM8 to assess the visual and spatial impact of the proposed overhead line in the Metropolitan Green Belt and Rural Areas where it passes through the countryside.

The ES should also refer to Strategic Policy S1 (Spatial Principles), S9 (Infrastructure Requirements) and S10 (Securing infrastructure and impact mitigation in relation to transport impacts). There is also the Chelmsford Climate and Ecological Emergency Action Plan (2020).

Within the arboricultural scoping, surveying and reporting strategy (Appendix J) the Project seeks to minimise the impact on protected species, trees and ancient woodland. The ES should refer to Strategic Policy S4 in relation to the Natural Environment and Local Plan Policies DM16 and DM17 in relation to Ecology and Biodiversity and Trees, Woodland and Landscape Features. A number of protected trees (TPOs) and ancient Woodlands are potentially affected by the proposed project, and these are contained within the documents attached.

The proposed project would potentially impact upon Community Facilities and Assets. The ES should refer to Strategic Policy S5 which relates to protecting and enhancing community assets and Local Plan Policy DM21 which relates to protecting community facilities.

The proposed route would impact on a number of strategic site allocations. The sites which are affected are North of Broomfield (Strategic Growth Site Policy 8), North East Chelmsford (Strategic Growth Site Policy 6) and West Chelmsford (Strategic Growth Site Policy 2). The masterplans for North of Broomfield and West Chelmsford are approved and a material planning consideration. The masterplan for North East Chelmsford (Chelmsford Garden Community) is currently in progress and likely to be approved in early 2023 so would also be a material planning consideration. There is also the Writtle Neighbourhood Plan 2021 which should be referenced.

The other key Policy documents which are a material planning consideration are the Making Places SPD 2021 in particular it references Green Infrastructure, Planning Obligations SPD in particular its Chapters (8 and 9) on Green and Blue Infrastructure, and the Solar Farm Development SPD.

4. Agriculture and Soils

The agricultural land survey must be undertaken of the entire route corridor to inform the grading of the land and in particular to inform and distinguish between Grade 3a and Grade 3b land.

The assessment should be based on the maximum Limits of Deviation (LoD) as defined in the DCO and should not just extend to the physical location of pylons and other physical features, but also the land extending underneath and to the side of the OHL (overhead lines) and proposed access roads.

5. Ecology and Biodiversity

It is concerning that the assessment of Great Crested Newts is proposed to be scoped out, given the City Council is aware of their presence close to the proposed route corridor, particularly within Broomfield/Little / Great Waltham area. Essex County Council Place Services will be providing comments on the acceptability of the ecology and biodiversity methodology as set out in the Scoping Report on behalf of Chelmsford City Council.

6. Health and Well Being

The decision to scope out Health and Well Being and Electro Magnetitic Fields is disagreed with and the approach to consider them in the cumulative impacts section of the ES and as a separate EMF report is not agreed.

Health and wellbeing, and the effect of Electromagnetic Fields must be considered holistically, as a chapters in their own right to enable a strategic assessment of the likely significance and harm that the proposal would have in ES terms. Piecemeal consideration on a theme-by-theme basis would not allow this assessment to take place.

Further, given the potential for public concern regarding EMFs and therefore the need for comprehensive information on EMFs and compliance of the proposed Project with the ICNIRP guidelines and requirements of NPS EN-5, it is considered that the findings of any EMF report should be reported within the Health and Well Being section, with a standalone report being appended to the ES.

The assessment on the level of significance/harm will need to be considered within the planning balance of the proposal and should be undertaken by relevant and appropriately qualified experts and professional personnel.

7. Built Heritage

Only 1 non designated heritage asset is identified within Chelmsford within the preliminary assessment. When the more detailed assessment is completed there are likely to be significantly more identified. The evidence base should include reference to the Chelmsford Register of Buildings of Local Value (local list), although it should be noted that this does not cover all parishes at present. The WWII Defence Survey and Register of Designed Landscape of Essex should also be referred to. The lack of any listing re-survey in Chelmsford means that there are occasional sites of national interest which are undesignated.

The grading of heritage significance, magnitude of impacts and significance of effects is based on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, 2011), which is standard approach for assessing major schemes. It should however by noted that a tabulated form of assessment cannot fully reflect heritage impacts, so professional judgement is an essential component to the assessment.

Appendix H sets out identified viewpoints to be assessed. This only includes 5 views points from public footpaths within Chelmsford. The assessment of views should be far more extensive, to include the key views that contribute to landscape character and the setting of heritage assets. For instance, but not limited to, views from/to designed landscapes and of/from parish churches. The LVIA should scope in views relating to historic landscape and heritage assets.

Mitigation options are described as embedded, standard and additional mitigation. Below ground routing is only proposed at Dedham Vale AOB at present. It is important that below grounding remains an option for other areas where the environmental impacts dictate that this level of mitigation is required. Low height or T pylons are noted as an option for mitigation. Landscaping is only proposed in the context of substations.

Potential mitigation measures should be extensive to reflect the scale and impact of the scheme. Landscape restoration, landscaping and tree planting should also be included, with adequate land take factored in at an early stage. Enhancement opportunities should also be fully explored, for instance with existing lower voltage power lines routed below ground in the immediate setting of listed buildings, heritage interpretation, and potentially a repair fund for heritage assets at risk all considered as part of the mitigation strategy.

Appendix A includes mapping to identify designated heritage assets, The conservation area at Writtle is not identified, but other relevant Conservation Areas are shown.

8. Landscape and Visual

Essex County Council Place Services will be providing comments on the acceptability of the landscape and visual impacts of the proposal as set out in the Scoping Report on behalf of Chelmsford City Council. Therefore, Chelmsford City Council will defer to them and their relevant experts.

However, Chelmsford City Council is concerned that the scoping out of the Assessment of visual effects on individual private views (with regard to the 'right to a view') is not within the proposed remit of EIA.

Although it is recognised that there is no private 'right to a view', it is considered that a methodological approach is undertaken as suggested above identify to group those receptors that have potential to significantly and adversely particularly affected by private views. This could include and not be limited to those properties sited immediately adjacent or neighbouring the route corridor where the impact and the scale of the proposal is likely to be greater.

9. Cumulative Effects

Chelmsford City Council does not agree with the proposal to include Health and Wellbeing within the cumulative effects section of the scoping report as proposed above.

Health and Wellbeing should comprise a standalone section within the ES.

10. Corrections

Within paragraph 13.6.21 the report refers to the boundary with Brentford. This is incorrect and should be Brentwood.
Table 15.8 is also incorrect. Ingatestone Hall is located within Brentwood District Council's administrative area and not Chelmsford. The George at Kelvedon is also located within Braintree District Council's area and not Chelmsford. Manna's Ark in Witham is also located in Braintree District and not Chelmsford.

Community Infrastructure Levy (CIL)

This application is not CIL liable.

SUMMARY OF RELEVANT ADOPTED PLANNING POLICIES:

SPS1
Strategic Policy S1 Spatial Principles - The Spatial Principles will guide how the Strategic Priorities and Vision will be achieved. They will underpin spatial planning decisions and ensure that the Local Plan focuses growth in the most sustainable locations.

SPS2
Strategic Policy S2 Addressing Climate Change & Flood Risk - The Council, through its planning policies and proposals that shape future development will seek to mitigate and adapt to climate change. The Council will require that all development is safe, taking into account its expected life span, from all types of flooding.

SPS3
Strategic Policy S3 Conserving & Enhancing the Historic Environment - The Council will conserve and where appropriate enhance the historic environment. When assessing applications for development , the Council will place great weight on the preservation and enhancement of designated heritage assets and their setting. The Council will also seek to conserve and where appropriate enhance the significance of non-designated heritage assets and their settings.

SPS4
Strategic Policy S4 Conserving & Enhancing the Natural Environment - The Council is committed to the conservation and enhancement of the natural environment through the protection of designated sites and species, whilst planning positively for biodiversity networks and minimising pollution. The Council will plan for a multifunctional network of green infrastructure. A precautionary approach will be taken where insufficient information is provided about avoidance, management, mitigation and compensation measures. Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

SPS5
Strategic Policy S5 Protecting & Enhancing Community Assets - The Council recognises the important role that community facilities have in existing communities and that they are also an integral part of any proposals for new residential and employment development. Existing community assets will be protected from inappropriate changes of use or redevelopment.

SPS9
Strategic Policy S9 Infrastructure Requirements - New development must be supported by the provision of infrastructure, services and facilities that are identified as necessary to serve its needs. New development must be supported by sustainable means of transport, safe from all types of flooding, provide a range of

community infrastructure, provide green infrastructure and utilities. Necessary infrastructure must seek to preserve or enhance the historic environment.

SPS10
Strategic Policy S10 Securing Infrastructure & Impact Mitigation - Infrastructure must be provided in a timely, and where appropriate, phased manner to serve the occupants and users of the development. Infrastructure will be secured through planning conditions and/or obligations or through the Community Infrastructure Levy or its successor.

SPS11
Strategic Policy S11 The Role of the Countryside - The openness and permanence of the Green Belt will be protected. Inappropriate development will not be approved except in very special circumstances. The Green Wedge has an identified intrinsic character and beauty and is a multi-faceted distinctive landscape providing important open green networks. The countryside outside of the Urban Areas and Defined Settlements, not within the Green Belt is designated as the Rural Area. The intrinsic character and beauty of the Rural Area will be recognised, assessed and development will be permitted where it would not adversely impact on its identified character and beauty.

DM6
Policy DM6 - New Buildings in the Green Belt - Where new buildings are proposed within the Green Belt, inappropriate development will not be approved except in very special circumstances. Planning permission will be granted for the redevelopment of previously developed land and replacement buildings subject to meeting prescribed criteria.

DM8
Policy DM8 - New Build & Structures in the Rural Area - Planning permission will be granted for new buildings in the Rural Area where the development would not adversely impact on the identified intrinsic character and beauty of the countryside and is for one of a number of prescribed developments. Planning permission will be granted for the redevelopment of previously developed land, replacement buildings and residential outbuildings subject to meeting prescribed criteria.

DM10
Policy DM10 - Change of use (Land & Buildings) & Engineering operations - Planning permission will be granted for the change of use of buildings in the Green Belt, Green Wedges and Rural Area subject to the building being of permanent and substantial construction and where the building is in keeping with its surroundings. Engineering operations will be permitted within the Green Belt where they preserve openness, do not conflict with the purposes of including land in the Green Belt, and do not harm the character and appearance of the area. Changes of use of land will be permitted in the Green Wedges and Rural Area where the development would not adversely impact on the role, function and intrinsic character of the area.

DM13
Policy DM13 - Designated Heritage Assets - The impact of any development proposal on the significance of a designated heritage asset or its setting, and the level of any harm, will be considered against any public benefits arising from the proposed development. The Council will preserve Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monuments.

DM14
Policy DM14 - Non-Designated Heritage Assets - Proposals will be permitted where they retain the significance of a non-designated heritage asset, including its setting. Any harm or loss will be judged against the significance of the asset.

DM15
Policy DM15 - Archeology - Planning permission will be granted for development affecting archaeological sites providing it protects, enhances or preserves sites of archaeological interest and their settings.

DM16
Policy DM16 - Ecology & Biodiversity - The impact of a development on Internationally Designated Sites, Nationally Designated Sites and Locally Designated Sites will be considered in line with the importance of the site. With National and Local Sites, this will be balanced against the benefits of the development. All development proposals should conserve and enhance the network of habitats, species and sites.

DM17
Policy DM17 - Trees, Woodland & Landscape Features - Planning permission will only be granted for development proposals that do not result in unacceptable harm to the health of a preserved tree, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands. Development proposals must not result in unacceptable harm to natural landscape features that are important to the character and appearance of the area.

DM18
Policy DM18 - Flooding/Suds - Planning permission for all types of development will only be granted where it can be demonstrated that the site is safe from all types of flooding. All major developments will be required to incorporate water management measures to reduce surface water run off and ensure that it does not increase flood risk elsewhere.

DM19
Policy DM19 - Renewable & Low Carbon Energy - Planning permission will be granted for renewable or low carbon energy developments subject to their impact on residential amenity, the historic and natural environment, visual impact and highway safety.

DM21
Policy DM21 - Protecting Community Facilities - The change of use of premises or redevelopment of sites that provide valued community facilities will only be permitted where the site cannot be used for an alternative community facility or where there is already an adequate supply of that type of facility in the locality or settlement concerned. Existing open spaces, sports and recreational buildings and land will also be protected.

DM22
Policy DM22 - Education Establishments - The change of use or redevelopment of educational establishments identified on the Policies Map will only be permitted if they are surplus to educational requirements. Extensions or expansion of existing educational facilities will be supported subject to compliance with other relevant local policies.

DM24
Policy DM24 - Design & Place Shaping Principles in Major Developments - The Council will require all new major development to be of high quality built form and urban design. Development should, amongst other matters, respect the historic and natural environment, be well-connected, respond positively to local character and context and create attractive, multi-functional, inclusive, overlooked and well maintained public realm. The Council will require the use of masterplans by developers and will implement design codes where appropriate for strategic scale developments.

DM25

Policy DM25 - Sustainable Buildings - All new dwellings and non-residential buildings shall incorporate sustainable design features to reduce carbon dioxide and nitrogen dioxide emissions and the use of natural resources. New dwellings and non-residential buildings shall provide convenient access to electric vehicle charging point infrastructure.

DM27
Policy DM27 - Parking Standards - The Council will have regard to the vehicle parking standards set out in the Essex Parking Standards - Design and Good Practice (2009) or as subsequently amended when determining planning applications.

DM29
Policy DM29 - Protecting Living & Working Environments - Development proposals must safeguard the amenities of the occupiers of any nearby residential property by ensuring that development is not overbearing and does not result in unacceptable overlooking or overshadowing. Development must also avoid unacceptable levels of polluting emissions, unless appropriate mitigation measures can be put in place and permanently maintained.

DM30
Policy DM30 - Contamination & Pollution - Permission will only be granted for developments on or near to hazardous land where the Council is satisfied there will be no threat to the health or safety of future users and there will be no adverse impact on the quality of local groundwater or surface water. Developments must also not have an unacceptable impact on air quality and the health and wellbeing of people.

POSPD
The Planning Obligations Supplementary Planning Document was adopted in January 2021 and sets out the City Council's approach towards seeking planning obligations which are needed to make development proposals acceptable in planning terms.

MPSPD
The Making Places Supplementary Planning Document was adopted in January 2021 and sets out detailed guidance for the implementation of the policy requirements set out in the Local Plan. It seeks to promote and secure high-quality sustainable new development. It is aimed at all forms of development, from large strategic developments, public spaces and places, to small extensions to individual homes.

NHP
The Neighbourhood Plan sets out the local community's aspirations for the area and establishes policies for development and land use in the area. It is a material planning consideration.

Background Papers

Case File

Chignal Parish Council, 2nd December 2022

Response to consultation on:

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

eastangliagreen@planninginspectorate.gov.uk

1. Consideration of alternatives to East Anglia GREEN

In its response to the National Grid's East Anglia GREEN, (EAG) public consultation in June 2022, Chignal Parish Council objected to National Grid's preferred option for an overhead high voltage corridor to the west of Chelmsford. Chignal Parish Council is one of a group of nine neighbouring parishes situated north west and south west of Chelmsford. A separate Common Statement response to this consultation was also submitted in June by the group, endorsed by Chignal Parish Council. The main message of this Common Statement is as follows:

- we support green energy and need to get it into the Grid
- however, we have grave concerns about the impact on the environment of doing so with traditional pylons
- we therefore support laying the cables under the sea for the full route
- we have particular concerns about the impact on the environment of the proposed route to the west of Chelmsford.

The EAG consultation was too narrow in scope. There should have been an opportunity for the public to choose from a wider set of transmission options, including a comparison of overland and undersea routes. Marine cables were included within the options taken forward between Sizewell and Richborough, North Kent and under the Thames Estuary to Tilbury. In the interests of transparency, the consultation should also have included an undersea route as an alternative to an overhead corridor from Norwich to Tilbury to allow the public to take a view on whether this would be a more acceptable solution.

In addition, as the National Energy Policy Statements: EN-1 and EN-5 are still under review and could change the transmission route selection factors and/or their weighting, it is considered premature for National Grid to have presented only one preferred overhead landward option at the initial stage of public consultation.

The rationale given so far by National Grid for discounting the alternatives does not justify excluding them from the category of "reasonable alternatives" for the purposes of the EIA Regulations. The result is that the contents of the Scoping Report cannot be relied upon and that an ES which results from this process will be deficient. It addresses none of the issues raised relating to selection of, or consultation on, alternatives to overheard power lines/pylons and as such fails against two of the Gunning Principles, i.e., that the choice of an overhead route was effectively predetermined and that there was insufficient information to give 'intelligent consideration' to alternatives, such as undersea cables.

In embarking on an EIA Scoping Report only covering their preferred overhead transmission route, National Grid now risks breaching a third Gunning principle: the requirement to give conscientious consideration to consultation responses.

The following options must be presented for consultation: strategic offshore grid; options such as following existing power lines or infrastructure (rail/A12); undergrounding; and, Tpylons. National Grid profitability for each option must be presented for transparency. Ofgem and independent reviewers should be fully engaged throughout this process.

The initial public consultation must be re-opened to give stakeholders a full range of alternatives for consultation at a stage when options have not already been foreclosed.

2. Scoping Report Chapter 17, Cumulative Impact

We understand that the Offshore Transmission Network Review (OTNR) seeks to deliver increased coordination of offshore transmission and interconnection with the aim of finding a better balance between environmental, social and economic costs in support of the UK's targets of 40GW of offshore wind by 2030 and net zero by 2050. Historically, there has been a lack of coordination in the development of offshore transmission infrastructure due to the broad commercial and regulatory landscape within which offshore wind developers operate.

EAG has 'functional interdependence' with projects such as North Falls and Five Estuaries, currently at non-statutory consultation stage, who have been told by NG that their connection point will be EAG.

National Grid Ventures are currently consulting on Eurolink, a proposed multi-purpose interconnected undersea cable from the Netherlands to the Sizewell nuclear power station to import electricity. How is this power to be transmitted to areas of high demand in London and the south-east?

NG must ensure that the cumulative impacts of energy projects in the region are considered fully.

3. Chapters which should be **scoped in** to the ES

Additional Chapter: Climate Change

The risk to infrastructure from climate change should not be scoped out – it must be scoped in and alternatives including offshore and underground compared. On 27 October 2022, the Joint Parliamentary Committee on the National Security Strategy concluded:

1. the UK's net-zero targets require the electrification of huge amounts of energy demand across the country and that this exposes the power system to enhanced vulnerabilities;
2. electricity pylons and cables are more prone to disruption from extreme weather than gas, which relies mainly on underground pipes rather than overhead power cables;
3. the energy sector was subject to an "adaptation shortfall" in relation to lightning, high winds and storms.

Steel lattice pylons and associated infrastructure are old technology. A complete audit of the carbon that would be generated in the manufacture, construction and operation of the overhead transmission lines should be provided by NG and similar audits undertaken of the alternatives listed above, (strategic offshore grid; options such as following existing power lines or infrastructure (rail/A12); undergrounding; T pylons).

Additional Chapter: Health and Wellbeing

EAG would result in significant impacts on the health and well-being of the rural population of Chignal parish and on the urban residents of north-west Chelmsford and should be considered in a separate chapter.

EN-1 and the draft EN-1 refer to direct impacts on health and well-being from electricity transmission from a variety of factors, including increased traffic and noise. Chignal parish is accessed via two narrow rural lanes which form a circle along which several small hamlets have developed. There are no pavements or street lighting and the lanes are used extensively by parishioners and residents from nearby north-west Chelmsford who walk, cycle and ride horses. Increased traffic resulting from the construction and operation of the overhead lines, especially HGVs, would cause safety hazards to these vulnerable road users.

The landscape that would be affected by the EAG graduated swathe through Chignal parish is tranquil, unspoilt and highly sensitive to change. The prospect of tall steel pylons marching across this landscape is already causing considerable distress for local residents who live near NG's preferred route and for people who live in the housing areas on western edge of Chelmsford City who enjoy interrupted views of Chignal's countryside and use the extensive network of footpaths for informal recreation. The mental health benefits of being able to escape to a rural environment so close to the urban edge would be compromised by the erection of high voltage power lines.

Seeing pylons is a known factor to negatively impact perceptions of tranquillity and tranquillity is a key characteristic of the Pleshey Farmland Plateau landscape of Chignal parish.

The potential impact on house values should also be taken into consideration. There is already empirical evidence that some recent local house sales have fallen through as a direct result of uncertainty caused by the pylon proposals; putting additional stress on house sellers.

4. Sub-topics that should be **scoped in** to the Scoping Report

Other notable mammals, such as brown hare (Lepus europaeus), fallow deer (Dama dama) and roe deer (Capreolus capreolus).

The restored landfill site, now a Nature Park, north of the A1060 and south of the former St James church, is home to a large colony of hares. There are substantial herds of fallow and roe deer that breed and forage in the woodlands, riverside and grassland areas covered by the pylons graduated swathe in Chignal. Both species are protected under the Deer Act 1991. The fact that NG notes that negative impacts could occur to 'other notable mammals' during construction (loss of habitat/habitat fragmentation/noise/light) means that this must be scoped back in.

We note that Otters, (Lutra lutra) are scoped in to the ES. They have been sighted in the river Can and in the lake adjacent to Bridleway 33 and the Nature Park, all within the pylons graduated swathe.

Raptors, geese and swans

The impact on the flight paths of raptors, geese and swans should be scoped in. Bird mortality can occur through collision with power lines and through electrocution from power lines or supporting structures. Siting power lines near or crossing important areas or flyways used by birds may increase collision risk. There are also barrier effects as birds are deterred from using

their normal routes to feeding or roosting grounds. Chignal parish is an important hunting and breeding ground for a wide range of raptors. Red Kites; Honey Buzzards; Marsh Harriers; Kestrels; Peregrine Falcons; Barn Owls; Tawny Owls and Little Owls are sighted regularly in the area covered by the graduated swathe.

Swans and other large waterfowl are of particular concern for power line collisions in the UK. All year round large populations of Greylag and Canada Geese and several Mute Swans graze on the banks of farm reservoirs and flooded gravel pits within or on the edge of the graduated swathe in Chignal St James and fly in formation between these areas several times a day. Significant numbers of Cormorants, Herons and Egrets also feed on lakes, rivers and ponds in Chignal in the vicinity of the graduated swathe.

5. Visual receptors, (Appendix H)

The 41 visual receptors put forward by NG are wholly insufficient. There is only one Viewpoint (30) for the graduated swathe that passes through Chignal parish marked on the table in Appendix H. This refers to the detrimental impact of the pylons on users of the circular Centenary Way Footpath No. 26 through Chignal and other local footpaths, (19, 21, 22, 27, 28, 37). There are also other key viewpoint sites in Chignal which should be included:

1. The Green, adjacent to the former St James Church;
2. Footpath No. 30 from former St James Church leading towards the western edge of Chelmsford and the Centenary Way footpath, No. 26;
3. Bridleway No 33 and The Nature Park, (restored landfill site) south of The Green, from where views extend as far as Margaretting and Willingale, uninterrupted by pylons or any major buildings;
4. from the rear garden of the Pig & Whistle restaurant in Chignal Road which has extensive attractive views of the farmland landscape to the south and west.

It is noted in 13.9.13 that views from private properties will be scoped out but that viewpoints from settlements will be scoped in. Given the scattered settlement pattern of Chignal Smealey and Chignal St James, we would wish to argue for views from small groups of properties/hamlets which are within or close the graduated swathe to be scoped in.

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Your ref: EN020027

Our ref: 221119

Date: 30 November 2022

Via Email: to eastangliagreen@planninginspectorate.gov.uk

Dear Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Our Ref: 221119
Proposal: National Grid (NGET) electricity connection project (East Anglia Green)
Location: National Grid Connection Project, North Colchester

Thank you for consulting us for our opinion on the information that we consider should be included in the Environmental Statement in support of the proposed DCO application. We have reviewed the accompanying scoping report and wish to submit the following representations on behalf of the City Council (the council) concerning the content of the following chapters:

i) Chapter 2 Legislation, Regulatory and Planning Policy Context.

1.1 **Section 2.4.3** Refers to the development plan for Colchester and refers to the former LDF with the Core Strategy and Development Policies DPD. Colchester now has a new local plan that supersedes these former policies comprising Sections 1 and 2 of the Colchester Borough Local Plan 2017-2033.

1.2 The shared Section 1 of the Colchester Local Plan covers strategic matters with cross-boundary impacts in North Essex. This includes a strategic vision and policy for Colchester. The Section 1 Local Plan was adopted on 1 February 2021. The following policies are considered to be relevant in this case: SP1 Presumption in Favour of Sustainable Development, SP7 Place Shaping Principles.

1.3 The Section 2 Local Plan 2017-2033 was adopted in July 2022. The following policies are of relevance to the determination of the current application: SG1 Colchester's Spatial Strategy, ENV1 Environment, NV3 Green Infrstructure, ENV4 Dedham Vale AONB, CC1 Climate Change, OV2 Countryside, DM15 Design and Amenity, DM16 Historic Environment, DM25 Renewable Energy, Water, Waste and Recycling,

ii) **Chapter 3 Main Alternatives Considered**.

2,1 Para.4 of Schedule 4 of the EIA Regs requires an explanation of the reasonable alternatives considered together with an explanation of the main reasons for selecting the preferred option together with a comparison of the environmental effects. The scoping report describes the intended ES coverage of this area (pp.18-29 and para.3.3.3 in particular). The council welcomes the intention to consider alternatives within the ES, and notes the assessment of strategic, route corridor and alignment options that has already been undertaken to date (as described in Chapter 3: Main Alternatives Considered of the Scoping Report).

2.2 The council requires a dedicated section in the ES providing full details of the reasonable alternatives studied and the reasoning applied to the selection of the chosen option(s), including a comparison of the alternative costs and environmental effects. In particular, a fully evidenced, robust assessment of alternative transmission technologies needs to be provided together with the underlying evidence. Given very widespread community opposition to the current proposals, and the wish to see offshore and less environmentally destructive alternatives, this council believe a detailed and fully evidenced and reasoned explanation needs to be set out within the ES for the rejection of offshore solutions including HVDC transmission. Furthermore, an explanation should be included explaining the role of agreed and anticipated grid connections to the decisions leading to the choice of the preferred option.

2.3 The design decisions made as part of the prefered option should include a detailed justification for the extent of overhead line (OHL) and undergrounded sections including the associated impacts of sealing end compounds along the proposed corridor. The ES should describe the selection process used and decisions made in the alignment of the final route and decision to locate a substation at Lawford thereby necessitating the eastern loop to the proposed substation in Lawford within Tendring District and/or to continue to propose an OHL in close proximity to the Dedham Vale and Stour Valley Area of Outstanding Natural Beauty (AONB) and sensitive local communities at Lawford and Ardleigh.

2.4 The council questions whether an evidenced case has been made in support of the Lawford substation and the cumulative impacts for a potential grid connection to proposed offshore wind development (North Falls and Five Estuaries) in this location. Furthermore, the proposed alignment in this location contains sharp changes in direction and a potential concentration of OHL that would be contrary to National Grid's own visual amenity guidelines. Compliance with the Holford and Horlock rules needs to be demonstrated throughout including the location of sealing end compunds and the proposed substation including cumulative impacts with the co-located additional connection compunds.

iii) **Chapter 4: Description of the Project.**

No comment on this chapter.

iv) **Chapter 5: EIA Approach & Method**

No comment on this chapter.

v) Chapter 6: Agriculture and Soils

No comment on this chapter.

vi) Chapter 7: Air Quality

6.1 With regard to air quality notably dust, last summer was exceptionally dry and hot for a prolonged period, so the council wishes to see references to the control and management of dust incorporated into the scope of the construction stage, to ensure against potential experiences of such extreme weather conditions in the future development phase (***sections 7.9.3 - 7.9.11*** refers). We are pleased to note that this issue is documented in ***Table 7.1 (para.7.5.1***) reflecting earlier engagement.

vii) Chapter 8: Ecology & Biodiversity

7.1 The council is satisfied that that nationally agreed CIEEM guidelines will be followed for the ecology surveys and all survey work will be undertaken in the appropriate season by appropriately qualified ecological consultants.

7.2 In accordance with Regulation 14 of the EIA Regulations, the Environmental Statement should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

7.3 The council agrees with suggested approach whereby the scoping for likely significant effects on biodiversity after mitigation measures have been embedded into the Project design. We are satisfied with the identification of impact pathways identified for further assessment in the ES to support the DCO submission as shown in Table 8.9 of the Scoping Report.

7.4 In addition to the EIA report, it will be necessary to also provide sufficient information on non-significant impacts on protected and Priority species and habitats at submission either in a non- EIA chapter or separate documentation. This is necessary in order that the LPA has certainty of all likely impacts, not just significant ones, from the development and PINS can issue a lawful decision with any mitigation and compensation measures needed to make the development acceptable, secured by DCO requirements.

7.5 ***Section 8.1.4***: We note that separate reports will be available for biodiversity legislation compliance and shadow Habitats Regulations Assessment screening.

7.6 ***Sections 8.1.5- 8.1.8***: We also note that a Biodiversity Legislation Compliance report will be provided and request that any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information. We advise that survey and assessment for protected species should meet the requirements of Natural England Standing Advice. We welcome that the draft European Protected Species licences will support Letters of No Impediment (LONI) to be submitted to PINS by Natural England before the close of the DCO examination.

7.7 As the applicant intends to use Great Crested Newt District Level Licensing instead of surveys, we note that Natural England have issued a letter of comfort which sets out their agreement to deliver DLL for the Project in principle which is included at Appendix K. It will therefore be important that best practice methods are secured for construction phases as other mobile species are likely to be present and affected.

7.8 ***Sections 8.2.4 and 8.2.11***: We welcome that the Project is seeking to deliver BNG (in line with National Grid corporate commitment of 10% Net Gain in Environmental value including

a minimum 10% biodiversity net gain across all its construction projects. We look forward to discussions on additional biodiversity gain objectives to be incorporated into the Project to deliver 10% BNG on this Project.

7.9 ***Section 8.2.5***: We note that potential bird collision risk will be assessed through bird survey work, at areas agreed with Natural England, (such as rivers and green corridors). in line with NPS EN-5 (2011) Section 2.7. We therefore expect details on making the overhead lines more visible as stated in the draft NPS EN5 (2021) Section 2.10. to be included in the ES.

7.10 ***Section 8.3, Table 8.1***: We are satisfied with the initial study areas but highlight that Priority species (s41 NERC Act) need to be specifically listed in the ES particularly Table 8.5 to show that these have been adequately considered (in line with Priority Habitats listed in 8.6.12 and Appendix A)

7.11 ***Section 8.4***: The desktop assessment has been prepared in consultation with Essex Field Club and alongside other data sources, these records to support the baseline information and need to inform the surveys which have not yet commenced. We highlight that all ecological records from new or updated surveys undertaken should be shared with the local record centre as required by CIEEM Code of Professional Conduct.

7.12 ***Section 8.6, Tables 8.3 and 8.4***: We agree that the sites designated for biodiversity within the 2km from the Scoping Report Corridor are listed.

7.13 ***Sections 8.6.9 - 8.9.11***: We note that the non-statutory sites within 2km of the Scoping Report Corridor are not listed nor referenced in an Appendix and request that this information is provided in the ES. We welcome confirmation that field survey would determine if wooded areas are found to support ancient woodland ground flora and veteran or ancient trees.

7.14 ***Section 8.8.2***: We welcome the best practice measures to be adopted during the construction phase and look forward to reviewing the Outline Code of Construction Practice (oCoCP).

7.15 ***Section 8.9, Table 8.5***: We request that relevant Priority species (s41 NERC Act) are also specifically listed in for further assessment.

7.16 ***Section 8.9.5-8.9.9***: We welcome that potential killing/injury of protected species e.g. large birds including swans and geese, has been scoped in for both the construction and post construction phases of this Project. We agree that there is the potential for a significant effect in relation to birds but until there is certainty on the extent and presence of certain species, this impact pathway should be scoped into the ES for relevant species.

viii) Chapter 9: Geology & Hydrogeology

No comment on this chapter.

ix) Chapter 10: Health & Well Being

9.1 The cross cutting nature of this chapter is appreciated and acknowledged in the report. The principal public concern inevitably relates to the potential impacts of EMF on health and the chosen methodology for assessment (based on Swanson and Renew, 1994) adopting a 200m study area as the Scoping Report Corridor for the EMF assessment (illustrated in Figure 10.1,

Appendix A) is supported. Whilst compliance with international ICNIRP standards/DECC codes of practice has resulted in scoping out of significant effects, the council welcomes the recognition of public concern regarding EMFs and commitment to provide comprehensive information on EMFs and compliance of the proposed Project with the ICNIRP guidelines via a standalone EMF report to be submitted as part of the DCO application.

9.2 It would be helpful, outside the scope of the ES, if a dedicated contact address could be provided so anxious residents can seek reasurance from NGET on this area,

x) Chapter 11: Historic Environment

Archaeology

10.1 The proposals inevitably have potentially signiifcant direct impacts on the archaeological resource. The archaeological information proposed in this Scoping Report for inclusion in the ES would be insufficient to assess the impact of the development on archaeological assets. Major issues identified are listed below:

a) The Scoping Report refers in places to trial trenching evaluation, but does not propose any methodology nor when it will take place. Undergrounding is proposed for much of where the project passes through the AONB within Colchester Borough. These areas, along with any other areas of relatively substantial ground impact such as compounds, substations or haul roads, should be subject to an appropriate trial trenching evaluation to provide enough information to support the ES chapter.
b) The Scoping Report refers to an Aerial Investigation that has already taken place. The report on this does not appear to be available, and the methodology used is not included in this Scoping Report. We are therefore unable to assess whether the methodology used is suitable.
c) More detail should be provided regarding the nature of the proposed geophysical survey. Any new haul roads should be included in the area for assessment.

10.2 Overall the proposed scoping report covers the primary areas that would be required for assessment of the historic environment. There are a number of areas which do cause concern that need to be amended or altered to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved. The Historic Environment impacts have been discussed with the applicants' consultants on two occasions as described within the document with some of the changes/recommendations discussed being included within this documentation.

10.3 The historic environment section 11 states that it has inter relationships with both chapters 9 Geology and Hydrology and 12 Hydrology and land drainage, however, neither of these identify they have an inter relationship with the historic environment. On other schemes the undergrounding of cables have been identified as affecting the water tables and thus potential for drying out waterlogged archaeological sites. The interrelationship identified by the heritage specialists needs to be integrated into the other sections of the ES.

10.4 The main concerns lie within sections 11.9 and 11.10. The protected lanes should be avoided by construction traffic. A significant concern within section 11.10 is the omission of a section on the proposed evaluation using trial trenching. This is especially important in areas of undergrounding.

10.5 ***Section 11.9.17***: It is unclear from the present document how the protected lanes in Essex are to be assessed. Will these be protected from construction traffic. The protected lanes would not be appropriate for large vehicles and as with the Bramford to Twinsted link application a haul road is now to be constructed if this scheme is given the go ahead. Has the presence of a haul road be considered within the ES as this has the potential to have a significant impact on below ground archaeological deposits.

10.6 ***Section 11.10.7***: Any undergrounding areas would require trial trenching as the most appropriate method to assess such a wide corridor to support the ES. No trial trenching methodology is included within the document.

10.7 ***Section 11.10.8***: Site walkover: Lidar survey results should be used to assess areas of scrub, woodland etc to identify potential assets which would help to inform the locations for the walkover survey.

10.8 ***Section 11.10.17***: Roads, railways etc should not be used as a pre existing barrier as these are low features in the landscape when considering the height of the proposed pylons. Any setting assessment must take into account the impact of such large features within the present historic agricultural landscape.

10.9 ***Section 11.10.23***: During our discussions it seems that the high quality aerial survey undertaken by the applicants was not undertaken at the best time for aerial cropmarks to be identified. Therefore it is recommended that a detailed aerial photographic survey looking at all available historic and modern sources of aerial photography such as Google Earth should be undertaken with the results appropriately rectified.

10.10 ***Section 11.10***: A section on intrusive archaeological evaluation has not been included within the Scoping document although this has been discussed at the meetings and is mentioned earlier in the document. Archaeological trial trenching should be expected for use in areas of undergrounding, main compounds and sub stations.

Built Heritage

10.11 As highlighted within the submission documents, the potential impacts to built heritage have been discussed during two virtual meetings, with most of the recommendations to date having been addressed. Generally, the EIA Scoping Report provides for the assessment of the majority of heritage assets which have the potential be impacted by the scheme, although there are a number of elements which do cause concern. These are highlighted below, and it is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved.

10.12 ***Section 11.6.6***: The PPG states that 'in comes cases, local planning authorities may also identify non-designated heritage assets (NDHA) as part of the decision-making process on planning applications' (040 Reference ID: 18a-040-20190723). No methodology/criteria for identifying, assessing, and recording potential non-designated heritage assets has been provided. This would be particularly helpful for areas which do not have a current Local List or an adopted or publicly accessible criteria. The City Council has adopted detailed assessment criteria for the assessment of NDHA and these are set out on our website. We suggest that these provide a comprehensive basis for assessment of hitherto unknown NDHA in our area and potentially other lpa's that may have yet to progress adoption of a local list of NDHA or assessment criteria.

10.13 ***Section 11.9.10***: An increase in construction traffic has the potential to directly impact historic buildings. If they are to be scoped out, it must first be adequately demonstrated that they are not located close to any vehicular or access routes and will not be affected by any increase in construction traffic.

10.14 ***Section 11.9.17***: In addition to comments made by the Historic Environment Consultant, it is recommended that a methodology for the assessment of the Protected Lanes in Essex is provided, to ensure they are fully protected from adverse impacts resulting from construction traffic.

10.15 ***Section 11.10.03***: It is welcome that the baseline setting of heritage assets will be informed by the Landscape and Visual Impact Assessment (LVIA) and Zone of Theoretical Visibility (ZTV). This is particularly important given the likely relationship between heritage assets and the historic landscape.

10.16 ***Section 11.10.15***: Reiteration of comments made in relation to 11.9.10

10.17 ***Section 11.10.19***: Any buildings which are scoped out should be listed in an appendix to the DBA. A full justification for scoping out must also be provided within the appendix; where there is no adequate justification for scoping out, a full assessment and description within the main body of the DBA will be expected.

Xi) Chapter 12: Hydrology & Land Drainage

The council defers to ECC as the LLFA on this topic area.

Xii) Chapter 13: Landscape & Visual

12.1 ***Section 13.6.16*** We note that the report acknowledges that “Within Tendring District and Colchester District the Project would run from Stratford St Mary (within Dedham Vale AONB) to the Colchester District boundary near Surrex. Between the proposed EACN in the east and vicinity of Fordham in the west, the Project would run in an east west direction to the south of the Dedham Vale AONB, within parts of the landscape that are likely to forms the wider setting to the AONB.” For this reason, we wish to see robust justification for the extent of undergrounding proposed outside the AONB designation but within its visual envelope forming a key part of the setting of the designated area and having intervisibility with the designated area and potentially affecting views from within. This issue needs to be justified and explored further in Chapter 3 Main Alternatives Considered in addition to the analysis provided in Chapter 13.

12.2 Given the current application to extend the Dedham Vale AONB to the northern extent of the Stour Valley, this visual envelope protection approach should be extended to encompass any areas that are outside the current AONB designation but are still within the area of the Stour Valley safeguarded through the Dedham Vale AONB & Stour Valley Management Plan. When finalising the proposed routing, careful consideration should be given to minimising any adverse impact on valued landscape features. This with particular reference to undergrounding matters within and bounding the Dedham Vale AONB, which, in order to comply with the CROW Act should demonstrably propose measures designed to protect, maintain and enhance the landscape character & features of the Dedham Vale AONB and its environs in line with the Dedham Vale AONB Management Plan. Thus careful consideration should be extended to

assessment of the impact of the wider East Anglia GREEN project's development corridor within and adjacent to Colchester, both on the ground (any required working area) and within its visual envelope where compliance with Colchester Borough Core Policy ENV1 should be sought, i.e., meeting the guidelines within the Colchester Borough Landscape Character Assessment (see above). Negatives should be avoided, e.g., removal of Important hedgerows (as defined under the Hedgerows Regulations 1997), and positives promoted, e.g., the replanting and reinforcement of degraded hedgerows along the corridor. On this point, under sction 13.8.5 of the Scoping Report it needs to be confirmed that physically impacted hedgerows protected under the Hedgerows Regulations 1997 will be identified and that all physically impacted hedgerows (protected under the Regulations or not) will be protected in accordance with BS5837.

12.3 It is noted that under section **13.8.3** of the Scoping Report that as the design proposals develop *'Other embedded measures that would continue to be explored include rationalisation of existing overhead lines, use of alternative tower designs, … and potential need for additional sections of underground cables'*. This is welcomed from a landscape perspective as once, as is proposed within the Scoping Report, the Zone of Theoretical Visibility (ZTV) and resulting viewpoints of finalised routes are defined and tested against local planning policies, it is anticipated that in order to conserve local landscape character, as required under Colchester's Local Plan Policy ENV1 through the Colchester Borough Landscape Character Assessment (CBLCA) these '*embedded measures'* will need to be drawn on.

12.4 ***Section 13.1 Approach to scoping:*** The approach to scoping set out at 13.1 is broadly satisfactory. It is also appreciated that the interrelationship between the landscape and visual chapter and other environment topics has been made clear in Para. 13.1.2.

12.5 ***Section 13.4 Data Collection***: Para 13.4.2 states that the Scoping Report has been informed by targeted field work undertaken in August 2022. For viewpoint photography visits, we would advise these are taken in the winter months to ensure leaf cover is reduced and therefore representing a 'worst case scenario'. It may be that both summer and winter views are used to help provide representation all year round, however winter views would be the minimum requirement.

12.6 ***Section 13.6 Baseline conditions***: The baseline conditions at 13.6 as set out in the scoping report do not appear to recognise the network of promoted routes, that is locally and regionally promoted footpaths and other rights of way, cycle routes, or other identified routes such as protected lanes (identified in Braintree District, Brentwood Borough, Colchester Borough and Tendring District).

12.7 ***Landscape Value***: We welcome the reference to Technical Guidance Note 02-21 'Assessing the Value of Landscapes Outside National Designations', which was published by the Landscape Institute. This builds on the details within GLIVIA3 (Box 5.1) and strengthens the argument that landscape value is not always signified by designation: 'the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value' (paragraph 5.26). In determining value, we would expect to see a critical analysis of landscape value criteria (including cultural and natural heritage) for all chosen landscape receptors. Along with susceptibility, these findings should then inform any sensitivity judgements.

12.8 ***Section 13.9 Likely significant effects - Residential amenity***: We accept that visual effects on individual private views is not within the remit of EIA (Para 13.9.13). However, given that the transmission tower locations have not yet been identified it may be necessary, in specific locations, for the applicant to assess impacts on residential amenity where there is a risk that the "lavender test" principles may be breached. This approach would be consistent with paragraph 16.17 of GLIVIA 3 and the Residential Visual Amenity Assessment Technical Guidance Note (Landscape Institute, 2019).

12.9 ***Visual amenity at night***: The Scoping Report concludes that lighting will be scoped out on the Environmental Statement during both construction and operation. Although the Scoping report highlights that there is no anticipation of significant effects from lighting on designated landscapes or landscape character at night, we are yet to see any information regarding the size, location and operating hours for any construction areas for key sites substations and sealing end compounds, as well as laydown/compound areas, On this basis, we do not consider it appropriate to scope out the impact on visual amenity at night during construction until details of operation are fully understood.

12.10 ***Sequential visual effects***: The methodology does not appear to deal specifically with sequential visual effects. Given the scale and repetitive nature of this project, combined with varying visibility of pylons, this will clearly be a significant matter for users of highways and rights of way networks, where there is a general expectation of higher levels of visual amenity and tranquillity.

12.11 ***Section 13.9 Viewpoints and Visualisations***: Currently there is 41no. proposed preliminary representative viewpoints. Whilst the emerging approach to viewpoint selection may be acceptable for the upcoming s42 Preliminary Environmental Information Report (PEIR) consultation, the overall number of representative viewpoints is considered to be inadequate and therefore ECC reserve the right to ask for further or amended viewpoints, prior to preparation of the EIA that will support the DCO application once further site visits and survey work has been undertaken.

12.12 Similarly, given the extent and complexity of this project, it may be deemed necessary to include both specific viewpoints and illustrative viewpoints (Para 16.19 GLVIA3).

12.13 ***Cumulative landscape and visual effects***: The EAG scheme cannot be considered in isolation. Potential cumulative landscape and visual effects, particularly at and around the Bramford substation site and near Ardleigh, Tendring. There is a suite of other energy connection and generation projects coming forward, including Bramford to Twinstead Pylons, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm. All of which should be considered in detail.

12.14 ***Appendix J***: The arboricultural survey will identify impacts to trees potentially subject to significant arboricultural impacts as a result of the project. In addition to this we would expect to see a comprehensive assessment of important hedgerows under the Hedgerow Regulations 1997 to be undertaken. This should identify all hedgerows along the routes that are important under the various historic, ecological and designation related criteria. Furthermore, all hedgerows along the route to be removed to facilitate construction should be surveyed in detail in advance to inform specific and appropriate planting schemes for their restoration.

12.15 ***Figure 13.2 Visual Receptors***: As stated in the comments above, there is 41no. proposed preliminary representative viewpoints, which is considered to be inadequate and does

not fully represent the impacts that this project will introduce on communities. For example, there are areas north of Witham (Page 8 of 11) that have not been represented.

12.16 We would also expect to see additional viewpoints from PRoWs and Promoted Routes within the Study area. To support NG, suggested viewpoints will be reviewed in detail and recommend as soon as possible to help with the preparation of the ES.

Allied Arboricultural issues

12.16 Care should be taken where possible to avoid areas of ancient woodland due to the potential impacts on an irreplaceable biological resource. Damage or disturbance to ancient/veteran trees should also be avoided. The Scoping Report has taken into account the high possibility of encountering trees used as bat roosts (a protected species) and this will need to be covered in the ecological section of the Environmental Statement.

12.17 The Scoping Report states that an arboricultural report will be carried out in line with BS5837 (2012) to identify and record features that may be lost or impacted by the proposed work. The BS5837 survey should also be helping to inform the project with regards to positioning of its infrastructure in as far as possible to avoid Category A and B trees that are considered a material consideration to planning and can be considered cumulatively significant. A desktop study should also be used to carry out data collection with regards to ancient, veteran and notable trees, ancient woodland, traditional orchards, Tree Preservation Orders (TPOs) and Conservation Areas (CAs). A walkover survey has also been outlined on potential sites.

12.18 The data collection suggested on potential sites should outline those trees of high value, either amenity or biodiversity, that should be taken into account for reasons of planning, protection or mitigation. Surveys and subsequent reports issued in line with that outlined in the Scoping Report should allow an assessment to be made regarding the arboricultural impact of these works and how any impacts will be mitigated either through tree protection or specialist construction methods. As previously mentioned, care should be taken to avoid loss to those habitats and individual trees that would be irreplaceable such as ancient woodland(s). As such if the methods outlined in the Scoping Report regarding trees are followed it should be sufficient to allow a detailed assessment of the arboricultural impacts at the next stage of the planning process.

Xiii) Chapter 14: Noise & Vibration

We have considered the methodology set out within the scoping report, and are satisfied that the coverage is comprehensive with regard to noise and vibration.

Xiv) Chapter 15: Socio Economic, Recreation and Tourism

13.1 The council has some concerns about the breadth of impacts that would be captured by the proposed methodology. Broadly they relate to inclusion of mental health impacts as well as physical and the need to cross reference issues between the ES chapters more effectively.

13.2 In terms of the methodology adopted in the scoping report, Tourism and Recreation are activities which have economic impacts. They also take place across Local Authority boundaries as visitors tour around, so a strategic approach needs to be adopted as to date most focus has been on consultations with Local Authorities and interest groups. Whilst the council participated in these groups, we consider that further work is required to effectively capture the effects of the proposals on this thematic area as outlined below. The council suggests that a wider perspective needs to be adopted beyond our City boundary for this purpose as Colchester

is used as a base for touring and also other visitors based elsewhere will come into the City area for tourism and recreation purposes.

13.3 Furthermore, consideration is required to evaluate the composition of the wider visitor experience which might involve birdwatching, visiting a pretty village, sitting by a river and enjoying the tranquillity, wildlife, flora and fauna. Considering the visitor experience in this way demands we believe that Chapter 15 Socio Economic Recreation and Tourism is considered / cross referenced in other Chapters in the EIA. These are: 8 - Ecology and Biodiversity, 10 - Health and Wellbeing, 11 - Historic Environment, 13 - Landscape and Visual, 14 - Noise and Vibration, 16 - Traffic and Transport and 17 - Cumulative Effects.

13.4 Furthermore, the council suggests that there is also a quality of life dimension which should be included and captured in the ES scope. Framed this way, residents also become visitors when they enjoy their locality and host visiting friends and relatives. This often involves interacting with the visitor economy as going out to pubs, restaurants, cafes and visitor attractions are key to enjoying time together.

13.5 Reviewing each relevant Chapter in turn and considering them from a Socio Economic Recreation and Tourism perspective we have the following points for inclusion:

Chapter	Reference	Comment
8 - Ecology and Biodiversity	8.9	Consulted with wildlife organisations but not tourism organisations. Visitors come to see birds, fish, walk and see wildlife, photograph, canoe and kayak.
	8.1.2	Include Socio Chapter 15 Economic Recreation and Tourism in the scope
	8.9.9	means that there's potential for significant impact on visitor demand because of impacts arising from the development
10 - Health & Wellbeing	10.1.2	Include Socio Economic Recreation and Tourism in the scope because the project affects recreation, escape and mental health management
	10.7.1	Considers physical health but not mental health impacts. The Dedham Vale in particular is very popular with residents as well as visitors. As both Colchester and Ipswich are places of significant population and housing growth, the Dedham Vale is ideally placed for recreation and hosting visiting friends and relatives. In addition, residents undertake recreational hobbies such as horse riding, fishing, walking, dog walking and cycling so
	13	arguably should include Chapter 13, Landscape and Visual in this section too
11 - Historic Environment	11.1.2	Include Chapter 15 here too in the scope as pretty villages and historic buildings and their stories are a key part of the attraction, stimulating demand to visit and spend money.
	Table 11.2	Non-designated assets should be included here too such as historic landscapes, villages a locations of historic events, all of which drive tourism and contribute to the visitor economy

	11.11	Ascribing Value: should include the value of the Historic Environment in tourism terms as a key part of the visitor experience and therefore the visitor economy
	Table 11.8	Considers direct asset value but not indirect asset value which would include the tourism value in the scope
13 - Landscape and Visual		Good to see Chapter 15 included but on that basis so should Chapter 8, 7 Chapter 11 and Chapter 16
	13.9.2	Describes the effect on the visual amenity of people living in and 'moving around'. .. However, this diminishes the impact of the visitor economy which is much more than moving around ('touring') as people spend more and also have a more meaningful visit as they have experienced more and by association, spent more – contributing to more tourism businesses and supporting more jobs. There's also the impact on image and reputation of 'East Anglia' as a destination region in this respect.
	13.9.13	The impact on private views implies private residences and has been excluded from the scope. However, commercial premises should be considered too as views from visitor accommodation can often be the selling point.
	13.10	Has been scoped in so arguably it needs more effective joining up
14 - Noise and Vibration	14.5	Engagement with stakeholders - unsure of heirarchy here but the focus is on Local Authorities when tranquillity has been proven by consultation to be a key attractor to the Dedham Vale and Stour Valley. Therefore, the Dedham Vale and Stour Valley Project should be included here too
	14.1.2	Needs to include: Chapter 10 Health and Wellbeing and Chapter 15 Socio Economic and Recreation
15 - Socio Economic, Recreation and Tourism	15.1.2	Include Chapter 11 Historic Environment, Chapter 8 Ecology and Biodiversity
	15.6.11	Accommodation stock - note that the data is from 2016 and that the situation might have changed since. Also, the reference to 'spare tourism beds' - this ignores the operator's capacity to service those beds (there is a serious skills shortage in hospitality currently which has not been referenced. So, it is inaccurate to describe them as 'spare'. There's also concern at the assumptions this term might carry. Domestic tourism is likely to grow as the cost of living situation bites harder and overseas travel becomes more expensive due to rising fuel costs, unfavourable exchange rates and inflation as a trend internationally. These beds aren't spare.
	Table 15.8	Tourism and Recreation Assets - natural features should be included such as rivers, viewpoints in landscapes, historic buildings and collections of historic buildings ('pretty villages'). All of which are major assets to the visitor economy and businesses and jobs depend on them.
	15.8.2	includes tranquillity and wellbeing in the narrative but should then cross reference Chapter 15 Socio, Economic, Recreation and Tourism in those chapter too
	15.8.3	Financial impacts on businesses have been included in the scope but needs to reference where this would be considered further and potentially scoped in, especially in r those businesses

	15.10	Could widen the scope beyond accommodation and then consider whether it should be considered in or out
16 - Traffic and Transport	16.7.5	references walking, cycling, horse riding which are tourism and recreation activities therefore Chapter 15 Socio Economic Recreation and Tourism needs to be included in the scope here. Chapter 10 Wellbeing also needs to be included
17 - Cumulative Effects	17.3	Zone of influence - needs to include image and reputation of East Anglia as a visitor destination (stimulating demand for tourism visits) and the competition from other areas as word spreads through social media which could potentially drive loss of business. This would be in the short, medium and long term. Also, to be considered here is the cumulative impact of this and other major infrastructure projects on the visitor experience. this would include Sizewell C construction and the Lower Thames Crossing as well as the significant pipeline of residential construction over the duration of the project

XV) Chapter 16: Traffic and Transportation
The council defers to Essex County Council as the hiaghway authority on this issue

XVI) Chapter 17: Cumulative Effects
The council has no observations on the proposed methodology.

Conclusion

This Council and our communities are opposed to the DCO proposals, mindful of the environmental harms this would entail and the current lack of exploration of more preferable off-shore or other alternatives. But, the City Council has worked collaboratively with other Councils affected by the proposed project preferred route to achieve a concensus of opinion across many areas of the ES. We remain very concerned to ensure that the fundamental decisions on the choice of the preferred technology and transmission corridor are transparent and justfied to form the foundation for a well designed project that genuinely minimises its impact on the wider environment and communities of Colchester and its neighbouring authorities.

We trust that you find the matters raised constructive in the assessment of the scoping report and its proposed methodology.

Yours sincerely

[redacted]
Development Manager, P & C

Development Manager

From: [redacted]
To: East Anglia GREEN
Subject: Dedham Parish Council Response two East Anglia Green Energy Project
Date: 05 December 2022 19:27:39

Dear Sirs
Dedham Parish Council Response
Dedham Parish Council wholly endorses the Essex Suffolk Norfolk Pylons (ESNP)response to the National Grid Scoping Report prepared by Charles Bremner KC.
http://www.pylonseastanglia.co.uk/
In particular we believe that the whole basis of the initial non-statutory consultation by not offering alternative routings including subsea is flawed and therefore it and future consultations based on it are invalid.
However, in addition there are several local factors that re-enforce our opposition

The Non Statutory Consultation was not inclusive of all stakeholders and is therefore invalid.

A very small percentage of the population of Dedham were included in the initial consultation. Only residents in the outlying hamlets closest to the proposed route received forms. Hence most residents only learned of the Green Project via the press and the appearance of “Stop the Pylons” signs. Therefore, most people were unaware of the National Grid information “Road Shows” that were all held outside the village and completely inaccessible by public transport. Subsequently, those residents who received the offer of £500 to have their land surveyed by National Grid were not fully informed of the facts and were lulled into a false sense of security by the rumours that cabling will go underground in the AONB and therefore Dedham will not be affected by the project.

This is despite:
Dedham having the unfortunate location of straddling the boundary of the AONB .will therefore be affected by three elements of the proposed project
!00 metre swathes being taken up for Underground cabling,
Where the cables change from underground to overground National grid have said the pylons will need to be even bulkier than the standard 50m . There will also need to be a Sealing End Compound this will be 30m x 80m
The pylons themselves
Therefore the initial Non-Statutory Consultation was most definitely not inclusive and therefore not valid

The Visual Receptors put forward by National Grid are wholly inadequate

Anyone leaving and accessing the Dedham from the south and west i.e. Ardleigh Road and Birchwood Road will be forced to pass under the transmission cables and associated infrastructure. Anyone using Coggeshall Road, Coles Oak Lane and Hunters Chase will have a full view of the infrastructure. As a result of the topography of the Dedham Vale It is also likely that residents will catch glimpses from Grove Hill, Monks Lane and Long Road West. All this is in in AONB, in a village with a conservation zone that derives a large proportion of its income from tourism.

The cumulative impact of other development in the area

Dedham (under Colchester Borough Council) faces significant threat from other developments in the area that are already creating intolerable pressure on our rural lanes and way of life This includes massive housing development in Tendring creating a rapid increase in the volume of traffic and associated anti-social driving using our lanes to access the A12. Similarly a huge distribution centre to built on our boundary with Tendring and continued development of Colchester not least in the form of the proposed Garden City will all contribute to changing the nature and character of what should be a protected area.

Dedham Parish Council therefore requests that the results of the initial Non-Statutory Consultation be scrapped and replaced by another that is wholly inclusive of all stakeholders. We also believe that National Gid must work together with relevant local authorities across East Anglia as well ss prescribed and non-prescribed bodies to identify potential alternative solutions to the current proposal.
Yours Faithfully

For and behalf of Dedham Parish Council

[redacted]
Vice-Chairman for Dedham Parish Council
[redacted]
[redacted]

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East of England Ambulance Service NHS Trust

By Email Only:

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Emma Cottam
Environmental Services
The Planning Inspectorate
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Bristol, BS1 6PN

East of England Ambulance Service NHS Trust
Hammond Road
Bedford
MK41 0RG

5th December 2022

Our Ref: EAG/ZM

Dear Ms Cottam

THE EAST ANGLIA GREEN ENERGY ENABLEMENT (GREEN) PROJECT
PLANNING INSPECTORATE REFERENCE No. EN020027

Scoping Report by National Grid Electricity Transmission PLC concerning an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) Project, requesting the Planning Inspectorate's Scoping Opinion pursuant to The Planning Act 2008 (as amended) & the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – Interested Party Submission by The East of England Ambulance Service NHS Trust (EEAST)

We write in response to the Planning Inspectorate's letter dated 7th November 2022, inviting comment from consultation bodies and interested parties as to the information considered to be included within the GREEN Environmental Statement.

EEAST is an **INTERESTED PARTY** in this planning process and is a health and blue light partner organisation operating in close association with the respective blue light partners and Integrated Care Boards across the East of England.

A joint health submitted by Mid South Essex Integrated Care Board and includes

EEAST has reviewed the Scoping Report submitted by National Grid Electricity Transmission PLC (NGET) from its operational perspective, and a summary of the key areas for inclusion either within the Environmental Statement (ES) or in a separate Technical Assessment accompanying the DCO Application are set out below:

- **Scoping Work –** is required to determine a suitable study area, baseline assessment & approach to identify the likely effects (impacts) of the Project on EEAST's operations

- **Scheme Design, Mitigation & Management Measures -** are required to avoid, reduce, mitigate & compensate for the likely Project impact on EEAST's operations during the construction phase of the development

- **Suitable DCO Requirements &/or Heads of Terms of Agreement, either via a Section 106 planning obligation or Deed of Obligation –** are required to secure funding & new facilities provision, as required, to increase the capacity, response capability & Project Preparedness for EEAST's staff, vehicle fleet and estate assets to mitigate & manage the impacts arising

- **Suitable Terms of Reference, Membership & a Communications Strategy for a Transport, Community Safety, Health & Wellbeing Working Group -** are required to inform & assist the management of the construction, operational and decommissioning phases of the Project, requiring a coordinated response from EEAST along with its health & blue light partners, as well as organisations such as the East Anglian and Essex & Herts Air Ambulances

EEAST, together with the Integrated Care Boards (ICB) within Norfolk, Suffolk and Essex, Norfolk & Suffolk Constabulary, Essex Constabulary and Norfolk, Suffolk and Essex Fire & Rescue Services are therefore keen to work with NGET to address these points - and agree and secure suitable mitigation and management measures either as a DCO Requirement and/ or a Section 106 planning obligation (or Deed of Obligation), at an early stage of the DCO process.

If it is deemed that the matters raised by EEAST are more appropriately addressed by a supporting technical assessment, rather than as 'other effects' within the ES, then we would be agreeable to this.

East of England Ambulance Service NHS Trust

EEAST is commissioned by Suffolk and North East Essex CCG on behalf of all CCGS to provide emergency and urgent care services throughout Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk.

EEAST transports patients to 17 acute hospitals amongst other healthcare settings, including within the 10 Local Authority areas located within the Order Limits envisaged by the GREEN Project of - South Norfolk DC, Mid Suffolk DC, Babergh DC, Colchester BC, Tendring DC, Braintree DC, Chelmsford CC, Brentwood BC, Basildon BC and Thurrock Council.

EEAST covers an area of approximately 7,500 sq miles with a resident population of over six million people and employs approximately 4,000 staff operating from 130 sites.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2

- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions

- Patients may be passed to 999 via other NHS health care systems, including NHS 111

- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) is a commissioned service providing an essential lifeline for people unable to use public or other transport due to their medical condition. Currently this service is provided by EEAST for the ICB areas within Norfolk, Suffolk and Essex likely to be affected by the GREEN Project outlined above. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics

- Being admitted to or discharged from hospital wards

- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Details of EEAST's service remit, priorities, staff, vehicle fleet and estate assets, service targets, co-working relationship with other healthcare and blue light partners, along with its operational standards and thresholds, are set out for information at **Annex 1 & Annex 2**.

East Anglia Green Energy Enablement Project Proposals – Location & Overview

The Project proposes to facilitate the transfer of power from the East Anglia region to the rest of the Main Interconnected Transmission System (MITS). This would enable connection of offshore wind generation, nuclear power generation and interconnectors, which are expected into East Anglia by 2035.

The Project comprises a 400 Kilovolt (kv) electricity transmission line over a distance of approximately 180 km, and would incorporate the following key elements;

- A new 400kv electricity transmission line – approximately 170 km being overhead lines (OHL) from Norwich to Tilbury, with 10 km undergrounded through the Dedham Vale Area of Outstanding Natural Beauty

- New Cable Sealing End Compounds (CSEC) to connect the OHL's to the underground cables

- A new 400kv connector substation
- Works at Norwich Main, Bramford & Tilbury Substations
- Temporary works associated with the Project
- Third party utilities diversions &/ or modifications may also be required to facilitate its construction

Construction, Operation & Decommissioning Phases

Construction Phase

Subject to gaining development consent, construction works are expected to start in 2027 and be completed by 2031, a duration of 4 years. At this stage the peak construction workforce and any accommodation, welfare and travel logistics are yet to be identified.

The main construction activities envisaged are summarised below;

- Removal, diversion & modification of existing National Grid infrastructure & third-party utilities
- Preparatory works, incorporating the construction of temporary fencing around works compounds, soil stripping & storage, site levelling, surfacing & provision of welfare buildings, equipment storage & parking facilities
- Construction of temporary haul routes for HGV's - route locations along with existing & new access works to local road networks to be determined
- Temporary crossings over rivers/ watercourses & ditch systems along with temporary bridge & culvert constructions to be determined
- Installation of approximately 500 – 550 steel lattice pylons averaging 50m in height carrying overhead electricity transmission lines
- Trenching works to accommodate underground cables, including trenchless crossings to pass under rivers, roads & railways
- A new substation at Tilbury (up to 25m in height) with an operational footprint of 450m x 250m, with ancillary buildings to house electrical equipment & security fencing
- A new substation at Tendring along with reinforced concrete bunds for each super grid transformer (SGT) oil containment measures, & a permanent access road connecting to the nearest main road,
- Extensions to the existing Main Substations at Norwich & Bramford (up to 12.5 m in height) to accommodate new OHL feeder circuits, with 4 m electrified palisade fencing

- Deployment & movement of excavators, cranes, pile rigs (including percussive piling equipment) steel work, drum cabling, construction materials & cement

Operational Phase

The OHL's and CSEC's would have a design life of 40 years (subject to use & location) with regular inspections by van or helicopter to check for visible faults, along with safety clearance checks.

Refurbishment of fittings only would be undertaken if conductors remained in good condition. The insulators and fittings have a life expectancy of 25-40 years.

Underground cables have a life expectancy of 40 years, and would be subject to regular checks using fibre optic cables installed during the construction phase.

The new Tendring substation would be unmanned during operation, with routine visits undertaken to visually inspect the condition of equipment, structures and buildings for signs of damage or wear.

Decommissioning Phase

At this stage the Scoping Report envisages that the transmission of electricity would continue for as long as a business case existed.

If decommissioning is required, this would be undertaken in line with construction and waste management best practice applicable at the time.

Potential Impacts on EEAST Service Areas & Capacity

Project Environmental & Social Effects

Review of the EIA Scoping Report documentation, indicates that the Project's potential effects (impacts) on EEAST's operational capacity, efficiency and resources (namely staff, vehicle fleet and estate assets) are absent from the work scope.

The EIA process does not therefore make any provision for this essential social infrastructure to be baselined or assessed, and no potential mitigation parameters are outlined.

EEAST therefore request that the EIA scoping process (or a separate technical assessment) determine the likely Project effects (impacts) on EEAST, who are keen to work with NGET to ensure this omission is addressed - by information being prepared to inform a robust DCO Application for the purposes of the Examination.

This approach would assist the DCO process, and looking ahead, EEAST wish to secure suitable mitigation and management measures as part of the DCO Requirements and/ or via a Section 106 planning obligation (or Deed of Obligation) and have this position agreed in advance of the Examination.

With this in mind, EEAST's principal areas of interest and concern are summarised overleaf.

EEAST Principal Areas of Interest & Concern

Information for Inclusion Within Scope of the Environmental Statement &/or within a Technical Assessment with Related Mitigation & Management Measures

The principal areas of Project interest which are likely to significantly impact on EEAST's operational capacity, efficiency and resources requiring appropriate mitigation and management measures are outlined below - in light of the information and assumptions presented in the NGET Scoping Report.

Highways, Traffic, Transport & Articulated Indivisible Loads (AIL's)

It is evident from Section 4 (Description of the Project) of the Scoping Report, that a major level of construction activity is envisaged, incorporating a 170km length of overhead and 10km length of underground 400kv electricity transmission line, along with substation and temporary and permanent access road provisions.

The Project requires 500 – 550 (50m high) steel lattice pylons along with open trenched corridors, trenchless crossings, haul roads, compounds, enabling and ancillary works, potentially requiring road closures and route diversions - along with the potential for significant HGV (and an unspecified number of additional/ AIL led) traffic movements.

Table 4.1 (Description of the Scoping Report Corridor north to south by section), identifies a significant number of principal and secondary road network locations that are to be crossed and directly impacted by the Project, potentially requiring temporary road closures, diversions with related highway network disruption.

This would give rise to the potential for significant road network delay and service disruption from EEAST's perspective, taking place as part of a major 4-year construction phase program, required to implement the Project.

Information to determine the effects arising from the construction phase of the Project and the likely impact on EEAST's operational capacity, efficiency and resources (including the likely highway disruption and delay), therefore need to be included within the scope of the ES and/ or within a Technical Assessment accompanying the application for a DCO.

Once this information is presented and assessed, any necessary mitigation and management measures ought to be secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Major Accidents & Disasters

It is evident that a significant level and duration of construction phase work reliant on the use and deployment of heavy lift plant, specialist machinery and equipment, producing noise, heat, vibration and dust (with work periodically carried out during sub optimal weather and natural daylight conditions) is likely to present construction site hazards.

Working on hilly and uneven, and in some instances poorly drained ground with challenging topography, affected by river features, road and railway line infrastructure crossing constraints, present potentially challenging and specialist work place considerations, particularly when needing to observe contractual timelines.

The presence of moving machinery, along with a requirement to lift and transport heavy materials, and working at depth, including the potential for trench collapse, for example, underline the risks associated with the construction led activities – requiring both urgent and other medical interventions and transport conveyance (including specialised airborne tasking/ conveyance) to be appropriately planned for and provided.

Indeed, HSE's construction publications (for Great Britain) indicate that work related incidents involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate.

This position is acknowledged in Section 5.7 of the Scoping Report (Major Accidents & Disasters) which indicates that the construction of the Project carries the risk of a physical accident occurring and leading to a low number of 'worker fatalities' (e.g. due to crane topple).

The Scoping Report does not provide a forecast for the number of major and less major accidents at this stage, which may be appreciable over the 4 – year construction period.

Information to determine the effect of the construction phase and its impact on EEAST's operational capacity, efficiency and resources is currently absent from the EIA Scoping Report, along with any potential mitigation measure parameters.

In the event of a construction phase accident occurring, appropriate procedures would need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting.

The processes and procedures developed by NGET, and any outsourced construction organisations, should refer to legislation and technical guidance which places a duty on NGET to have its own response and medical mitigation to take the patient to a place of 'normal access' and handover to EEAST crews.

EEAST would expect any trench collapse to fall under the confined space regulations and NGET, the construction company and/or contractor(s) should have access to a confined space trained team that could extricate a casualty safely.

Plans and contingencies for facilitating emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders, whilst sustaining operationally optimal attendance times (noting the likely delay factors above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) and/ or Fire & Rescue Services (FRS) with lifting and cutting equipment, is therefore considered to be necessary.

The incidence and impact of major accidents (and disasters) on EEAST including its hazardous area response teams (HART) and its HEMS/ FRS partner operational capacity, efficiency and resources, needs to be presented and assessed, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Population Increase, Health & Wellbeing

It is evident that during the anticipated 4 - year construction period, a significant number of construction workers would be required to implement all the components of the Scheme.

Information to determine the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation, which are factors likely to directly impact on EEAST's operational capacity, efficiency and resources, including its co-ordinated response with healthcare and blue light partners, is required.

This information is absent from Section 10 (Health & Wellbeing) of the Scoping Report and ought to be presented and assessed, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Joint Working With EEAST, Health & Blue Light Partners

Transport, Community Safety, Health & Wellbeing Working Group

In the light of the above, EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety, Health and Wellbeing Working Group, is established at an early stage in the DCO preparation process, and in advance of the Examination.

This would help to inform and assist the management of relevant aspects of the Project requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, the ICB's, Norfolk & Suffolk and Essex Constabulary's and Norfolk, Suffolk & Essex Fire and Rescue Services, with liaison maintained with other relevant organisations such as the East Anglian and Essex & Herts Air Ambulances.

Concluding Remarks

EEAST welcomes the opportunity to respond to the East Anglia Green EIA Scoping Report, and following review of the documentation, consider that it is currently deficient in its proposed assessment of the potential Project impacts on EEAST as outlined above.

EEAST considers that the Project is likely to give rise to significant effects on its operational capacity, efficiency and resources (incorporating its staff, vehicle fleet and estate assets) which ought to be baselined and assessed in order to determine appropriate mitigation and management measures.

The Project is considered likely to adversely affect EEAST's ability to meet and deliver its targets and priorities (statutory duties) as a key healthcare and emergency services provider.

The likely scheme effects arising from the Project on EEAST should therefore be assessed - either as part of the ES under 'other effects' or as part of a separate Technical Assessment to accompany the DCO Application.

Identified impacts can then be addressed by employing appropriate avoidance, reduction, mitigation and management measures, secured and implemented through the scheme design, DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

In due course this approach can be reflected in a Statement of Common Ground to clarify the position reached between NGET, EEAST and its health and blue light partners, to inform the Examination process.

The measures ought to include a process to assist EEAST and its health and blue light partners to plan for and implement co-ordinated responses to construction phase (and any operational and decommissioning phase) Project impacts and incidents, to optimise patient and wider service outcomes, and contribute to Best Practice.

We trust this is of assistance and look forward to working with NGET to satisfactorily address the points raised.

Yours sincerely

[redacted]

Zoë May
Head of Business Relationships

cc:

[redacted], *Suffolk County Council*
[redacted], *Philippa Kelly, Cambridgeshire County Council*
[redacted], *East Cambridgeshire District Council*
[redacted], *Cambridgeshire & Peterborough CCG*
[redacted], *Suffolk and North East Essex CCG*

ANNEX 1

EEAST KEY FACTS & SERVICE INFORMATION

This section summarises EEAST's service remit, priorities, staff, vehicle fleet and estate assets, and co-working relationship with other healthcare and blue light partners and service targets

Service Remit & Priorities

The East of England Ambulance Service NHS Trust provide accident and emergency services and non-emergency patient transport services across the East of England.

The Trust Headquarters is in Melbourn, Cambridgeshire and there are Ambulance Operations Centres (AOC) at each of the three locality offices in Bedford, Chelmsford and Norwich who receive over 1 million emergency calls from across the region each year, as well as 800,000+ calls for patients booking non-emergency transport.

The 999 service is part of the wider NHS system providing integrated patient care. Provision of 999 services is aligned closely with national and regional initiatives driven by:

- Sustainability and Transformational Partnerships
- Integrated Care System
- Integrated Urgent Care systems, i.e. NHS 111, Clinical Assessment Services, Urgent Treatment Centres, GP Out of Hours Services.

Additionally, regional Ambulance Trusts may collaborate closely with other ambulance services, the wider emergency services or wider system providers to deliver appropriate patient care.

To support the service transformation agenda, the key requirements are:

- To deliver the core response and clinical outcome standards as defined by the Ambulance Response Programme
- To fulfil statutory duties relating to emergency preparedness, resilience and response (EPRR)
- Optimisation of call handling and appropriate responses through virtual alignment of NHS 111/999 and call/CAD transfer between ambulance services
- Increase the percentage of lower acuity calls managed through "hear and treat" and "see and treat" options
- Utilise a virtual delivery model to support wider workforce integration for paramedics, call handlers and specialist staff with local urgent care delivery models
- Facilitate cross boundary working and the flexible use of ambulance service resources to support the development of regional Sustainability and Transformational Plans and Integrated Care Systems.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) provide an essential lifeline for people unable to use public or other transport due to their medical condition. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics or other healthcare location
- Being admitted to or discharged from hospital wards
- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Service Assets

EEAST clinicians:

- Emergency Care Support Workers
- Emergency Medical Technicians
- Paramedics
- Specialist Paramedics
- Critical Care Paramedics.

Types and models of response:

- Community First Responder (CFR)
- Patient Transport Service (PTS)
- Clinical See and Treat
- Clinical Hear and Treat (telephone triage)
- Early Intervention Team (EIT)
- Rapid Response Vehicle (RRV)
- Double Staff Ambulance (DSA)
- Hazardous Area Response Team (HART)
- Specialist Operations Response Team (SORT)

- Helicopter Emergency Medical Service (HEMS), EEAST utilise 5 aircraft across 3 charities within the region

    - Magpas – 1 x aircraft from RAF Wyton
    - East Anglian Air Ambulance – 2 x aircraft form Cambridge and Norwich Airport
    - Essex and Herts Air Ambulance – 2 x aircraft form North Weald and Earls Colne

Ambulance Operations Centre (AOC) staff:

- 999 Call Handlers
- Emergency Medical Dispatchers
- Tactical Operations Staff.

EEAST support services staff cover all other corporate and administrative functions across the region.

Estates

The Trust is rolling out a Hub and Spoke network with up to 18 hubs to provide regional premises for delivery of operational responses to calls, flow of ambulance preparation via the Make Ready function (cleaning and restocking of ambulances) and despatch of ambulances to local spokes (reporting posts/response posts/standby locations). Support services such as workshop facilities, clinical engineering (medical equipment store and workshop), consumable product stores and support office accommodation are also provided from Hubs.

- Ambulance Station Central Reporting Post - A 24/7 - Permanent reporting base for staff and primary response location for one or more vehicles. Provision of staff facilities.
- Ambulance Station Response Post - A primary response location, which includes staff facilities but is not a reporting base for staff.
- Standby Location - Strategic locations where crews are placed to reach patients quickly. Facilities used by staff are provided on an informal basis only by agreement with the relevant landowner.

Ambulance Stations in the East Anglia Green Enablement Project area are

Cambridge x 3
Bury St Edmunds x 2
Ely
Mildenhall
Newmarket

Vehicle Fleet

- 387 front line ambulances
- 178 rapid response vehicles
- 175 non-emergency ambulances (PTS and HCRTs vehicles)
- 46 HART/major incident/resilience vehicles located at 2 x Hazardous Area Response Team (HART) bases with a number of specialist vehicle resources.

Workforce & Equipment

Approximately 4,000 staff and 800+ volunteers across 120 sites. Each resource has equipment specific to the operational function of the vehicle and skill level of the staff.

Specialisms

EEAST works collaboratively across our blue light partners and have joint working groups with Police and Fire Services across the region, working in partnership managing responses to incidents and undertaking joint exercises with our dedicated resources to prepare for specialist rescue, major incidents and mass casualty incidents.

EEAST is a Category 1 Responder under the Civil Contingencies Act, 2004, playing a key role in developing multi-agency plans against the county and national risk registers. EEAST also works closely with the Military, US Air Force, Royal Protection Service, Stansted Airport and the Port of Felixstowe Police, Fire and Ambulance services.

EEAST's Emergency Preparedness Resilience Response (EPRR) team lead on the Joint Emergency Services Interoperability Principles (JESIP) working in close partnership with all blue light agencies, the Coastguard and Local Authorities. Specialist resources work with the Police in counter terrorism and developing response plans in the event of a major incident.

EEAST are an integral part of the locality's resilience response sitting on a number of safety advisory groups, east coast flood working groups and hospital emergency planning groups.

Co-working Relationship with other Blue-Light and Healthcare Partners

EEAST is an integral part of the wider healthcare system working closely with the North Essex Integrated Care System (ICS) and Clinical Commissioning Groups (CCGs) to deliver emergency and urgent care and are key stakeholders in supporting wider healthcare initiatives.

Within North Essex, EEAST work with the CCGs in delivering additional care pathways focussing on hospital admission avoidance, this is a partnership with the local acute providers and local authorities. EEAST operate Early Intervention Response vehicles and a Rapid Intervention Vehicle. These resources work collaboratively within the system to offer holistic care to patients whilst reducing pressure on Emergency Departments.

This is EEAST's response to the requirements of the NHS Long Term Plan, with the clear narrative that in order to bring the NHS into financial balance all NHS providers must find mechanisms to treat patients in the community and out of the most expensive care setting, which are acute hospitals. This not only saves the NHS critical funding, but it also improves patient outcomes.

EPRR and Specialist Operations teams routinely train with other blue light agencies in preparedness for major incidents such as terrorist attacks and major incidents with statutory training obligations to respond to local and national incidents.

In continuing to respond to the COVID-19 Pandemic, EEAST is working collaboratively with Private Ambulance providers, the Military, volunteer Ambulance Services (such as St John Ambulance and British Red Cross) and local Fire and Rescue Services, to increase its capacity and maintain service delivery to meet the additional demand.

EEAST Service Targets

All NHS organisations are required to report against a set of Core Quality Indicators (CQIs) relevant to their type of organisation. For ambulance trusts, both performance and clinical indicators are set as well as indicators relating to patient safety and experience.

NHS organisations are also required to demonstrate their performance against these indicators to both their commissioners and Regulators (NHS England/Improvement).

It is important to note that EEAST is also measured on how quickly a patient is transported to an appropriate location for definitive care, often in time critical circumstances.

Failure to deliver against these indicators will result in a Contract Performance Notice and could result in payment being withheld, as prescribed in NHS Standard Contract 20/21 General Conditions (Full Length) GC9 9.15.

ANNEX 2

EEAST Operational Standards & Thresholds
Ambulance Service Response Times

Operational Standards	Threshold	Consequence of Breach
Category 1 (life-threatening) calls – proportion of calls resulting in a response arriving within 15 minutes	Operating standard that 90th centile is no greater than 15 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 15 minutes, £2.50 per 1,000 Category 1 calls received in the Quarter
Category 1 (life-threatening) calls – mean time taken for a response to arrive	Mean is no greater than 7 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 2 (emergency) calls – proportion of calls resulting in an appropriate response arriving within 40 minutes	Operating standard that 90th centile is no greater than 40 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 40 minutes, £2.50 per 1,000 Category 2 calls received in the Quarter
Category 2 (emergency) calls – mean time taken for an appropriate response to arrive	Mean is no greater than 18 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 3 (urgent) calls – proportion of calls resulting in an appropriate response arriving within 120 minutes	Operating standard that 90th centile is no greater than 120 minutes	Issue of a Contract Performance Notice and subsequent in process accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 120 minutes, £2.50 per 1,000 Category 3 calls received in the Quarter
Category 4 (less non-urgent "assess, treat, transport" calls only) – proportion of calls resulting in an appropriate response arriving within 180 minutes	Operating standard that 90th centile is no greater than 180 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 180 minutes, £2.50 per 1,000 Category 4 calls received in the Quarter

For All Indicators:

Method of Measurement:	See AQI System Indicator Specification at: https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/ Review of Service Quality Performance Reports
Timing of Application of Consequence	Quarterly for all indicators
Application	AM

FAO Emma Cottam
Environmental Services
Central Operations
Temple Quay House

2 The Square
Bristol
BS1 6PN
eastangliagreen@planninginspectorate.gov.uk

Your ref: EN020027
Our ref: EA Green Scoping
Date: 5 December 2022
Please ask for: Naomi Goold
Customer Services: [redacted]
Direct dial: [redacted]
Email: [redacted]

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

East Suffolk Council (ESC) welcomes the opportunity to comment on the East Anglia GREEN Scoping Report dated 7 November 2022. This letter comprises ESC's response under Section 43(1) of the Planning Act 2008.

ESC is not a host authority but is a direct neighbouring authority of the scoping area. ESC considers that the host authorities and County Councils along the proposed route are best placed to provide comments on detailed technical matters within their geographical jurisdictions. For this reason, ESC has limited comments to the consideration of offshore alternatives, cumulative impacts, socio-economic, recreation, and tourism impacts.

Offshore Alternatives

ESC recognises that the East Anglia GREEN project is as presented within the Scoping Report and associated material, but it is noted that at 3.3.9 of the Scoping Report, National Grid provided further clarification on the potential for a feasible offshore strategic option to deliver the additional transmission capacity required. This was provided in response to questions about

offshore alternatives raised in non-statutory consultation responses earlier this year and by the Offshore Electricity Grid Task Force (OffSET).

The further clarification provided by National Grid details why the offshore strategic option is not being progressed, but notes conclusions should not be seen as final. The project webpage (under Frequently Asked Questions) notes not only would an offshore solution of equivalent capacity require three subsea connections and associated onshore infrastructure, but it would also require onshore infrastructure from Bramford to the coast and Norwich to the coast.

ESC supports proper consideration of alternatives to the current proposal, but if alternatives to the current proposal necessitate additional onshore infrastructure in East Suffolk, this would not be supported by ESC.

Cumulative Impact

ESC wishes to highlight that the East Anglia GREEN project is one of several Nationally Significant Infrastructure Projects (NSIPs) currently proposed, or recently consented but not yet constructed, within Suffolk. It is therefore essential that the project is not considered in isolation and that the full cumulative effects of East Anglia GREEN with other projects and proposals is adequately and appropriately assessed, mitigated, and where appropriate compensated.

ESC continues to promote the need for a coordinated solution to deliver the renewable and low carbon generation and associated transmission infrastructure needed to meet Net Zero and decarbonisation targets. This is essential to minimise the extent and scale of the impacts of onshore infrastructure, particularly in East Suffolk. This remains our position. ESC would therefore not be supportive of an alternative solution which would cause significant additional onshore infrastructure within East Suffolk, such as the alternative subsea solution described above.

Section 17.3 of the Scoping Report identifies the methodology for assessing inter-project cumulative effects, including NSIPs. The methodology for identifying NSIPs at 17.3.4 notes the Planning Inspectorate's Programme of Projects will be used.

The long list of projects is not included within the Scoping Report, and ESC would like to note that while most NSIP projects currently in planning do have project pages on the Planning Inspectorate's website, there are exceptions. For example, the EuroLink project does not yet have a project page, although a non-statutory consultation on siting and routeing options for the project is currently taking place. ESC would expect to see this project included in the list of NSIPs considered for cumulative assessment.

Table 17.1 identifies the Zone of Influence (ZOI) for a number of the topic areas, it is however noted that socio-economics, recreation, and tourism is not included. It is essential that the ZOI for this topic matter is not too narrowly defined and extends beyond that identified at 15.3.1, further comments have been provided on this matter in the section below.

Socio-Economics, Recreation, and Tourism

The study area for socio-economics, recreation, and tourism as set out at 15.3.1 is divided into two spatial scales; the Local and Wider study areas. The Local study area comprises the scoping report corridor and will be refined to become the Order Limits within the Environmental Statement, and the Wider study area covers the local authority spatial areas that the scoping report corridor passes through.

While ESC is not included in either study area, the Council is concerned about the project's potential cumulative impact on tourism when combined with other NSIPs. The construction period for the East Anglia GREEN project if consented likely overlaps with that of several other high profile NSIPs in Suffolk. Visitors/residents may be unaware or unable to distinguish between areas of Suffolk hosting the individual projects, and therefore may perceive the separate projects as one large project, particularly where there is temporal and/or spatial overlap between projects. This may subsequently affect perception and propensity for people to visit the area.

ESC would like to ensure that the impact of the project is not evaluated solely within the boundary limits nor in isolation from the wider district, particularly given the multiple consented and emerging NSIP projects in both East Suffolk and the wider district, and the likely temporal overlap between this project and other NSIPs.

The visitor economy is one of largest economic sectors in east Suffolk and provides a good illustration of how the impact of the scheme extends beyond the boundary limits. There is a high degree of interdependency between visitor destinations, employment, and supply chains within Suffolk. ESC is concerned that disruption to the visitor experience will have a consequential impact on the perception of Suffolk as a holiday and visitor destination and therefore negatively affect the visitor economy throughout the lifetime of the project. Full consideration of this impact needs to be included within the assessment of the potential effects on tourism during the construction phase.

If you would like to discuss any of the comments made in this response further, please do not hesitate to contact ESC using the above contact details.

Yours sincerely,



Philip Ridley BSc (Hons) MRTPI
Head of Planning and Coastal Management
East Suffolk Council

From: [redacted]
To: East Anglia GREEN
Subject: EN020027 - Scoping Opinion
Date: 05 December 2022 10:36:29

Thank you for your letter dated 7 November 2022.

Eight Ash Green Parish Council would comment as follows:

We would welcome information in the Environmental Statement about measures to be taken to mitigate the impact on the Essex Way and the designated ancient woodland in Fiddlers Wood.

The Essex Way is an ancient and popular walking route used by hundreds each year and the pylons would greatly detract from its attraction.

Kind regards,
[redacted]

[redacted]
Parish Clerk

Eight Ash Green Parish Council
E-mail: [redacted]
Tel: [redacted]

Planning Inspectorate
Room 4/04 Kite Wing
Temple Quay House (2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: AE/2022/127339/02-L01
Your ref: EN020027

Date: 21 November 2022

Dear Sir/Madam

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS)– REGULATIONS 10 AND 11. APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION (NGET) (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE EAST ANGLIA GREEN ENERGY ENABLEMENT (GREEN) (THE PROPOSED DEVELOPMENT)

Thank you for consulting us on the EIA Scoping report for the proposed East Anglia Green Energy Enablement (GREEN) project. We have provided our responses below in the same format as the report itself. We have broken our response down in relation to the various constraints within our remit

Chapter 8 – Ecology and Biodiversity

The Scoping looks to have summarised the biodiversity issues well and generally appears inclusive.

There are a lot of Main River and ordinary watercourse crossings and these are most likely to be overhead lines in the main. Where undergrounding is proposed such as in the Dedham Vale AONB this should be made deep enough to avoid impacts on water dependent habitats. There have been recent problems with HDD break out under estuaries and even inland alluvial soils are likely to be free draining and porous so we wish to highlight our very real concerns about the risk of breakout and the serious consequences this can have on river habitat and the international sites downstream. It is possible that some irreversible damage to sensitive habitats could be caused by this method.

We expect developments of compounds and pylon foundations to avoid rivers, wetlands and floodplains as well as other sensitive habitats. We welcome the planning for Biodiversity Net Gain and would be happy to propose enhancement schemes to benefit rivers and watercourses. We would particularly welcome enhancements including native tree and shrub planting along watercourses and gravel enrichment

especially after any trenched crossings. Ponds and scrapes are key habitat enhancements too which will be all the more important with Climate Change.

Chapter 9 – Geology and Hydrogeology

Contaminated Land

In relation to paragraph 9.6.26 - Approximately one third of the Scoping Report corridor within Norfolk is located within a groundwater SPZ3. An SPZ2 is present approximately half-way through Norfolk, centred on a SPZ1 (partially crossed by the Scoping Report corridor) located at Cargate Common.

The route actually crosses multiple SPZ1 and 2 locations as stated in sections 9.6.26, 9.6.27 and 9.6.28 Advise avoiding the multiple SPZ1 and SPZ2 if possible, preferably forming part of the route selection constraints

Section 9.8.2 refers to the need for site investigation where required for geotechnical purposes. It should also be undertaken to inform land contamination risks to the water environment, where the Phase 1 Preliminary Risk Investigation / Desk study deems it necessary, as highlighted in sections 9.9.6 and 9.9.7. It is agreed that disturbance and mobilisation of existing contamination during construction should be scoped into the ES.

Groundwater

As always, we recommend that applicants scoping out Environmental Statements refer to the appropriate Hydrogeological Impact Appraisal guidance and Groundwater Protection Position Statements.

Sections 9.5 and 9.8.2 acknowledge the need for additional assessment and regulation should dewatering be required.

Until further clarification is provided, sections 9.9.11 and 9.9.12 should be disregarded. The Environment Agency does not recognise the criteria listed, nor does it support these being used as a screening tool. It is unclear to us what is meant by “Where these criteria are met, the discharge would not be considered further, as significant effects are unlikely”.

In any case where dewatering is required and does not meet the relevant exemption criteria per the Water Abstraction and Impounding (Exemptions) Regulations 2017, an appropriately detailed HIA assessment should be carried out to assess the bespoke risks and suitable control measures needed in pursuance of a transfer licence.

Section 9.10.12 sates that “localised [HIA] may also be required where dewatering is proposed”. In light of the above comments, we would like to clarify that HIA’s *will* be required where a transfer licence is needed.

For reference, our generic comments on HDD are as follows:
“They should provide a profile of proposed depths and route and then take into consideration things such as:

Potential for contamination

- Permitted/historic landfills along the route, waste sites, historic land uses. Has any ground investigation been undertaken for more than civils reasons.

Cont/d..

- Unsuspected contamination and how this will be dealt with – following standard land contamination guidance.
- Prevention of contaminant mobilisation.

Groundwater levels

- Depending on working depths they might strike artesian conditions; where there is a chance of this, a HIA needs to be prepared so they know what to expect and how to prevent/mitigate risks, prevent resource loss.
- Potential for groundwater flooding – relates back to artesian conditions.

SPZs and SgZs

- If the route passes through these, additional mitigation might be required; HIA to demonstrate risks are fully understood, why other options aren't feasible.
- WFD considerations – ensuring there will be no adverse impacts which risk deterioration.

Construction

- Ensuring a Construction Environment Management Plan will be in place, and will address the simple things like spills and incidents.

Another consideration is if drilling into non-consolidated sand, it is possible that the drilling mud can break through, causing blow-outs. So it's not a feasible option in all ground conditions, and if it's proposed in very loose unconsolidated sands then alternatives/mitigation need to be considered. Appropriate geotechnical engineering assessments should be undertaken to address these and related issues".

Chapter 12 – Hydrology and Land Drainage

Pollution Prevention

We generally agree with the scope provided in section 12. However, if there is the possibility of disrupting flows in any watercourses then existing water interests (discharges and abstraction) should be included.

In relation to paragraph 12.6.6 we would highlight that the river Jordan is not at 'good' chemical status under WFD. It is infact failing chemically with an overall status of 'moderate'.

Paragraph 12.8.2 should consider procedures for breakout of drilling mud into watercourses and on to land from directional drilling.

Flood Risk

12.10.3 – We agree that modelling is unlikely to be required, providing that compensatory flood storage is provided for any built development in Flood Zone 3, to prevent an increase in flood risk elsewhere.

Table 12.11 – Proposed Scope of ES

We agree that flood risk from rivers and the sea should be scoped in for both construction and operation, so that any flood risk impacts from permanent or temporary

structures or works in Flood Zone 3 can be assessed, and mitigation measures included as appropriate.

If there will be permanent works in Flood Zone 3 then it will need to be ensured that compensatory flood storage is provided to ensure there is no offsite flood risk impacts. If there are to be any permanent structures in Flood Zone 3b then there should be no net loss of flood storage, in accordance with 5.7.24 of EN1.

We have included further advice on Flood Risk in our response to Appendix B (Initial Outline CoCP) below.

Environment Agency Assets/Flood Defences

Our operations team have a preference for underground crossings of main rivers rather than overpass. Any pylons should be situated away from the banks of a main river or flood defence. We would want reassurance that the foundations of any pylons would not impact on the structural integrity of flood defences/structures. We would welcome further discussions with the applicant in relation to the crossing of main rivers and defences.

For the river Stour and Colne catchments there is a crossing of the river Stour at Stratford St Mary at NGR TM0387134486. We highlight that there is Environment Agency registered land within Preferred route.

We also note that on the river Stour at Stratford St Mary there is an Environment Agency Flood Defence Scheme that runs to the East of the preferred route from TM0420634571 to TM0425133910.

For Blackwater catchment, there is no major concern as long as the main point stated above about under passing main river is followed.

For Thameside catchment, there is a couple of concerns.
The route to the east of East Tilbury is of concern to the Environment Agency as it covers a fall back line of defence to be constructed by the landowner and which requires significant vertical clearance. Avoidance of this area is required and we recommend the applicant takes this into account. The applicant is welcome to contact us if they wish to discuss further.

<u>Tilbury Flood Storage Reservoir</u>

The other concern is the route could fall into the eastern extreme of Tilbury Flood Storage Area (FSA). Any construction work should not impact on the integrity of the reservoir.

With regards any works in the FSA, no reduction in total capacity of the eastern portion of the FSA is acceptable, so that means that any pylon foundations installed will need to include offset of any reduction of volume to the FSA. In the same manner that compensatory flood storage would be required for all pylons along the route within future Flood Zone 3.

Also, while we note that the substation is proposed to be outside of the FSA, any impacts the works there have on the total surface run-off of the site will however need to be considered as it would impact on the very limited capacity of the Worlds End Pumping Station catchment.

Cont/d..

Thames Estuary 2100

We have previously sent comments directly to the applicant in relation to the Thames Estuary 2100 plan (TE2100). We have reiterated these again below.

The comments raised in this section specifically relate to the proposals in Tilbury. Having looked through the consultation we understand that:

- There are proposed works to Tilbury substation but they remain within the current site boundary
- The site in inland and not on the rivers edge
- Tilbury substation is the southern most point of the application and nothing else is being built or developed beyond this point, towards the river.

If the above are correct, then our comments in relation to the TE2100 plan are high level and are provided for information.

The Thames Estuary 2100 Plan (the Plan) sets out how we (the Environment Agency) and our partners can work together to manage tidal flood risk in the Thames Estuary, from now until the end of the century. It is an adaptive plan, ensuring current standards of flood protection provided by the existing tidal defence system are maintained or improved whilst taking into account the effects of climate change e.g. sea level rise.

Current climate projections suggest that the Thames Barrier can continue to protect London from tidal flooding until 2070. The Plan identifies several long-term options for a future barrier. These long-term options include upgrading the existing Thames Barrier at Woolwich or building a new one within either Long Reach or Tilbury (Gravesend) Reach.

If we are to ensure a new barrier is operational by 2070, a decision will need to be taken on the preferred long-term option around 2040 and for construction to begin around 2050. Any land required for a new barrier needs to be secured well in advance of these dates and we have started work to explore possible areas within these identified reaches of interest. At this stage, it is also too soon to say what a future barrier will look like.

This ongoing work is something the applicant should be aware of as the site may be impacted, or in close proximity to a potential new barrier, in the future.
Please note that there will be a public consultation on updates to the Plan taking place from September 2022. If the applicant would like to be involved, they should contact ThamesEstuary2100@environment-agency.gov.uk.

Below we have provided comments on the scoping document submitted as part of this consultation:

Section 12.5 (engagement with stakeholders) of the Scoping Opinion, doesn't reflect our most up to date engagement. This section refers to a meeting on 7 July but our letter referenced AE/2022/127339/01-L01 and dated 31 August 2022 should be included. This letter refers to TE2100 and a possible future Thames barrier. Therefore this is not included in that table 12.1. We request that this is included.

In section 12.11 reference should be made to Thames Estuary 2100 and the plans for the estuary in the short, medium and long term in terms of climate change and

mitigations for this. The EIA should address this and highlight the relevant recommendations from the TE2100 Plan, including a possible new Thames barrier in the Tilbury (Gravesend) Reach.

A study area is shown on the maps in the appendices and the maps showing Tilbury show the study area going into or very close to the edge of the river Thames but we have made the assumption that this is just for the EIA assessment purposes and not because any development would occur in this area. We would request that the applicant confirms this with us.

We could not see any detailed maps showing the Tilbury site substation. Paragraph 4.4.15 suggests there would be an extension to the existing substation boundary. This would be of interest to the securing land for future barrier options team but realise that this level of detail probably hasn't been submitted as part of this consultation. We would be interested to see this plan when it is available.

Appendix B – Initial Outline CoCP

Pollution Prevention

In regards to Appendix B, we highlight that the use of chemicals for settling silt prior to dewatering discharge will require an Environmental Permit.

Flood Risk

W01 (and 12.8.3 in main Scoping Report)

This should state that all works within 8m of fluvial main rivers and 16m of tidal main rivers will be in accordance with methods approved under environmental permitting regulations or protective provisions of DCO, rather than just 'works within main rivers'.

W02 (and 12.8.2 in main Scoping Report)

The measures for open cut watercourse crossings should include reference on how river flows and flood risk will be managed, for example the use of overpumping to maintain the river flow downstream and prevent the water levels building up upstream. Details of measures that would be taken in the event of high flows should also be included, such as signing up to Flood Alerts and Flood Warnings from the Environment Agency and weather warnings from the Met Office, and removing temporary barriers on receipt of alerts or warnings. It should also include details of how temporary culvert crossings will be sized to maintain the river flow in a flood if possible, with the largest possible culvert diameter, and shortest length used.

W06

For the proposed trenchless crossing to qualify for Flood Risk Activity Permit Exemption FRA3 then the cables should be laid at least 1.5m below the hard bed of the river and should remain at this depth for a distance of 5m beyond the banks of the river, among other requirements.

W07

We agree that the construction compounds should follow the Sequential Test and be located in Flood Zone 1 wherever possible. Storage of equipment or materials should

also be located in Flood Zone 1 wherever feasible to prevent them taking up flood storage and so causing an increase of offsite flood risk should there be a flood. If they are to be unavoidably located in Flood Zone 3 then they should be removed in advance of a flood wherever possible, which will include signing up to receive Flood Alerts and Flood Warnings and taking action on receipt of an alert or warning, 24 hours a day. If any materials or equipment cannot be moved from Flood Zone 3 in advance of a flood, or in the case of there being a flood without sufficient prior warning, then we agree that they should be stored to prevent them being a barrier to floodplain flows and advise that they should also be securely fastened to prevent them becoming mobile in a flood and becoming a debris hazard. If large volumes of materials and/or equipment are to be stored in Flood Zone 3 then the FRA may need to demonstrate that they will not increase flood risk elsewhere by taking up flood storage.

We trust this advice is useful.

Yours faithfully

[redacted]

Sustainable Places - Planning Specialist

Direct dial [redacted]
Direct e-mail [redacted]

End

Environmental Services Central Operations
Temple Quay House
2 The Square Bristol
BS1 6PN

Response sent by email: eastangliagreen@planninginspectorate.gov.uk

Case reference: N020027

5 December 2022

Dear Emma

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10: Application for a scoping opinion and 11: **Procedure to facilitate the preparation of an environmental statement.**

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development) high voltage electricity network reinforcement between Norwich, Bramford and Tilbury.

Thank you for consulting Essex County Council (ECC) in relation to the Applicant's request to the Planning Inspectorate (PINS) on behalf of the Secretary of State (SoS) for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) of the Proposed Development. The consultation was received by email on 7 November 2022.

ECC have reviewed the submitted Scoping Report (SR) and have made further comments below in relation to the information we have in our possession considered relevant to the preparation of an ES by the Applicant of the Proposed Development.

Prior to detailing this information but recognised as outside of the scope of this consultation, ECC would take this opportunity to reiterate its objection to the Proposed Development on the grounds that the Applicant has yet to demonstrate that the preferred onshore option is the most efficient, coordinated and economical reinforcement of the network in this location, or that it fully considers the need for nationally significant infrastructure projects (NSIPs) to contribute towards sustainable development in accordance with national policy.

ECC can only maintain it objection (first formally made on 16 June 2022 as part of the Applicant's non statutory consultation) to a technology and route option that does not provide an integrated and long-term approach to energy transmission, or sufficiently balances the national need for safe, secure, affordable and low carbon energy with adverse likely significant effects (LSEs) to the local environment and health and wellbeing of communities across Essex. This objection relates not just to the Proposed Development in isolation but cumulatively with the increasing cluster and uncoordinated deployment of terrestrial and marine energy NSIPs in Essex and the south-east. To note, the Applicant's preferred route corridor prejudices areas of allocated planned growth for housing, including one of the Government's lead Garden Communities at Dunton Hills and would further restrict areas of future planned growth.

ECC supports the Department for Business, Energy and Industrial Strategy's Offshore Transmission Network Review currently looking at how the offshore electricity transmission network can be delivered in a more coordinated way. ECC welcomes acknowledgement by the Government in the Energy White Paper (2020) that the current regime is uncoordinated and inefficient and does not sufficiently balance the national need for renewable energy with local adverse environmental, social and economic impacts. ECC accepts that notwithstanding how offshore coordination is developed in the future, major onshore development and electricity network reinforcement will still be necessary to deliver the Government's ambition for 40 gigawatts of offshore wind by 2030. Further, accepting that the existing high voltage electricity network in the south-east does not have the capability needed to reliably and securely transport all the energy that will need to be connected to meet net zero. ECC understands that to fulfil its statutory duties, the Applicant needs to reinforce the network to provide additional capability to allow power flows into and out of the south-east to connect with areas of demand and interconnectors in Europe. Nevertheless, due to the absence of any meaningful consultation on alternatives and this primarily relates to a fully offshore and integrated High Voltage Direct Current (HDVC) route option (offshore option), ECC remains concerned that the Proposed Development represents another example of the uncoordinated and inefficient approach to energy transmission that the Government accepts requires urgent improvement and is currently reviewing.

ECC acknowledges that the Applicant has updated their Strategic Options Technical Appendix (June 2022) with the intention to explain the rationale for discarding an offshore option as an alternative to the Proposed Development. ECC recognises the significant challenges related to cost, anticipatory investment and timeliness of delivering offshore reinforcement by 2030 but considers this alternative would be significantly less harmful locally and more closely aligned with the principles of sustainable development. However, until such time that the updated document is independently reviewed by a competent expert, cannot comment further on the reasonableness of the conclusions reached by the Applicant.

1. Essex County Council comments on the Scoping Report

Reasonable Alternatives

1.1 ECC acknowledges the intention of the Applicant to consider alternatives within the ES, and notes the assessment of strategic, route corridor and alignment options that has already been undertaken to date (as described in Chapter 3: Main Alternatives Considered). ECC would expect to see a discrete section in the ES that provides details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects. This should include consideration of how much of the cable is overhead line (OHL) and how much is undergrounded across the proposed development.

1.2 The ES should describe the selection process used and decisions made in the alignment of the final route should it be taken into or close to the district of Tendring and/or continue to propose OHL in proximity to the Dedham Vale and Stour Valley Area of Outstanding Natural Beauty (AONB) and sensitive community receptors at Lawford and Ardleigh. ECC consider that there is not sufficient justification for a potential connection point to proposed offshore wind development (North Falls and Five Estuaries) at Lawford. Further, the proposed route corridor in this location contains sharp changes in direction and a potential concentration of OHL that would be contrary to national planning policy and the Applicant's own visual amenity guidelines.

Description of the Proposed Development

1.3 ECC notes that the final alignment of the Proposed Development, location of construction compounds and haul road(s) are still to be confirmed and so a Scoping Route Corridor has been used as the basis for the SR (as described in Chapter 4: Description of the Project). This has limited the ability of ECC to comment in detail on the scope and relevant information that should be included in the ES to assess LSEs for sections 3-8 of the Scoping Route Corridor that are in Essex (Table 4.1). The Applicant should make effort to fix the alignment and design of the Proposed Development, including all permanent and temporary infrastructure required for construction and operation, to reduce uncertainties and enable ECC to understand more about how it can contribute to the information relevant to the preparation of the ES. Where this is not possible, the ES should be clear about which elements of the Proposed Development have yet to be finalised and assess a worst-case scenario. ECC would extend these comments to the construction methodology which the Applicant also acknowledges has not yet been defined (paragraph 5.5.2) and is an additional limitation of the SR.

1.4 The ES should clearly describe any changes that have been made to the final boundary from the Scoping Route Corridor, including reduction or increase in extent, or variation of extent, and the reasons for any changes.

EIA Approach and Method

Baseline

1.5 The Applicant recognises that the baseline information in the SR will need to be updated for the ES (paragraph 5.5.4) and this should include monitoring of other ongoing and proposed development (paragraph 5.5.3). ECC would support this assertion for both current and future baseline scenarios; future baseline should be assessed with and without the Proposed Development. ECC encourages the Applicant to engage with us to help provide the information necessary to support updating and monitoring baseline scenarios. However, would take this opportunity to reiterate its concern that the current preferred route corridor would prejudice significant areas of allocated planned growth for housing.

Non-technical summary (NTS)

1.6 ECC acknowledges the Applicant's intention to submit a NTS and notes that a summary of the Proposed Development and LSEs will be written in plain English for a non-technical audience (paragraph 18.3.1). Given the scale and complexity of the Proposed Development and LSEs, ECC would welcome working with the Applicant to ensure that the NTS is accessible to everyone who wants to engage with the development consent process, particularly local communities.

Mitigation and Monitoring

1.7 ECC acknowledges the intention of the Applicant to include a description of any proposed monitoring arrangements where LSEs have been identified and notes that these details would be included within the ES topic chapters (paragraph 5.4.1). ECC welcomes the monitoring of LSEs and their inclusion in the ES. However, would request that all mitigation and monitoring for the purposes of the EIS is collated into a single table to enable clear and efficient cross-referencing. Further, the likely effectiveness of any proposed mitigation be explained with reference to residual LSEs and how all mitigation and monitoring would be secured. This explanation should also include how the results of monitoring LSEs would be used to inform any necessary remedial interventions.

Climate

1.8 ECC does not consider that sufficient justification has been provided by the Applicant in the SR to scope out LSEs to climate from the Proposed Development (section 5.7). This is despite the proposed inclusion of vulnerability to future flooding being considered in Flood Risk Assessment (paragraph 5.7.12) and general reference to details of "likely" construction materials being included in the description of the Proposed Development, together with a "simple" estimate of Green House Gas (GHG) emissions during the construction phase and "potential" opportunities to save carbon (paragraph 18.2.2).

1.9 The ES should include a description and assessment (where relevant) of the LSE of the Proposed Development on climate considering in detail the nature and magnitude of GHG emissions and the vulnerability of the Proposed Development to climate change. The ES should describe and assess GHG emissions for the construction and operational phases and, where relevant, provide the adaptive capacity that has been incorporated into the design and construction of the Proposed Development.

Ecology, Biodiversity and Arboriculture

1.10 ECC is broadly satisfied with the proposed scope for LSE on ecology, biodiversity and arboriculture (as described in in Chapter 3: Ecology and Biodiversity and Appendix E: Biodiversity – Sites Designated for Biodiversity, Appendix F: Biodiversity – Proposed Survey Methodology and Appendix J: Arboriculture Strategy) but would expect to see a comprehensive assessment of important hedgerows included in the ES.

1.11 Further detailed comments related to ecology, biodiversity and arboriculture can be found in Appendix 1 of this letter.

Minerals and Waste

1.12 ECC is the minerals and waste local planning authority for any part of the Proposed Development that is within the administrative boundary of Essex.

1.13 ECC is satisfied with the proposed scope for LSE on minerals (as outlined in Chapter 9: Geology and Hydrogeology of the SR) and welcomes the scoping in of mineral safeguarding areas (MSAs) and mineral consultation areas (MCAs) for both the construction and operation phases of the Proposed Development. However, would query the impact assessment methodology for ascribing value/sensitivity to mineral resources (Table 9.4 – Criteria for determining value/sensitivity).

1.14 ECC agrees that existing mineral sites should be considered as ‘very high’ value/sensitivity but due to the definition of MCAs in Essex, does not agree that land in an MCA, which are designated up to 250 metres from existing, allocated and permitted mineral extraction sites, can then be considered of ‘medium’ value/sensitivity. It is not appropriate to apply a single value/sensitivity to these receptors.

1.15 It is not clear why land in an MSA is designated as ‘medium’ value/sensitivity. Paragraph 209 of the Nationally Planning Policy Framework (NPPF) requires that ‘best use’ needs to be made of minerals as finite resources that can only be worked where they are found. Further, paragraph 210 of the NPPF states that mineral resources of local and national importance should not be sterilised by non-mineral development where this can be avoided and should be prior extracted where it is environmentally feasible and practical to do so.

1.16 Table 9.4 contains no category for undelivered mineral site allocation in adopted local plans or preferred sites for future allocation that many become

relevant during the local plan review process. Further, no distinction is made between 'preferred sites' and 'preferred areas' for minerals development. Table 9.5 – Criteria for determining magnitude contains no category related to the impact of the Proposed Development on mineral resources and therefore not possible for ECC to understand how the significance matrix described in Table 9.6 would then be applied.

1.17 ECC consider that the most appropriate method to assess the LSEs from the Proposed Development to strategic mineral sites is through a Minerals Infrastructure Impact Assessment (MIIA). If the MIIA concluded that the Proposed Development would result in the sterilisation of mineral resources, the ES should provide robust justification for this that includes the consideration of alternatives and mitigation.

1.18 In the absence of a Waste Infrastructure Impact Assessment, ECC consider that sufficient justification has not been provided by the Applicant in the SR to scope out LSEs from the Proposed Development to waste.

1.19 Further detailed comments relating to minerals and waste can be found in Appendix 2 of this letter.

Population and Health

1.20 ECC acknowledges the intention of the Application to scope in LSEs to population and health during the construction stage only and notes that the ES will not separately report on this topic (paragraph 10.1.5). ECC is not able to conclude that the proposed scope and methodology of the ES (as detailed in Chapter 10: Health and Wellbeing) would contain all the information necessary for the ES. This is due the absence of any reference in the SR to the assessment of workforce, and construction and operation related incidents on healthcare capacity and emergency services. For the reasons detailed in the SR (section 5.7).

1.21 As a general approach, ECC does not agree with the Applicant that a separate chapter that brings together the LSEs from the Proposed Development on population and health is not required. This generalised approach would be contrary to previous advice from ECC and Public Health England on similar projects. The consideration of LSEs from the Proposed Development to population and health should be underpinned by a Health Impact Assessment.

1.22 Further detailed comments relating to health and wellbeing can be found in Appendix 3 of this letter.

Historic Environment

1.23 ECC is broadly satisfied with the proposed scope of information for LSE on the historic environment (as described in Chapter 11: Historic Environment, Appendix B- Initial Outline Code of Construction Practice, Appendix G – Key Characteristics of Landscape Character and Assessment and Appendix I -

Landscape and Visual Impact Assessment Methodology) but does not consider that sufficient information has been provided in the SR to scope out LSEs to historic buildings from the impact of construction traffic. ECC also makes the following additional comments in relation to the proposed impact assessment methodology.

Inter-relationship of impacts

1.24 The inter-relationship between impacts and LSEs to the historic environment should be considered and reported consistently in all relevant ES topic chapters.

Protected lanes

1.25 The ES should include an assessment of LSEs to all protected lanes in Essex impacted by construction traffic. ECC consider that protected lanes are not suitable for heavy goods vehicles associated with the construction of the Proposed Development (section(s) 11.9 – 11.10).

Trial trenching

1.26 The ES should be supported by an intrusive archaeological evaluation and trial trenching methodology. Archaeological trial trenching should be expected in areas of undergrounding and the construction of main compounds and sub stations (Section 11.10).

Site walkover survey

1.27 The ES should be supported by light detection and ranging survey data that has been used to assess areas of scrub and woodland for potential archaeological assets that has then informed the locations for the walkover survey (paragraph 11.10.8).

Historic landscape setting

1.28 The ES should ensure assessment of LSEs to historic landscape setting and proposed mitigation, in particular relating to pylon height does not include modern infrastructure i.e., roads and railways as pre-existing barriers (paragraph 11.10.17).

Aerial photographic survey

1.29 The high-quality aerial survey undertaken by the Applicant was not undertaken at the best time of year for aerial cropmarks to be identified and the ES should include an additional aerial photographic survey to rectify this issue (paragraph 11.10.23).

Non-designated heritage assets

1.30 The ES should include a methodology for assessing LSEs to non-designated heritage assets. This would be particularly helpful in areas which do not have a up-to-date local heritage list.

1.31 Further detailed comments related to the historic environment can be found in Appendix 1 of this letter.

Surface Water Drainage

1.32 ECC is the lead local flood authority for any part of the development that is within the administrative boundary of Essex.

1.33 ECC is satisfied with the proposed scope for LSE on surface water drainage and flooding as described in Chapter 12: Hydrology and Land Drainage and Appendix 2 - Initial Outline Code of Construction Practice.

Landscape and Visual

1.34 ECC is broadly satisfied with the proposed scope of information for LSEs on landscape and visual (as described in in Chapter 13: Landscape and Visual and Appendix B: Initial Outline Code of Construction Practice, Appendix G – Key Characteristics of Landscape Character and Assessment, Appendix H – Preliminary Viewpoints, Appendix I -Landscape and Visual Impact Assessment Methodology and Appendix J – Arboriculture Study). However, until such time that the Applicant has provided details relating to the final route alignment and the construction methodology for the Proposed Development, ECC considers that it would be premature to scope out LSE to visual amenity at night (paragraph 13.9.19) and residential amenity (section 13.9). ECC welcomes the Applicant's acknowledgement that landscape value is not always signified by designation and would make the following additional comments in relation to the impact assessment methodology:

Data collection

1.35 Viewpoint photography visits should be taken in the winter months to ensure leaf cover is reduced and represents a 'worst case scenario' (section 13.4).

Baseline

1.36 The baseline scenario should include the network of promoted routes, including public rights of way, cycleways, bridleways and protected lanes (section 13.6)

Landscape value

1.37 The determination of landscape value should include critical analysis of landscape value criteria (including cultural and natural heritage) for all chosen

landscape receptors. Along with susceptibility, these findings should then inform any sensitivity judgements.

Sequential visual impacts

1.38 The scale and repetitive design of the Proposed Development will need to be assessed to understand the LSEs from sequential visual impacts to users of the highway and public rights of way networks, especially where there is a general expectation of high value levels of visual amenity and tranquillity.

Viewpoints

1.39 The proposed 41 preliminary representative viewpoints are inadequate to fully understand the LSEs from the Proposed Development. Once further site visits and survey work have been undertaken, ECC are likely to request further or amended viewpoints to be included in the ES. This is likely to include additional viewpoints from promoted routes within the study area and both specific and illustrative viewpoints. ECC encourages the Applicant to engage with us in the review and addition of viewpoints to support the preparation of the ES (section 13.9 and figure 13.2).

Cumulative landscape and visual LSEs

1.40 The alignment of the proposed Scoping Route Corridor and clustering of other energy infrastructure in and around the district of Tendring is particularly sensitive to cumulative landscape and visual LSEs which should be assessed.

1.41 Further detailed comments related to landscape and visual can be found in Appendix 1 of this letter.

<u>Local economy and employment</u>

1.42 ECC is broadly satisfied with the proposed scope of information LSEs on socio-economic (as described in Chapter 15: Socio-Economic, Recreation and Tourism) but does not agree that LSEs from the operation of the Proposed Development on the local economy and employment should be scoped out of the ES. The Proposed Development would be one of a number of energy NSIPs located in or neighbouring Essex that are required to meet national net zero targets and support economic recovery post-pandemic. Given the national and local skills shortage to deliver these ambitions, the direct and indirect beneficial LSES from the Proposed Development during construction and operation, alone and cumulatively with other NSIPs are significant and should be scoped into the ES. ECC would welcome the opportunity to work with the Applicant on how to maximise the benefits of the Proposed Development to local economic growth and in levelling up education, skills and employment across Essex, both during construction and operation.

Traffic and Transport

1.43 ECC is the local highway authority for any part of the Proposed Development that is within the administrative boundary of Essex.

1.44 ECC is broadly satisfied with the proposed scope and methodology for assessing LSEs on traffic and transport (as described in Chapter 16: Traffic and Transport and Appendix B: Initial Outline Code of Construction Practice) and acknowledges the intention of the Applicant to produce a Transport Assessment and Construction Transport Management Plan (CTMP) separate to the ES. Nevertheless, until the Applicant can provide details relating to the final route alignment, location of construction compounds, haul road(s), site access points, phasing, construction methodology and traffic flow data, ECC is limited in its ability to comment further on LSEs to the local highway network for the purposes of the ES.

1.45 Further detailed comments related to traffic and transport can be found in Appendix 4 of this letter.

Green infrastructure

1.46 ECC is satisfied with the proposed scope and methodology for assessment LSEs from the Proposed Development to green infrastructure in Essex (as described throughout the SR).

Cumulative impacts

1.45 ECC is satisfied with the proposed scope for the assessment of LSEs from the Proposed Development (as detailed in Table 17.2: Proposed Scope of ES of Chapter 17: Cumulative Effects) but due to the clustering of committed or reasonably foreseeable NSIPs and strategic development in or neighbouring Essex, would welcome working with the Applicant to establish a reasonable long and short list to ensure a robust and accurate baseline to assess inter-project cumulative LSEs.

Despite continued objection to the Proposed Development, ECC will continue to engage with the Applicant on the preferred route corridor as presented to ensure that LSEs (positive and negative) are fully understood and that the ES includes best practice embedded and secondary mitigations to reduce adverse LSEs, including effective interventions to manage adverse residual LSEs.

Yours sincerely



Graham Thomas
Head of Planning and Sustainable Development

Enquiries to: Charlotte Rushmere
Principal Planning Officer – National Infrastructure

Appendices 1 – 4

Appendix 1 – Response from ECC Place Service
Appendix 2 – Response from ECC Minerals and Waste Planning
Appendix 3 – Response from Mid and South Essex Integrated Care Board
Appendix 4 – Response from ECC Highways

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24/11/2022

For the attention of: **Charlotte Rushmere**

RE: East Anglia Green Energy Enablement (GREEN) - The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 (Application for a scoping opinion) and 11 (Procedure to facilitate the preparation of an environmental statement).

The following response summarises the specialist views of Place Services' Landscape, Urban Design, Arboriculture, Ecology, Archaeology and Historic Buildings Teams in regard to the identification of likely significant effects (LSEs).

1.0 Landscape (Ryan Mills)

1.1 ***Section 13.1 Approach to scoping:*** The approach to scoping set out at 13.1 is broadly satisfactory. It is also appreciated that the interrelationship between the landscape and visual chapter and other environment topics has been made clear in Para. 13.1.2.

1.2 ***Section 13.4 Data Collection***: Para 13.4.2 states that the Scoping Report has been informed by targeted field work undertaken in August 2022. For viewpoint photography visits, we would advise these are taken in the winter months to ensure leaf cover is reduced and therefore representing a 'worst case scenario'. It may be that both summer and winter views are used to help provide representation all year round, however winter views would be the minimum requirement.

1.3 ***Section 13.6 Baseline conditions***: The baseline conditions at 13.6 as set out in the scoping report do not appear to recognise the network of promoted routes, that is locally and regionally promoted footpaths and other rights of way, cycle routes, or other identified routes such as protected lanes (identified in Braintree District, Brentwood Borough, Colchester Borough and Tendring District).

1.4 ***Landscape Value***: We welcome the reference to Technical Guidance Note 02-21 'Assessing the Value of Landscapes Outside National Designations', which was published by the Landscape Institute. This builds on the details within GLIVIA3 (Box 5.1) and strengthens the argument that landscape value is not always signified by designation: 'the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value' (paragraph 5.26). In determining value, we would expect to see a critical analysis of landscape value criteria (including cultural and natural heritage) for all chosen landscape receptors. Along with susceptibility, these findings should then inform any sensitivity judgements.

1.5 ***Section 13.9 Likely significant effects - Residential amenity***: We accept that visual effects on individual private views is not within the remit of EIA (Para 13.9.13). However, given that the transmission tower locations have not yet been identified it may be necessary, in specific locations, for the applicant to assess impacts on residential amenity where there is a risk that the "lavender test" principles may be breached. This approach would be consistent with paragraph 16.17 of GLIVIA 3 and the Residential Visual Amenity Assessment Technical Guidance Note (Landscape Institute, 2019).

1.6 ***Visual amenity at night***: The Scoping Report concludes that lighting will be scoped out on the Environmental Statement during both construction and operation. Although the Scoping report highlights that there is no anticipation of significant effects from lighting on designated landscapes or landscape character at night, we are yet to see any information regarding the size, location and operating hours for any construction areas for key sites substations and sealing end compounds, as well as laydown/compound areas, On this basis, we do not consider it appropriate to scope out the impact on visual amenity at night during construction until details of operation are fully understood.

1.7 ***Sequential visual effects***: The methodology does not appear to deal specifically with sequential visual effects. Given the scale and repetitive nature of this project, combined with varying visibility of pylons, this will clearly be a significant matter for users of highways and rights of way networks, where there is a general expectation of higher levels of visual amenity and tranquillity.

1.8 ***Section 13.9 Viewpoints and Visualisations***: Currently there is 41no. proposed preliminary representative viewpoints. Whilst the emerging approach to viewpoint selection may be acceptable for the upcoming s42 Preliminary Environmental Information Report (PEIR) consultation, the overall number of representative viewpoints is considered to be inadequate and therefore ECC reserve the right to ask for further or amended viewpoints, prior to preparation of the EIA that will support the DCO application once further site visits and survey work has been undertaken.

1.9 Similarly, given the extent and complexity of this project, it may be deemed necessary to include both specific viewpoints and illustrative viewpoints (Para 16.19 GLVIA3).

1.10 ***Cumulative landscape and visual effects***: The EAG scheme cannot be considered in isolation. Potential cumulative landscape and visual effects, particularly at and around the Bramford substation site and near Ardleigh, Tendring. There is a suite of other energy connection and generation projects coming forward, including Bramford to Twinstead Pylons, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm. All of which should be considered in detail.

1.11 ***Appendix J***: The arboricultural survey will identify impacts to trees potentially subject to significant arboricultural impacts as a result of the project. In addition to this we would expect to see a comprehensive assessment of important hedgerows under the Hedgerow Regulations 1997 to be undertaken. This should identify all hedgerows along the routes that are important under the various historic, ecological and designation related criteria. Furthermore, all hedgerows along the route to be removed to facilitate construction should be surveyed in detail in advance to inform specific and appropriate planting schemes for their restoration.

1.12 ***Figure 13.2 Visual Receptors***: As stated in the comments above, there is 41no. proposed preliminary representative viewpoints, which is considered to be inadequate and does not fully represent the impacts that this project will introduce on communities. For example, there are areas north of Witham (Page 8 of 11) that have not been represented.

1.13 We would also expect to see additional viewpoints from PRoWs and Promoted Routes within the Study area. To support NG, suggested viewpoints will be reviewed in detail and recommend as soon as possible to help with the preparation of the ES.

2.0 Arboriculture (Anna Harris)

2.1 Care should be taken where possible to avoid areas of ancient woodland due to the potential impacts on an irreplaceable biological resource. Damage or disturbance to ancient/veteran trees should also be avoided. The Scoping Report has taken into account the high possibility of encountering trees used as bat roosts (a protected species) and this will need to be covered in the ecological section of the Environmental Statement.

2.2 The Scoping Report states that an arboricultural report will be carried out in line with BS5837 (2012) to identify and record features that may be lost or impacted by the proposed work. The BS5837 survey should also be helping to inform the project with regards to positioning of its infrastructure in as far as possible to avoid Category A and B trees that are considered a material consideration to planning and can be considered cumulatively significant. A desktop study should also be used to carry out data collection with regards to ancient, veteran and notable trees, ancient woodland, traditional orchards, Tree Preservation Orders (TPOs) and Conservation Areas (CAs). A walkover survey has also been outlined on potential sites.

2.3 The data collection suggested on potential sites should outline those trees of high value, either amenity or biodiversity, that should be taken into account for reasons of planning, protection or mitigation. Surveys and subsequent reports issued in line with that outlined in the Scoping Report should allow an assessment to be made regarding the arboricultural impact of these works and how any impacts will be mitigated either through tree protection or specialist construction methods. As previously mentioned, care should be taken to avoid loss to those habitats and individual trees that would be irreplaceable such as ancient woodland(s). As such if the methods outlined in the Scoping Report regarding trees are followed it should be sufficient to allow a detailed assessment of the arboricultural impacts at the next stage of the planning process.

3.0 Ecology (Sue Hooton)

3.1 We are satisfied that that nationally agreed CIEEM guidelines will be followed for the ecology surveys and all survey work will be undertaken in the appropriate season by appropriately qualified ecological consultants.

3.2 In accordance with Regulation 14 of the EIA Regulations, the Environmental Statement should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

3.3 We agree with the scoping for likely significant effects on biodiversity after mitigation measures have been embedded into the Project design. We are satisfied with the identification of impact pathways identified for further assessment in the ES to support the DCO submission as shown in Table 8.9 of the Scoping Report.

4.0 Archaeology (Richard Havis)

4.1 Overall the proposed scoping report covers the areas that would be required for assessment of the historic environment. There are a number of areas which do cause concern that need to be amended or altered to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved. The Historic Environment impacts have been discussed with the applicants' consultants on two occasions as described within the document with some of the changes/recommendations discussed being included within this documentation.

4.2 The historic environment section 11 states that it has inter relationships with both chapters 9 Geology and Hydrology and 12 Hydrology and land drainage, however, neither of these identify they have an inter relationship with the historic environment. On other schemes the undergrounding of cables have been identified as affecting the water tables and thus potential for drying out waterlogged archaeological sites. The interrelationship identified by the heritage specialists needs to be integrated into the other sections of the ES

4.3 The main concerns lie within sections 11.9 and 11.10. The protected lanes within Essex should be avoided by construction traffic. A significant concern within section 11.10 is the omission of a section on the proposed evaluation using trial trenching. This is especially important in areas of undergrounding.

4.4 ***Section 11.9.17***: It is unclear from the present document how the protected lanes in Essex are to be assessed. Will these be protected from construction traffic. The protected lanes

would not be appropriate for large vehicles and as with the Bramford to Twinsted link application a haul road is now to be constructed if this scheme is given the go ahead. Has the presence of a haul road be considered within the ES as this has the potential to have a significant impact on below ground archaeological deposits.

4.5 ***Section 11.10.7***: Any undergrounding areas would require trial trenching as the most appropriate method to assess such a wide corridor to support the ES. No trial trenching methodology is included within the document.

4.6 ***Section 11.10.8***: Site walkover: Lidar survey results should be used to assess areas of scrub, woodland etc to identify potential assets which would help to inform the locations for the walkover survey.

4.7 ***Section 11.10.17***: Roads, railways etc should not be used as a pre existing barrier as these are low features in the landscape when considering the height of the proposed pylons. Any setting assessment must take into account the impact of such large features within the present historic agricultural landscape.

4.8 ***Section 11.10.23***: During our discussions it seems that the high quality aerial survey undertaken by the applicants was not undertaken at the best time for aerial cropmarks to be identified. Therefore it is recommended that a detailed aerial photographic survey looking at all available historic and modern sources of aerial photography such as Google Earth should be undertaken with the results appropriately rectified.

4.9 ***Section 11.10***: A section on intrusive archaeological evaluation has not been included within the Scoping document although this has been discussed at the meetings and is mentioned earlier in the document. Archaeological trial trenching should be expected for use in areas of undergrounding, main compounds and sub stations.

5.0 Historic Buildings (Samantha Pace)

5.1 As highlighted within the submission documents, the potential impacts to built heritage have been discussed during two virtual meetings, with most of the recommendations to date having been addressed. Generally, the EIA Scoping Report provides for the assessment of the majority of heritage assets which have the potential be impacted by the scheme, although there are a number of elements which do cause concern. These are highlighted below, and it is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved.

5.2 ***Section 11.6.6***: The PPG states that 'in comes cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications' (040 Reference ID: 18a-040-20190723). No methodology/criteria for identifying, assessing, and recording potential non-designated heritage assets has been provided. This would be particularly helpful for areas which do not have a current Local List or an adopted or publicly accessible criteria.

5.3 ***Section 11.9.10***: An increase in construction traffic has the potential to directly impact historic buildings. If they are to be scoped out, it must first be adequately demonstrated that they are not located close to any vehicular or access routes and will not be affected by any increase in construction traffic.

5.4 ***Section 11.9.17***: In addition to comments made by the Historic Environment Consultant, it is recommended that a methodology for the assessment of the Protected Lanes in Essex is provided, to ensure they are fully protected from adverse impacts resulting from construction traffic.

If you have any queries regarding the above matters, please do not hesitate to contact me.

Kind Regards,

Jonathan Crane
Principal Planning Consultant
Place Services | Essex County Council

Email: [redacted]
Web: www.placeservices.co.uk

Place Services provide and coordinate specialist planning advice on behalf of Essex County Council.
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Essex County Council
Minerals & Waste Planning
County Hall
Chelmsford
Essex CM1 1QH

Essex County Council

Your ref N/A
Our ref: N/A
Date: 05 December 2022

Dear Sir/Madam,

Nature of Response: To address minerals and waste safeguarding implications arising through an Environmental Impact Assessment (EIA) Scoping Report (SR) related to the East Anglia Green Energy Enablement project.

Proposal: A new 400Mw overhead electricity connection running from Bramford in Braintree, into Colchester, Tendring, then through Chelmsford, Brentwood and Basildon before termination in Tilbury at a grid connection point. The proposal is to connect both the permitted and proposed offshore electricity generation proposals off and on shore in East Anglia to the Grid

Location: A new overhead/underground connection between Norfolk and Tilbury

Thank you for your email received 8th November 2022 consulting the Mineral and Waste Planning Authority (MWPA) on the above proposals.

The proposed application site forms the basis for the minerals and waste safeguarding assessment set out below.

This response deals with mineral policy matters and waste policy matters in turn. A spatial representation of the application site and the matters discussed can be found in Appendix One. A list of relevant designations and specific facilities which would potentially be affected are listed, with their most recent planning application reference where relevant, in Appendix Two.

Mineral Matters

Safeguarding Mineral Resources

The EIA SR notes, at Paragraph 9.6.21, that the Scoping Report Corridor within Essex crosses through multiple MSAs for sand and gravel, Mineral Consultation Areas (MCA) for brick clay and also crosses safeguarded minerals infrastructure and preferred / reserved sites for minerals extraction.The MWPA clarifies that within Essex, MSAs relate to mineral resources in the ground and MCAs relate to existing, permitted and operating mineral developments. As such, brick clay is in an MSA but the brick quarry and the transhipment site at Marks Tey are both in an MCA. The MWPA has also designated Waste Consultation Areas which

are associated with active, allocated and permitted waste developments. The implication of WCAs is addressed under the section Waste Matters below.

At Paragraph 9.9.5 of the EIA SR it is stated that the 'Scoping Report Corridor crosses through multiple Minerals Consultation[1] and Minerals Safeguarding Areas[2]. As possible interactions and thus significant effects cannot be ruled out at this stage potential effects on MCAs and MSAs are proposed to be scoped into the ES for both construction and operation (inc. maintenance).' The MWPA welcomes the scoping in of these considerations.

The ES includes, at Section 9,10, a proposed assessment methodology regarding mineral impacts. The MWPA welcomes existing mineral sites being designated as having a 'Very High' value/ sensitivity as set out in Table 9.4. However, due to the definition of MCAs in Essex, it cannot then hold that land in 'Mineral Consultation Areas' has 'Medium' sensitivity. As explained below, MCAs are designated up to 250m from existing, allocated and permitted mineral extraction sites. The impact that the East Anglia GREEN proposal will have on the operation of strategic sites is what needs to be assessed and potentially mitigated through Mineral Infrastructure Impact Assessments, as set out below. It cannot be a blanket score. It is accepted that this is potentially just a matter of terminology and the MWPA welcomes the opportunity to clarify these matters. With regards to land within a Mineral Safeguarding Area being of 'Medium' sensitivity, the NPPF is clear, at Paragraph 209 that 'best use' needs to be made of minerals. The NPPF further states that resources of local and national importance should not be sterilised by non-mineral development where this should be avoided, and in fact prior extracted where this is environmentally feasible and practical. It is expected that it be demonstrated that any sterilisation of mineral resources as a consequence of the preferred route is justified, and commentary provided with regards to the spatial extent of mineral sterilised and any future opportunities for use.

Further with regards to Table 9.4, there is no category for undelivered site allocations in adopted plans or 'preferred sites' for future allocations that may become relevant through local plans reviews. The MWPA notes that 'preferred sites' is not the same as the 'preferred areas' set out in Table 9.4 with the latter being larger areas of land, often allocated in extant local plans, within which planning applications of the nature for which the land is a preferred area may be more favourably received. A 'preferred site' is a Council supported specific location for a future mineral development in a Plan that has not yet reached adoption.

With regards to Table 9.5, there is no 'mineral' category to assess magnitude and therefore it is not understood how mineral considerations could be placed within the Significance Matrix set out in Table 9.6, if indeed that was the intention.

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[1] In Essex defined as being associated with active, allocated and permitted mineral developments – footnote added by MWPA

[2] Associated with mineral bearing land – footnote added by MWPA

Approach to Mineral Resource Assessment and Mineral Infrastructure Impact Assessment

Minerals Resource Assessment

Paragraph 9.10.13 states that 'A preliminary Minerals Resource Assessment (MRA) would be completed to identify where the Project has the potential to impact on mineral resources and provide qualitative assessment of the potential for significant effects. The preliminary MRA would have regard to Minerals Safeguarding Practice Guidance (Minerals Products Association, 2019)'. Reference to the Guidance is welcomed but it is noted that this Guidance does not make any specific provisions for what would be included in a 'preliminary MRA' such that it is materially different to a standard MRA.

Essex County Council has put together its own guidance as to what it would expect to see addressed through a MRA. This has been informed by the same Guidance referenced above.

The scope and level of detail of a Minerals Resource Assessment will be influenced by the specific characteristics of the site's location, its geology, and the nature of the development being applied for. However, a number of key requirements can be identified which are likely to satisfy the MWPA that the practicality and environmental feasibility of prior extraction have been suitably assessed in the MRA. The detail to be provided should be in proportion to the nature of the proposed application. The MWPA welcomes early engagement to clarify the requirements of MRA.

MRA Section	Matters to Cover
Site location, relevant boundaries, timescale for development	Application area in relation to MSA/MCA Description of development including layout & phasing Timescale for development Whether there is any previous relevant site history – this could include previous consideration of site or adjacent land in preparation of Minerals Local Plan, any previous mineral assessments and market appraisals, boreholes, site investigations, technical reports and applications to the MWPA for extraction.
Nature of the existing mineral resource	Type of mineral Existing mineral exploration data (e.g. previous boreholes in area) Results of further intrusive investigation if undertaken Extent of mineral – depth & variability Overburden – depth & variability, overburden:mineral ratio. To be expressed as both actual depths and ratio of

	overburden to deposit, as well as variation across the site. Mineral quality – including silt %/content and how processing may impact on quality. Consideration should give given to the extent to which the material available on site would meet the specifications for construction. An assessment of the amount of material that would be sterilised (whole site area) and could be extracted (following application of any required buffer zones). Estimated economic/market value of resource affected across whole site and that which could be extracted.
Constraints impacting on the practicality of mineral extraction (distinct from those that would arise from the primary development)	Ecology designations, Landscape character, Heritage designations, Proximity to existing dwellings, Highways infrastructure, Proximal waterbodies, Hydrology, Land stability, Restoration requirements, Effect on viability of non-minerals development including through delays and changes to landform and character, Utilities present etc. Constraints should be assessed in light of the fact that construction of the non-minerals development would be taking place e.g. landscape issues are to be presented in light of the final landscape likely to be permanent built development. It is held that mitigation methods employed as part of the construction of the non-minerals development may also facilitate prior extraction at that locality.
Potential opportunities for mineral extraction at location	Ability of site to incorporate temporary mineral processing plant, Proximity to existing mineral sites or processing plant, Context of site and mineral within wider mineral resource area, Proximity to viable transport links for mineral haulage, The potential for indigenous material to be used in the construction of the proposed development, thereby reducing/removing the need for import, Potential benefits through mineral restoration e.g. land

	reclamation, landscape enhancement, Any opportunities for ancillary extraction as part of the primary development of the site such as foundations, footings, landscaping, sustainable drainage systems, Evidence or otherwise of interested operators/local market demand.
Conclusion (as relevant to the findings)	Whether mineral extraction at the site would be practical, based on conclusions of a competent person, Whether prior extraction is practical at the site in the context of the non-mineral development, taking into account the estimated value of the mineral, restoration and the viability of the proposed development, How the MRA has informed the proposed non-mineral development, If prior extraction is not practical, the justification for sterilising the mineral, If prior extraction is practical, how this will be phased as part of, or preceding, the non-mineral development, Whether prior extraction is environmentally feasible, Whether the site has the potential to be worked for mineral in the future.

An MRA is expected to be evidence based and informed by quantified information.

To ensure that a comprehensive assessment of the mineral resource at risk of sterilisation is undertaken, it is recommended that:

- Any questions regarding the scope of an MRA are discussed with the MWPA as early as possible;
- a draft borehole location plan is agreed prior to commencement, and preferably as part of pre-application;
- the borehole depths should be sufficient to prove the depth of the safeguarded deposit;
- borehole analysis must note the depth of the water table;
- a non-stratified sampling technique is applied. An initial spacing of approximately 100m-150m centre to centre should be considered, with additional locations if required to determine the extent of deposits on site; and
- The MRA provides documented evidence confirming any commercial interest in working the resource at risk of sterilisation based on its quality, quantity, and viability of prior extraction.

The MRA should be prepared using the Pan-European Standard for Reporting of Exploration Results, Mineral Resources and Reserves (PERC) Standard, which was revised and published on 23 May 2013.

Any application, through a MRA or otherwise, is required to be submitted with sufficient information such that safeguarding issues can be appropriately considered.

Minerals Infrastructure Impact Assessment

The application site passes through a number of Mineral Consultation Areas as shown in Appendix One and listed in Appendix Two. With regard to Mineral Consultation Areas, Policy S8 of the MLP seeks to ensure that existing and allocated mineral sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy S8 of the Essex Minerals Local Plan defines Mineral Consultation Areas as extending up to 250m from the boundary of an infrastructure site or allocation for the same.

Paragraph 187 of the NPPF states that "Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

Due to the proposed project passing through Mineral Consultation Areas, a Mineral Infrastructure Impact Assessment (MIIA) is required as part of a planning application. The MWPA has designed a generic schedule of information requirements that should be addressed as relevant through an MIIA. The detail to be provided should be in proportion to the nature of the proposed application.

Mineral Infrastructure Impact Assessment Components

Minerals Infrastructure Impact Assessment Components	**Information requirements & sources**
Site location, boundaries and area	Application site area in relation to safeguarded site(s), Description of proposed development, Timescale for proposed development,
Description of infrastructure	Type of safeguarded facility e.g. wharf, rail depot, concrete batching plant; asphalt plant;

potentially affected	recycled aggregate site, Type of material handled/processed/supplied, Throughput/capacity.
Potential sensitivity of proposed development as a result of the operation of existing or allocated safeguarded infrastructure (with and without mitigation)	Distance of the development from the safeguarded site at its closest point, to include the safeguarded facility and any access routes, The presence of any existing buildings or other features which naturally screen the proposed development from the safeguarded facility, Evidence addressing the ability of vehicle traffic to access, operate within and vacate the safeguarded development in line with extant planning permission, Impacts on the proposed development in relation to: • Noise • Dust • Odour • Traffic • Visual • Light
Potential impact of proposed development on the effective working of the safeguarded infrastructure/allocation	Loss of capacity – none, partial or total, Potential constraint on operation of facility – none or partial.
Mitigation measures to be included by the proposed development to reduce impact from existing or allocated safeguarded infrastructure	External and internal design & orientation e.g. landscaping; living & sleeping areas facing away from facility, Fabric and features e.g. acoustic screening & insulation; non-opening windows; active ventilation.
Conclusions	How the MIIA informed the final layout of the proposed development. Potential sensitivity of proposed development to effects of operation of the safeguarded infrastructure/facility and how these can be mitigated satisfactorily; or If loss of site or capacity, or constraint on operation, evidence it is not

	required or can be re-located or provided elsewhere.

A MIIA is expected to be evidence based and informed by quantified information. It is recognised that the requirements of an MIIA may be addressed through other evidence base documents, such as those addressing transport, odour and noise issues. In these instances, it would be acceptable for the MIIA to signpost to the relevant section of complementary evidence supporting the planning application. The MWPA welcomes early engagement to clarify the requirements of MIIA.

Waste Matters

East Anglia Green Energy Enablement Corridor and Preliminary Routeing and Siting Study Report (PRSS), 2022

In its response to the PRSS, the MWPA was pleased to note that through its appendices, the PRSS recognised the role of the Essex Minerals Local Plan 2014 and the fact that the proposed development has implications for the safeguarding of mineral resources and mineral development.

It was further noted by the MWPA that the PRSS further recognised that the proposed development has implications for the safeguarding of waste development although the MWPA noted that there was no reference to the Essex and Southend-on-Sea Waste Local Plan 2017. This remains the case in the EIA SR, which does not provide the same level of recognition of the need to safeguard existing, allocated and permitted waste infrastructure as it does for mineral infrastructure.

The MWPA accepts that the safeguarding of waste management infrastructure may not be appropriate to address through EIA but it is nonetheless noted that The EIA SR references that the Scoping Corridor passes through waste sites within Paragraph 9.6.21 and then does not appear to make any further reference to this planning issue.

For completeness, further information with regards to the safeguarding of waste infrastructure is set out below:

Safeguarding Waste Infrastructure

The application site passes through a number of Waste Consultation Areas as shown in Appendix One. Its location within these Waste Consultation Areas means that an application would be subject to Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP). The WLP can be viewed on the County Council's website via the following link:

https://www.essex.gov.uk/minerals-waste-planning-policy/waste-local-plan

Policy 2 of the WLP seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that

may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy 2 defines Waste Consultation Areas as extending up to 250m from the boundary of existing or allocated waste infrastructure, unless they are Water Recycling Centres, where the distance increases to 400m.

Due to the proposed project passing through a Waste Consultation Area, a Waste Infrastructure Impact Assessment (WIIA) is required as part of a planning application. The MWPA has designed a generic schedule of information requirements that should be addressed as relevant within the supporting evidence of any application which falls within a Waste Consultation Area. The detail to be provided should be in proportion to the nature of the proposed application. It is understood that the nature of the development is unlikely to have significant impacts on waste development but this should be qualified through an appropriately scoped assessment.

Waste Infrastructure Assessment Components

Waste Infrastructure Assessment Components	**Information requirements & sources**
Site location, boundaries and area	• Application site area in relation to safeguarded site(s) • Description of proposed development • Timescale for proposed development
Description of infrastructure potentially affected	• Nature of relevant safeguarded facility • Type of material handled/processed/supplied • Throughput/capacity

Potential sensitivity of proposed development as a result of the operation of existing or allocated safeguarded infrastructure	• Distance of the development from the safeguarded site at its closest point, to include the safeguarded facility and any access routes.
	• The presence of any existing buildings or other features which naturally screen the proposed development from the safeguarded facility
	• Evidence addressing the ability of vehicle traffic to access, operate within and vacate the safeguarded development in line with extant planning permission.
	• Impacts on the proposed development in relation to:
	  ○ Noise
	  ○ Dust
	  ○ Odour
	  ○ Traffic
	  ○ Visual

	○ Light
Potential impact of proposed development on safeguarded infrastructure/ allocation	• Loss of capacity – none, partial or total • Potential constraint on operation of facility – none, partial or full
Measures to mitigate potential impacts of operation of infrastructure on proposed development	• External and internal design & orientation eg landscaping; living & sleeping areas facing away from facility. • Fabric and features eg acoustic screening & insulation; non-opening windows; active ventilation
Conclusions	• Sensitivity of proposed development to effects of operation of safeguarded infrastructure/facility can be mitigated satisfactorily; or • If loss of site or capacity, or constraint on operation, evidence it is not required or can be re-located or provided elsewhere

A WIIA is expected to be evidence based and informed by quantified information. It is recognised that the requirements of a WIIA may be addressed through other evidence base documents, such as those addressing transport, odour and noise issues. In these instances, it would be acceptable for the WIIA to signpost to the relevant section of complementary evidence supporting the planning application. The MWPA welcomes early engagement to clarify the requirements of WIIA.

Site Waste Management Plan

Paragraph 8 of the NPPF recognises the importance of "using natural resources prudently and minimising waste" to ensure the protection and enhancement of the natural environment and to achieve sustainable development. It also reiterates the need to mitigate and adapt to climate change and move towards a low carbon economy. An efficient and effective circular economy is important to achieving these objectives.

Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated as a result of development/ redevelopment. Not only does this reduce the need for mineral extraction, it also reduces the amount sent to landfill. Clause 4 specifically requires:

"The maximum possible recovery of minerals from construction, demolition and excavation wastes produced at development or redevelopment sites. This will be promoted by on-site re-use/ recycling, or if not environmentally acceptable to do so, through re-use/ recycling at other nearby aggregate recycling facilities in proximity to the site."

It is vitally important that the best use is made of available resources. This is clearly set out in the NPPF and relevant development plan documents. As such, the recognition of the need for a SWMP at Paragraph 5.7.8 is welcomed.

A SWMP would be expected to:

- present a site wide approach to address the key issues associated with sustainable management of waste, throughout the stages of site clearance, design, construction and operation,
- establish strategic forecasts in relation to expected waste arisings for construction,
- include waste reduction/recycling/diversion targets, and monitor against these,
- advise on how materials are to be managed efficiently and disposed of legally during the construction phase of development, including their segregation and the identification of available capacity across an appropriate study area.

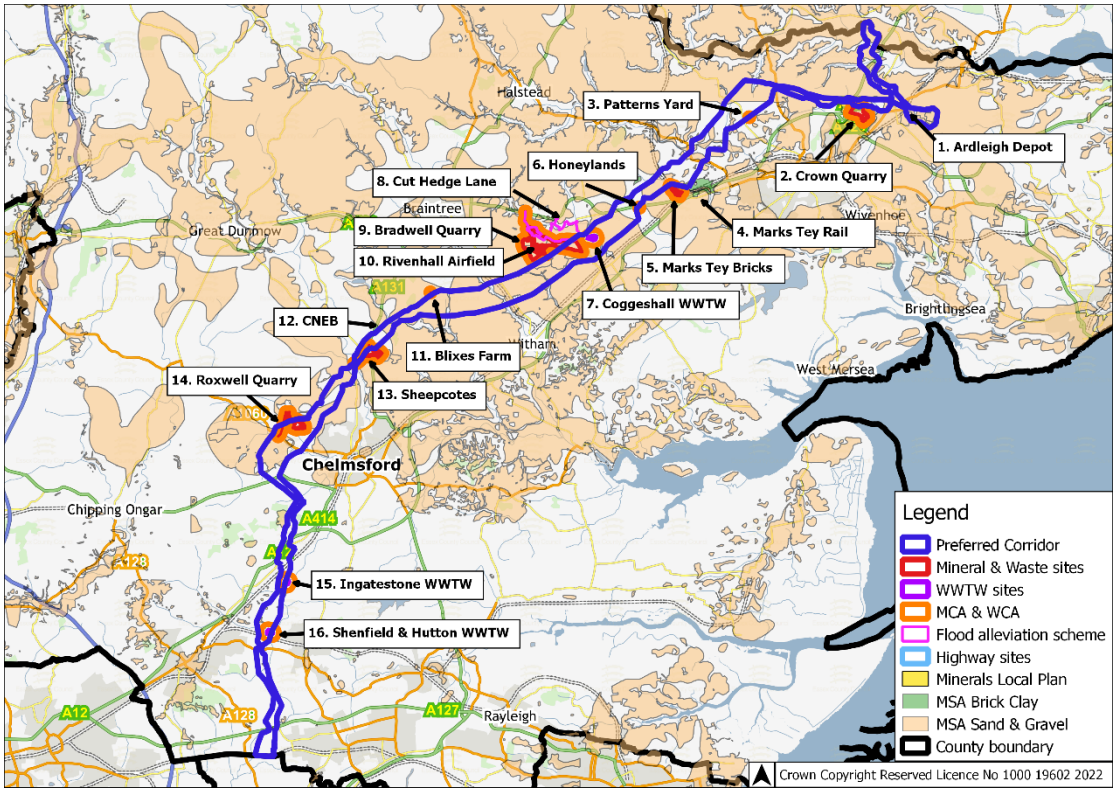
Yours sincerely,



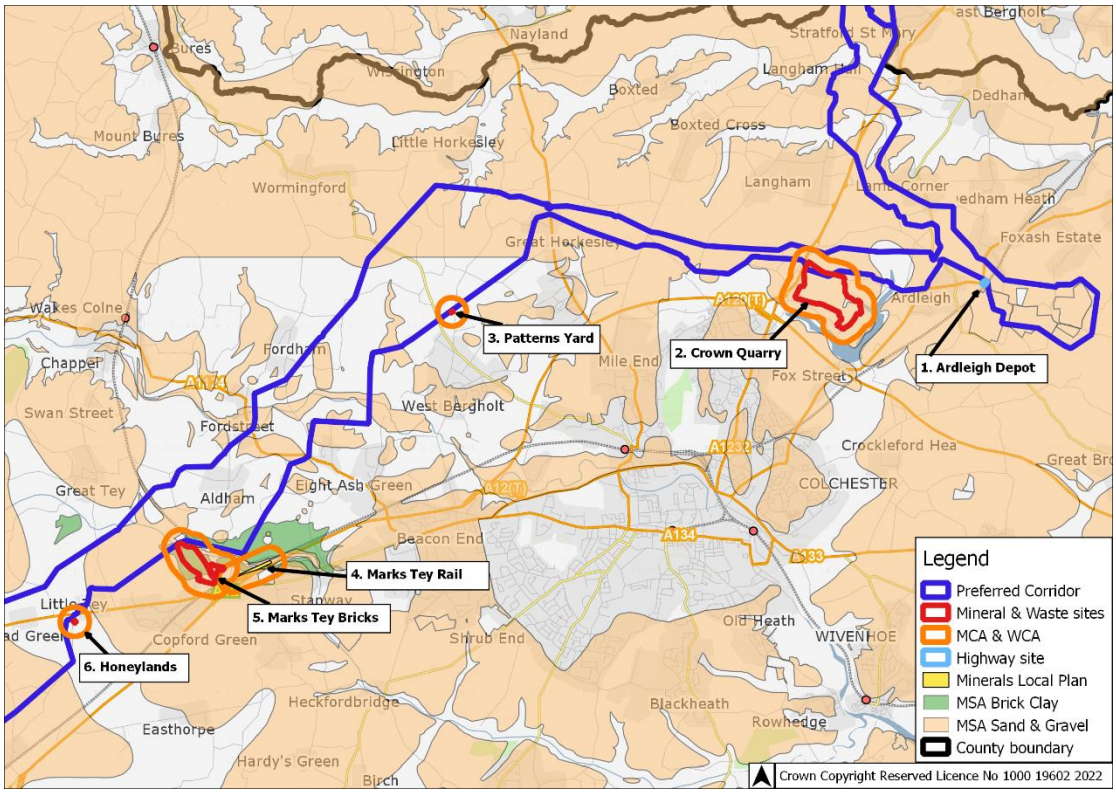
Philip Dash
Principal Planner
Email:

Appendix One

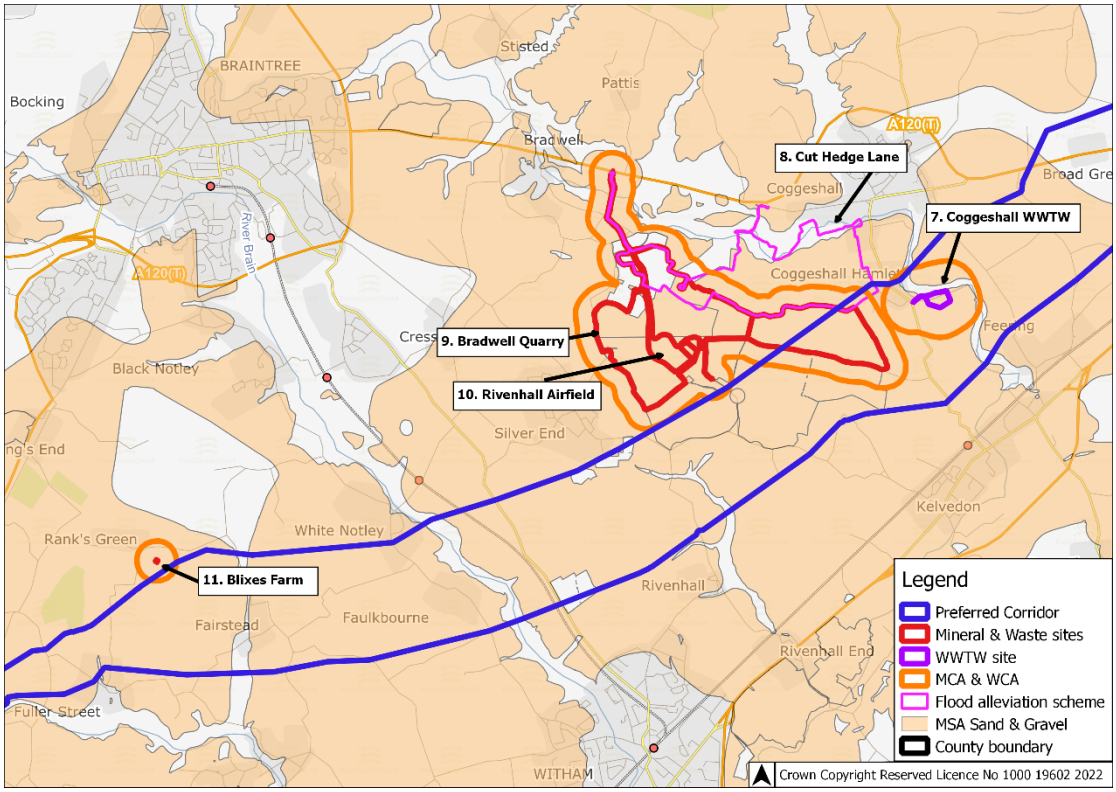
Map 1 – Minerals and Waste Safeguarding Screening – Full Extent of Proposed Development



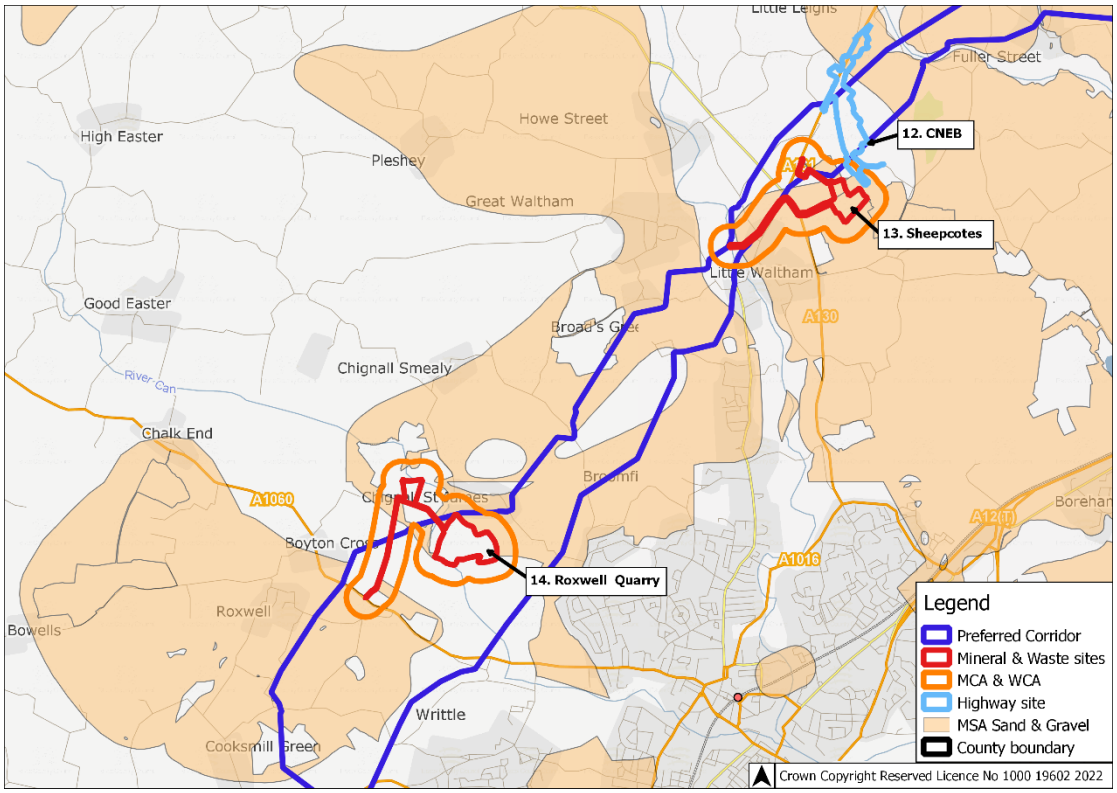
Map 2 – Northeast Essex



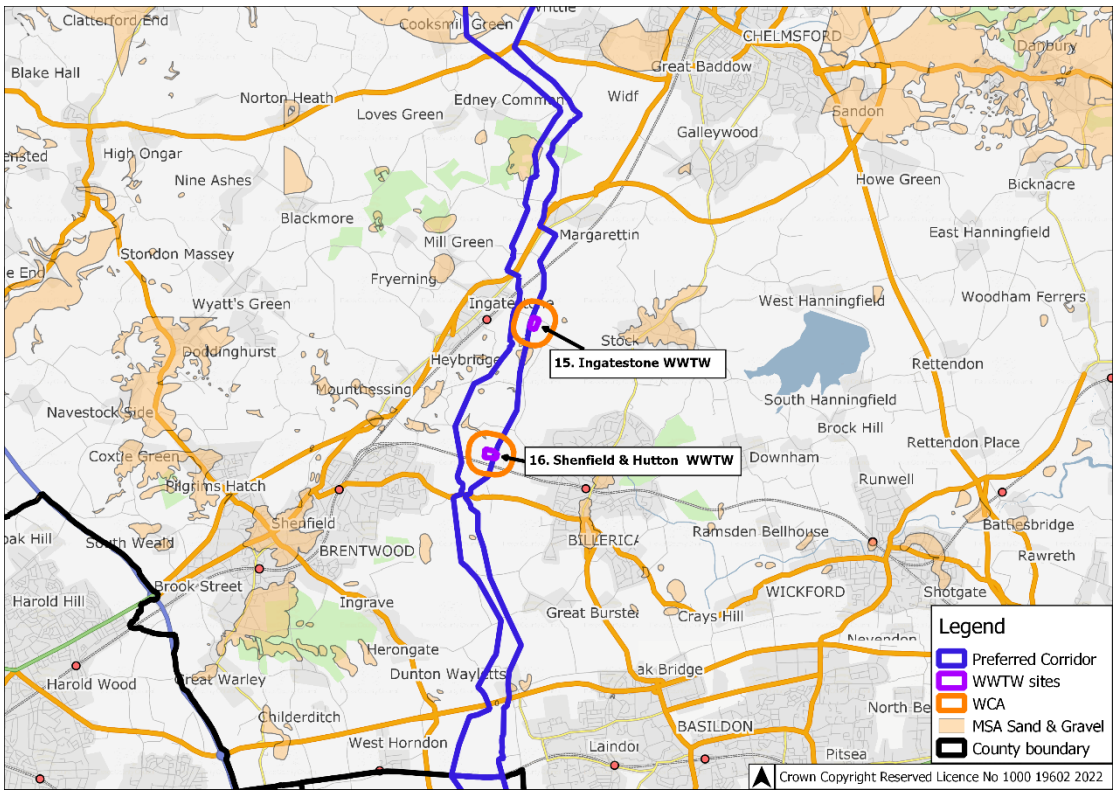
Map 3 – North Essex



Map 4 – Central Essex



Map 5 – South Essex



Appendix Two – Schedule of Safeguarding Designations and Safeguarded Minerals and Waste Infrastructure Relevant to The Application Site

Schedule of mineral infrastructure and designations within the application site

Details of planning applications can be viewed on the ECC website, by accepting the disclaimer and then searching on the planning reference

Site type	Site name	Planning application number	Further Details
Mineral Safeguarding Areas Policy implications set out under 'Mineral Matters – Safeguarding Mineral Resources'. Subject to MSA designation – Policy 8 of the Essex Minerals Local Plan 2014 Spatial extent shown in Appendix One.	Sand and gravel	N/A	
MLP Allocations or Safeguarded Mineral Development Sites Policy implications set out under 'Mineral Matters –	2. Wick Farm, Ardleigh Reservoir, Crown Quarry (Ardleigh Reservoir Extension),Old Ipswich Road,Tendring,Colchester,CO7 7QR	ESS/57/04/TEN - Winning & Working of minerals, removal of surplus soils & erection of a low profile processing plant concrete batching plant & ancillary buildings (inc a workshop). Interim restoration to lakes &	17/07/2028 permission end date

Safeguarding Mineral Infrastructure'. Subject to MCA designations – Policy 8 of Essex Minerals Local Plan 2014. Spatial extent shown in Appendix One.		subsequent construct of a public water storage.	
	4. Marks Tey Rail Siding	MLP2014 Site F3 (p181)	
	5. [redacted].	ESS/26/08/COL - Periodic review of mineral permission IDO/COL/1/92A for the extraction of brickearth clay and use in the adjacent brickworks	
	8. Land North of Cuthedge Lane, [redacted]	ESS/01/19/BTE/SPO - EIA Scoping Opinion Request re: Creation of a passive flood alleviation scheme through the construction of a low level "on-line" embankment (or dam) across the River Blackwater and the creation of an "off-line" flood storage area and connection points within the flood plain of the Blackwater Valley which will be delivered through the phased extraction of approximately 13 million tonnes sand and gravel and the restoration of land for agricultural purposes with a wetland flood meadow using the underlying clay	Opinion Issued – 25/02/2019
	9. Bradwell Quarry	MLP2014 – Sites A3, A4, A5, A6, A7 (p145 – 151) **Site A5**	

		Extant Permission ESS/03/18/BTE - Extraction of 2 million tonnes of sand and gravel (from Site A5 as identified in the Essex Minerals Local Plan 2014) including the retention of the existing access onto the A120, the processing plant (including sand and gravel washing plant), office and weighbridge, ready mix concrete plant, bagging unit, DSM plant, water and silt management systems and extension of the internal haul road into Site A5 with restoration to agriculture and biodiversity (species rich grassland and wetland). ESS/35/20/BTE - to allow extended week day hours for the dry silo mortar plant for the life of the development following the 12-month trial period. (Granted 16/06/22) ESS/79/20/BTE - to allow amended timescales for phasing of working and restoration, such that restoration is required to be completed by July 2021, one year later than previously permitted. (Granted 20/06/22)	

		Current Applications ESS/106/22 – Continuation of development permitted by ESS/79/20/BTE without compliance with conditions 2 and 71 (Application details) and conditions 6, 7, 18, and 72 (time related conditions) to allow amended timescales for the completion of the Site A5 quarrying and restoration operations and completion of restoration of other areas within Bradwell Quarry originally granted under planning permission ESS/03/18/BTE (as amended by ESS/79/20/BTE). (Out for consultation). **Site A6** No applications have been submitted on this site. **Site A7** Extraction of 6.5 million tonnes of sand and gravel (from Site A7 as identified in the Essex Minerals Local Plan 2014) including the retention of the existing access onto the A120, the processing	

		plant (including sand and gravel washing plant), office and weighbridge, ready mix concrete plant, bagging unit, DSM plant, water and silt management systems. In addition, extension of the internal haul road into Site A7 and access for private and support vehicles to the Site A7 contractors' compound via Woodhouse Lane and Cuthedge Lane. Restoration of Site A7 to agriculture and biodiversity (species rich grassland and wetland). (granted 22/06/2022)	
	13. Land at Sheepcotes Farm, [redacted]	ESS/01/18/CHL - The construction of an agricultural reservoir involving the extraction, processing and exportation of sand and gravel and soils; the erection and use of an on-site processing plant with ancillary facilities; and highway and access improvements. Together with the construction of an associated irrigation pipeline from the proposed abstraction point (River Chelmer at Langleys, Great Waltham)	Commencement required by 31/07/2022. Once commenced, mineral extraction to be completed within 5 years; with restoration due within a further 12 month period
	14. Roxwell Quarry	Previously subject to ESS/70/17/CHL	The landfill or quarry are not active anymore. The eastern side

			of the site is restored and landfill gas is being extracted. The western side of the site is currently being restored and is due to have seeds planted in the next few months.

Schedule of waste infrastructure and designations within the application site

Site type	Site name	Planning application number	Further Details
Waste management infrastructure (subject to WCA designations – Policy 2 of Essex and Southend-on-Sea Waste Local Plan)	1. Ardleigh Highway Depot	CC/TEN/83/05 - The construction of a 14m high 'dome' building for the storage of Road Salt, with the formation of hard surfacing and the erection of 2.5m high steel palisade fencing to site perimeter	
	3. Patterns Yard, Nayland Road,West Bergholt ,Colchester, CO6 3DG	ESS/41/11/COL - Retrospective importation of inert waste material (hardcore, concrete and soils), together with storage and recycling of the same prior to export from the site.	
	6. Honeylands Farm, [redacted]	ESS/41/08/COL - Change of use of an industrial unit to a waste transfer station to be used for the recycling of waste arising from highway gullies, including the construction of concrete	

		pads, sumps, ancillary equipment, office and welfare facilities	
	7. Coggeshall WWTW, Blackmore End, Braintree CM7 4DF	Braintree District Council permission 76/00763/P – Construction of new sewage treatment works and access road.	
	10. Land at Rivenhall Airfield, Coggeshall Road (A120), Braintree CO5 9DF	ESS/34/15/BTE – (inter-alia) 'The Integrated Waste Management Facility comprising: Anaerobic Digestion Plant treating mixed organic waste, producing biogas converted to electricity through biogas generators; Materials Recovery Facility for mixed dry recyclable waste to recover materials e.g. paper, plastic, metals; Mechanical Biological Treatment facility for the treatment of residual municipal and residual commercial and industrial wastes to produce a solid recovered fuel; De-inking and Pulping Paper Recycling Facility to reclaim paper; Combined Heat and Power Plant (CHP) utilising solid recovered fuel to produce electricity, heat and steam; extraction of minerals to enable buildings to be partially sunken below ground level within the resulting void;	Likely to recommence implementation in 2021.

		visitor/education centre; extension to existing access road; provision of offices and vehicle parking; and associated engineering works and storage tanks. And approval of details…' WLP2017 - IWMF Rivenhall - IWMF2	
	11. Slaughter House at Blixes Farm, Ranks Green Road, Fairstead, Essex, CM3 2BH	Earliest ECC electronic record ESS/33/15/BTE - Installation of a sealed rectangular plastic coated polyester fabric bladder tank complete with vent pipes and drum type activated filters, measuring 29.20m long x 25.66m wide x 2.80m deep of which 1.1m would be above ground level to facilitate the storage of abattoir wash water	
	15. Ingatestone WWTW	Earliest ECC electronic record ESS/22/05/BRW - Construction of kiosk to house electrical equipment to control plant on site. Can't find Brentwood permission.	

	16. Shenfield & Hutton WWTW	ESS/46/17/BRW - Lawful Development Certificate	

Other County Matters

Site type	Site name	Planning application number	Further Details
Road Scheme	12. Chelmsford North-east Bypass (CNEB)	CC/CHL/85/21 – Chelmsford North East Bypass (CNEB): A single carriageway road between Roundabout 4 of the Beaulieu Park Radial Distributor Road (RDR1) and a new roundabout on the A131 at Chatham Green plus dualling of the existing A131 between Chatham Green and Deres Bridge roundabout. With one intermediate roundabout, 3 road overbridges and 1 pedestrian/cycle/horse overbridge. Together with other associated works and landscaping.	

ANNEX 1

EEAST KEY FACTS & SERVICE INFORMATION

This section summarises EEAST's service remit, priorities, staff, vehicle fleet and estate assets, and co-working relationship with other healthcare and blue light partners and service targets

Service Remit & Priorities

The East of England Ambulance Service NHS Trust provide accident and emergency services and non-emergency patient transport services across the East of England.

The Trust Headquarters is in Melbourn, Cambridgeshire and there are Ambulance Operations Centres (AOC) at each of the three locality offices in Bedford, Chelmsford and Norwich who receive over 1 million emergency calls from across the region each year, as well as 800,000+ calls for patients booking non-emergency transport.

The 999 service is part of the wider NHS system providing integrated patient care. Provision of 999 services is aligned closely with national and regional initiatives driven by:

- Sustainability and Transformational Partnerships
- Integrated Care System
- Integrated Urgent Care systems, i.e. NHS 111, Clinical Assessment Services, Urgent Treatment Centres, GP Out of Hours Services.

Additionally, regional Ambulance Trusts may collaborate closely with other ambulance services, the wider emergency services or wider system providers to deliver appropriate patient care.

To support the service transformation agenda, the key requirements are:

- To deliver the core response and clinical outcome standards as defined by the Ambulance Response Programme
- To fulfil statutory duties relating to emergency preparedness, resilience and response (EPRR)
- Optimisation of call handling and appropriate responses through virtual alignment of NHS 111/999 and call/CAD transfer between ambulance services
- Increase the percentage of lower acuity calls managed through "hear and treat" and "see and treat" options
- Utilise a virtual delivery model to support wider workforce integration for paramedics, call handlers and specialist staff with local urgent care delivery models

- Facilitate cross boundary working and the flexible use of ambulance service resources to support the development of regional Sustainability and Transformational Plans and Integrated Care Systems.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) provide an essential lifeline for people unable to use public or other transport due to their medical condition. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics or other healthcare location
- Being admitted to or discharged from hospital wards
- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Service Assets

EEAST clinicians:

- Emergency Care Support Workers
- Emergency Medical Technicians
- Paramedics
- Specialist Paramedics
- Critical Care Paramedics.

Types and models of response:

- Community First Responder (CFR)
- Patient Transport Service (PTS)
- Clinical See and Treat
- Clinical Hear and Treat (telephone triage)
- Early Intervention Team (EIT)
- Rapid Response Vehicle (RRV)

- Double Staff Ambulance (DSA)
- Hazardous Area Response Team (HART)
- Specialist Operations Response Team (SORT)
- Helicopter Emergency Medical Service (HEMS), EEAST utilise 5 aircraft across 3 charities within the region

    - Magpas – 1 x aircraft from RAF Wyton
    - East Anglian Air Ambulance – 2 x aircraft form Cambridge and Norwich Airport
    - Essex and Herts Air Ambulance – 2 x aircraft form North Weald and Earls Colne

Ambulance Operations Centre (AOC) staff:

- 999 Call Handlers
- Emergency Medical Dispatchers
- Tactical Operations Staff.

EEAST support services staff cover all other corporate and administrative functions across the region.

Estates

The Trust is rolling out a Hub and Spoke network with up to 18 hubs to provide regional premises for delivery of operational responses to calls, flow of ambulance preparation via the Make Ready function (cleaning and restocking of ambulances) and despatch of ambulances to local spokes (reporting posts/response posts/standby locations). Support services such as workshop facilities, clinical engineering (medical equipment store and workshop), consumable product stores and support office accommodation are also provided from Hubs.

- Ambulance Station Central Reporting Post - A 24/7 - Permanent reporting base for staff and primary response location for one or more vehicles. Provision of staff facilities.
- Ambulance Station Response Post - A primary response location, which includes staff facilities but is not a reporting base for staff.
- Standby Location - Strategic locations where crews are placed to reach patients quickly. Facilities used by staff are provided on an informal basis only by agreement with the relevant landowner.

Ambulance Stations in the East Anglia Green Enablement Project area are:

ATTLEBOROUGH	BASILDON
DISS	BILLERICAY
LONGWATER (Norwich Depot)	BRAINTREE
NORWICH (N&N)	BRENTWOOD
NORWICH (Trowse)	CHELMSFORD
NORWICH (Earlham)	COLCHESTER
NORWICH OFFICE & AOC (Hellesdon)	DUNMOW
BURY ST EDMUNDS	EPPING
BURY ST EDMUNDS (Parkway)	GREAT NOTLEY
IPSWICH	GREENSTEAD

STOWMARKET	LOUGHTON
SUDBURY	ONGAR
THETFORD	SOUTH WOODHAM FERRERS
	THURROCK
	WICKFORD
	WITHAM

Vehicle Fleet

- 387 front line ambulances
- 178 rapid response vehicles
- 175 non-emergency ambulances (PTS and HCRTs vehicles)
- 46 HART/major incident/resilience vehicles located at 2 x Hazardous Area Response Team (HART) bases with a number of specialist vehicle resources.

Workforce & Equipment

Approximately 4,000 staff and 800+ volunteers across 120 sites. Each resource has equipment specific to the operational function of the vehicle and skill level of the staff.

Specialisms

EEAST works collaboratively across our blue light partners and have joint working groups with Police and Fire Services across the region, working in partnership managing responses to incidents and undertaking joint exercises with our dedicated resources to prepare for specialist rescue, major incidents and mass casualty incidents.

EEAST is a Category 1 Responder under the Civil Contingencies Act, 2004, playing a key role in developing multi-agency plans against the county and national risk registers. EEAST also works closely with the Military, US Air Force, Royal Protection Service, Stansted Airport and the Port of Felixstowe Police, Fire and Ambulance services.

EEAST's Emergency Preparedness Resilience Response (EPRR) team lead on the Joint Emergency Services Interoperability Principles (JESIP) working in close partnership with all blue light agencies, the Coastguard and Local Authorities. Specialist resources work with the Police in counter terrorism and developing response plans in the event of a major incident.

EEAST are an integral part of the locality's resilience response sitting on a number of safety advisory groups, east coast flood working groups and hospital emergency planning groups.

Co-working Relationship with other Blue-Light and Healthcare Partners

EEAST is an integral part of the wider healthcare system working closely with Integrated Care Boards/System (ICB/ICS) to deliver emergency and urgent care and are key stakeholders in supporting wider healthcare initiatives.

Within Norfolk, Suffolk and Essex, EEAST work with the ICB/ICSs in delivering additional care pathways focussing on hospital admission avoidance, this is a partnership with the local acute providers and local authorities. EEAST operate Early Intervention Response vehicles and a Rapid Intervention Vehicle. These resources work collaboratively within the system to offer holistic care to patients whilst reducing pressure on Emergency Departments.

This is EEAST's response to the requirements of the NHS Long Term Plan, with the clear narrative that in order to bring the NHS into financial balance all NHS providers must find mechanisms to treat patients in the community and out of the most expensive care setting, which are acute hospitals. This not only saves the NHS critical funding, but it also improves patient outcomes.

EPRR and Specialist Operations teams routinely train with other blue light agencies in preparedness for major incidents such as terrorist attacks and major incidents with statutory training obligations to respond to local and national incidents.

In continuing to respond to the COVID-19 Pandemic, EEAST is working collaboratively with Private Ambulance providers, the Military, volunteer Ambulance Services (such as St John Ambulance and British Red Cross) and local Fire and Rescue Services, to increase its capacity and maintain service delivery to meet the additional demand.

EEAST Service Targets

All NHS organisations are required to report against a set of Core Quality Indicators (CQIs) relevant to their type of organisation. For ambulance trusts, both performance and clinical indicators are set as well as indicators relating to patient safety and experience.

NHS organisations are also required to demonstrate their performance against these indicators to both their commissioners and Regulators (NHS England/Improvement).

It is important to note that EEAST is also measured on how quickly a patient is transported to an appropriate location for definitive care, often in time critical circumstances.

Failure to deliver against these indicators will result in a Contract Performance Notice and could result in payment being withheld, as prescribed in NHS Standard Contract 20/21 General Conditions (Full Length) GC9 9.15.

ANNEX 2

EEAST Operational Standards & Thresholds
Ambulance Service Response Times

Operational Standards	Threshold	Consequence of Breach
Category 1 (life-threatening) calls – proportion of calls resulting in a response arriving within 15 minutes	Operating standard that 90th centile is no greater than 15 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 15 minutes, £2.50 per 1,000 Category 1 calls received in the Quarter
Category 1 (life-threatening) calls – mean time taken for a response to arrive	Mean is no greater than 7 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 2 (emergency) calls – proportion of calls resulting in an appropriate response arriving within 40 minutes	Operating standard that 90th centile is no greater than 40 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 40 minutes, £2.50 per 1,000 Category 2 calls received in the Quarter
Category 2 (emergency) calls – mean time taken for an appropriate response to arrive	Mean is no greater than 18 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 3 (urgent) calls – proportion of calls resulting in an appropriate response arriving within 120 minutes	Operating standard that 90th centile is no greater than 120 minutes	Issue of a Contract Performance Notice and subsequent in process accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 120 minutes, £2.50 per 1,000 Category 3 calls received in the Quarter
Category 4 (less non-urgent "assess, treat, transport" calls only) – proportion of calls resulting in an appropriate response arriving within 180 minutes	Operating standard that 90th centile is no greater than 180 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 180 minutes, £2.50 per 1,000 Category 4 calls received in the Quarter

For All Indicators:

Method of Measurement:	See AQI System Indicator Specification at: https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/ Review of Service Quality Performance Reports
Timing of Application of Consequence	Quarterly for all indicators
Application	AM

Essex County Council	
East Anglia GREEN response template	Internal submission deadline 21 November 2022

- *We use this to compile response and we delete shaded comments if table becomes an external document*
- *At the bottom of the table, add a row and enter your comment, please complete all rows in the Response and also Comment Owners (they will be rearranged once agreed)*
- *If you support an existing comment, please just put your initials next to the other comment owner. This way, we can see if more than one person sponsors an issue*

Becomes Basis of ECC/HA/TDC Response to Environmental Impact Assessment Scoping Report	Delete to generate Response Report

Ref.	Error/Data Issue/Clarification/Formatting /Comment	Joint Comment	Recommended Actions for National Grid	Comment Owners	Raised at Working Group?	
EXAMPLE	*Error*	*Table 1.2 is dated incorrectly.*	*Amend date.*	*JoeB*	*Yes.*	*No. identified at working group, but not recorded on minutes*
16.2.5	Comment	Consider use of Essex County Council Development Management Policies – February 2011	Reference to Essex County Council DM Policies – February 2011	Matthew Bradley		
16.3.1	Comment	For the purposes of the Transport Assessment an increase of 30 vehicles or more or 5% increase in trips may require further assessment	Please use this threshold for Transport Assessment.	Matthew Bradley		

Ref.	Error/Data Issue/Clarification/Formatting /Comment	Joint Comment	Recommended Actions for National Grid	Comment Owners	Raised at Working Group?	
		should capacity issues be identified. Particularly on key local roads and junctions.				
16.3.2	Comment	Sensitive areas to also include the rural road network and villages		Matthew Bradley		
16.7.2	Comment	The formation of new accesses onto the highway network or significant changes to existing accesses may necessitate the requirement for a stage 1 road safety audit and designer's response. Automatic Traffic Counters may also be required to carry out speed surveys on rural roads to determine visibility requirements.		Mathew Bradley		
16.7.6	Comment	Duration of PROW survey agreed in principle subject to agreement of routes where surveys might be required		Matthew Bradley/ Rob Lee		
16.9.2	Comment	The acknowledgement that a Transport Assessment and CTMP will be produced is welcomed by ECC and is key to the consideration of the impact		Matthew Bradley		

Ref.	Error/Data Issue/Clarification/Formatting /Comment	Joint Comment	Recommended Actions for National Grid	Comment Owners	Raised at Working Group?	
		of the DCO on highway safety and capacity and identification of appropriate mitigation. Further engagement with ECC is required to determine the scope of these documents.				

Essex County
Fire & Rescue Service

Essex County Fire and Rescue Service Initial Response to East Anglia Green Energy Enablement

About

This document outlines Essex Fire and Rescue Service's initial response to the consultation for the proposed development.

Essex County Fire and Rescue Service has a statutory duty to provide Response, Prevention and Protection functions within the community. Therefore, we would welcome any opportunities to enable further development and enhancement of these provisions.

If further information or clarification on any of the points presented is required to support the developers, please contact the Service via future.infrastructure.risk@essex-fire.gov.uk.

National Fire and Rescue Priorities – Home Office

The priorities for fire and rescue authorities set out in the National Fire and Rescue Framework for England July 2018 are to:

- Make appropriate provision for fire prevention and protection activities and response to fire and rescue related incidents
- Identify and assess the full range of foreseeable fire and rescue related risks their areas face
- Collaborate with emergency services and other local and national partners to increase the efficiency and effectiveness of the service they provide
- Be accountable to communities for the service they provide
- Develop and maintain a workforce that is professional, resilient, skilled, flexible and diverse

The Fire and Rescue Plan – Essex County Fire and Rescue Service

The Fire and Rescue Plan sets out the priorities for fire and rescue services in Essex and a series of strong, tangible commitments to how we will help keep our communities safe.

The plan brings together the Service, partners and the public to build safe and secure communities and other efficient and effective prevention, protection and response activity.

The activities in this plan set out a clear direction for development of the Service and how, by working closer together with other emergency services and wider partners, we can deliver a better service while being closer to the communities we serve.

Our priorities are:

- Prevention, protection and response
- Improve safety on our roads
- Help the vulnerable to stay safe
- Promote a positive culture in the workplace
- Develop and broaden the roles and range of activities undertaken by the Service
- Be transparent, open and accessible
- Collaborate with our partners
- Make best use of our resources

Essex Design Guide

The Essex Design Guide provides high level direction for new developments which we would like to draw your attention to:

- Continuation of road design to ensure safe and timely access and egress to and from new developments.
- Continuation of road design to include turning circle provision plus future consideration to appliance sizes to ensure adequate space to manoeuvre on a development.
- Consideration for installation of an approved suppression system with better safety and more design freedom. Sprinkler considerations would help to isolate fire to the source and to ensure better safety for occupants / emergency services / reduce insurance costs. This may also afford developers more design freedom and scope for capacity in respect of distance from buildings to fire appliance access points.
- Continued consultation with Water Authorities for fire hydrant / water main provisions and consideration to ensure sufficient strategically placed resources are made available for operational firefighting and with appropriate water pressure considerations.
- Ensure new fire hydrant installations are fully operational before permitting residents to occupy dwellings.
- Ensuring new fire hydrants are not installed within private driveways / gardens.
- Continuation of at least 3 forms of fire hydrant asset indication. Hydrant indicator plate / post, painted FH cover and painted adjacent kerb. In the absence of a kerb then a thermoplastic yellow road ‘H’ applied to the road surface.
- Section 106 agreement at planning application stage to ensure that the developer will bear the costs for any new fire hydrant installations deemed necessary by the Fire Authority where the new development exceeds 10 dwellings.
- Where applicable door sets to carry dual certification ensuring compliance with fire and security regulations. Such recommendations align with both the Independent Review of Building Regulations and Fire Safety in the wake of and the review and recommendations resulting from the Grenfell Fire tragedy of 2017.
- Fire resistant cladding considerations that may fall outside of Building Control matters.

Initial Response to Consultation Document

Having reviewed the consultation document, at this time Essex County Fire and Rescue Service would ask that the following are considered during the continued development of the East Anglia Green Energy Enablement:

- Adherence to the requirements of the Fire Safety Order and relevant building regulations, especially approved document B.

- Within the improvements and developments of substations, the provision of adequate separation between buildings/containers and thermal barriers between switch gear and batteries.
- Within the improvements and developments of substations, the provision of suitably spaced hydrants and where necessary an Emergency Water Supply (EWS).
- Development of an emergency response plan with Essex County Fire & Rescue Service to minimise the impact of an incident during construction and operation of the substations.
- Consideration for providing an Information Box at access points to the substations to provide details of the Site Emergency Response Plan.
- Installation of smoke alarms and/or sprinkler systems at suitably spaced locations throughout each building.
- Implementation of vision zero principles where there are introductions of or changes to the road network.
- Appropriate planning and mitigations to reduce risks around outdoor water sources.
- Suitable principles in design to avoid deliberate fire setting.
- Consideration for road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles).
- Implementation of a transport strategy to minimise the impact of construction and prevent an increase in the number of road traffic collisions. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.
- A risk reduction strategy to cover the construction and completion phases of the project.
- Implementation of a land management strategy to minimise the potential spread of fire either from or towards the development site.

Essex County Fire and Rescue Service welcomes the opportunity to continue these conversations as the development progresses to ensure opportunities to reduce risk and improve the emergency service provision are realised.

Future Infrastructure Risk Team: future.infrastructure.risk@essex-fire.gov.uk

From: [redacted]
To: East Anglia GREEN
Subject: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation
Date: 01 December 2022 09:52:24

Dear Sirs

Feering Parish Council are grateful for the opportunity to consult on the scoping notification.

Feering Parish Council acknowledge the boundaries for scoping within our parish, in particular, the settlement of Skye Green, shown in Appendix 1. In addition to understanding the precise route which we understand will come from the next phase, Feering Parish Council will be very interested in understanding the aesthetics and the design of the overhead cables.

Kind regards

[redacted]
Clerk to Feering Parish Council
Tel: [redacted] Mob: [redacted]
[redacted]
Website: www.feeringparishcouncil.gov.uk

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From: [redacted]
To: East Anglia GREEN
Subject: Est Anglia GREEN Scoping Consultation Response
Date: 05 December 2022 09:10:52

Dear Sirs,

Finningham Parish Council strongly OBJECTS to the National Grid's East Anglia Green Energy Enablement proposal to reinforce the high voltage electricity network from Norwich main substation to Tilbury substation, by way of a new line of 400kv pylons. We do not believe, and have seen no evidence, that National Grid has considered the effects on the environment, visually significant open spaces, or cultural assets of Finningham, or neighbouring parishes. Suffolk County Council has also confirmed its intention to object to the proposals, stating its belief that there are better ways to meet the demands of energy projects, such as an undersea network, which it claims has not been fully investigated.

The value of the pylons does not supersede the value or importance of the environmental surrounds of Finningham, or its cultural and visual assets. The pylons will be hugely detrimental and have a negative impact on property values and businesses linked to tourism in the parish. We believe the environmental, visual, and cultural constraints of the proposed pylon route will ultimately be significantly higher than the alleged budget savings of an overland route. We do not believe the viable alternative options have been fairly or transparently presented for public consultation by the National Grid. In fact we are aware that National Grid have now conceded to this, and therefore we strongly believe that it is not appropriate for the Scoping Consultation to be conducted at all at this time.

National Grid has started to remove pylons and overhead cable as it heads towards the conclusion of its first Visual Impact Provision, to transform views of the Dorset AONB (Area of Outstanding Natural Beauty). It is inconceivable that National Grid's Visual Impact Provision does not extend to East Anglia.

Kind regards,

Jane Challis - Finningham Parish Clerk
[redacted]
Diss
[redacted]

From: [redacted]
To: East Anglia GREEN
Subject: EN020027 - the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)
Date: 09 November 2022 11:26:23

Dear Mr. Patten,

Thank you for consulting the Forestry Commission on this proposal. As the Governments forestry experts we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as Ancient \semi natural Woodland as well as other woodland. We are particularly concerned about any impact on Ancient Semi natural Woodland and will expect to see careful consideration of any impact and any weightings which might be applied to any assessments of route options/or site choice. This is because Ancient woodland is an irreplaceable habitat, they have high biodiversity and a long history with many heritage features remaining undisturbed. Paragraph 180 (c) of the National Planning Policy Framework states ;

'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'

This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

The East Anglia, Green Energy Enablement (Green) EIA Scoping Report, page 82 states ;

Paragraph 5.3.14 - "Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why."

The Forestry Commission acknowledges that the Scoping Report identifies the important of and need for protect ancient woodlands. The Scoping Report also includes the application of the Mitigation Hierarchy should there be any impact upon ancient woodlands within the proposed development area. Therefore the Forestry Commission

has no further comment to make on the proposed development.

Yours sincerely,

[redacted]

Local Partnership Advisor
East and East Midlands
Mobile number [redacted]

My working days are Monday, Tuesday and Wednesday.

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From: [redacted]
To: East Anglia GREEN
Subject: East Anglia Green - Scoping Notification
Date: 19 November 2022 09:09:41

Dear Sir / Madam,

Forncett Parish Council has considered the scoping notification and the comments from the parish council are as follows:

Forncett Parish Council recommends that the list of 41 visual receptors along the route be expanded to include more key points as suggested by groups and members of the public along the proposed route of the pylons.
The scoping out of the effects of climate change seems to warrant further consideration given the possible far reaching impacts of severe weather phenomena such as high temperatures, high winds, fire and flooding etc. The Council also feels that there should be detailed analysis of the whole range of security risks and the environmental impact of the ways they might be mitigated. Other apparently unsatisfactory aspects of the Scoping Options proposals are dealt with in more detail in the report by the Essex Suffolk Norfolk Pylons Group (published 15th November 2022) and the council urges full consideration of the validity of these for inclusion in the Environmental Impact Assessment.

Yours faithfully,

[redacted]
Clerk to Forncett Parish Council
[redacted]

From: [redacted]
To: East Anglia GREEN
Subject: East Anglia GREEN Scoping Consultation Response
Date: 05 December 2022 13:03:12

Dear Sirs,

Where both sections of National Grid's proposed high voltage electricity network cross Thornham Road in Gislingham, (on either side of the Railway bridge off Thornham Road), they enter land whose current use is agricultural. These areas of land have been farmed for food production for hundreds of years.

As a rural village the purpose of the settlement of Gislingham has for over a thousand years been based around food production. The proposal either removes or limits the ability for farmers to continue that traditional role.

This does not just damage the current and future generations of those famers to generate income from their land, it also risks changing the nature of Gislingham away from its traditional role as a centre of food production. Such a change is not only contrary to current Planning Policy, but also contrary to the long-term interests of the United Kingdom as a self-sufficient producer of grain to enable the country to feed itself sustainably.

Putting these Pylons across agricultural land is contrary to national interest, Planning Policy, and damages the interests of those landowners involved in vital food production. In addition, the pylons will have a negative impact on the much used footpath and bridleway network, property values, and businesses linked to tourism in the parish, due to the detrimental visual impact of the pylons.

We do not believe the viable alternative options have been fairly or transparently presented for public consultation by the National Grid. In fact we are aware that National Grid have now conceded to this, and therefore we strongly believe that it is inappropriate for the Scoping Consultation to be conducted at this time.

National Grid has started to remove pylons and overhead cable as it heads towards the conclusion of its first Visual Impact Provision, to transform views of the Dorset AONB (Area of Outstanding Natural Beauty). It is inconceivable that National Grid's Visual Impact Provision does not extend to East Anglia.
Therefore Gislingham Parish Council objects to the National Grid's East Anglia Green Energy Enablement proposal to reinforce the high voltage electricity network from Norwich main substation to Tilbury substation, by way of a new line of 400kv pylons. Suffolk County Council has also confirmed its intention to object to the proposals, stating its belief that there are better ways to meet the demands of energy projects, such as an undersea network, which it claims has not been fully investigated.

Kind regards

Jane Challis
Clerk to Gislingham Parish Council

PLEASE NOTE: I work on Mondays, Wednesdays and Fridays (excluding Public Holidays), the hours are flexible due to the varying demands of my work. For urgent matters outside of these days I can be contacted on [redacted].

As your Parish Council we may assist you for a particular reason, i.e. a 'legitimate interest'. During this assistance we may need to take personal information and other details relating to the concern. We may also need to share this information to complete our assistance to you. For further details on how we will use, share, protect and dispose of your information, you can review our Privacy Notice here:
https://gislinghamparishcouncil.com/assets/Policies/GDPRprivacynoticewebsite.pdf

To find out more about your rights under data protection, visit the Information Commissioner's Office here: www.ico.org.uk.

This email has been scanned by iomartcloud.
[redacted]

Great Horkesley Parish Council's Response to National Grid Scoping Report (GREEN Project)
4 December 2022

Great Horkesley Parish Council has serious concern as to significant deficiencies in the informal consultation carried out by National Grid and notes that these deficiencies have not been addressed or indeed properly considered and taint the scoping report, undermining its validity. The route appears to have been pre-selected and a foregone conclusion, and breaches the Gunning Principles. There has been a lack of transparency and no proper and costed analysis of alternative options. We maintain our view that the consultation should be re-opened and commenced afresh with all options considered, including offshore, alongside full costings and impact evaluation, including not only the environmental cost, but the human cost too.

It is noted, with concern, that Table 4.1, Section 5 of the Scoping Report omits to mention that the proposed route abuts the Dedham Vale AONB at both Great Horkesley and Little Horkesley (indeed the AONB is omitted from the description and principal features), and it bisects the village of Great Horkesley at its historic centre, where there is a large cluster of listed buildings, including the Grade II* listed Chapel Cottage less than 50m from the narrow swathe at the Great Horkesley pinchpoint.

Great Horkesley is a rural parish comprising a village and open farmland, and the Northern part of the parish falls within the Dedham Vale AONB. The surrounding landscape is open to the North, East and West. Most of the parish is atop a plateau and at a relative high point topographically. There are very few trees and the 50M pylons will be both prominent and clearly visible for miles around, including within the AONB.

We consider that the following should be scoped-in:

1. **Cumulative impacts of other existing and proposed energy infrastructure in the region**
2. **Vulnerability of infrastructure to climate change;** it is recognised that pylons and overhead cables are more prone to disruption from extreme weather than underground infrastructure; long-term impacts and repair and maintenance costs must be considered for a true and meaningful comparison between overground and underground and/or sub-sea options to be made
3. **Potential impacts on surface water for biodiversity receptors during construction**
4. **Negative impacts on "other notable mammals" such as brown hare, hedgehog and harvest mouse during construction**
5. **Existing environment & views – visual receptors outside of the ZTV; Expanded ZTV;** the 41 visual receptors selected by NG (Appendix H) are wholly inadequate for a project of this size and nature (along 180KM; 50m high pylons; passing both through and adjacent to the Dedham Vale AONB) and leave significant gaps; we support the use of a significant further number of receptors put forward by local residents via the Essex Suffolk Norfolk Pylons Group (https://www.google.com/maps/d/u/0/edit?mid=1cuHdnJdQKeHpzCiH0TWokTQmpSlAyY&usp=sharing) and in particular the several local points identified to Great Horkesley

along public footpaths, from the AONB and surrounding listed buildings; the ZTV needs to be appropriately expanded to take account of the AONB and topography

6. **Visual effects on people travelling by train –** it is nonsensical to scope this out due to "speed of travel" – there are both fast and slow trains; it is not just the main line, but also the branch line to Sudbury along the picturesque Chappel viaduct
7. **Impacts on foraging and commuting bats** – no sections of the line should be scoped out; a 10km assessment area should be used (as per North Wales pylon project scoping)
8. **Impacts of existing infrastructure locally on communities,** including the doubling back of pylons at Ardleigh, the potential "ring of steel" around the AONB due to existing pylons to the North, East and West; and the impact of the relatively sharp turn of the pylons at Great/Little Horkesley; further existing telegraph poles along the proposed route at Great Horkesley
9. **Full swathe width for undergrounding** – the SR swathe width of 40m is wholly inadequate given the non-statutory consultation noted a 60m width and that the NG webinar in Spring 2022 informed viewers that up to 100m-wide needed to be accounted for; the width needs to account for construction damage to ecology, habitats and archaeology
10. **Full impact on historic listed buildings and their surroundings and the rich archeological and architectural heritage of our locality**
11. **Full impact on Dedham Vale AONB of proposed route, including the views within the AONB looking Southward; impact assessment area of a minimum of 7.5km**
12. **Whether alternative options (including offshore ring, upgrading existing infrastructure) or routes (including those avoiding the AONB and/or following existing infrastructure) would have less negative impact.**

We endorse the full and detailed submissions made by Little Horkesley Parish Council and incorporate their contents herein.

From: [redacted]
To: East Anglia GREEN
Subject: East Anglia Green: Environmental Statement Scoping Proposals
Date: 02 December 2022 14:46:48

The Planning Inspectorate
Environmental Services Central Operations
Temple Quay House
2 The Square
Bristol BS 6PN
FAO Emma Cottam
eastangliagreen@planninginspectorate.gov.uk.

Dear Sirs,

East Anglia Green: Environmental Statement Scoping Proposals

Thank you for including the Great Tey Parish Council as a statutory consultee on the scope of the Environment statement to be prepared by National Grid. The proposed pylons will pass through the countryside in the South of the parish.

Local concerns
We are concerned that the scope of the work to be carried out is too narrow. There is a long list of items that are scoped out (summarised in section 18) and some may affect our Parish. We don't have the technical knowledge to comment properly and must rely on the Inspector's expertise.

Chapter 2 needs to be updated: both sections of the Colchester Local Plan have now been adopted, so the 2008 Core Strategy and associated development policies are now superseded.

Chapter 4 should include four specific features in the description of principal features on page 32:

- The SSSI around Little Tey Church, as pointed out in the non-statutory consultation
- The Essex Way public footpath. It passes through Broad Green and on to Great Tey via Little Tey, and the landscape impact of the pylons will be significant. The Essex Way was conceived by the CPRE and is promoted as a showcase for Essex. It is popular with local walkers and long distance rambler groups and is a significant attraction for walkers to come into the area and enjoy the views whilst celebrating the achievement of completing the entire length of the Essex Way.
- The Gainsborough line, sometimes known as the Lovejoy line, is just described as "a railway". The line's rich history and iconic views, including the famous Chappel viaduct, need proper consideration.

- The detrimental effects to the scenery and views around Great Tey Church which is Norman and includes features of historical interest should be especially noted. It will be dwarfed in comparison to one of the proposed pylons.

Appendix H needs to include some viewpoints within the parish of Great Tey. At present there are none, the nearest one being Marks Tey Station. We suggest the addition of the following viewpoints:

- From the A120 near to the proposed crossing point in open countryside
- From the Essex Way in the Broad Green area
- From the Great Tey Road crossing point
- From St. James the Less Church, Little Tey

In addition the impact on the following private properties might be considered:

- Upp Hall Farm which is home to an extended family who have lived there for many years and treasure their views over the countryside
- the hamlet of Broad Green whose nature will be changed if pylons appear either to its North or south
- the Kings Arms pub which has recently benefitted from investment in 6 new rooms designed around views over the open countryside to the North. Pubs along the A120 are failing and it was hoped that the investment would allow this one to survive.

The amount of upheaval in terms of traffic congestion that will be caused during the construction phase should also be considered. We are already experiencing the effects of the roadworks on the A12 which are forcing people to find alternative routes. Now that the planned re-routing of the A120 has been shelved the proposed pylon construction work will add further mayhem to an already over stretched and underfunded road network.

Overarching concern

Our biggest concern is that the scoping paper fails to properly address the reasonable alternative preferred by East Anglian residents, Councils and MPs – an offshore grid. An environmental statement that skirts around this alternative cannot have full credibility in the community.

This view is supported by para 1.1.5 of the scoping document which explains that the purpose of the East Anglia Green project is to connect offshore wind generation, nuclear power generation and interconnectors to the Main Interconnected Transmission System. But the proposed ES scope is limited to a Norwich-Tilbury link and we fear that the bigger picture will not be properly addressed.

A focus solely on the Norwich-Tilbury connection will produce a perverse answer. Once the power has been taken onshore and converted to AC it

will be prohibitively expensive to convert it back to DC for an offshore leg. It is wrong to rule out a proper offshore grid on this basis.

Chapter 3 "Alternatives Considered" needs to be widened to look at the best way to transmit electricity from the North Sea Wind Farms and Sizewell to London. National Grid will rightly point out that the transmission network is complex, but its own boundary analysis illustrates the surplus of power in the North of East Anglia and the deficit in the London area, and this is therefore the problem that needs to be addressed. The Inspector should not allow the consultation to be too narrow (ie just Norwich to Tilbury) or too wide (ie the whole grid). If it were too wide the Inspector's task would become unwieldy and complex.

A straightforward explanation of three main aspects of each alternative is needed – i) environmental impact, ii) cost and iii) speed of delivery. It is not sufficient just to describe a historic decision-making process, as in the existing Chapter 3.

The possibility of amending some existing connection agreements should be within the scope of the explanation – it may make sense to reimburse the abortive design costs incurred by some developers. It is not satisfactory to assume that changes cannot be made.

The benefits of faster delivery to the windfarm operators should also be within the scope of the explanation. The onshore network could well suffer HS2 style delays which will be very costly for the industry as a whole. An offshore grid will have fewer consultees and less environmental damage. There is the potential to start it much more quickly.

The project will not have sufficient legitimacy in the eyes of the public unless these issues are explained in full. They should not be sidelined into a separate report – the EIA rules require an explanation of the reasonable alternatives in the Environment Statement itself.

Please could you acknowledge receipt of this submission.

Regards

[redacted]
Clerk
Great Tey Parish Council

Responses to East Anglia Green Energy Enablement (GREEN) Consultation feedback form

About you
Your details

Title: [redacted]
First name:
Surname:
Organisation/group: **Great Waltham Parish Council**
Address: **The Parish Office, Great Waltham Village Hall (Houlton Hall), South Street, Great Waltham, Essex**.
Postcode: **CM3 1DF**
Email address: [redacted]

How would you describe your interest in East Anglia GREEN?
Statutory organisation

Please specify
Clerk to Great Waltham Parish Council

General

Q.1 *As part of the goal for delivering net zero carbon emissions in the UK by 2050, and the need to connect 40 GW of offshore wind energy by 2030 as part of this goal, do you agree with the identified need for East Anglia GREEN in upgrading the region's energy infrastructure?*
Neither agree nor disagree.

Policy context

Q.2 *How concerned are you about the following?*

The effect of climate change/global warming on your life.
Neutral.

The effect of climate change/global warming on the lives of future generations.
Neutral.

Q.3 To what extent do you agree or disagree with each of the following statements?

The UK meeting its target of net zero carbon emissions by 2050 is important to you.
Neither agree nor disagree.

With more renewable energy connection in East Anglia, it is important to reinforce the network between Norwich and Tilbury to enable this energy to be transported to where it is needed.
Neither agree nor disagree.

Having domestic energy sources and the associated infrastructure would help increase the UK's energy security.
Neither agree nor disagree.

Increasing our domestic renewable energy production and associated infrastructure would make us less reliant on imported oil and gas.

Neither agree nor disagree.

Our proposals

The preferred corridor

Q.4 We considered and assessed a number of options to select a preferred corridor. Do you agree with the process we have taken?
Strongly disagree.

Please indicate which local authority section(s) of the route your response relates to
Chelmsford.

Please tell us the reason for your answer and if you think there is anything we should take into consideration when developing our plans.
See our comments in the response to Q.17. We are very concerned that you have only offered your pre-selected preferred transmission line route for public consultation. We regard this *fait accompli* approach as undemocratic and that the public should have the right to scrutinise all options. Therefore, a full and proper consultation should be conducted with every possible solution (such as offshore, overland along other routes or use of buried cables rather than pylons) presented in detail for public examination, comment and consent.

The graduated swathe

Q.5 *Please indicate which local authority sections(s) of the route your response relates to*
Chelmsford.

Are there any features within the graduated swathe that you think we should take into consideration when developing our plans?
Given our absolute opposition to the proposed route in the first instance, our comments on the graduated swathe are in that sense hypothetical. That part of the proposed route which violates our parish fails to appreciate the harm it would do to the acknowledged green wedge between Great Waltham and Broomfield, takes no account of the special status of the Langleys estate and the location of the Scheduled Ancient Monument area in the Chelmer valley, means the likely removal of mature trees and would be far too close to residential properties. See our comments in full in our response to Q.17.

Dedham Vale Area of Outstanding Natural Beauty (AONB)

Q.6 *Please comment on any aspects of the routeing and mitigation that you would like to see in relation to our proposals through the AONB.*
We believe our parish is an area of outstanding natural beauty even though it does not have an official designation. However, like the Dedham Vale Area, your proposals for routeing and mitigation become academic with the adoption of another solution, such as offshore or along existing transmission line corridors. We do not accept the premise that your proposal is the only one which is viable.

Substations

The preferred substation site on the Tendring Peninsula

Q.7 *We considered and assessed a number of options to select a substation site. Do you agree with the process we have taken?*

Neither agree nor disagree.

Please tell us the reason for your answer and if you think there is anything we should take into consideration when developing our plans.
We do not have sufficient local knowledge to offer a definitive view, but suspect that many of our comments in response to Q.17 would be applicable as much on the Tendring Peninsula as in our parish.

Q.8 *Please comment on any aspects of the site and/or areas of mitigation that you would like to see in relation to our proposals for a new connection substation.*
We have no comments.

Q.9 *Associated work at existing substations*

Please indicate which substation your response relates to
[To be left unanswered].

Is there anything that you think we should consider in relation to this work?
We have no comments.

Other considerations

Refining our proposals

Q.10 *Are there any particular features, considerations or mitigation that you think we should consider as we refine our proposals?*
See our comments in the response to Q.17.

Q.11 *Are there any other considerations we should take into account when developing our proposals?*
See our comments in the response to Q.17.

Our consultation process

Q.12 *Please let us know how you heard about this consultation by ticking one or more of the following boxes:*
Received information from a local authority.
Informed by a local elected representative.
Saw coverage in local and/or national media.
Saw social media coverage.
Word of mouth.

Q.13 Please rate the information included in our consultation materials in terms of how clearly it was presented and how easy it was to understand:
Good

Reasons for answer
The presentation of information was clear, we just happen to fundamentally disagree with its content and underlying assumptions.

Q.14 Please rate how well this consultation was promoted and advertised to the public:
Good

Reasons for answer

While we do not like or agree with the messages being delivered, we acknowledge that they have been well communicated.

Q.15 *Did you attend one of our face-to-face or online consultation events?*
Yes.

Q.16 *If you answered yes to question 15, how informative did you find our consultation events?*
Quite informative

Q.17 *Do you have further comments about our materials, consultation process or any suggestions for how we can improve our consultation?*

Great Waltham Parish Council – Statement to the East Anglia GREEN project on its Consultation, April 2022

1. **Great Waltham Parish Council ("Council") welcomes the opportunity to comment on National Grid's proposals to reinforce the high voltage electricity transmission network between Norwich, Bramford and Tilbury, as well as a proposed connection substation to connect new offshore wind generation, under its East Anglia Green Energy Enablement (GREEN) project. We understand that new overland transmission lines are being proposed for the majority of the route, carried by large, visually intrusive latticed metal pylons.**

2. **We see that part of the proposed graduated swathe for the lines slices across a section of our parish, entering across the River Chelmer from the parish Little Waltham, just south of the Langleys estate, then across fields before going over Chelmsford Road somewhere between its junction with the B1008 and the Rose and Crown public house, across Lark's Lane and fields to the south of Broad's Green, and then into the parish of Broomfield either across or to the west of the ancient woodland of Sparrowhawk Wood (as named in OS Explorer 1:25,000 Map 183). The lines would seem to be very close to – and even possibly above – a number of properties (some both historic and listed) along Chelmsford Road, Lark's Lane and in Broad's Green.**

3. **The route would be framed within the view east from the village of Great Waltham, Langleys estate, several listed buildings and a popular pub. The health and mental wellbeing of the residents will be compromised by this unnecessary violation of the vista they currently enjoy.**

4. **You may be unaware that the proposed swathe would pass through an area which has over several decades been protected from development by Chelmsford City Council. The valley of the River Chelmer is considered to be a 'green lung' into the heart of Chelmsford and the area between Broad's Green and Broomfield Hospital is considered to be a 'green wedge' with the countryside protected from further urban expansion.**

5. **The swathe cuts through a narrow area between Great Waltham and Little Waltham and in doing so has to span a unique row of 16 poplar trees which have been there for decades and are a major characteristic of the route along Chelmsford Road. They are taller than the height of pylon wires and it is difficult to see how the span of wires between the pylons could weave**

through them without necessitating some removal. These poplars are a mainstay of the character of the area.

6. **Also, you may be unacquainted with the of the nature of the Langleys estate and its associated parkland. The estate has medieval origins along with much of the ancient woodland. Multi-period archaeological deposits are known from the zone from the Neolithic through to the 2nd World War. The nearby village of Great Waltham itself has evidence of occupation from the Roman period onwards. Langleys is a 17th century grade 1 listed house. The estate visible today dates at least to the thirteenth century with the parkland and house coming under the ownership of the Langleys estate in the 14th century. Elements of woodland shown on the first edition OS survive within the present landscape along with much of the original parkland. It is possible that earthworks would survive within these woodlands. If implemented, your proposal would disfigure this ancient landscape.**

7. **We assume you will have studied Chelmsford City Council's *Chelmsford Green Infrastructure Strategic Plan 2018-2036* which states that '*heritage resources often coincide with biodiversity and recreational interests, including Hylands Park and Danbury Palace and Langleys (all Registered Parks and Gardens), Conservation Areas along the Chelmer & Blackwater Navigation, Danbury and the Walthams*', although your proposal to site transmission lines so close to Langleys and across the parishes of Great and Little Waltham perhaps suggests otherwise. The same Plan also confirms that there are 'designated biodiversity resources across the City Council area, [with] notable clusters around [the Walthams]'. Again, your proposals seem the very type of development that the Plan, for all the reasons it was agreed and implemented, was designed to ensure do not take place.**

8. **This part of the Chelmer Valley is of significant archaeological importance. Stone Age artefacts have been recovered on the banks of the River Chelmer near Chatham Green. Evidence was found of a late Iron Age settlement dating between 300-100 BCE. During the Roman occupation of Britain, from 43-410 CE many Roman roads were built, one of which (now the B1008), passes through the parish from Dunmow connecting south of the parish with a second Roman road (now the A131), leading to Chelmsford (then Caesaromagus).**

9. **Elsewhere along the significant cropmarks have been revealed with numerous finds made of multi-period date. Major excavations took place along the valley when the Great Leighs bypass was constructed revealing a Middle to Late Iron Age village. Finds of Bronze Age pottery hint at prehistoric activity and a major Middle Iron Age settlement has been excavated to the north of Little Waltham. The area of excavation lay beneath the present Little Waltham bypass with the remaining area of the field which survives now protected as a Scheduled Ancient Monument – your proposed swathe cuts across this area of land. Nearby, Roman settlement and an associated cemetery close to the Roman road has been recorded. Occasional chance finds such as that of a Saxon spearhead close to the river suggest further archaeological potential for this period. The river valley has potential for the preservation of environmental and palaeo-environmental deposits surviving in waterlogged deposits. We believe the unique characteristics of our part of the Chelmer Valley make it an entirely unsuitable site for an electricity transmission lines corridor.**

10. **Furrther west, towards our boundary with Broomfield Parish Council, the proposed pylon route comes near to the KEGS playing field. There would be concerns about high balls hitting the wires.**

11. **Given the very special nature of this part of our parish, the Council and, we believe, Great Waltham residents in general, have been shocked and dismayed by your proposals. We pride ourselves on the beauty and heritage of our parish and find it impossible to regard placing a horrific scar across our part of the countryside as anything other than a gratuitous violation of both.**

12. **We remain fully supportive of the concept of North Sea wind farms to generate abundant, cheap, clean electricity, and furthermore we understand that recent increases in energy prices, coupled with the global insecurity of energy supplies gives added impetus to this strategy. However, this must never be at the expense of permanently disfiguring our landscape and its environment. It seems ironic that with so much trouble having been taken to install unsightly power generation facilities off-shore there is an apparent zeal to now tarnish the landscape with ugly transmission lines.**

13. **We have consulted the literature produced by the project, but we are very concerned that the consultation's starting point is to seek views on a single overland route, rather than one where all options remain on the table. The Council's preferred options are for either offshore cabling or integration along existing transmission line corridors to be used to transmit power from the generation sites. These may have technological and financial challenges, but they would avoid the need for blighting yet more countryside with hundreds of extra pylons and reduce environmental damage and disruption.**

14. **We believe that for any initial consultation to be valid it must ask seek views on all possible solutions, notwithstanding any technological and/or financial challenges – we may not be experts ourselves, but we feel we have a right for our voices and opinions to be heard on all alternatives, not just one presented as a fait accompli. In the circumstances, we feel your current consultation falls well short of the standards the public can reasonably expect. On that basis, we demand that National Grid holds a proper public consultation on all options, including the offshore route and the use of existing corridors, with full details and costings being made available for public scrutiny.**

15. **Be assured, this Council will continue to lobby your organisation and the Government to ensure that all necessary infrastructure upgrades are delivered in sustainable ways, but this must not be at the cost of ruining the Essex countryside with another pylon route.**

<u>Equality and diversity</u>

Q.18 What is your gender?
Prefer not to say

Q.19 Do you consider yourself a person with a disability?
Prefer not to say

Q.20 How would you describe your ethnic background?
Prefer not to say

Q.21 What is your age?
Prefer not to say

From: [redacted]
To: East Anglia GREEN
Subject: wenham magna parish meeting
Date: 08 November 2022 22:19:26

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to whom it may concern ,please note the officiers representing wenham magna resigned earlier this year. wenham magna has no parish meeting at present. regards david coe

HSE

Health and Safety Executive

Chemicals, Explosives and
Microbiological Hazards
Division – Unit 4

NSIP Consultations
Land Use Planning Team
Building 1.2,
Redgrave Court,
Bootle L20 7HS

NSIP.applications@hse.gov.uk

http://www.hse.gov.uk/

For the attention of:
Emma Cottam
Senior EIA Advisor
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Via email
EastAngliaGREEN@planninginspectorate.gov.uk

Date: 2/12/22

References: CM9 Ref: 4.2.1.7047.
NSIP Ref: EN020027

Dear Ms Cottam,

PROPOSED EAST ANGLIA GREEN ENERGY ENABLEMENT (GREEN)
PROPOSAL BY NATIONAL GRID ELECTRICITY TRANSMISSION (NGET)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) REGULATIONS 10 AND 11

Thank you for your letter of **(date)** regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records the proposed DCO application boundary corridor for this Nationally Significant Infrastructure Project falls into the inner, middle and outer zones of a number of Major Accident Hazard Pipelines and Major Accident Hazard Sites. This is based on the plans contained in EN020027-000013-EAGN - Scoping Report (Appendix A - Part 1 of 8 - Figures 1.1 to 6.5).pdf (planninginspectorate.gov.uk) , Figure 1.1, Locations Plan, Drawing No. 19951663-ARC-EGN-ZZ-00001-S2

The Major Accident Hazard Pipelines are :

Pipelines: 7447, 7448, 7599, 8189, 8190, 8191.
These pipelines are operated by National Grid Gas Limited.

Pipelines: 7386, 7424, 2428, 7567, 2435, 7571, 2532, 7586, 2437, 7583, 2438,7578, 8185, 8178.
These pipelines are operated by Cadent Gas Limited.

Pipelines: 1037406.
Operated by Intergen (UK) Limited.

Pipelines : 6978.
Operated by Calor Gas Limited.

The Applicant should make the necessary approaches to the relevant pipeline operators. There are three particular reasons for this:

i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.

ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.

iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

The major accident hazard sites are :

- **H0795 - Taylor Barnard Ltd, The Airfield, Norwich Road, Mendlesham, Stowmarket, Suffolk, IP14 5NA**
- **H0786 - National Grid Gas PLC, Bishop Stortford Road, Roxwell, Chelmsford, Essex, CM1 4LU**
- **H0349 - Northumbrian Water Ltd, Langford Treatment Works, Langford, Maldon, Essex, CM9 6QA**
- **H0179 - Calor Gas Limited, Canvey Terminal, Thames Road, Canvey Island, Essex, SS8 0HR**
- **H0802 - OIKOS Storage Ltd, Hole Haven Wharf, Haven Road, Canvey Island, Essex, SS8 0NR**
- **H0439 - Morzine (UK Branch) Ltd, Thames Oil Port, Coryton Refinery The Manor Way Stanford Le Hope Essex SS17 9LL**
- **H0809 - Durox Building Products Ltd, Northumberland Road, Lindford,Stanford - le - Hope, Essex, SS17 0PU**

The Applicant should make contact with the above operators, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present. Based on the information in the Scoping Report http://infrastructure.planninginspectorate.gov.uk/document, it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Hazardous Substance Consent

Based on http://infrastructure.planninginspectorate.gov.uk/document/EN020027-000012 , it is unlikely that hazardous substance consent will be required.

Further information on HSC should be sought from the relevant Hazardous Substances Authority, if required or if changes to the scheme are made.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive . This document includes consideration of risk assessments on page 3.

Explosives sites

CEMHD7's response is no comment to make in regards to the proposed development.

Electrical safety

No comment from a planning perspective

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours faithfully,

[redacted]

[redacted]
CEMHD4
NSIP Consultation Team

From: [redacted]
To: East Anglia GREEN
Subject: Green energy pylons
Date: 10 November 2022 15:15:41

Dear Sirs

The Heywood is an area of open countryside with many listed houses it is unbelievable that you would be prepared to decimate aforementioned countryside with these pylons when an undersea route is available . I urge you to refuse this application and find an alternative route.

Yours
[redacted] Correspondent Heywood Parish Meeting
[redacted]

Historic England

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: PL00784122

Your ref: EN020027

Telephone [redacted]

BY EMAIL
East AngliaGREEN@planninginspectorate.gov.uk

5th December 2022

To Emma Cottam

Request for a Formal EIA Scoping Opinion for 'East Anglia Green'
Proposed by National Grid Electricity Transmission plc (National Grid)

Historic England has been notified about a scoping request for the proposed East Anglia Green Energy Enablement project by the Planning Inspectorate via an email (dated 7th November 2022). The Green Energy Enablement Project is a proposal by National Grid Electricity Transmission plc to facilitate the transfer of power from the East Anglia Region to the rest of the Main Interconnected Transmission System thereby enabling the connection of offshore wind generation, nuclear power generation and interconnectors expected into East Anglia by 2035.

The letter is accompanied by the East Anglia Green Energy Enablement EIA Scoping Report dated November 2022.

Historic England, as the governments lead advisors on the historic environment would like to offer our comments on this proposal, taking into consideration the information provided by the applicant in this report.

Historic England Advice

Our primary concern in relation to this proposal is the impact of the development upon the significance of designated heritage assets and non-designated heritage assets, from constructional and operational phases of the proposal. The development is likely to cause harm to a large number of heritage assets through change to their setting from this development. Our comments are set out in sections using the paragraph numbers in the EIA Scoping Report.

Section 1 – Introduction

Paragraph 1.2.5 - This paragraph notes that an optioneering process was undertaken and the preferred route was consulted on during a non-statutory consultation process. Historic England responded to this non-statutory consultation on 15th June 2022. Our consultation response made the National Grid aware of the negative impacts that would be likely to arise to a large number of heritage assets through the route and on impacts arising to the setting of heritage assets which fall outside of the route. We advised that should the route be taken forward, detailed assessments of a large number of heritage assets, both designated and non-designated would need to occur. We are pleased that this scoping report has recognised the need to scope heritage into the report and our detailed comments will be provided in later sections.

1.3 - the route covers a huge area, covering a range of landscapes and environments. There is the potential for the development to result in a significant impact (direct and indirect) on a range of heritage assets that will need to be addressed, both above and below ground.

1.3.2 – This paragraph states that "The topography of the wider geographical area is predominantly flat and low lying". During site visits undertaken on 20/10/22 and 17/11/22, Historic England were concerned with becoming familiar with the route corridor and its topography. From our experience, we noted the landscape is undulating creating high and low points where distant items can be revealed and disappear for long periods of time. The landscape, even outside of the AONB is predominately rural with far reaching views across valleys and undulating hills. There are significant valleys such as the Gipping and Waveney Valleys which the route will cross.

Historic England therefore consider that this statement is incorrect and would need to be reconsidered and we recommend amending this statement. This is to ensure the basis of the assessment stems from the right baseline of understanding.

1.3.5 – The report lists a number of 'cultural assets' as examples of assets which would be affected. These assets are not the only ones affected. Non designated heritage assets are also affected by the route and there are many more of these within the route corridor than has been picked up so far. The presence of non-designated heritage assets needs to be mentioned within this paragraph. We would recommend that the ES uses the same language as the NPPF throughout the statement to avoid confusion.

Section 2 – Legislation, Regulatory and Planning Policy Context

2.5 – This section lists the relevant guidance which the National Grid will use to make decisions on the scheme. Historic England considers that this section is incomplete. In particular we recommend the following guidance is added and an amended version of the scoping report reissued;

- Historic Environment Good Practise Advice in Planning 3 (2nd Edition): The Setting of Heritage Assets

We note however that this guidance is mentioned in Section 11, the chapter on the Historic Environment.

Section 3 - Main Alternatives Considered

Section 3 details the options considered and makes it clear this forms part of a wider project with other National Grid schemes. We are aware of other scheme being undertaken within parts of the route such as Bramford to Twinstead, another reinforcement and upgrading line also utilising some of the same sub station technology.

Consideration must be given to the cumulative impacts on East Anglia of these schemes and, where possible the schemes should utilise the same corridor and infrastructure in order to minimise this impact. Schemes should be undertaken at the same time – in particular those which involve undergrounding in the Dedham Vale which, is currently has two schemes wishing to dig trenches in two different locations. This was highlighted by us in the non-statutory public consultation given to National Grid on 15th June 2022.

This cumulative impact of separate by related schemes and the opportunity's for reducing impacts on heritage assets by co-locating cables should be given early consideration in the scheme and considered in more detail in the Environmental Statement. This also needs to be acknowledged within this Scoping Report.

Section 4 – Description of the Project

4.1.2 – The document states that 10km of undergrounding will be installed largely through the Dedham Vale AONB. If further areas of sensitive landscapes become apparent through the assessment process, the National Grid should consider further undergrounding alongside the Local Planning Authority, Local Authority Landscape Specialists and other major infrastructure specialists.

4.1.3 – This paragraph states that he removal of existing National Grid infrastructure would also be considered. This has not been discussed within working group meetings so far and whilst we recognise this as a positive statement, further details would be helpful.

We recommend National Grid should continue to hold working group meetings throughout the development. Discussion of this topic would be welcome at the working group/heritage liaison meetings to determine where and how this would be possible.

Table 4.1 – This table is a description of the route and has a column entitled “principle features”. Historic England consider that given the clear impact on heritage assets identified, both designated and non designated and the prevalence of them throughout

the route and its buffer zones, that these should be a part of the “principle feature” column and noted within this table. The Bressingham Steam Museum has been noted within the table and other assets should also be listed for consistency.

Table 4.2 summarises the embedded mitigation measures proposed for the scheme. We are pleased to see that avoidance will form the backbone of the mitigation strategy, but this will be a challenge considering the scale and proposed footprint of the scheme. It is noted that underground cables have been proposed for the Dedham Vale AONB, which would reduce the impact on views and setting, but would directly impact any buried archaeological remains and deposits in this area.

The impacts could include the physical impact on remains through excavation and compression but may also include changes to the local preservation conditions through changes to aspects such as groundwater levels. Any changes to the local preservation conditions could result in the damage and/or loss of vulnerable organic archaeological remains, such as wood, leather and deposits of palaeoenvironmental interest (e.g. peat).

We would therefore recommend that the Historic England document ‘*Preserving Archaeological Remains*’ (2016) is referred to: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/

Section 4.4.1 summarises the permanent features that will be constructed. All of these elements will directly impact buried archaeological features if present (e.g. for the pylons, the compounds, the new substation etc.). The details provided in the Scoping report focus on the area of the proposed footprint, but details will need to be provided about the foundations/piling that may be needed in order to understand the potential impact to buried archaeological remains.

Piling is being considered for some elements of the scheme (e.g. CSEC, Section 4.5.16) and so we would recommend that the Historic England document ‘*Piling and Archaeology*’ (2019) is referred to: https://historicengland.org.uk/images-books/publications/piling-and-archaeology/

4.4.5 – This paragraph states that the undergrounding would be undertaken within a 200m corridor, in some areas this may need to be increased to 500m. The National Grid have not explained where these areas of 500m corridors are likely to be required. This is a large corridor within a sensitive area and needs to be explained further in the Environmental Statement.

The cables would either be buried in trenches approximately 1.8m below ground level or would be installed using trenchless approaches (Sections 4.5.22 & 4.5.23). The impact of these approaches will need to be considered in terms of direct physical impact as well as how the works may alter local preservation conditions (e.g. groundwater levels) of archaeological sites within the area of development and in adjacent areas. If trenchless approaches are going to be used, the potential issues

associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains.

It is noted that site preparation works will include stripping of the upper layers of soil (for example Sections 4.5.2, 4.5.11). This would could damage any near-surface archaeological features and should be considered when investigating the potential impact of the proposed scheme.

4.5.5 – The erection of a temporary haul road would avoid sensitive ecological locations and crossings where possible. This also needs to demonstrate the National Grid's commitment to assessing this route with relation to designated and non-designated heritage assets. We recommend further work is needed to look at both the impact of the haul road and options to avoid impacts on heritage asset. Consideration of this issue needs to be included into in the scoping of the scheme and referenced in this document.

It is stated in Section 4.5.11 that foundation designs will be informed through a programme of ground investigation. We recommend that a specialist geoarchaeologist is included in this working team as the cores may also provide valuable information about the archaeological potential of the area. The geoarchaeologist should be allowed direct access to any cores as it is better to record and assess continuous core sequences rather than isolated deposits as this allows for greater reliability and confidence in the resulting conclusions.

We also recommend that the Historic England documents '*Geoarchaeology*' (2015) and '*Deposit Modelling and Archaeology*' (2020) are referred to in included in this scoping report:

Geoarchaeology (2015): https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record

Deposit Modelling (2020): https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology

Section 5 – EIA Approach and Method

Table 5.2 – Landscape needs to be noted as a "cultural heritage asset" alongside architectural and archaeological aspect. We note the provision of a Landscape and Visual assessment section but the assessment of designed landscapes as a "cultural asset" is important to understand the impact upon the view shown in the LVIA and, is an important part of the historic environment in its own right.

We recommend this is changed in this table and the methodology altered to reflect this.

Chapter 9 – Geology and Hydrology

We are pleased to see that the interrelationships between the information/data in other chapters has been recognised (e.g. Geology & Hydrology, Chapter 9; Hydrology, Chapter 12); the information in these chapters can contribute to the assessment of the archaeological potential of the development area and the impacts of the proposed scheme.

The 'further data' section of the Historic Environment chapter (Section 11.7) does not however mention the value of the BGS borehole data summarised in the Geology chapter (Chapter 9). The information collated from BGS about the published geology (bedrock and superficial) could be used to develop a preliminary deposit model, which would characterise the sequence of deposits present and provide an indication of the archaeological and palaeoenvironmental potential.

Assessments will also be needed to investigate the potential impacts caused through dewatering, the mobilisation of contaminants or the compression of deposits (Sections 9.9.6, 9.9.11 and 12.8), as these issues could impact the preservation of archaeological structures, features or remains, including palaeoenvironmental remains that could lead to their damage and/or loss.

We recommend these issues are addressed in the scoping report.

Additional works are also planned to investigate the geology, hydrology and hydrogeology of the development area (e.g. Sections 9.7 & 9.10.7); we would recommend that the value of this information to inform the assessment of the historic environment should be considered and discussed with the project archaeological team.

This will allow any opportunities to be maximised where possible, and it will also hopefully reduce any duplication of effort. For example, any intrusive works such as boreholes that are collected for ground investigation works (Section 9.8) or work to investigate the impacts of dewatering will potentially add to the understanding of the historic environment, the likely preservation conditions that may be present on the site and the potential impacts.

Historic England's Regional Science Advisor will be pleased to provide technical advice and guidance concerning the appropriate techniques for archaeological and palaeoenvironmental assessment.

Section 11 – The Historic Environment

11.3.1 – This paragraph states that the study area comprises the route corridor plus 250m for non-designated heritage assets, 2km for all designated assets and 3km for I and II* assets. The document goes on to state that this could be increased if the asset

requires longer lines of visibility which would be assessed through an LVIA. This is heartening, however we consider that this may need to be wider for certain types of non-designated heritage assets and in specific landscapes and locations. It is good to see that a case by case basis would be adopted once the LVIA has been produced.

It would be key therefore to approach the Local Planning Authorities and heritage consultees to ensure that all non-designated heritage assets as well as the settings of the most important and relevant designated heritage assets are properly considered.

11.6.6 – This paragraph states that a non-designated heritage asset is one that was included on a local list or HER data maintained by a relevant authority. Historic England would ask that in line with paragraph 040 of the National Planning Policy Guidance for the Historic Environment, that other ways of looking for non-designated heritage assets are considered alongside the published data. Paragraph 040 recognises that Local Planning Authorities can identify non-designated heritage assets through the planning decision making process which do not have to be recorded on a formal list, although it is desirable that they are.

We recommend the applicant talks to Local Authorities and consultees to ensure heritage assets of all types are scoped in as part of this process. Local knowledge will be key to the successful identification of all of the assets.

One point to come out of the working group for example, was the availability from Suffolk County Council of a historic farmsteads assessment project and whether these will be considered as non-designated heritage assets. This is one example of a data set that is available and clarification is needed to its status and relevance to this process.

11.9 - The potential impacts of the proposed development have been provided in the section. The likely significant impacts have been divided into those that impact Archaeological remains, Historic Buildings and Historic Landscapes (Section 11.9.2).

We recommend this section also reference the potential impacts to palaeoenvironmental remains , which provides information about the landscape and environment and how this changed over time. This information places the archaeological evidence into a wider context.

We would recommend consideration is taken in this scoping report of the potential changes to the preservation conditions on a site, which may occur through dewatering or the movement of contaminants or pollutants (Section 11.9.3). In addition, we would suggest that the direct and indirect impacts are considered and discussed.

We agree that the construction of the proposed scheme has the potential to directly impact buried archaeological remains, both known and unknown (Section 11.9.6 & Table 11.8). This includes the physical removal of material, compression or impacts following dewatering of deposits (Section 11.9.6). We are pleased to see that

important archaeological remains will be avoided where possible (Section 11.9.7), but that direct impacts to buried archaeological remains have been scoped into further assessments.

11.9.9 – Throughout this section “archaeological remains” are referred to. As this rather overlaps with Scheduled Monuments which do not always fit neatly into the following categories of Historic Buildings and Historic Landscape, it has been assumed that Scheduled Monuments will be discussed within this section. It is welcomed that effects during the construction phase are to be scoped in.

Section 11.10.5 summarises the work that be carried out to inform the desk-based assessment (DBA). We recommend that a preliminary deposit model would need to be produced, where possible using existing information (BGS boreholes, geotechnical information and previous investigations) and new information when geotechnical work is undertaken.

For some areas of the proposed route, the potential for Palaeolithic archaeological remains to be present is high, and so we would recommend that a Palaeolithic-specific DBA or specific chapter in the DBA is produced to investigate the potential in more detail. It may be useful for a period specialist to carry out this work. If the proposed scheme has the potential to impact deposits of this age, then Palaeolithic deposits should also be included in the preliminary deposit model in order to characterise the deposits and understand the potential for archaeological and palaeoenvironmental remains to be present.

11.10.17 – It is proposed within this paragraph to scope out certain types of heritage assets, particularly those with a setting that does not extend beyond the urban area in which it is situated. The scoping report has assumed that listed buildings within urban settings are informed by those settings and do not have settings that extend beyond it. During working group sessions, we expressed caution at this approach specifically as using this as a way of discounting buildings from the scope. There are always exceptions to this and we always recommend the significance of heritage assets and the contributions made by their setting are taken on merit and on a case by case basis.

Before scoping out these heritage assets, an assessment of the area in which they are located, what is special about it, and the contribution it makes to the asset will be required to understand the reasons why they are not to be considered. Dismissing them on type and description only is not appropriate.

There also does not seem to be an approach for historic landscape's in this section. This is an omission and we recommend the applicant would need to detail the approaches to assessing these important features along the route.

Section 11.10.22 summarises the non-intrusive approaches that will be used to investigate the area of the proposed scheme, which includes geophysical survey.

The choice of techniques has not been stated in the Scoping report and we recommend further details are be provided as the assessments progress and with a separate WSI. We recommend that the most appropriate geophysical techniques are utilised for each given area, which in some cases may result in more than one geophysical technique being applied. For example, magnetometry is frequently used to assess large areas but this technique is not suitable to investigate areas of wetlands/fens for example. Alternative approaches would be needed in those areas (different geophysical approaches, borehole surveys, and increased percentage of trial trench evaluations etc.)

This is to ensure the applicant maximise the chances of identifying any archaeological features, and hopefully minimise the risk of any unexpected finds.

We are pleased to see that the impacts of the proposed scheme to palaeoenvironmental and geoarchaeological deposits will be considered, and that the geotechnical information will be shared with the relevant archaeological specialists (Section11.10.25). As stated above, we would recommend that the geoarchaeologist should be allowed direct access to any cores as this allows for greater reliability and confidence in the resulting conclusions.

We are pleased to see that intrusive trial trench evaluations will be carried out prior to submission. This information is needed to understand the archaeological potential of an area, the potential impacts and help devise an appropriate mitigation strategy.

We are pleased to see that a mitigation strategy will be developed following the assessment of the historic environment (non-intrusive and intrusive approaches), which will be presented in the draft Heritage Mitigation strategy and the Outline WSI (Section 11.10.30). We look forward to seeing these documents.

11.11 – This section is entitled ascribing value. The standard approaches of very high, high, medium, low, negligible and unknown are proposed for heritage value assessment criteria and high, medium, low, negligible and no change for quantifying the magnitude of harm. We would suggest that the National Grid also consider indicating the level of harm in planning terms, using the definitions within the National Planning Policy Framework.

This is to ensure that the applicant is able describe and balance the severity of the impacts across both the EIA and national planning frameworks.

11.11.4 – The potential impacts on heritage assets need to contain cumulative factors for a full assessment of any impacts to be properly understood.

Section 13 – Landscape and Visual

13.8.6 – The outline LEMP needs to consider the prevailing landscape character. It may not always be appropriate to screen using tree belt planting when the landscape is either designed or open. Careful consideration to these mitigation measures needs to be undertaken.

In our view the applicant would need to consider landscape planting outside of the current corridor and redline boundary in order to maximise the positive effects. Given the scale of the infrastructure consideration should be given to the best ways of achieving positive effects from mitigation by planting.

13.9.24 – This paragraph notes the parties that have fed into the preliminary viewpoints. The historic landscape has been identified as an important part of the route corridor and the effects upon it would be detrimental should the pylon route, as preferred be agreed. The viewpoints as contained within appendix H are lacking in consideration of the impact upon designated and non-designated landscapes and we will consider this further in our comments on this section

Historic England have however not been consulted on these viewpoints which is disappointing. We recommend further consultation in order to identify the most important historic environment viewpoints before the LVIA is produced.

It is important to recognise photomontages for historic environment features will also be necessary.

13.10 – This table gives the scope of the ES. It is unclear whether designed historic landscapes are being considered in the ES as part of the LVIA. Section 11 of this ES paragraph 11.3.1 – noted that as part of the LVIA these heritage assets that needed to be assessed including landscapes would be considered as part of the LVIA yet it is not mentioned in the table. If historic designed landscapes are being considered here then the impacts at night could be detrimental and would need to be scoped in. This matter needs to be addressed by the applicant before moving forward with the assessment.

Appendix H – Preliminary Viewpoints

Historic England have not been party to discussions on preliminary viewpoints, either for the LVIA or for heritage impacts.

We do not consider that the viewpoints within this appendix are appropriate in heritage terms and they do not assess historic landscapes or views from heritage assets.

We would suggest that a more collaborative approach is adopted by the applicant which includes Historic England.The three stages should be as follows;

1. Historic England and the National Grid to agree (along with other consultees), the most important historic views. These need to consider; Scheduled

Monuments, Listed Buildings, Registered Parks and Gardens, non-designated heritage assets and the settings of all of those assets.
2. Once these have been agreed, site assessments are carried out of those viewpoints; and
3. Historic England and National Grid alongside other consultees to decide which viewpoints are taken forward to full photomontage's.

We recommend that a historic LVIA is produced within a separate historic environment viewpoint document that sets it apart from the wider landscape impacts and which would make it easier to use.

Summary
Overall, we are content with the applicant's approach to sources, baseline information and the assessment of heritages impact. We confirm however that historic environment represents a potentially significant issue in EIA terms, and confirm that the historic environment should be 'scoped in' to the assessment.

We note the applicant intends to produce an LVIA. As set out above we recommend the LVIA is supplemented with heritage specific viewpoints (both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment. If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter. Ideally though a separate heritage viewpoints appendix should be produced.

The setting of heritage assets is not however just restricted to visual impacts and other factors should also be considered in particular noise, light, traffic and assessments. Where relevant, the cultural heritage should also be cross-referenced to other relevant chapters, and as above we advise that all supporting technical heritage information is included as appendices.

We strongly recommend that the applicant involve the County Councils specialist advisers on archaeological matters and we recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; and of any required mitigation measures. Likewise, all the local Conservation Officers will need to be consulted in relation to the built environment.

Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be in an appendix and seen only as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter.

The ES should also use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting,

together with the effects of the development upon them. Alongside appropriate mitigation to offset adverse effects on heritage assets we are also looking for explicit and demonstrable heritage enhancements and benefits from the scheme to be set out clearly in the application. This could include Interpretation, public engagement in the archaeological discoveries, heritage education and heritage focus in relation to design and placemaking.

Given the designated heritage asset within the area, we would welcome further discussions with the applicant in order to refine the approach to the scope of the ES, to the assessment, enhancements and mitigation.

Recommendation
We broadly accept the approach set out in the scoping report, but we have some concerns that we consider would need to be addressed. These are set out in the specific bullets above. We consider further refining of the scope would be necessary taking these comments into consideration.

This is to fully address heritage matters and to fully consider the impact on the historic environment in relation to policy.

We confirm the historic environment represents a potentially significant issue in EIA terms, and we would support the need for further work to support the publication of an ES.

If you have any queries about any of the above, or would like to discuss anything further, please contact me

Yours sincerely

Lynette Fawkes
Inspector of Historic Buildings and Areas
Email: [redacted]

From: [redacted]
To: East Anglia GREEN
Subject: Response to National Grid Scoping Report East Anglia GREEN - EN020027
Date: 01 December 2022 16:23:50
Attachments: image001.jpg

Dear Sirs

Below is Ingatestone & Fryerning Parish Council's response to the National Grid Scoping Report for East Anglia GREEN

Ingatestone & Fryerning Parish Council reiterate their objection to National Grid's proposals to construct a new high voltage transmission network overland from Norwich to Tilbury. The proposed route would have the effect of hugely disfiguring a wide swathe of beautiful countryside. Other, greener, options are available, such as a subsea route. Attached is the Parish Council's formal response to the Consultation held April to June 2022.
The Parish Council is most disappointed that the subsea option has not been evaluated. It is our understanding that relevant MP's, County Councils, Borough Councils and Parish Councils agree that a subsea route is the best way to connect new offshore wind to the National Grid. The technology is already available to construct a subsea route and has been employed by National Grid in other projects.
The current overland proposal will have a severely adverse effect on the environment and communities that it passes through. The cost of the overland proposal should be subordinate to the impact the pylons will have on the beautiful countryside around Ingatestone and mid Essex, for example the Wid valley to the east of Ingatestone, and the views of historic buildings such as Margaretting Hall and Ingatestone Hall.

[redacted]
Assistant Clerk
Ingatestone and Fryerning Parish Council

Address: Suite 2, 4 The Limes, Ingatestone, Essex, CM4 0BE
Tel: [redacted] (office)
www.ingatestone-fryerningpc.gov.uk

Opening Hours: Tuesday -Thursday, 9-5pm (an answer phone facility is available outside of these hours)

For details of our Privacy Policy and your rights under the GDPR, please visit our website:
http://www.ingatestone-fryerningpc.gov.uk/privacy

Our ref: East Anglia Green Energy

Please ask for: [redacted]

Email: [redacted]

Direct dial: [redacted]

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08 December 2022

Dear Ms Cottam,

Thank you for consulting Ipswich Borough Council on the Scoping Opinion for the proposed East Anglia Green Energy Enablement development. Officers have reviewed the submitted information and have no formal comments to make at this stage; however, we would support any proposals to underground overhead power cabling within the AONB to help reduce the landscape impacts. Thank you again for the opportunity to comment and please keep the Council informed of all future consultation stages.

Yours sincerely,

[redacted]

Senior Planning Policy Officer
Ipswich Borough Council

Dear Ms Cottam

eastangliagreen@planninginspectorate.gov.uk

We set out below Langham Parish Council's response to National Grid's scoping report for East Anglia Green.

The parish of Langham, 2,977 acres (1,205 hectares) in area, lies immediately north of the town of Colchester.

Historically there is significant evidence in the parish of very early settlement, including the sites of Neolithic barrows and a Roman farmstead. Initial habitation and development seem to have begun in the north, on the site of the Hall and church and moved south. In the Middle Ages, the land south of Park Lane was a Royal Forest and the last area to be farmed.

Langham village abuts the Dedham Vale Area of Outstanding Natural Beauty (AONB) and our beautiful and historic landscapes compliment the AONB. The proposal to take a direct route through the AONB and to use underground cables there to reduce any landscape and visual effects of the infrastructure is a recognition that areas such as Langham are not receiving any due consideration and will be subject to the blot on the landscape caused by massive overhead Pylons which can be seen from a great distance.

Langham Parish Council are one of many smaller bodies that represent the majority views of its residents which in this case is around 1,200 people. This situation is replicated the length and breadth of East Anglia and the messages that are emerging from other parishes are very much the same. There has been a lack of transparency over the projects that should have been considered prior to this preferred solution being presented by National Grid and we believe that alternative solutions and the rationale for not choosing them should be made clear.

Excess wind power from the North Sea must be transmitted via a coordinated offshore grid. Such a grid has been shown by National Grid ESO (in 2020) not only to be deliverable but hugely beneficial. Fifty percent less infrastructure will be required for a coordinated grid than the current piecemeal approach. That results in cost savings for consumers of £6billion and benefits the environment and communities.

We submitted concerns to the non-statutory consultation but note that the scoping report makes no reference to these. We request that you take note of the Essex Suffolk Norfolk Pylons action group's note on the scoping report and we include a link to this document with this submission. It sets out topics which need to be scoped in and points to legal deficiencies with the process.

We are concerned that the scope of the work to be conducted is too narrow. There is a lengthy list of items that are scoped out (summarised in section 18) and some may affect our Parish. We do not have the technical knowledge to comment properly and must rely on the Inspector's expertise.
Chapter 2 of the scoping document needs to be updated: both sections of the Colchester Local Plan have now been adopted, so the 2008 Core Strategy and associated development policies are now superseded.

As previously mentioned, our biggest concern is that the scoping paper fails to properly address the reasonable alternative preferred by East Anglian residents, Councils and MPs. Which is an offshore grid. An environmental statement that skirts around this alternative cannot have full credibility in the community.

This view is supported by para 1.1.5 of the scoping document which explains that the purpose of the East Anglia Green project is to connect offshore wind generation, nuclear

power generation and interconnectors to the Main Interconnected Transmission System. But the proposed ES scope is limited to a Norwich-Tilbury link and we fear that the bigger picture will not be properly addressed.

A focus solely on the Norwich-Tilbury connection will produce a perverse answer. Once the power has been taken onshore and converted to AC it will be prohibitively expensive to convert it back to DC for an offshore leg. It is wrong to rule out a proper offshore grid on this basis.

Finally, we seek to ensure that National Grid takes fully into account the impact on Langham Parish's priority habitats, listed buildings and other Langham receptors. The Black Brook Valley itself is within the Colchester Conservation Area, the twelfth-century Parish Church of St. Mary and the Langham Hall Estate are set in exquisite surroundings on the ridge above the Stour valleyside, adjacent to the Essex Way, a walking path which follows the route of a mediaeval track way through the Essex forests. The southern farmlands which form a very important "green break" between the village and the town of Colchester and also contains the remains of the Second World War Boxted Airfield and the Museum. The southern farmlands in particular have a high exposure to the visual impact of the proposed Pylon route. There is an extensive network of footpaths throughout the village, which are well used by villagers and visitors that value the countryside and their access to it.
As a licence holder National Grid has specific duties to uphold in relation to the desirability of preserving amenity of certain aspects of the environment and mitigating any effect which its proposals would have on the natural beauty of the local environment under Section 38 and Schedule 9 of the Electricity Act 1989.

East Anglia Green will dramatically affect Langham's historic landscapes and natural habitats, and we repeat our opposition to this proposal.

Also shown below is a link to the Langham Village Design Statement (VDS) which provides more information on Langham sites and associated pictures.

Yours Sincerely

Langham Parish Council

Link to Essex Suffolk Norfolk Note on Scoping Report :

[redacted]

Link to Langham VDS:

[redacted]

LITTLE BROMLEY PARISH COUNCIL

Clerk: [redacted]
Tel: [redacted]

Chairman: Mr Jon Buxton
Tel: [redacted]

Email: [redacted]

Dear Sir / Madam -

Little Bromley Parish Council – Response to Planning Inspectorate - East Anglia Green EIA Scoping Report – Your Reference EN020027

Little Bromley Parish Council (LBPC) would like to make you aware of our strong opposition to the National Grid East Anglia Green Energy Enablement proposal. The proposal particularly affects the village of Little Bromley and neighbouring village of Ardleigh, with its plans for 50 metre tall electricity pylons and the location of a 23 plus Hectare electric substation (East Anglia Connection Node EAC) to the West of the village.

Additionally we have been advised that agreements have been reached between National Grid and offshore windfarm providers, North Falls and Five Estuaries. These providers will be running onshore underground cable connections to their own new electric substations within the vicinity of the National Grid substation. These are likely to be sited to the West of the village and will further increase the total land demand (we understand that each offshore windfarm provider substations will be in the order of 8 hectares in size) with underground cable routes through the parish. This Cumulative impact needs to be considered.

LBPC believe that the East Anglia Green proposal needs a complete rework. National Grid have consulted on a single solution only. When challenged as to why other approaches are not under review National Grid representatives stated Cost as the only metric. There seems to be no regard for the long term implications or environmental, ecological and sociological impact of such a scheme. The quality of life for residents and impact on villages needs to be a prime consideration.

There is a huge negative response to the National Grid plans across East Anglia, with Residents, Parish Councils, District Councils, County Councils and local Members of Parliament uniting in voicing their opposition. There was a debate in the House of Commons on the National Grid plans on the 19th July where this opposition was discussed.

We ask that National Grid and offshore energy providers Five Estuaries and North Falls design an alternate fully offshore solution for power transmission – an undersea power grid.

These proposals if they go ahead will be a permanent disfigurement of the East Anglian countryside, remove valuable arable land from production necessary for food-security, generate significant noise, affect resident and community amenities and potentially drive down property values for a large swathe of the affected area. Our current precious rural landscape will be industrialised by massive substations and 50 metre high pylons.

These works combined place a massive burden on the village and parish, and within this context we would like to make the following response to the East Anglia Green EIA Scoping Report.

Scoping Report Section	Topic	Report Suggested Scope	Little Bromley Parish Council (LBPC) Response
6 – Agriculture and Soils. 6.11 Proposed Scope of ES.	Agricultural Landholdings - Operation	Scoped Out	The report states that impacts on agricultural landholdings are likely to be limited and not significant. With substation developments to the West of Little Bromley, LBPC believe the requirement for prime Agricultural land is significant and should be considered In Scope.
9 – Geology and Hydrology. 9-11 Proposed Scope of ES.	All	Various.	LBPC is concerned that limited consideration is given to well water used for drinking. Many properties rely on well water and have no mains water connection. There also seems to be no consideration to effect on boreholes used for Agricultural irrigation systems, nor on land drainage systems. The impact of the project on the overall drainage of the Parish of Little Bromley needs to be considered.
12 – Hydrology and Land Drainage. 12-11 Proposed Scope of ES	All	Scoped Out Points.	Little Bromley has a very high water table, and land drainage is difficult due to the 'flatness' of the area. In wet years surface water flooding is common. LBPC suggest that no points are Scoped Out until a proper understanding is gained of the effect of proposed developments.
13 – Landscape and Visual.	All	All	To the West of Little Bromley the current National Grid proposal is for lines of 50 metre pylons and a 23 Hectare substation with equipment up to 24 metres high. The connection licenses offered to Five Estuaries and North Falls Offshore windfarms will see each company developing 8 Hectare substation with equipment up to 15 metres high. The area proposed is agricultural, and is very flat, so these developments will be visible for many miles. The cumulative effect of these developments to the visual amenity of the area is highly negative and adverse. The village of Little Bromley is within the 5km suggested 'review zone' as are many other properties in the neighbouring village of Ardleigh. LBPC would like to understand what mitigation strategies are planned.

14 – Noise and Vibration	All	All	LBPC believe that there should be no topics scoped out in the EIA. The proposal is for a significant multi-year construction project to the West of the village by National Grid and their licensed Offshore Windfarm providers. There will be three substations constructed and placed into operation close to the villages of Little Bromley and Ardleigh. The effect of these needs to be understood as well as the mitigation measures planned. This is a rural area with very low levels of background noise which should not be impacted by these proposals.
16 – Traffic and Transport	All	All	There seems to be no consideration in the EIA for the increase in traffic flows and heavy good vehicle use during the construction phase of the substation(s) to the West of Little Bromley. This is a rural area with narrow country lanes. There is a 7.5 Ton weight limit in place in the village of Little Bromley. LBPC would like to understand planning and mitigation measures for this proposal.
17 – Cumulative Effects	All	All	LBPC is of a view that this proposal cannot be considered in isolation. National Grid is providing connection licenses to Five Estuaries and North Falls Offshore Windfarms who each have their own plans for underground cable routing and substation development within the Parish of Little Bromley. The impact of all these projects needs to be considered together rather than each individually.

Yours Sincerely –

[redacted]

Little Bromley Parish Council Chairman – For Little Bromley Parish Council

Written Correspondence to: The Clerk, [redacted]

Jo Petersen,
Parish Clerk,
Little Horkesley Parish Council,
Little Horkesley,
Essex

[redacted]

November 29th 2022

Dear Sir,

Response by Little Horkesley Parish Council to East Anglia Green Scoping Report[1]

Little Horkesley is a small, rural parish, situated four miles to the North of Colchester on the southern bank of the Stour river. Landscape in the impacted area is open and entirely agricultural. There are no shops, schools, major roads, railway lines or other significant infrastructure. Any pylons will be the first significant infrastructure and thereby have dramatic impact on parish ammenity, heritage assets and setting.

A large part of the parish is within the boundary of the Dedham Vale Area of Outstanding Beauty and enjoys stunning views across the Vale towards Nayland, Stoke by Nayland and Wormingford.

In the other direction views are towards West Bergholt and Great Horkesley and are equally stunning. Landscape is extremely open and comprised agricultural views with interspersed dwellings which are either isolated or in small clusters of two or three properties, almost entirely agricultural in history, and many of which are Listed Buildings. Many of the local farmhouses across the parish date back to late 14th / early 15th century and many are Listed.

A large part of the parish falls within the "Purple Swathe" defined by National Grid's East Anglia Green project. The parish is also the point of closest approach between the Purple Swathe and the Dedham Vale AONB.

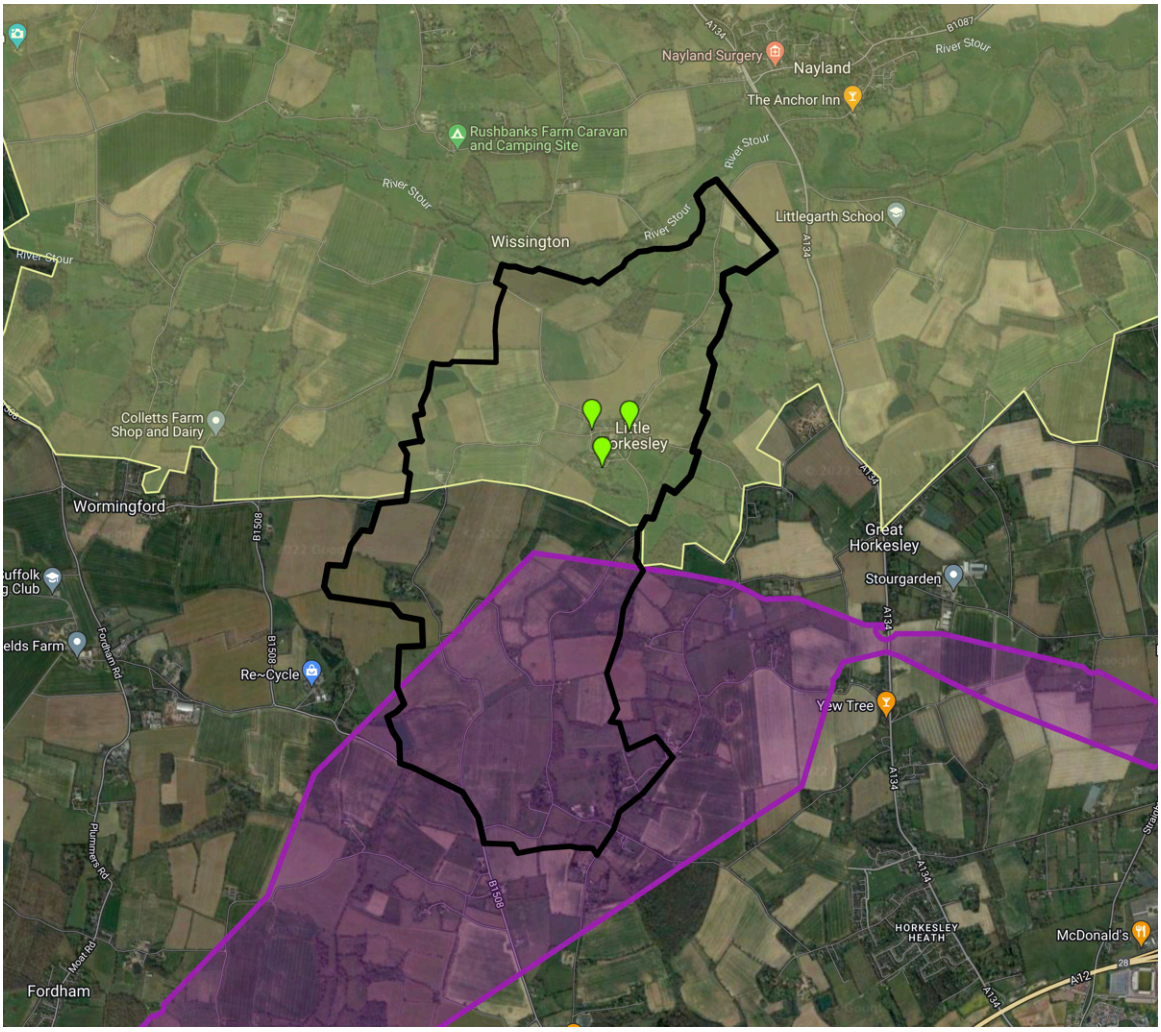
The main approach for visitors to the parish is from West Bergholt, following either the B1508 and Vinesse Road or alternatively Nayland Road and London Road as they head in towards the AONB.

Both of these routes fall almost entirely within the Purple Swathe and any pylons in this area will inevitably have a dramatic impact and cause very significant damage to the setting of the parish, the village and the AONB.

The map below shows the interplay between landscape, Purple Swathe [in Purple], AONB [in Yellow) and Parish Boundaries [in Black].

[1] https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-green-energy-enablement-green-project/?ipcsection=docs

No alternatives have been proposed by National Grid which avoid the Parish. This is extremely unfortunate as a route alongside the already industrialised A12 to the immediate south would have been easily possible and also falls along a valley which would have been of limited visibility, more compliant with the Holford rules and have avoided damage to the rural setting of the Parish or of the AONB entirely.



We bring issues to the attention of the Inspector as follows:

1) **Legally deficient process which has failed to offer alternatives.**
The Scoping Report is based upon a non-statutory Consultation held earlier in the year. The leading Barrister Charles Banner KC has concluded [2]that the consultation was deficient in law due to 'after-the-event rationalisation of alternatives' and failure against two of the Gunning Principles. Mr Banner further advised that unless remedied prior the deficient consultation would infect later stages which is what we now see with the scoping report. By failure to take account of any of the feedback provided in the Consultation prior to submission of the Scoping Report, National Grid have now breached a third Gunning principle – the requirement to give conscientious consideration to consultation responses.

2) **Cumulative impacts of energy transmission infrastructure in the region**
Little Horkesley PC is supportive of wind energy. However, excess power from North Sea wind farms must be transmitted out of East Anglia to London and southern England. That power makes landfall in Norfolk, Essex and Suffolk, with adverse impacts on the environment & communities. Despite evidence from National Grid ESO [3] in 2020 that a fully integrated offshore grid would be a deliverable alternative that is better for consumers, the environment and communities, instead, EAG is the proposed solution (and an offshore option not consulted on).

These offshore energy projects and EAG cannot be considered separately or in isolation. They are functionally interdependent and inextricably linked. There is a clear causal connection between the two. The ES must therefore scope in the cumulative, in- combination effects with wind farms that connect into EAG.

3) Specific Topics in respect of Little Horkesley parish and Dedham Vale AONB

The Dedham Vale AONB is already bounded on 3 sides by existing pylons which are visible across the full width of the AONB. The EAG proposals as currently set out would fully encircle the AONB in highly visible electricity infrastructure. If permitted, it will not be possible to look into the AONB from any direction without seeing pylons. It will not be possible to look outwards from the AONB in any direction without seeing pylons. All major approach and egress roads to/from the AONB will either be crossed by pylons or else run parallel to pylons. The proposed pylons must therefore be considered alongside the existing pylons and the cumulative impacts considered as a whole.

We detail relevant local aspects in respect of Landscape, Listed Buildings, Heritage Assets, Archaeology, Scheduled Monuments and Nature resources. We highlight the expansive local

[2] [redacted]

[redacted]

views and importance of open rural setting in a parish with no industrial infrastructure at all and specify additional requirements for inclusion in ES. This results in a need to augment significantly the number and positioning of Visual Receptors.

4) **Topics which should be scoped into the Environmental Statement (ES).**

These issues are set out in further detail on the following pages.

1. Main Alternatives to EAG and continuing deficiencies in NG's process

Deficiencies with the consultation process mean that the SR cannot be considered valid.

Legal deficiencies
It is clear from the SR that NG is doubling down on its 'after-the-event rationalization' and failure against two of the Gunning Principles which led Charles Banner KC in an opinion for ESNP to conclude that the non-statutory consultation was deficient[4].

Mr Banner further concluded that the deficiencies of the consultation meant that it cannot be relied upon at statutory consultation stage:

> *"Further, there is a real risk that the legal deficiencies in the current consultation will, if left uncorrected, will infect the later statutory consultation (which would in turn mean that the intended DCO application cannot lawfully be accepted by the Planning Inspectorate). As a minimum, the options which have already been improperly foreclosed would need to be revisited and consulted upon with a demonstrably open mind, providing the public with sufficient information to have a fair opportunity to advocate the alternatives discussed above."*

Specifically, Mr Banner noted that the rationale given so far for discounting the alternatives would *not justify excluding them from the category of "reasonable alternatives" for the purposes of the EIA Regulations.*

The result is that the contents of the Scoping Report cannot be relied upon and that an ES which results from this process will be deficient.

Summary of relevant conclusions in ESNP submission

Little Horkesley Parish Council supports the view of the Pylons East Anglia / Essex Norfolk Suffolk Pylons group [ENSP]. In brief, to assist the Inspector(s), the ENSP submission to the non-statutory consultation concluded:

> *12.1 The East Anglia GREEN consultation must be abandoned. As demonstrated in this document, and supported by the opinion of Charles Banner QC, it is significantly and fundamentally deficient. It cannot be used to inform future consultations, nor to support a Development Consent Order application to the Planning Inspectorate.*
>
> *12.2 We have the following recommendations:*
> *12.2.1 National Grid must first demonstrate the need for this project.*
> *12.2.2 Decision criteria must be objective and set out in advance. Results must be justified and testable. Any new consultation must be re-run and adhere to the Gunning Principles.*
> *12.2.3 A new consultation must take into account the Offshore review, the new (accompanying) Network Options Assessment and the Sea Link consultation.*
> *12.2.4 National Grid must present options with full cost breakdown, setting out environmental, socio-economic, heritage and health impact of each, plus impact to the AONB. Cost*

[4] in an opinion for Essex Suffolk Norfolk Pylons on 10 June 22 [redacted]

must be presented in a transparent, accurate and unbiased manner. Cost of mitigation must be included and comparison of risks of each project with climate change and extreme weather must be set out. Stakeholders need to see an evidenced appraisal of options covering lifetime costs, technical complexity, impact on security of supply, delivery and planning risks.

12.2.5 The following options must be presented for consultation: Strategic offshore grid; options such as following existing power lines or infrastructure (rail/A12); undergrounding; T-pylons. National Grid profitability for each option must be presented for transparency. Ofgem and independent review must be performed throughout the process.

NG's Main Alternatives Considered

Despite the legal opinion and the detailed submission both of this Parish Council and of many of our residents, Chapter 3, Main Alternatives Considered, in the SR demonstrates that NG is continuing to move forward with the very same process which was found to be deficient.

<u>New alternative proposed by NG post-consultation but not consulted on</u>

Since the closure of the non-statutory consultation, NG has prepared a quasi-offshore option[5] for MPs of the OFFSET group. That has not been consulted on and there was very limited information to support the option.

In fact, the letter from NG to OFFSET states *"It would have been disingenuous for us to present an offshore option to the public for consultation feedback, knowing this did not comply with the framework requirements."* It is referred to in paragraph 3.3.9 of the Scoping Report as an alternative dismissed.

The SR is disingenuous for three reasons. Firstly, the option was designed after the fact. Secondly, National Grid have themselves confirmed in writing to members of parliament that they have not consulted upon it. Thirdly, National Grid are willfully mis-stating the relevant requirements.

The 'framework' referred to relates to the National Policy Statement (NPS) EN-5, which does *not* as stated by NG, prevent offshore development. It merely says that overhead lines will often be a starting point.

NG goes on to say, *"…decisions made will be reconsidered and backchecked throughout the process, having regard to consultation responses and other relevant information (policy and regulation), none of the conclusions should be seen as final."*

So, in fact, the post-consultation, quasi offshore option, continues NG's post-justification of a prior decision to choose an onshore, overhead lines option, with consultation limited to the 'purple swathe' preferred route.

NG continues to fail to acknowledge that the alternatives it has dismissed have never been presented to the public for consultation.

[5] [redacted])

All decisions have been made by NG without external stakeholder review. The result is that NG also now falls foul of a third Gunning Principle: *"conscientious consideration' must be given to the consultation responses before a decision is made."*

This is despite NG noting the requirement in NPS EN-5[6] to set out cost and benefits of alternatives, particularly economic and environmental, in paragraph 2.3.2 of the Scoping Report yet has neglected to do so to date:

> *"2.3.2 Section 3.7 in EN-1 states that current scenarios show significant potential increases in generation and changes in direction of net electricity flows from Eastern England to centres of demand in the Midlands and South-East England and that these kinds of flows of power cannot be accommodated by the existing network and new lines would have to be built. It also acknowledges in paragraph 3.7.10 that "in most cases, there will be more than one technological approach by which it is possible to make such a connection or reinforce the network (for example, by overhead line or underground cable) and* ***the costs and benefits of these alternatives should be properly considered as set out in EN-5*** *before any overhead line proposal is consented"*

This is in distinct contrast from the approach taken in the north of England by National Grid. We set out in Appendix A of a case study of an EIA in Cumbria. It demonstrates that alternatives were properly considered with stakeholders from the outset. Ruling out alternatives on the basis of cost without first subjecting them to environmental assessment and consultation, means that the "costs and benefits" cannot properly be considered as the scoping report acknowledges is required by EN-5.

Without an EIA and consultation informed assessment of the environmental differentials between the alternatives, it cannot properly or lawfully be determined whether the difference in cost outweighs the difference in environmental impacts, or vice versa.

Solution?

This is what the current EN-1[7] says about alternatives:

> *"4.4.3 Where there is a policy or legal requirement to consider alternatives the applicant should describe the alternatives considered in compliance with these requirements. Given the level and urgency of need for new energy infrastructure, the IPC should, subject to any relevant legal requirements (e.g. under the Habitats Directive) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:*
>
> *the consideration of alternatives in order to comply with policy requirements should be carried out in a* ***proportionate*** *manner;*
>
> *the IPC should be guided in considering alternative proposals by whether there is a* ***realistic prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale*** *as the proposed development;*

[6] 1942-national-policy-statement-electricity-networks.pdf (publishing.service.gov.uk)

[7] 1938-overarching-nps-for-energy-en1.pdf (publishing.service.gov.uk)

where (as in the case of renewables) legislation imposes a specific quantitative target for particular technologies or (as in the case of nuclear) there is reason to suppose that the number of sites suitable for deployment of a technology on the scale and within the period of time envisaged by the relevant NPSs is constrained, the IPC should not reject an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals;

alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the IPC thinks they are ***both important and relevant to its decision****;*

as the IPC must decide an application in accordance with the relevant NPS (subject to the exceptions set out in the Planning Act 2008), if the IPC concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the IPC's decision;

alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the IPC's decision;

alternative proposals which are vague or inchoate can be excluded on the grounds that they are not important and relevant to the IPC's decision; and

it is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the IPC in respect of it (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant).

We believe that the SR as submitted will lead to a deficient ES.

NG cannot continue its pre-determined course of action in breach of Gunning Principles whilst mis-representing NPS repeatedly.

We re-iterate the words of Charles Banner KC, *"As a minimum, the options which have already been improperly foreclosed would need to be revisited and consulted upon with a demonstrably open mind, providing the public with sufficient information to have a fair opportunity to advocate the alternatives discussed above."*

The Environmental Statement (ES) must include detailed relevant analysis of alternatives.

2. Cumulative Impacts of energy infrastructure in the region

NG must ensure that the cumulative impacts of energy projects in the region are considered fully.

Scoping Report Chapter 17, Cumulative Impact
The SR states that there are intra- and inter-project impacts, and it is inter-project impacts that concern us in relation to this Scoping report, *"Inter-project effects (also referred to a 'cumulative effects', Planning Inspectorate, 2019) occur when a resource or receptor or group of receptors is potentially affected by more than one development at the same time and the impacts act together additively and/or synergistically (IEMA, 2011)"*

Guidance and background
Planning Inspectorate guidance on cumulative impact[8] sets the background, saying:

> *"1.5 NPS EN-1 paragraph 4.2.6 goes on to state that the Secretary of State should consider how the "accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place."*
>
> *1.6 The NPSs variously state that applicants should, amongst other matters, consider mitigation for cumulative effects in consultation with other developers; assess cumulative effects on health; give due consideration to other NSIPs within their region; consider positive and negative effects; and consider environmental limits (e.g. the potential for water quality effects to arise due to incremental changes in water quality)."*

NG itself notes (under section 13.2 Regulatory and planning policy context) that NPS EN-5 says,

> *"2.8.2 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."*

Functional interdependence of projects

EAG cannot be considered in isolation from many of the other energy infrastructure projects in the region.

In all NG Future Energy Scenarios[9] the East of England will be a power exporting region. The project is required to remove excess power generated by offshore wind farms from the region.

EAG's website states that, *"A need[10] was identified to resolve electrical boundary issues in East Anglia. There are three onshore power boundaries where additional system flexibility is required to*

[8] Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects | National Infrastructure Planning (planninginspectorate.gov.uk)
[9] [redacted]
[10] EAG frequently asked questions | National Grid ET

ensure that power generated in the area from offshore windfarms and nuclear generation has more ways to flow into the wider transmission network during maintenance or faults on the system."

EAG has 'functional interdependence' with projects such as North Falls and Five Estuaries, currently at non-statutory consultation stage, who have been told by NG that their connection point will be EAG. Equinor's two projects currently at DCO stage with PINS are also dependent on EAG. Functional interdependence is set out in case law. (Burridge v Breckland DC 2013[11] and Wingfield, R v Canterbury City Council 2019[12])

For example:

"63. The question as to what constitutes the 'project' for the purposes of the EIA Regulations is a matter of judgment for the competent authority, subject to a challenge on grounds of Wednesbury rationality or other public law error." and *"64. Relevant factors may include: iii) Functional interdependence - where one part of a development could not function without another, this may indicate that they constitute a single project (Burridge at [32], [42] and [78]);"*

In addition, a Scoping Opinion by the Planning Inspectorate for a Proposed North Wales Connection found that, *"The ES should give equal prominence to any development which is related with the proposed development to ensure that all the impacts of the proposal are assessed."*

It also said that, *"In assessing cumulative impacts, other major development should be identified through consultation with the local planning authorities and other relevant authorities on the basis of those that are [*amongst others*]:*

• *Projects on the National Infrastructure's programme of projects."* There are a number of NSIPs energy projects in East Anglia.

Therefore, EAG cannot be considered in isolation and offshore wind farms at consultation and DCO stage must be scoped in to the Environmental Statement.

Thus we also believe that the Zones of Influence identified by NG in its Scoping report (in particular 30km Ecology and Biodiversity and 3km for Landscape and Visual) for will have to be extended to include coastal north Norfolk and coastal Suffolk and Essex.

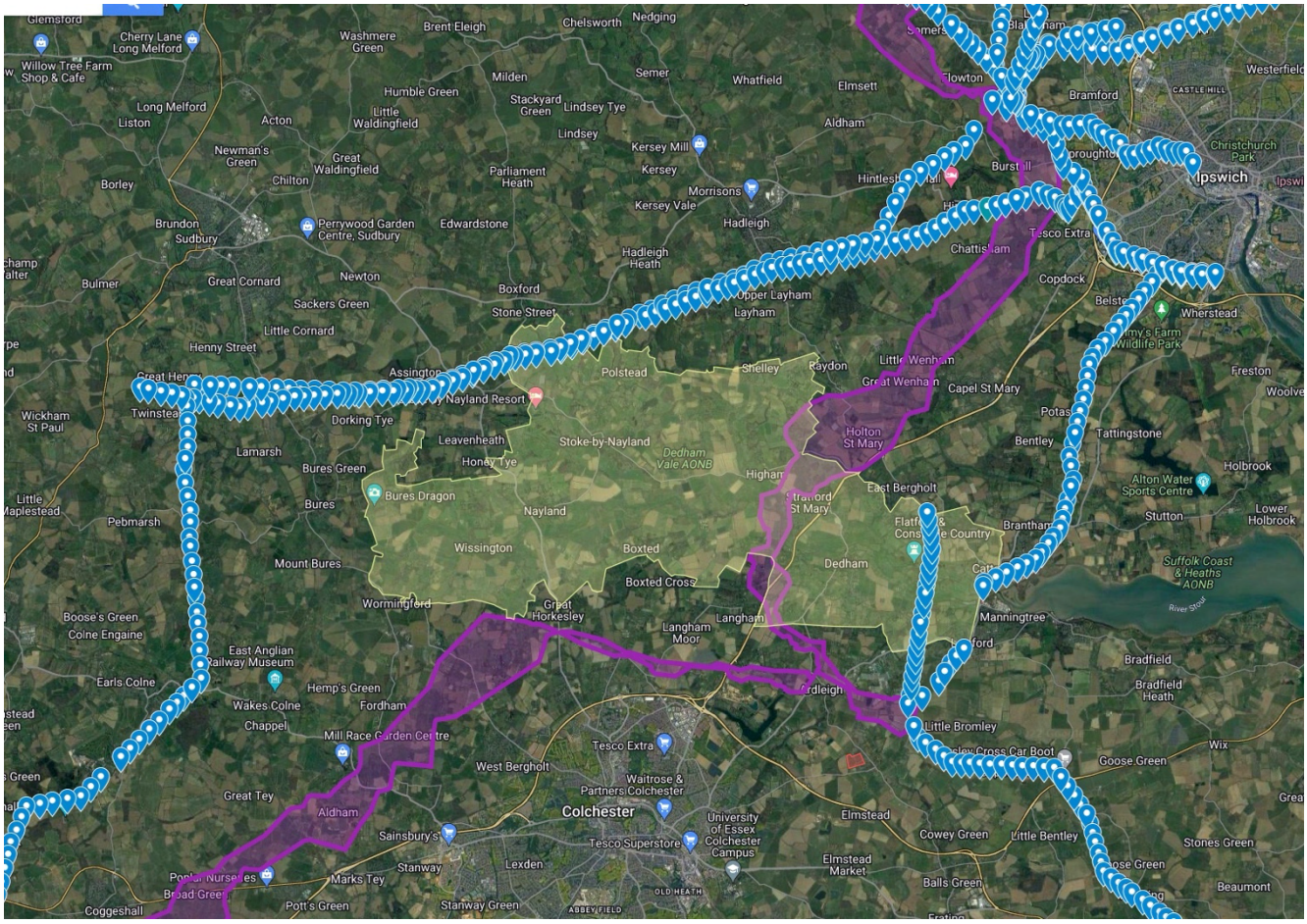
We believe that EAG cannot be considered in isolation of the upstream projects it supports. This must be factored in and the cumulative impacts examined in detail.

[11] [redacted]

3) Specific Topics in respect of Little Horkesley parish and Dedham Vale AONB

Cumulative Impact together with Existing Pylons

The map below shows the interplay between landscape, Purple Swathe proposed by National Grid to contain the route of Pylons [in Purple], Dedham Vale AONB [in Yellow] and existing transmission Pylons [each denoted by a Blue point].



As is clear from this diagram the setting of the AONB is already significantly impacted by Pylons. Existing pylons already border the North, East and Western edges of the AONB. In two places pylons make incursion into and across the AONB, cutting directly across the entire height of the AONB in the East.

Given the fall of the land, the open landscape and dramatic height of the pylons (50m), existing pylons to the North of the AONB are already visible from the southern tip of the Little Horkesley Parish, some 10km away, across the full width of the AONB.

The proposed route would see a third 'column of attack' from the North East towards the AONB and would then bound the entire southern edge at close distance, the purple swathe actually touching the AONB at Little Horkesley within our Parish.

Given the existing infrastructure it would scarcely have been possible to imagine a more damaging (to the AONB or to the Parish) choice of route had damage been specifically intended.

The cumulative result, should pylons be allowed in the purple swathe within the area illustrated on the map, would be to ensure that:

- There would be no entry route to the AONB which does not pass beneath or alongside pylons, and does so in close proximity to the AONB
- There would be no external position from which the AONB can be viewed without that view being interrupted by pylons
- There would be few positions on the edge of the AONB from which an outward view will be uninterrupted by pylons save for those achieved by standing directly in front of and facing into a bush or tree.
- The view in several directions, from many positions within the centre of the AONB, will include pylons in at least one direction and in many cases in several directions.

For these reasons it is imperative that in the EA: (1) the proposal be considered in cumulation with existing pylon infrastructure (2) the Zones of Influence around the AONB are significantly widened to a minimum zone of 7.5km in every direction around the AONB in respect of Landscape, Heritage and Visual (7.5km as measured from the boundary of the AONB).

Visual Receptors, Scope and Range of Impact upon the AONB

In justification of their choice of purple swathe in their "East Anglia Green – Corridor and Preliminary Routeing and Siting Study" document (CPRSS[13]) National Grid repeatedly seek to imply that regulation requires mitigation only within the AONB. This is clearly wrong.

Relevant rules and legislation are contained within the Holford Rules, the Electricity Act, and National Planning Statements EN1, EN5 and Draft EN-1.

- National Grid themselves publish the full text of the Holford Rule 1[14] as follows:

> "Rule 1: Avoid ***altogether***, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence." (Emphasis added).

"Altogether" does not mean "within". It means "in its entirety" which clearly includes "without but having impact upon".

- Requirements in the Electricity Act, EN1 and EN5 speak of ***damage to*** an AONB and do ***not*** specify that the origin of the damage is required to be ***within*** the AONB in order to have any

[13] https://www.nationalgrid.com/electricity-transmission/document/142461/download
[14] https://www.nationalgrid.com/sites/default/files/documents/13795-The%20Holford%20Rules.pdf

impact. Specific references occur to “protecting sites”, “setting” and “harm to…. designated assets” and do not go further by limiting position. Use of the word “setting” and “to” always imply that the source of damage can be ***without***.

- Draft NPS EN-1 puts the matter beyond doubt and makes explicit reference to potential damage to the AONB caused by things outside of its boundary including when impact might be caused across national borders (Draft NPS EN-1 5.10.14)

National Grid wrongly and repeatedly try to suggest that Government Policy is that Pylons must be employed ***everywhere*** outside of the AONB and underground only within the AONB.

- This is set out most clearly at (CPRSS 2.1.1) which also quotes EN-5 “Government does not believe that development of overhead lines is generally incompatible in principle with developer’s statutory duty under Section 9 of the Electricity Act to have regard to amenity and to mitigate impacts”, but is prevalent throughout the CPRSS.

  However, “does not believe…. is generally incompatible with” does not mean “should be used”. It merely means “not be precluded a-priori”. In this regard EN-5 sets out a starting point, not a desired outcome.

- Similarly, CPRSS quotes Draft NPS EN-5

  “*Although it is the government’s position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, Broads, or Area of Outstanding Natural Beauty). In these areas, and where harm to the landscape cannot feasibly be avoided by mitigation or re-routing, the strong starting presumption will be that the developer should underground the relevant Section of the line*”.

  However, the “reversing of this presumption within the AONB” – that the starting point should be to underground within the AONB – does not mean and can not be read to mean that there is no need for such measures on the outskirts of the AONB.

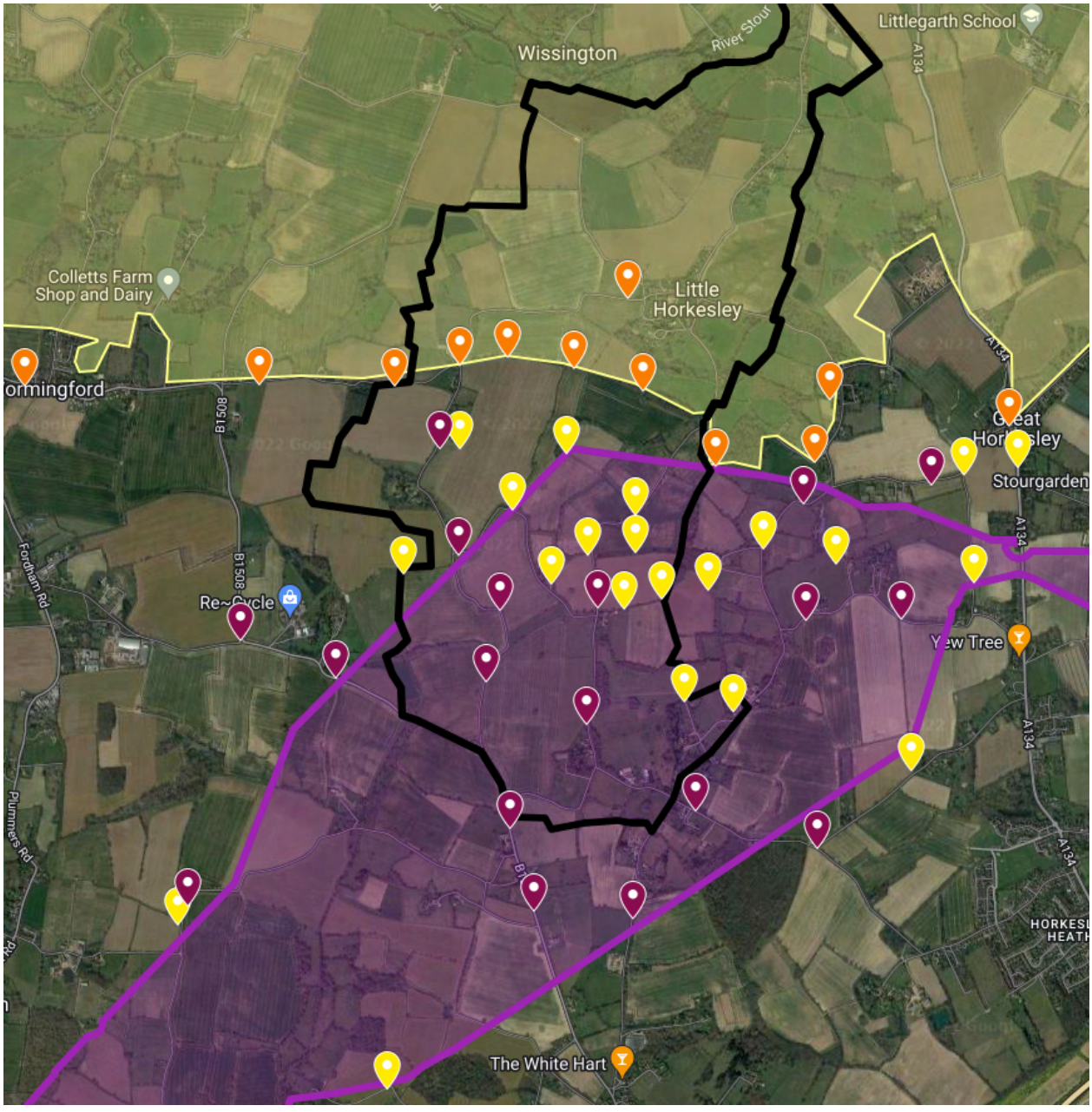
  Indeed, when the impact to the AONB of overhead lines outside of the AONB would be similar to the impact of overhead lines within the AONB then the starting assumption should be the same: to underground the lines. It is the effect which is to be mitigated, regardless of cause. The scope of the Environmental Impact Assessment needs to be drafted such as to ensure that impact on and damage to the AONB is considered holistically and not in the narrowest possible sense as National Grid seem to desire.

As a result of their prior bias, the list of Visual Receptors specified by National Grid in the SR is woefully inadequate as is the proposed Zone of Influence.

Both number of Visual Receptors and also Zone of Influence must be increased significantly within proximity of the AONB with receptors being positioned so as to capture the impact of existing as well as new infrastructure when looking outwards from the AONB as well as inwards towards the AONB from the outside.

These should be positioned in order to provide adequate coverage of the whole of the AONB and all areas from or at which impact is likely including from without. A minimum Zone of Influence of 7.5 km from any point of the AONB must be defined.

Impact on Landscape and Setting outside of the AONB



The purple swathe crosses the parish immediately to the south of the Dedham Vale AONB and then turns towards Fordham.

The landscape is very open with often low hedge boundaries and only interspersed tree coverage. Isolated historic houses (many of which of significant heritage value including Listed buildings) dot the landscape and boundary lines are often demarked by Oak trees.

Whilst there are pockets of woodland these are often isolated and with individual trees otherwise located across the landscape there is no significant tree cover to provide a backdrop, nor to shield the view in the immediate area or into / from the Dedham Vale AONB.

The land falls away gently to the north, moderately to the east and west. The landscape to the west of Vinesse Road is raised and hence views into and out from the AONB are extensive, reaching Wissington and beyond. Existing radio/tv towers are very easily visible from the southern edge of the Parish even at a distance of over 9 miles, being on the opposite side of the AONB.

There are no 'moderately open valleys' along which pylons could be run, rather, given the falloff of the land East of Vinesse Road as they approach from Great Horkesley pylons would need to cross directly across the valley and would be extremely visible across a wide area and would impact upon views of the Church at Great Horkesley within the AONB.

There are no other infrastructure corridors within the Parish along which pylons could be run.

The number of Visual Receptors specified within the area is woefully inadequate. Given the open nature of the landscape it will be necessary to spread receptors over a significant distance looking both into and out from the Parish and AONB as well as along public footpaths and roads outside of the AONB focussing on open lines of sight.

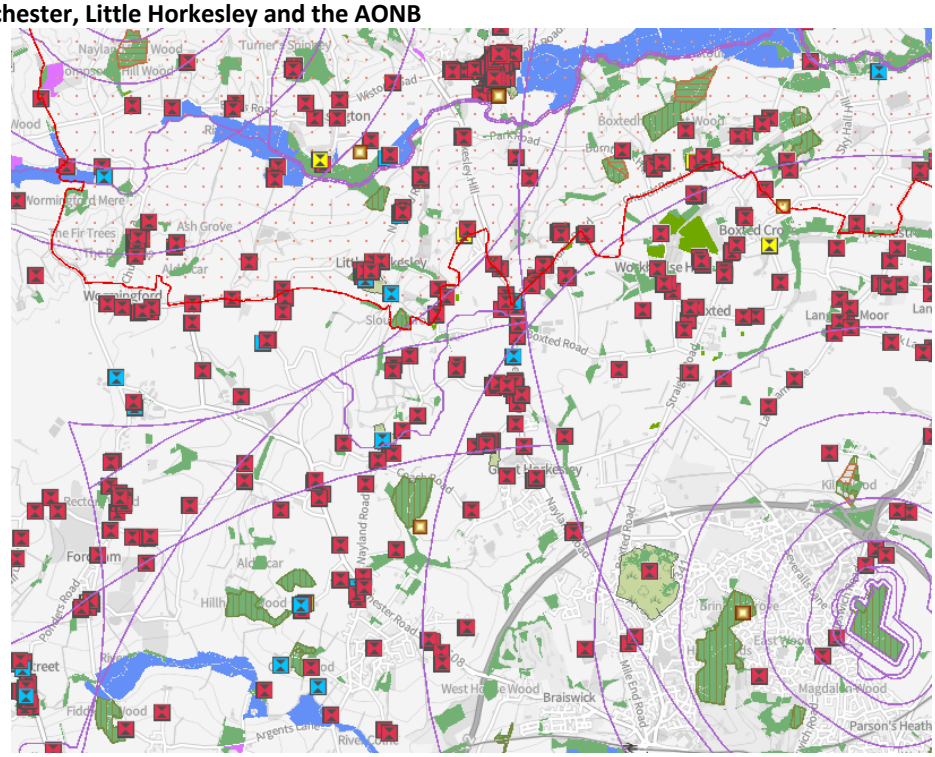
At 50m tall proposed pylons are some 2.5 times the height of many of the (approx.) 500 year old Oak trees which often demarcate land boundaries in the Parish. These trees are often the most significant visual landmarks visible from 1 or 2 kilometers, and hence it will be necessary to consider an area up to 5km just in order to reach the point whereby the Pylons appear to be as tall as those trees. As has already been referenced, Pylons to the North of the AONB are visible from the Little Horkesley Parish some 10km away. We therefore propose an Impact Assessment area of 7,5km.

Those Visual Receptors selected by the Parish as important to the Parish are indicated on the map above (Orange: boundary, Yellow: footpaths, Red: road access). Impact studies with respect to at least these sites should be included in the ES.

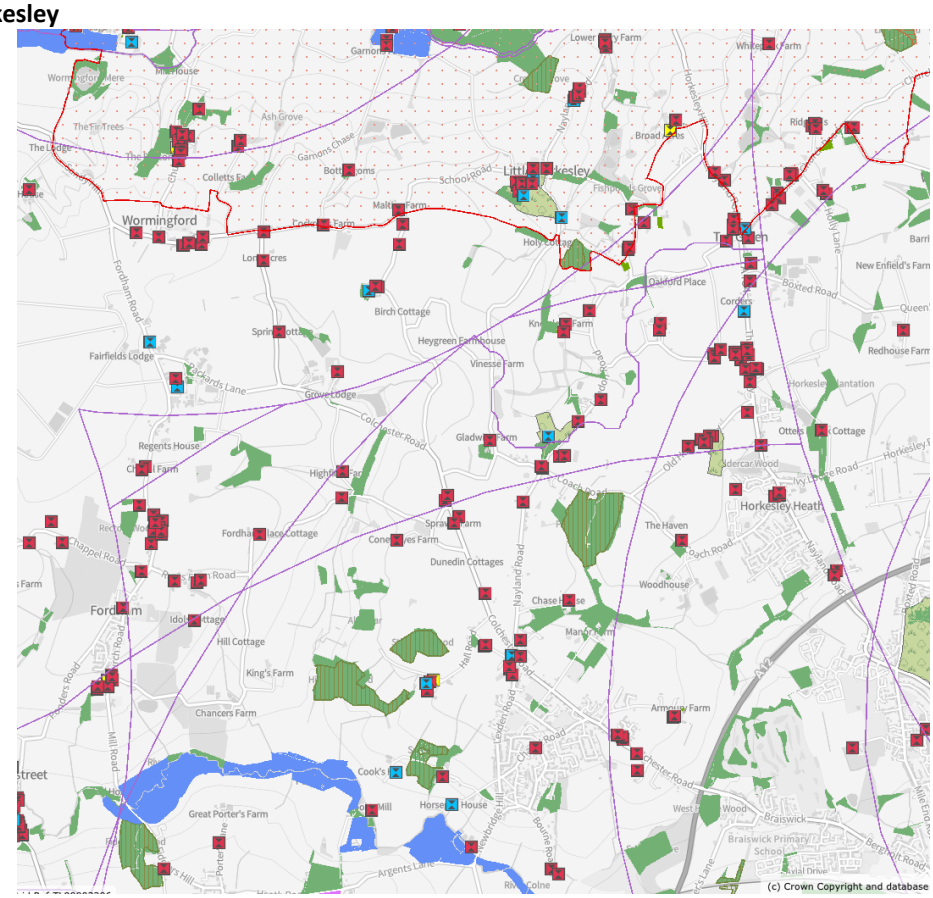
Given the 'bend' of the purple swathe near to Little Horkesley it is likely that and pylons if allowed would need to be more substantial. This would greatly increase impact and specific consideration must be given within the ES to the increased impact and alternative sites for any such proposals.

Nature, Cultural and Heritage Assets[15]

Maps: North Colchester, Little Horkesley and the AONB



Maps: Little Horkesley



[15] https://magic.defra.gov.uk/magicmap.aspx

Listed Buildings and Heritage Assets

There are numerous listed buildings within the Parish which would be impacted by the proposed route of pylons as illustrated in the map above, including those designated as Grade I, II and II*.

With respect to Listed Buildings, at (CPRSS 7.5.14) National Grid confirm that they have not in fact looked at the listed buildings within the impacted area to date:

> CPRSS 7.5.14 "From a Historic Environment perspective, there would be effects on multiple listed buildings in all of the sections including on Grade I and Grade II* buildings. However, a comparison of the magnitude of change on individual listed buildings would vary significantly with detailed routeing within corridor options. As a result, the effects on listed buildings were not considered to be sufficiently dissimilar between the corridor options to act as a differentiator in identification of a preferred option."

Many of the Listed Buildings within the Parish are farmhouses where open setting and views of / from the buildings across wide-open fields are of historic and cultural importance. The ES must therefore include a detailed assessment of impact on building and setting in respect of each building within the affected area. Given this rural nature of the Parish and the particular importance of wide-open views the Zone of Influence must extend to 7.5km of the proposed pylons and particular attention paid to each asset which has views into the AONB or views out from the AONB as referenced above.

In respect of each and any Listed Building set in or with views across open farmland as well as those visible from elsewhere across open farmland, specific details of impact should be included in the (for the avoidance of doubt including viewpoints from other buildings outside of the AONB).

Open views are to be protected and hence specific consideration given in detail in the ES.

Archaeology and Scheduled Monuments

There are Scheduled Monuments within the immediate vicinity of the Purple Swathe in our area.

In addition, work by Fordham Local History Society and Colchester Archaeological Group in a narrow stretch of land crossing the swathe of Section F (for definition see CPRSS) near to Fordham has demonstrated the presence of numerous Iron Age, Bronze Age, Roman and Saxon sites including those of potentially international importance.

National Grid has been informed of this through responses to their previous consultation but has made no detailed allowance in the SR.

NPS requires that these sites are treated as if Scheduled until they are not and that detailed onsite study is carried out where there is probable cause to suspect presence of archaeology. Despite this, National Grid consider that "potential presence of archaeological remains is not considered to be a differentiating factor" (CPRSS Appendix B29). This is clearly contrary to NPS.

National Grid need to appropriately survey the entire area and examine local archaeology PRIOR to determining the route. For the same reason that National Grid concluded that the southern branch of Section F towards Pitchbury Ramparts was inappropriate, the northern branch of Section F through the Great Horkesley / Little Horkesley / Fordham area is likely untenable, but this needs to be determined through detailed study.

Study should be undertaken, details of this work and outcomes should be included in the ES.

Nature

(Local Nature Reserves, SSSI Impact Zones, Priority Habitats: flood-plane, semi-improved grassland, deciduous woodland, traditional orchards, wood pasture and parklands)

The Electricity Act 1989, schedule 9 seeks the preservation of amenity including: taking into account impacts upon communities, landscape, visual amenity, cultural heritage and ecological resources. Section 38 and Schedule 9 of the same Act go on to state in 1a) that project proposers must:

> "*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and protecting sites, buildings and objects of architectural, historic or archaeological interest."*

And 1b):

> *"…shall do what he 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"*

NPS EN-1 Requires applicants to show how the project has taken advantage of opportunities to conserve and enhance biodiversity interest.

Within the parish there are numerous Local Nature Reserves, SSSI Impact Zones, Priority Habitats (including flood-planes, semi-improved grassland, deciduous woodland, traditional orchards, wood pasture and parklands) as illustrated in the map above.

The ES must provide specific and adequate ***local detail*** in respect of the route through the parish of Little Horkesley taking account of the nature and setting of each specific SSSI Impact Zone, Habitat and Listed Building as well as and other heritage assets together with actual landscape beneath and around the path of pylons as well as any access or construction roads. This work should recognise and be designed to identify the impact and differences in impact with respect to assets of differing nature. Details of impact for these as well as for alternative routes should be included to the same level of detail within the ES.

There are significant populations of Bats in the pockets of woodland along the routes, as well as significant populations of Buzzard, Owl (Little, Barn, Tawney) and deer (Roe, Muntjac, Water) which make use of both the open fields and the pockets of trees.

The ES should provide specific survey details and outline potential impact upon these populations. All are known to roam / hunt widely and hence the Zone of Influence needs to extend significantly

beyond the purple swathe and / or areas of woodland which might act as home to these animals.
Detailed analysis

Alternative Routes avoiding or within North of Colchester

In Chapter 5 of the CPRSS National Grid conclude that the route from Bramford to the EAC should proceed underground through the AONB on the basis that building overhead lines so closely along the southern edge would be as or **more damaging** than burying cables within it. There are statements that significant damage to the AONB would result from use of overhead lines even near to the AONB (5.1.4; 5.5.5; 5.5.24;7.5.15; 7.5.16; Appendix B30) and that mitigation in the form of alternate routes (5.1.4; 5.5.5) alternative pylon design (5.5.18; Appendix B30) or more likely significant sections underground would be required in respect of section F close to the AONB (1.3.40; 3.1.9; 5.5.8; 5.5.9; Appendix B30).

In Chapter 7 other local alternatives are summarily dismissed without detailed information and the route selected is precisely the one discarded in Chapter 5 and set out as the purple swathe. Although proximity to the AONB is recognised as problematic (7.1.4), potential for significant adverse effects resulting from the selected Segment F are discussed (inter alia 7.5.15; 7.5.16; Appendix B29; Appendix B30) and the need for mitigation is stated several times (7.5.14, 7.5.16), contrary to the requirements of the Electricity Act EN-1 and EN-5 no mitigation is included in the design and the proposals of Chapter 7 resort to overhead lines.

These deficiencies have been highlighted to National Grid in the course of our response to their non-statutory consultation however it appears that no notice of this has been taken in the course of preparing the Scoping Report.

In addition to setting out in detail the reasons for the concerns raised by National Grid in their CPRSS within the ES it is imperative that National Grid also include assessment of properly detailed alternatives to the route North of Colchester within the ES alongside that for the proposed route.

Ideally pylons should be replaced with an integrated offshore route delivering power around the region. This would minimise on-land impact and dramatically speed up the path to construction, allowing the country to maximise benefits from renewable energy.

However, if to be routed on land then Pylons need to be positioned to minimise environmental impact and making significantly better use of landscape features and existing road and rail corridors than currently proposed. To this end, alternative routes must be considered and detailed within the ES.

One plausible route would be to follow closely the line of existing pylons [or alternatively, upgrading them the 800 kV to carry more power on the same Pylons]. This would achieve the objectives whilst (post construction) constraining environmental damage to the extent that it already exists.

Another plausible route would be along National Grid's so-called "Route H" which runs immediately adjacent to the A12. This would be in compliance with the Holford Rules approaching Colchester through a commercial area, would be far removed from open countryside. This route would make use of tree cover and natural hill profiles which would render pylons invisible from open landscape and invisible from within the AONB. There are far fewer Listed Buildings or other Heritage Assets in

this area, the route passes further from relevant archaeological sites, and is further removed from priority habitats. Statements in CPRSS Chapter 7 about the impossibility of crossing the A134/A12 bridge and the difficulty with working at the same time as building work on an adjacent site are nonsense: (i) the homes in question are for sale now, building work will be long finished; (ii) any pylons would be to the north of the A12 at that point in farmland which is not designated for building (iii) the route there proceeds through a moderate valley and IS bounded by trees, so impact would be absolutely minimised. Placement immediately adjacent to the A12 would also greatly constrain impact to areas which are already impacted by other significant infrastructure.

A third plausible route would be to the South of Colchester. Other plausible routes are of course also possible and should be considered.

Additional Visual Receptors should therefore be positioned along each alternative route, detailed assessments of potential environmental impact be made and included within the ES.

Comparative impact between each alternative route and the purple swathe should be included and should obviously include absolute and comparative impact to flora and fauna as well as to heritage assets, landscape, nature, visual impact and to the AONB as mentioned above.

Failure by National Grid to include assessment in the ES of either these or other alternatives will reinforce their attempts to 'back-fit' their proposed route by preventing objective measurement against erroneous and unsubstantiated claims with respect to alternatives. This will render the ES legally deficient.

3. Topics that should be scoped into the ES

We set out below:

- Whole topics to be scoped back in
- Sub topics scoped out to be scoped back in
- Additional topics to be scoped in
- Additional comments relating to scoped in topics

Whole topics scoped out which need to be scoped back in: Vulnerability to Climate Change

We disagree with NG that risk to infrastructure from climate change should be scoped out – it must be scoped in and alternatives including offshore and underground compared. Our reasoning is that on 27 October 2022, a Parliamentary Committee[16] concluded:

- the UK's net-zero targets require the electrification of huge amounts of energy demand across the country and that this exposes the power system to enhanced vulnerabilities: electricity pylons and cables are more prone to disruption from extreme weather than gas, which relies mainly on underground pipes rather than overhead power cables.
- the energy sector was subject to an "adaptation shortfall" in relation to lightning, high winds and storms.

Sub topics scoped out that to be scoped back in:

We list below elements scoped out of the SR that we believe must be scoped in.

Scoped out:	**Why scope in?**
Potential impacts on surface water are scoped out for biodiversity receptors in the ES during construction.	Watercourses are already stressed and in poor condition and this should be scoped in, irrespective of CoCP. Directional drilling should be considered in sections where cut trenches for underground cable are near watercourses.
Other notable mammals (brown hare (Lepus europaeus), hedgehog (Erinaceus europaeus), and harvest mouse (Micromys minutus))	The fact that NG notes that negative impacts could occur to 'other notable mammals' during construction (loss of habitat/habitat fragmentation/noise/light) means that this must be scoped back in. This, from the SR, indicates the level of disruption expected just for the haul roads*: "A temporary haul route would be constructed to provide access for construction vehicles along the working areas and to minimise impacts of construction traffic using the local road network. The position of the haul route would be determined as the Project evolves,*

[16] Readiness for storms ahead? Critical national infrastructure in an age of climate change (parliament.uk)

	the location would be assessed and presented in the ES. It is currently assumed that temporary haul route would have the topsoil stripped and hardcore placed on top of the subsoil, this would be delivered to site by Heavy Goods Vehicles (HGV). It would be sited where possible to make use of existing access tracks where possible and avoid sensitive ecological locations and water crossing where possible. 4.5.6 The haul route for the OHL would be typically 12m wide to allow for a running track, topsoil storage and passing places where required (formed with imported stone and geogrid)". Underground sections require a swathe of up to 100metres wide (according to a National Grid webinar, Spring 22).
Existing environment and views – construction and operation (inc. maintenance) 13.9.12 Effects on visual receptors located outside of the ZTV are therefore proposed to be scoped out of the ES.	The 41 visual receptors selected by NG (Appendix H) are wholly inadequate for a 180km project with 50-metre high pylons. Essex Suffolk Norfolk have mapped NG's receptors and supporters across Essex, Suffolk and Norfolk have added key visual receptors that NG must include irrespective of Zone of Theoretical Visibility. Local residents have the knowledge of lines of sight and areas of greatest impact.
"Significant visual effects on people travelling by train on the Greater Anglia railway network are not anticipated due to the speed of travel, therefore this is proposed to be scoped out." (Scoped in, Wales)	This is clearly ludicrous. It must be scoped back in and we note that the visual receptors refer to trains anyway. Note that in North Wales, visual impact of pylons on rail travellers was scoped in. It must include the Sudbury to Marks Tey line – the famous Lovejoy line.
Bat activity surveys. Where it is considered that habitat impacts would have a significant potential adverse effect on bats, bat activity surveys would be undertaken to establish a baseline. Based on the information outline in Section 8.12.42, it is considered that impacts on foraging and commuting bats can be scoped out for the sections of overhead line	Bats forage over a very wide area. They will be impacted by the construction of the pylons due to loss of habitat (specifically, in SR: Direct severance/ fragmentation of woodland and linear habitat features (e.g., hedgerows and watercourses). Direct loss of woodland with good connectivity to the wider landscape), noise and light. There can be no sections of the line scoped out and a 10km assessment area must be set – as in North Wales's pylons project scoping. So-called temporary impacts could have permanent impact on bat colonies. Some

	impacts will be permanent, when habitat is lost for good.The habitat avoidance policy set out by NG is already proposed to be breached in at least one place: in Aldham, Essex, where the pylons will pass directly over woodland. There needs to be a full assessment of habitat impact and it is imperative that bat activity surveys must be scoped back in.

Additional topics to be scoped in: Existing infrastructure

The Scoping Report must scope in impact of existing infrastructure on communities who risk being sandwiched between the proposed pylons and existing pylons or roads/rail e.g:

- In Norfolk, where Foncett St Mary, Tibenham Mill Green Westbrook Green, Roydon and Mellis will all be sandwiched between two lines of Pylons, with the average separation being approx. 3km and the widest 5km (ie, likely within 1km either side of the villages)

- In Suffolk where the purple swathe bisects the gap between existing lines hence dramatically increasing impact in Gislingham, Cotton, Mendlesham, and Needham Market

- Around the Dedham Vale AONB [including the areas immediately to the North and South thereof] whereby the AONB will become imprisoned in a ring of steel and numerous villages subjected to views of pylons in all directions

- Near to the historic villages of Coggeshall and Cressing where very significant cultural heritage assets will become encircled including the barns at Cressing Temple

- Near to Fairstead where numerous lines will now converge from different directions and will cross each other.

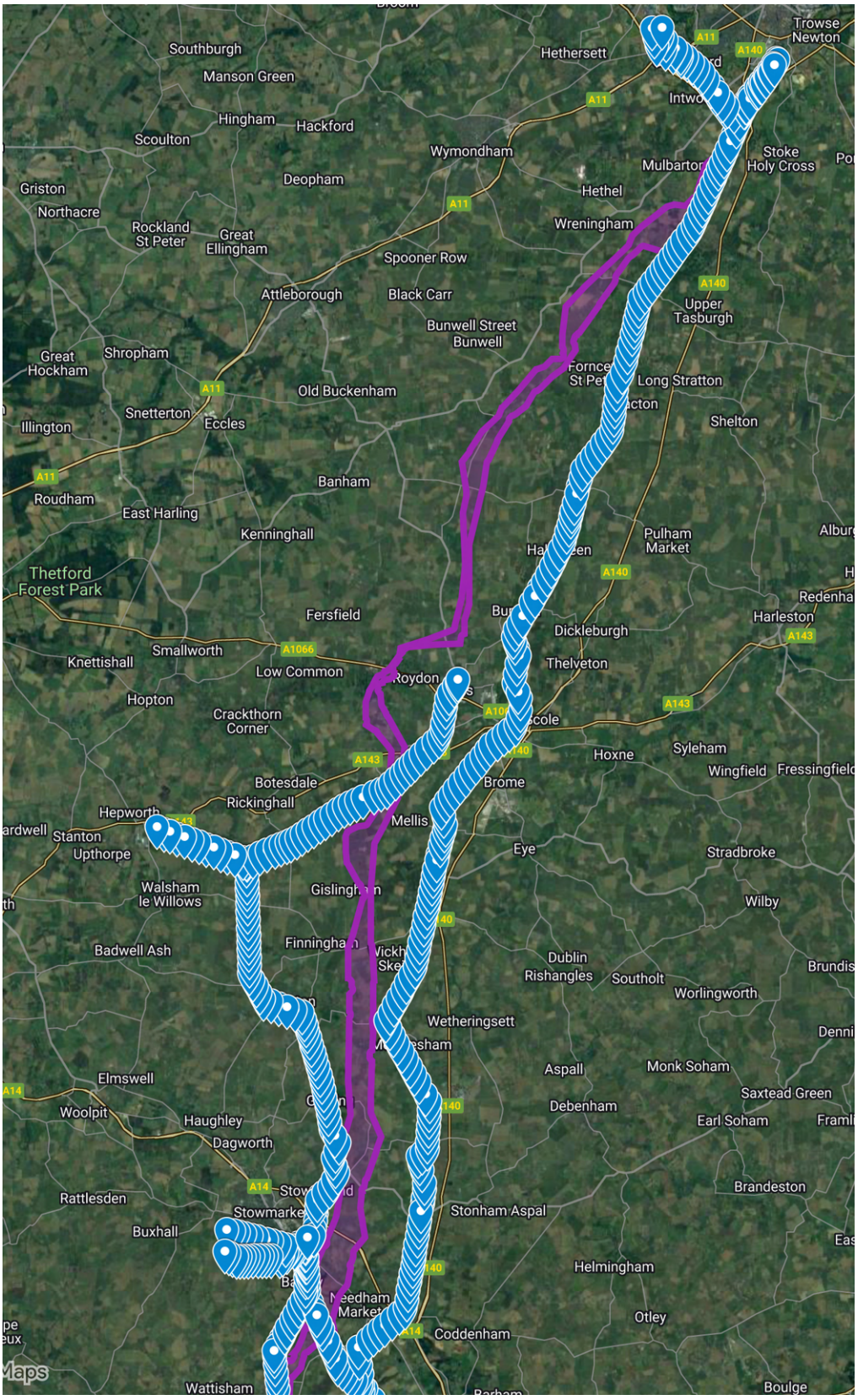
- Near to Chelmsford where the city will become needlessly encircled and where there are existing 400kv and 132k OHL's.

- existing electricity transmission and distribution equipment in the study area including 400kV and 132kV OHL's and the 400kV substations at Norwich Main, Bramford and Tilbury

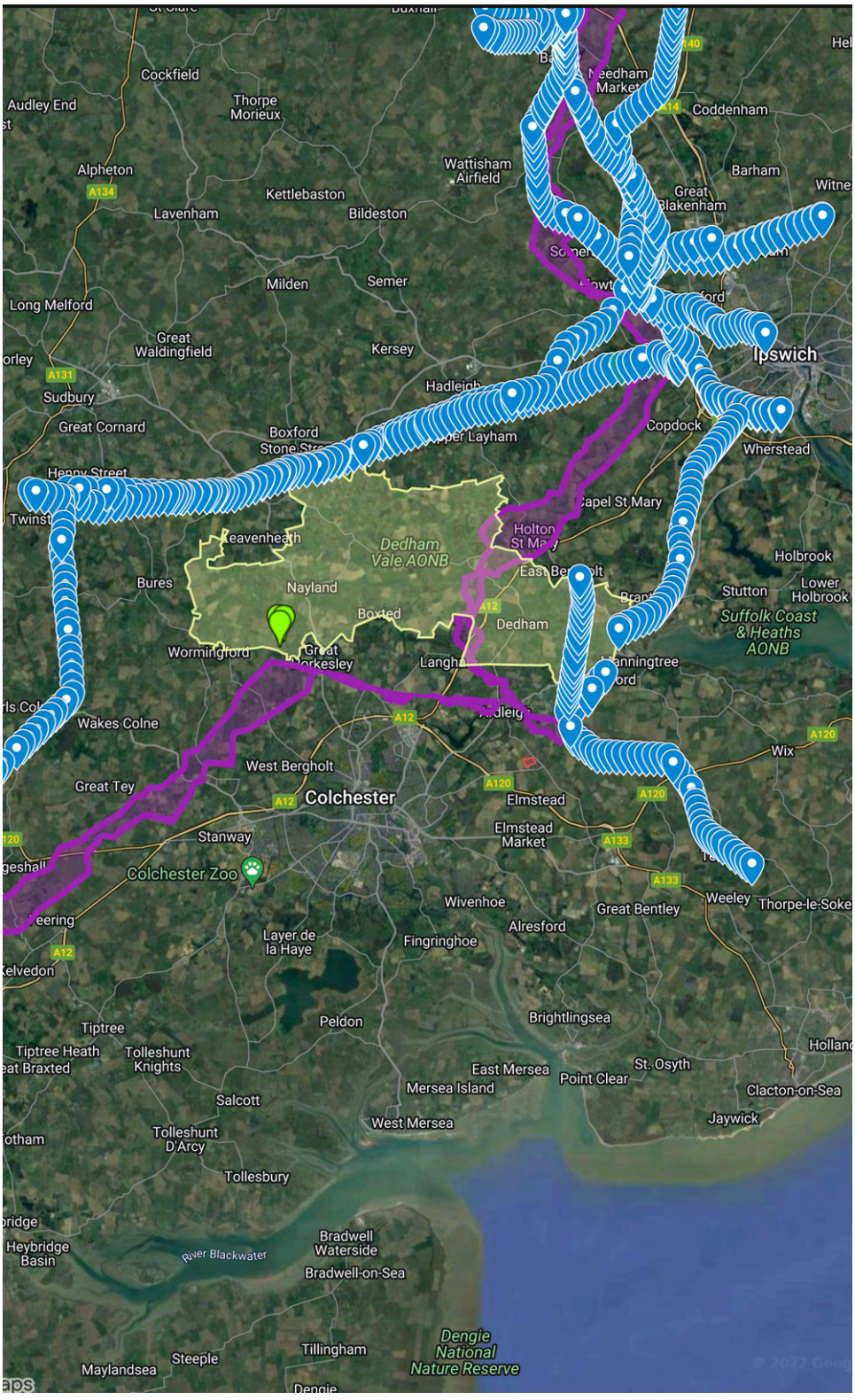
- Thurrock section EAG There are also three existing OHL which run through this area along the Scoping Report Corridor.

The maps on the following pages illustrate the confluence of existing pylons [Blue markers] and the proposed purple swathe [Purple] as well as the road network [major: Yellow]

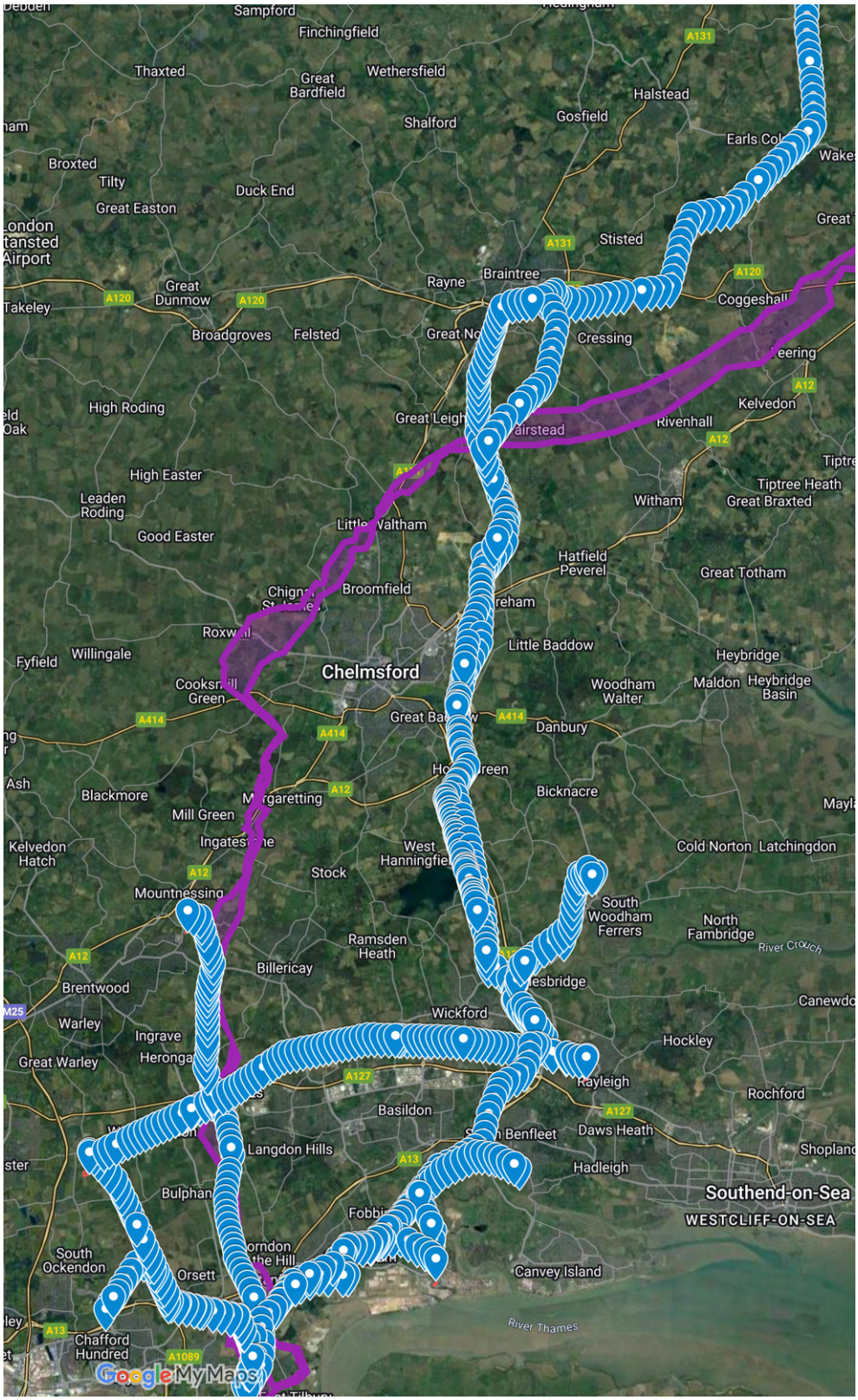
Map: Norfolk: The proposed route dramatically increases the area impacted by Pylons between Roydon and Norwich given that new proposed Pylons are positioned some 4km away from existing. Between Melis and Needham Market the entire landscape will become 'Industrialised'. Cumulative effect must be considered. Explaination of alternatives needs to include details as to why pylons could not follow route of existing closely hence constraining impact.



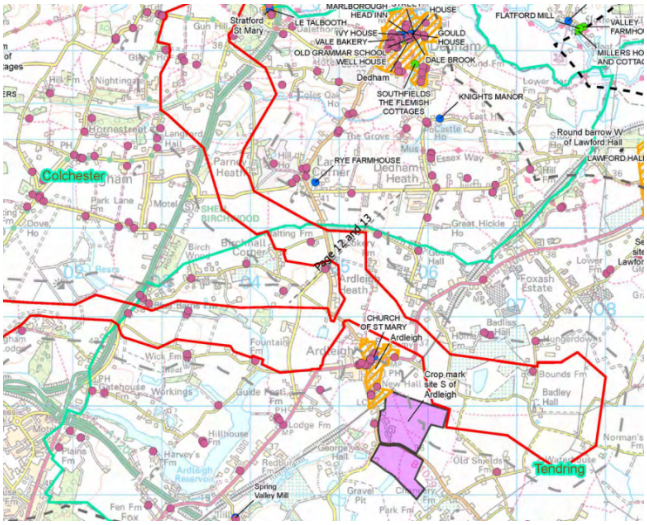
Map: Dedham Vale AONB: already closely bordered on 2 sides and with 2 points at which Pylons encroach into the AONB, the new 'third approach' to the North will dramatically impact the setting. Proposed tunnels beneath AONB are nothing more than lip-service given that the AONB will become fully encircled. Pylons proposed along the entire southern border and approaching to within a few metres at Little Horkesley despite open nature of setting will destroy views in to and out from the AONB on contradiction to requirements of Electricity At and NPS. All routes in to and out from AONB will be impacted by Pylons, there will be no 'unimpacted approach'. All roads will pass beneath or run parallel to Pylons. Cumulative imnpact must be assessed. Detailed explanations are required and must as a minimum explain why pylons cannot follow existing routes and / or major road & rail corridor immediately adjascent to the A12.



Map: Essex: already impacted to the North the historic town of Coggeshall with a high density of heritage assets as well as the Grade I Listed 13th century Barns at Cressing will become surrounded with views in all directions across open flat countryside dominated by Pylons. In Chelmsford, rather than following the route of existing Pylons (which also closely follows the A12 and main rail corridor and hence is already impacted), National Grid propose instead to encircle the City and to route via so-far rural North Chelmsford rural area in which there is to date no significant infrastructure at all [including no major road arteries]. Detailed analysis and explanation of alternatives is required.



It is imperative, too, that the ES will consider the impact of the doubling back effect of pylons at Ardleigh, which leaves residents living in a 'V' of pylons:



Additional comments relating to scoped in topics - Visual receptors

The 41 visual receptors put forward by NG are wholly insufficient. They leave huge unassessed gaps along the route and many very key sites of importance unaccounted for. Essex Suffolk Norfolk Pylons have therefore asked our supporters to log key visual receptors in their own area that should be scoped in to the ES.

The results are available on a map, and Essex Suffolk Norfolk Pylons would be delighted to supply the full list to the Inspector(s) if required.

Map of visual receptors submitted by the public:
https://www.google.com/maps/d/u/0/edit?mid=1cu-HdnJdQKeHpzCiH0TWokTQmpSlAyY&usp=sharing

Additional comments relating to scoped in topics - Undergrounding of cables – swathe width

The area of impact for the purposes of assessment of undergrounding cables must be set at the maximum of the several set out by NG. The SR report states a swathe of only 40-m wide is required for undergrounding. The non-statutory consultation documentation noted c60m-wide. At a NG webinar, Spring 2022, we were told that a swathe of up to 100m-wide is required. For the purposes of the ES, the swathe width must be assumed to be 100-m to ensure that all construction damage to ecology, habitats and archaeology is factored in.

Additional comments relating to scoped in topics - Impact on farms

The impact of the 12-metre wide access roads must be scoped in to the ES. These roads will damage habitat and lead to security issues for land-owners. The impact of walkers using these roads to access previously undisturbed areas of countryside on wildlife must be assessed.

Appendix A

Cumbria[17] – how alternatives *should* be consulted on

The below is taken from National Grid's Environmental Impact Assessment Scoping Report and Appendices for North West Coast Connections, Cumbria, in 2012. It highlights starkly the difference between the approach taken in East Anglia, where only one route has been pre-determined and presented for consultation. In Cumbria, by way of comparison, a variety of alternatives were discussed with stakeholders from the outset and those alternatives narrowed down through the process of consultation:

> *"Strategic Options (2009 to 2012)*
>
> *After establishing the need for new 400kV connections, National Grid worked together with local authorities from across Cumbria and Lancashire, as well as many prescribed and non-prescribed organisations, to explore the different options available for connecting the new generating capacity to the NETS. The outcome of this work helped to identify six high level options that represented potential solutions for making the connections needed in the North West.*
>
> *2.2.3 In October 2012, following the completion of consultation on the possible strategic reinforcement options to meet the connection need, National Grid published a Strategic Options Report (SOR) (Ref. 2.4) for the Project. The SOR outlined six Strategic Options for electricity transmission system reinforcement in the North West identified by National Grid, and set out National Grid's appraisals of each of the options.*
>
> *2.2.4 The six options were:*
>
> *1. Option 1 – Twin South Onshore (four onshore circuits south from Moorside);*
>
> *2. Option 2 – Twin South Offshore (four offshore circuits south from Moorside);*
>
> *3. Option 3 – Cumbria Ring Onshore South (two circuits north from Moorside, either onshore (3a) or offshore (3b) and two onshore circuits south from Moorside); Chapter 2 The Proposed Development 2-3*
>
> *4. Option 4 – Cumbria Ring Offshore South (two circuits north from Moorside, either onshore (4a) or offshore (4b) and two offshore circuits south from Moorside);*
>
> *5. Option 5 – Twin North and North-South (four circuits north from Moorside, either onshore (5a) or offshore (5b) and two circuits south from Harker); and*
>
> *6. Option 6 – Twin North and East-West (four circuits north from Moorside, either onshore (6a) or offshore (6b) and two circuits east from Harker plus 275kV to 400kV uprating of North East ring.*
>
> *2.2.5 The appraisals reported in the SOR considered the Strategic Options in terms of environmental, socio-economic, technical and cost factors, and took into account consultation feedback."*

[17] EN020007-000050-NWCC EIA Scoping Report (Main_Report_and_Appendices).pdf (planninginspectorate.gov.uk)

Application No: EN020027

Little Waltham Parish Council response to East Anglia Green Application for a scoping opinion for an Environmental Impact Statement

Little Waltham Parish Council (the Council) wishes to make the following comments and representations in relation to this application.

The Council remains concerned that there has not been an effective consultation in relation to the proposals generally with no options provided other than a single overland route, with no other options provided for comment. The Council contends that a fair and transparent consultation should seek views on all possible solutions including an under-sea route rather than presenting one option as a fait accompli.

In relation to an Environmental Impact Statement, the Council considers that the following matters should be covered –

1. **The visual impact of the proposals upon the sensitive and historic rural landscape.**

Within Little Waltham Parish the area is criss-crossed by public footpaths and bridleways including the Essex Way which provides walkers with access to the beautiful and historic landscapes of the area which includes not just farmland but wooded plantations. In addition, in the Parish there is an area of 'Green Wedge' being part of the Chelmer Valley which is protected within local planning policies and Little Waltham Meadows being an Essex Wildlife Trust nature reserve. The impact of the proposals upon the intrinsic character of the area and the existing rural vistas and views will need to be considered.

2. **The visual impact of the proposals upon the historic landscape and built environment and heritage.**

The proposed purple swathe enters the Parish at its northern tip directly in conflict with listed buildings on Braintree Road and the historic hamlet of Chatham Green which again has a number of listed buildings. Properties such as Liberty Hall, Hyde Hall, Bakery Cottage, the row of cottages along the main centre of Chatham Green and Baileys Farm and all grade II listed properties. On the other side of the A131 there is a row of houses which although not all are listed would be within only a matter of feet from the proposed pylons

The purple swathe is effectively a pinch point as it passes through the Parish following the B1008 and will be in extremely close proximity to the Little Waltham village centre. The village is a prime example of a historic north Essex village and contains a large number of grade II listed properties. Indeed, the historic and architectural value of the village centre has been recognised by being designated a Conservation Area. The purple swathe passes in extremely close proximity to the Conservation area and the pylons would be clearly visible thus again impacting upon the historic village.

The area generally is known for its roman and iron age remains. The river Chelmer runs through the Parish and was a focus for Roman populations in the area. The proposals could impact upon the archaeology of the area, thus, the impact upon built environment and heritage will need to be considered.

3. The impact of the proposal upon wildlife and habitat

Little Waltham provides habitat for numerous species of animals, birds and insects. In particular the DEFRA map shows that the area is a haven for lapwings and the great crested newt. In addition, there are populations of hare, hedgehogs, dormice and also bats, red kites and buzzards which are regularly witnessed in the Parish. The impact of the pylons and power lines together with noise emitted and effecting these species would need to be assessed. As the proposed pylons would be in the close proximity of Broomfield Hospital there is a concern that it would have an impact upon the Essex Air Ambulance and thus aviation lights may need to be installed on top of the pylons emitting light throughout the night, which may impact upon local wildlife and thus would need to be assessed.

4. The impact upon agricultural land

The Parish contains a substantial amount of agricultural land much of which is already being lost to ongoing development including housing allocated within the Chelmsford Local Plan, a proposed Solar Farm and extensions of quarries. The proposals would mean the use of yet more agricultural land both during the construction phase and for ongoing use and the impact would need to be considered**.**

Little Wenham Parish Meeting

Chairman: Richard Langton Secretary: [redacted]

[redacted]

The Planning Inspectorate

Environmental Services

Temple Quay House

2, The Square

Bristol, BS1 6PN

Your Ref. EN020027 30th November 2022

Dear Sir/Madam,

Application by National Grid for an Order Granting Development consent for GREEN

Scoping consultation with non-prescribed consultation bodies

Thank you for your email of 8th November 2022.

We are deeply dissatisfied with the process adopted for this consultation thus far. No attempt was made to engage with us before the adoption of this route. The first intimation of this major infrastructure project was contained in the letters we all received in April setting out the one overland option. Very brief

mention was made of two other overland routes and the obvious offshore alternative. We continue to argue that the process to date is, and continues to be, deeply flawed. However to ensure that we are not further disadvantaged we shall continue to engage at every stage whilst believing that the whole process should be restarted on an equitable basis.

Reading and understanding a 406-page document and formulating a response within 27 days has been challenging. A Parish Meeting was held on 28th November 2022, and it was agreed that the following comments should be relayed to you.

For a major infrastructure project, we find it unacceptable that the Environmental Statement does not contain separate chapters for Health/Well-Being and Climate. Concerning the former it is now well documented that the natural environment is hugely significant for both physical and mental health: surely one of the major lessons we learnt with Covid Lockdown. If the newspapers as well as Television and Radio are to be believed Suffolk and Norfolk have the worst Mental Health services in the country: please do not make an appalling situation even worse by not even considering the effects of this massive project throughout the length of Suffolk, Norfolk south of Norwich and Essex north of Tilbury. Regarding Climate: already we have lived through record breaking heat this summer, extended drought (no rain for over 100 days in Little Wenham summer 2022), heavier rainfall over shorter time so floods occur, as well as increasing numbers of gales. As Sir David Attenborough has stated," We have upset the perfect balance of the planet". Who knows what is to come? Those with most knowledge on the subject must have an input at this stage. It cannot be right to look at Environmental impact without a proper investigation into the effects of climate change not only on the natural environment but also on structures and systems which were designed a century ago and cannot be seen as appropriate in the 21st century.

In addition to the above comments, the Parish Meeting wishes to see the following matters **SCOPED INTO** the Environmental Statement. **We refer you to page 273 table 18.1 chapters 6 to 17.**

<u>Chapter 6. Agriculture and Soils</u>

1. Effects on agricultural holdings during operation
2. Effects on soil quality associated with ecosystem services during operation

3. Economic effects on landowners during construction and operation.

Chapter 7 Air Quality

1. Effects from construction dust
2. Effects from generators during construction

Chapter 8 Ecology and Biodiversity

1. Effects on Great Crested Newt and other notable mammals brown hare, hedgehog, harvest mouse, during construction and operation
2. Effects on national and local sites designated for biodiversity during operation
3. Effects on local (statutory sites) designated for biodiversity during operation
4. Effects on ancient woodland and important hedgerows during operation
5. Effects on habitats of Principal importance in England during operation
6. Effects on Ground Water Dependent Terrestrial Ecosystems. Vascular and non-Vascular plants, fungi and INNS during operation
7. Effects on protected species, fish, invertebrates, reptiles, breeding birds, badger, hazel dormouse, otter, water vole, white clawed crayfish and amphibians during operation

Chapter 9 Geology and Hydrology

1. Effects of geohazards and ground instability during construction and operation

2.Effects on sites of geological importance during construction and operation

3.Disturbance and mobilisation of existing contamination during operation

4. Discovery of unexpected contamination during construction and operation

5.Introduction of new contamination within construction and operation

6. Effects of groundwater discharges during construction and operation

Chapter 10 Health and Well-Being

As stated in our opening paragraph we consider this extremely important topic warrants a chapter. Little Wenham is one of many small settlements which have the misfortune to be in the path of this rapacious project. Throughout its 180km route the peace and tranquillity will be shattered in hundreds of communities and the green environment irretrievably damaged. All this for no benefit for those affected along the route, but to make electricity available to London and the South-east when there is an excellent option which will avoid a huge percentage of this damage and get this energy directly to those wanting it **namely UNDER THE SEA**.

Chapter 11 Historic Environment

1. Physical effects on the built heritage during construction and operation

Chapter 12 Hydrology and Land Drainage

1. Effects of surface water quality during operation
2. Effects of hydromorphology of water courses during operation
3. Effects of flood risk from other sources (sewers and artificial water bodies) during construction and operation.

Chapter 13 Landscape and Visual

1. Effects on designated landscapes, landscape, character and views at night during construction and operation

We value the darkness which nurtures our owl and bat population. Light pollution is a serious threat to the environment and some threatened species.

Chapter 14 Noise and Vibration

1. Effects of traffic vibration during construction (our houses tend to be old)
2. Effects of noise from overhead lines (our environment is essentially quiet if not actually silent)

3. Effects of vibration during operation.

Chapter 15. Socio Economic, Recreation and Tourism

1. Effects on the local economy and employment during operation
2. Effects of potential disruption to future and existing businesses during construction and operation. (Our particular concern is Raydon Wings Airfield, which is largely in Great Wenham and is an active General Aviation Airfield – an important asset in economic and social terms. Raydon Wings is one of very few GAAs in Suffolk which is one of the least well served counties in such matters. It is also an emergency landing site for general aviation aircraft transiting up the East coast.
3. Financial effects on individual businesses and property prices during construction and operation.

Without including these figures how can the cost of this project be assessed?

Chapter 16 Traffic and Transport

1. Effects of traffic and transport during operation
   Because of the peace and relative safety of our narrow rural roads we are part of national cycle routes added to which horses, runners and walkers take advantage of this quiet location.

Chapter 17. Cumulative Effects

So far ahead it is impossible to say whether the village will be facing other major issues but as the Government appears to have given consent for the construction of Sizewell C we can only shudder as we imagine the joint impact of two such projects on our once peaceful county.

Please will you acknowledge safe receipt of this response,

Yours faithfully,

Richard Langton, Chairman Little Wenham Parish Meeting

[redacted], Secretary, Little Wenham Parish Meeting.

From:	SM-MMO-SH - MFA Marine Consents (MMO)
To:	East Anglia GREEN
Subject:	RE: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation
Date:	08 November 2022 15:09:03
Attachments:	~WRD0000.jpg image003.png image004.png image005.png image006.png image007.png image012.png image013.png

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Marine Licensing, Wildlife Licences and other permissions

Dear Sir/Madam,

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence

https://www.gov.uk/guidance/make-a-marine-licence-application

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours.

A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

The MMO is a signatory to the coastal concordat and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should be directed to the follow pages: check if you need a marine licence and asked to quote the following information on any resultant marine licence application:

- local planning authority name,
- planning officer name and contact details,
- planning application reference.

Following submission of a marine licence application a case team will be in touch with the relevant planning officer to discuss next steps.

Environmental Impact Assessment

With respect to projects that require a marine licence the EIA Directive (codified in Directive 2011/92/EU) is transposed into UK law by the Marine Works (Environmental Impact Assessment) Regulations 2007 (the MWR), as amended. Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with the MWR.

In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations http://www.legislation.gov.uk/uksi/2017/571/contents/made may be applicable.

If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link

https://www.gov.uk/guidance/make-a-marine-licence-application

Marine Planning

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions.

At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

A map showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our Explore Marine Plans service.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. If you wish to contact your local marine planning officer you can find their details on our gov.uk page.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below;

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you require further guidance on the Marine Licencing process, please follow the link https://www.gov.uk/topic/planning-development/marine-licences

Regards

[redacted]

[redacted] | Administration Officer Business Support Team | Marine Management Organisation

Lancaster House, Hampshire Court, Newcastle Business Park, Newcastle upon Tyne, NE4 7YH

[redacted] | Tel: [redacted] Mob:

[redacted]

Our MMO Values: Together we are **Accountable, Innovative**, **Engaging** and **Inclusive**

From: East Anglia GREEN <EastAngliaGREEN@planninginspectorate.gov.uk>
Sent: 07 November 2022 15:50
Subject: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation

You don't often get email from eastangliagreen@planninginspectorate.gov.uk. Learn why this is important

Dear Sir/Madam

Please see attached correspondence on the proposed Byers Gill Solar Farm.

Please note the deadline for consultation responses is **24 November 2022**, and is a statutory requirement that cannot be extended.

Kind regards

Jack Patten

Jack Patten | EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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DPC:76616c646f72



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Marks Tey Parish Council Response to The Planning Inspectorate

Re; Scoping report for EAGN

Appendix A

The proposals will physically affect part of Marks Tey Parish. Map 7 covers Marks Tey with the detailing of the proposed route of the new grid defined by the boundaries of the area of influence of the works and thus the area the National Grid seek approval to work across although the actual line of the power line is not shown.

Appendix B

This section is a detailed and sectional analysis of the various physical limiting factors on the design dealing with each aspect in considerable detail. However, there seems little assessment of the human reaction to the proposals and this does not seem to have figured in the appraisal criteria.

Options Appraisal - Section B to K

No statutory requirement to state other options considered but a recommendation that it is done.

Several on-land and sub-sea options are stated as have been considered but no detailed compassion of the results of these options are stated. Much more detailed comparison of the on land route options adjacent to the actual route chosen is given. This seems week considering the contention and concern the overall chosen proposals were likely to create.

Observations on the Report

It is difficult to contest the need for the overall project nor the right of National Grid to undertake it. There is a question about the attractiveness/acceptability of a pylon based approach but this is the basis of the national power distribution system (be that right or wrong) of which this is a needed extension.

It is also difficult to challenge the detailed analysis of the various physical constraints on the chosen route although I am sure that differing views could be taken on many of the myriad of details.

The proposed power line will affect Marks Tey. It passes through the northern part of the Parish quite close to Little Tey. It will cause construct disturbance to Little Tey and the resulting pylons will be visible from properties in Little Tey. It's affect on the rest of the Parish is likely to be limited although construction is likely to increase traffic on the Coggeshall Road/A120 through Marks Tey and exacerbate an already bad situation.

Our main criticism of the report is in the modular analysis of the various physical features (although it is difficult to see how else such a complex situation could have been tackled) and the way in which these factors are brought together to an overall conclusion. There is a need for greater detail and consultation on the criteria and weighting used to bring these together. In addition to this is the almost complete concentration on physical factors and the absence of any assessment of human/community reaction. There needs to be a more reasonable balance between this being treated as an engineering project with environmental consequences as opposed to an environmental project with engineering consequences. Principal in this is a need for a more open and detailed explanation of the alternative options and a detailed comparative analysis of scoring and appraisal of all options compared.

We feel that the options should be revisited and all options should be fully costed, with details of the environmental cost of each scheme. The environmental cost must be a major consideration of this proposal as little detail has currently been provided.

The scoping should also take into consideration the adopted and proposed Neighbourhood Plans of all the parishes along the route.

Marks Tey Parish Council

Decision Notice

MC/22/2637

Medway Council
Serving You

National Grid Electricity Transmission
(NGET)
The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
Temple Quay
2 The Square
Bristol
BS1 6PN

Applicant Name:
National Grid Electricity Transmission
(NGET)

Planning Service
Physical & Cultural Regeneration
Regeneration, Culture, Environment &
Transformation
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR
[redacted]
Planning.representations@medway.gov.uk

Town and Country Planning Act 1990

Location: Multiple Sites Including Works At Norwich Main, Bramford And Tilbury Substations, , , ,

Proposal: Consultation from the Planning Inspectorate for Planning Act 2008 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11 for an order granting development consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development) Scoping consultation and notification of the Applicant's contact details and duty to make available information to the applicant if requested

---

I refer to your letter of consultation regarding the above and would inform you that the Council **RAISES NO OBJECTION** to it.

0 Medway Council has no comment to make on the proposed development for the reason that the protected sites in the borough namely Medway Estuary and Mashes SPA will fall within the specialist control of Natural England and Environment Agency. As such, Medway Council will rely on their input to cover any environmental issues/impact on these protected sites.

Therefore, Medway Council raises no objection or comments on the Scoping Opinion and what information is required to be provided in an Environmental Statement relating to the Proposed Development.

Your attention is drawn to the following informative(s) :-

1 This comment is based on the consultation letter from PINs and cover letter received 7 November 2022.



David Harris
Head of Planning
Date of Notice 25 November 2022

TOWN & COUNTRY PLANNING (APPEALS) (WRITTEN REPRESENTATIONS) (ENGLAND) (AMENDMENT) (REGULATIONS 2013)

TOWN AND COUNTRY PLANNING ACT 1990

Appeals to the Secretary of State

- If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

- If you want to appeal against your Local Planning Authority's decision then you must do so within **12 weeks** from the date of this notice for appeals being decided under the **Commercial Appeals Service** and **6 months** from the date of this notice for all other **minor and major applications.**

    - However, if an enforcement notice has been served for the same or very similar development within the previous 2 years, the time limit is:
    - **28 days** from the date of the LPA decision if the enforcement notice was served before the decision was made yet not longer than 2 years before the application was made.
    - **28 days** from the date the enforcement notice was served if served on or after the date the decision was made (unless this extends the appeal period beyond 6 months).
    - Appeals must be made using a form which you can obtain from the Planning Inspectorate by contacting Customer Support Team on 0303 444 50 00 or to submit electronically via the Planning Portal at

    https://www.planningportal.co.uk/info/200207/appeals/110/making_an_appeal

Commercial Appeals Service

- This type of appeal proceeds by way of written representations, known as the "Commercial Appeals Service". Third parties will not have the opportunity to make further representations to the Planning Inspectorate on these.

All other Minor and Major Applications

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

- The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the

proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

- In practice, the Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based on their decision on a direction given by him.

Purchase Notes

- If either the Local Planning Authority or the Secretary of State refuses permission to development land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

- In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

From: [redacted]
To: East Anglia GREEN
Subject: EN020027 - East Anglia GREEN - EIA Scoping Consultation
Date: 05 December 2022 13:48:07

Dear Sirs,

Mellis Parish Council strongly objects to the National Grid's East Anglia Green Energy Enablement pylon route proposal. We have seen no evidence that National Grid has either recognised or considered the effects on the environment, visually significant open spaces, or cultural assets of Mellis, or its neighbouring parishes.

Mellis is a small village set on and around the largest unfenced Common area in England, and is steeped in history. Oliver Cromwell encamped and exercised his troops on the Common. There are 32 listed buildings in Mellis; Cavalry Barn gains its name from being used as the stabling area for Cromwell's cavalry. The pylons would cause immeasurable harm to the setting of these cultural assets.

Mellis Common is a 59-hectare nature reserve. In summer rare plants such as green winged orchid, sulphur clover, and adder's tongue fern flourish. The abundance of small mammals also makes the site a favourite hunting ground for barn owls and tawny owls. The wider area falls under the MSDC descriptor of a cultural Heritage site containing many special landscape areas (as described in the BMSDC joint landscape guidance document 2015). There are many archaeological sites on the common and within the surrounding agricultural land and woodlands. These environmentally important assets, and the visual amenity they provide, will all be directly, and negatively impacted by the proposed pylon route.

The value of the pylons does not supersede the value or importance of these sites, or cultural and visual assets. The pylons will be hugely detrimental and damaging, and have a negative impact on property values, and businesses linked to tourism in the parish. We believe the environmental, visual, and cultural constraints of the proposed pylon route will in fact be much, much higher than the alleged budget savings of an overland route.

We instead support an offshore option which we do not believe has been fairly or transparently presented for public consultation by the National Grid, and for which there are precedents nationwide. Suffolk County Council has also confirmed its intention to object to the proposals, stating its belief that there are better ways to meet the demands of energy projects, such as an undersea network. We are aware that National Grid has actually recently admitted its failure to include the viable alternative options in their initial consultation, and therefore do not feel it is even appropriate for this Scoping Consultation to have been called at this stage.

National Grid has in fact started to remove pylons and overhead cable as it heads towards the conclusion of its first Visual Impact Provision, to transform views of the Dorset AONB (Area of Outstanding Natural Beauty). It is inconceivable that National Grid's Visual Impact Provision does not extend to East Anglia.

Kind regards,

[redacted] **- Mellis Parish Council Clerk**

[redacted]

Diss

[redacted]

[redacted]

Application ref EN020027

Application by National Grid Energy Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement) (GREEN) (the proposed document).

Consultation response from Mendlesham Parish Council.

Mendlesham Parish Council appreciates the need for the electricity network to move energy from where it is produced to where it is needed, including the change from a North/South direction to accommodate energy now coming into East Anglia. We also understand that the current infrastructure does not have sufficient capacity so solutions need to be found.

However, we completely support the stance from Suffolk County Council, Mid Suffolk District Council, our local MP's and OFFSET. This scoping request is woefully inadequate in that it only covers provision of a new overhead pylon system with some undergrounding in ANOB's which means our Parish will be subject to 50m pylons every 1Km in additional to the existing infrastructure through our valuable, rural historic landscape and villages.

The events attended by our Councillors have included much talk about sea infrastructure and excessive costs. The information on sea infrastructure and undergrounding, have not been fully publicly answered and we believe a fully comprehensive public consultation should include all options and financial costs (National Policy Statement for Electricity Networks Infrastructure (EN-5) 2.8.4.). May we suggest approximate costs for each option: pylon, undergrounding, sea infrastructure, perhaps per km for ease of comparison as well as the cost to the individual user over what should be a national investment over many years.

Mendlesham Parish:

The current graduated swathe for our Parish will mean a new pylon line to the west of the Parish severely impacting on our landscape and visual amenity. When leaving the village of Mendlesham travelling towards Mendlesham Green, around the Cay Hill area, and then on to Stowmarket, the addition of the new line plus the existing infrastructure will promote a concentration of lines and wire scape for all our residents when travelling to and from Stowmarket, the nearest Market Town. This will negatively impact the wellbeing of all residents of the Parish of Mendlesham, whatever the means of travel or location of where they live. We all currently enjoy a rural landscape including a wealth of ancient rights of way, Quiet Lanes, historic hedges, woodland areas and traditional villages and dwellings.

In addition, individual properties including Mendlesham Green, residents of Hoggars Lane and properties as the route enters our parish from the north will specifically experience huge negative visual and valuation consequences for their individual properties.

We request further consideration for undergrounding, removal of existing infrastructure and mitigation against the impact on our parish. Whilst we are aware of EN5 and Government funding policy, we consider these arguments can be solved between Government and National Grid. We request specific and individual meetings for our parish, to include all options, including undergrounding.

Whilst we understand that community infrastructure funding is currently under review, the disruption during build and loss will be massive so funding should also be available at Parish level as mitigation.

Mendlesham Parish Council

Mid and South Essex Integrated Care System

NHS
Mid and South Essex

Our ref: *EAGscoping/CB*
Your ref:

EMAIL ONLY
eastangliagreen@planninginspectorate.gov.uk

Wren House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF

[redacted]
Email: [redacted]

Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Applicant: National Grid Electricity Transmission (NGET)

02 December 2022

Dear Sir / Madam

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Environmental statement scoping report consultation
East Anglia Green Energy Enablement (GREEN) Project

Introduction

This letter is a response prepared by the Mid and South Essex Integrated Care Board on behalf of the health partners of the Mid and South Essex Integrated Care System (the ICS), to consultation on the environmental statement scoping report in relation to the **East Anglia Green Energy Enablement (GREEN) Project**. The ICS is responding in the capacity of strategic health authority for part of the area (the areas within the local authority districts of Braintree, Chelmsford, Brentwood, Basildon and Thurrock) where the development is located. Partner organisations such as the East of England Ambulance Service (EEAST) have wider geographical responsibilities and may have additional points to make, perhaps in association with the other emergency services.

In considering the whole of the report the chapters of the scoping report most relevant to the responsibilities of the ICS are Chapter 5: EIA Approach and methodology; Chapter 7: Air Quality, Chapter 10: Health and wellbeing, Chapter 16: Traffic and Transport and Chapter 17: Cumulative Effects. To this end our responses focuses on these particular areas:

Chapter 5: EIA Approach and methodology

The general methodology proposed in the scoping report is considered to be appropriate. The approach considers effects on people and the environment at different stages of the development including the construction phase, describes the use of embedded, standard and additional mitigation measures, assigns impact significance through considering receptor sensitivity and magnitude of impact, and identifies the need for monitoring.

The environmental topics that are identified for consideration include air quality, health and wellbeing, traffic and transport and socioeconomics, recreation and tourism. Consideration of these topics is felt to be appropriate; we have not identified any gaps in this consideration that would impact on health and wellbeing.

The report proposes whole topics to be scoped-out from the environmental statement either at construction or operational phase. Topics that are proposed for scoping out include major accidents and disasters. The assessment reviews the possibility of physical accident, electrical accident, fire/explosion/ground hazards, external industrial hazards, security threat, external interference, and adverse weather and concludes that their likelihood is so low as to be not significant. This conclusion is not accepted, the ICS considers that major accidents and disasters should be scoped into the environmental statement.

It is evident that a significant level and duration of construction phase work reliant on the use and deployment of heavy lift plant, specialist machinery and equipment, producing noise, heat, vibration and dust (with work periodically carried out during sub optimal weather and natural daylight conditions) is likely to present construction site hazards. Working on hilly and uneven, and in some instances poorly drained ground with challenging topography, affected by river features, road and railway line infrastructure crossing constraints, present potentially challenging and specialist work place considerations, particularly when needing to observe contractual timelines.

The presence of moving machinery, along with a requirement to lift and transport heavy materials, and working at depth, including the potential for trench collapse, for example, underline the risks associated with the construction led activities – requiring both urgent and other medical interventions and transport conveyance (including specialised airborne tasking/ conveyance) to be appropriately planned for and provided. Indeed, HSE's construction publications (for Great Britain) indicate that work related incidents involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate. This position is acknowledged in Section 5.7 of the Scoping Report (Major Accidents & Disasters) which indicates that the construction of the Project carries the risk of a physical accident occurring and leading to a low number of 'worker fatalities' (e.g. due to crane topple).

The Scoping Report does not provide a forecast for the number of major and less major accidents at this stage, which may be appreciable over the 4 – year construction

period. Information to determine the effect of the construction phase and its impact on the East of England Ambulance Service Trust (EEAST) operational capacity, efficiency and resources is currently absent from the Scoping Report, along with any potential mitigation measure parameters.

In the event of a construction phase accident occurring, appropriate procedures would need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting. The processes and procedures developed by NGET, and any outsourced construction organisations, should refer to legislation and technical guidance which places a duty on NGET to have its own response and medical mitigation to take the patient to a place of 'normal access' and handover to EEAST crews. EEAST would expect any trench collapse to fall under the confined space regulations and NGET, the construction company and/or contractor(s) should have access to a confined space trained team that could extricate a casualty safely.

Plans and contingencies for facilitating emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders, whilst sustaining operationally optimal attendance times (noting the likely delay factors above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) and/ or Fire & Rescue Services (FRS) with lifting and cutting equipment, is therefore considered to be necessary.

The incidence and impact of major accidents (and disasters) on EEAST including its hazardous area response teams (HART) and its HEMS/ FRS partner operational capacity, efficiency and resources, needs to be presented and assessed, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Chapter 7: Air Quality

Chapter 7 of the scoping report considers impacts on air quality. The methodology recognises the interrelationships of the potential effects on other environmental topics, including health and wellbeing. The scoping report proposes scoping out construction dust, construction generators and operational vehicle emissions as it concludes that these matters will have no likely significant effects.

The ICB accepts that operational vehicle emissions are unlikely to have significant effects. However, the ICB asks that advice is sought from the public health team before scoping out construction dust and construction generators. The impact of air quality on population health can be significant and should be thoroughly considered.

Chapter 10: Health and wellbeing

Chapter 10 of the scoping report considers impacts on health and wellbeing. This includes the potential for effects on health and wellbeing in relation to air quality; geology & hydrogeology; hydrology & land drainage; noise & vibration; traffic and transport and concludes that effects would be limited to the construction phase. It

states that no potential for effects in operational phase have been identified. The ICS accepts the report's conclusion that impacts on health and wellbeing could occur during the construction phase and not the operational phase of the development.

The report says that, given the type, temporary duration and level of potential construction phase effects, and recognising that any likely significant effects from various topics on health and wellbeing would already be reported within separate chapters, it is not considered that general health and wellbeing requires additional separate reporting in the ES. A health and wellbeing chapter is therefore, not proposed within the ES.

It is not accepted that a separate health and wellbeing chapter is not needed. While impacts on health and wellbeing do overlap with other topics, it is necessary to devote a separate chapter to health and wellbeing to ensure that the overall impacts of the scheme on health and wellbeing are assessed, and relevant impacts are not overlooked.

The scoping report should also assess the impact of the scheme on access to health and wellbeing services by the scheme workforce and the resident population. It is not possible to conclude from the scoping report whether significant effects are likely because this topic is not considered. A temporary workforce area should be provided with healthcare and wellbeing support. Their ability to access these services, as well as the impact of such demand on services should be assessed. To determine whether significant impacts are likely, the scoping report should consider the size of the non-permanent workforce, timing and duration of their employment, location during their stay, their health status and healthcare needs, and provide details of any healthcare and wellbeing facilities to be provided by the developer

Access to healthcare services is also impacted by the availability of transport links to premises. It is important that routes to and between healthcare facilities are safeguarded. This is in relation to emergency and routine transportation of residents and healthcare workers. This should be addressed within the health and wellbeing chapter as well as the traffic and transport chapter.

The ICS requests that health and wellbeing is considered through a separate chapter and recommends that a health impact assessment (HIA) is undertaken to inform this chapter. The Essex Design Guide provides guidance on undertaking health impact assessments, which includes consideration of access to healthcare services.

The report explains that intra-project effects would be considered within Chapter 17: Cumulative effects, and that this assessment would include a specific section on health and wellbeing. This is considered appropriate as an addition to the separate chapter requested above and not in place of a separate health and wellbeing section.

Chapter 16: Traffic and Transport

As outlined above, it is necessary to safeguard access to and between healthcare facilities both for emergency and routine movement of residents and healthcare workers. The ambulance service has specific targets (set out in Annex 1 to this letter)

for conveying patients to hospitals and the impact of the construction phase of the project on these standards should be considered.

Table 4.1 (Description of the Scoping Report Corridor north to south by section), identifies a significant number of principal and secondary road network locations that are to be crossed and directly impacted by the Project, potentially requiring temporary road closures, diversions with related highway network disruption. This would give rise to the potential for significant road network delay and service disruption from EEAST's perspective, taking place as part of a major 4-year construction phase program, required to implement the Project.

Information to determine the effects arising from the construction phase of the Project and the likely impact on EEAST's operational capacity, efficiency and resources (including the likely highway disruption and delay), therefore need to be included within the scope of the ES and/ or within a Technical Assessment accompanying the application for a DCO. Once this information is presented and assessed, any necessary mitigation and management measure should to be secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Reference specifically to the impact on health and wellbeing is not evident in the scoping report and should be included in the environmental statement.

Chapter 17: Cumulative Effects

The scoping report proposes that intra-project and inter-project cumulative effects are scoped in. This approach is supported and intra-project and inter-project impacts on health and wellbeing will be one topic to be assessed. However, this should not be an alternative to considering health and wellbeing in a standalone chapter. As described above, it is important that health and wellbeing is considered in a separate chapter

Conclusion

The ICB requests that:

1. Health and wellbeing impacts are considered in a separate chapter and not only within a chapter about cumulative effects
2. Health and wellbeing impacts considered include the capacity of health services to provide healthcare for the scheme workforce
3. Accidents and major incidents are scoped into the report.
4. The traffic and transport chapter considers impacts on access by residents, the scheme workforce and healthcare workforce to and between healthcare settings.
5. A health impact assessment (HIA) is undertaken to inform the health a wellbeing chapter, which should include consideration of access to healthcare services.
6. Advice is sought from the public health team before deciding to scope out construction dust and construction generators

Mid and South Essex Integrated Care System

NHS
Mid and South Essex

Yours faithfully

[redacted]

[redacted]

Planning Policy Manager

Mid and South Essex Integrated Care Board,
Phoenix Court, Christopher Martin Road, Basildon, Essex SS14 3HG

www.midandsouthessex.ics.nhs.uk [redacted]
Chair: Professor Michael Thorne CBE | CEO: Anthony McKeever

ANNEX 1

EEAST KEY FACTS & SERVICE INFORMATION

This section summarises EEAST's service remit, priorities, staff, vehicle fleet and estate assets, and co-working relationship with other healthcare and blue light partners and service targets

Service Remit & Priorities

The East of England Ambulance Service NHS Trust provide accident and emergency services and non-emergency patient transport services across the East of England.

The Trust Headquarters is in Melbourn, Cambridgeshire and there are Ambulance Operations Centres (AOC) at each of the three locality offices in Bedford, Chelmsford and Norwich who receive over 1 million emergency calls from across the region each year, as well as 800,000+ calls for patients booking non-emergency transport.

The 999 service is part of the wider NHS system providing integrated patient care. Provision of 999 services is aligned closely with national and regional initiatives driven by:

- Sustainability and Transformational Partnerships
- Integrated Care System
- Integrated Urgent Care systems, i.e. NHS 111, Clinical Assessment Services, Urgent Treatment Centres, GP Out of Hours Services.

Additionally, regional Ambulance Trusts may collaborate closely with other ambulance services, the wider emergency services or wider system providers to deliver appropriate patient care.

To support the service transformation agenda, the key requirements are:

- To deliver the core response and clinical outcome standards as defined by the Ambulance Response Programme
- To fulfil statutory duties relating to emergency preparedness, resilience and response (EPRR)
- Optimisation of call handling and appropriate responses through virtual alignment of NHS 111/999 and call/CAD transfer between ambulance services
- Increase the percentage of lower acuity calls managed through "hear and treat" and "see and treat" options
- Utilise a virtual delivery model to support wider workforce integration for paramedics, call handlers and specialist staff with local urgent care delivery models

- Facilitate cross boundary working and the flexible use of ambulance service resources to support the development of regional Sustainability and Transformational Plans and Integrated Care Systems.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) provide an essential lifeline for people unable to use public or other transport due to their medical condition. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics or other healthcare location
- Being admitted to or discharged from hospital wards
- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Service Assets

EEAST clinicians:

- Emergency Care Support Workers
- Emergency Medical Technicians
- Paramedics
- Specialist Paramedics
- Critical Care Paramedics.

Types and models of response:

- Community First Responder (CFR)
- Patient Transport Service (PTS)
- Clinical See and Treat
- Clinical Hear and Treat (telephone triage)
- Early Intervention Team (EIT)
- Rapid Response Vehicle (RRV)

- Double Staff Ambulance (DSA)
- Hazardous Area Response Team (HART)
- Specialist Operations Response Team (SORT)
- Helicopter Emergency Medical Service (HEMS), EEAST utilise 5 aircraft across 3 charities within the region

    - Magpas – 1 x aircraft from RAF Wyton
    - East Anglian Air Ambulance – 2 x aircraft form Cambridge and Norwich Airport
    - Essex and Herts Air Ambulance – 2 x aircraft form North Weald and Earls Colne

Ambulance Operations Centre (AOC) staff:

- 999 Call Handlers
- Emergency Medical Dispatchers
- Tactical Operations Staff.

EEAST support services staff cover all other corporate and administrative functions across the region.

Estates

The Trust is rolling out a Hub and Spoke network with up to 18 hubs to provide regional premises for delivery of operational responses to calls, flow of ambulance preparation via the Make Ready function (cleaning and restocking of ambulances) and despatch of ambulances to local spokes (reporting posts/response posts/standby locations). Support services such as workshop facilities, clinical engineering (medical equipment store and workshop), consumable product stores and support office accommodation are also provided from Hubs.

- Ambulance Station Central Reporting Post - A 24/7 - Permanent reporting base for staff and primary response location for one or more vehicles. Provision of staff facilities.
- Ambulance Station Response Post - A primary response location, which includes staff facilities but is not a reporting base for staff.
- Standby Location - Strategic locations where crews are placed to reach patients quickly. Facilities used by staff are provided on an informal basis only by agreement with the relevant landowner.

Ambulance Stations in the East Anglia Green Enablement Project area are:

ATTLEBOROUGH	BASILDON
DISS	BILLERICAY
LONGWATER (Norwich Depot)	BRAINTREE
NORWICH (N&N)	BRENTWOOD
NORWICH (Trowse)	CHELMSFORD
NORWICH (Earlham)	COLCHESTER
NORWICH OFFICE & AOC (Hellesdon)	DUNMOW
BURY ST EDMUNDS	EPPING
BURY ST EDMUNDS (Parkway)	GREAT NOTLEY
IPSWICH	GREENSTEAD

STOWMARKET	LOUGHTON
SUDBURY	ONGAR
THETFORD	SOUTH WOODHAM FERRERS
	THURROCK
	WICKFORD
	WITHAM

Vehicle Fleet

- 387 front line ambulances
- 178 rapid response vehicles
- 175 non-emergency ambulances (PTS and HCRTs vehicles)
- 46 HART/major incident/resilience vehicles located at 2 x Hazardous Area Response Team (HART) bases with a number of specialist vehicle resources.

Workforce & Equipment

Approximately 4,000 staff and 800+ volunteers across 120 sites. Each resource has equipment specific to the operational function of the vehicle and skill level of the staff.

Specialisms

EEAST works collaboratively across our blue light partners and have joint working groups with Police and Fire Services across the region, working in partnership managing responses to incidents and undertaking joint exercises with our dedicated resources to prepare for specialist rescue, major incidents and mass casualty incidents.

EEAST is a Category 1 Responder under the Civil Contingencies Act, 2004, playing a key role in developing multi-agency plans against the county and national risk registers. EEAST also works closely with the Military, US Air Force, Royal Protection Service, Stansted Airport and the Port of Felixstowe Police, Fire and Ambulance services.

EEAST's Emergency Preparedness Resilience Response (EPRR) team lead on the Joint Emergency Services Interoperability Principles (JESIP) working in close partnership with all blue light agencies, the Coastguard and Local Authorities. Specialist resources work with the Police in counter terrorism and developing response plans in the event of a major incident.

EEAST are an integral part of the locality's resilience response sitting on a number of safety advisory groups, east coast flood working groups and hospital emergency planning groups.

Co-working Relationship with other Blue-Light and Healthcare Partners

EEAST is an integral part of the wider healthcare system working closely with Integrated Care Boards/System (ICB/ICS) to deliver emergency and urgent care and are key stakeholders in supporting wider healthcare initiatives.

Within Norfolk, Suffolk and Essex, EEAST work with the ICB/ICSs in delivering additional care pathways focussing on hospital admission avoidance, this is a partnership with the local acute providers and local authorities. EEAST operate Early Intervention Response vehicles and a Rapid Intervention Vehicle. These resources work collaboratively within the system to offer holistic care to patients whilst reducing pressure on Emergency Departments.

This is EEAST's response to the requirements of the NHS Long Term Plan, with the clear narrative that in order to bring the NHS into financial balance all NHS providers must find mechanisms to treat patients in the community and out of the most expensive care setting, which are acute hospitals. This not only saves the NHS critical funding, but it also improves patient outcomes.

EPRR and Specialist Operations teams routinely train with other blue light agencies in preparedness for major incidents such as terrorist attacks and major incidents with statutory training obligations to respond to local and national incidents.

In continuing to respond to the COVID-19 Pandemic, EEAST is working collaboratively with Private Ambulance providers, the Military, volunteer Ambulance Services (such as St John Ambulance and British Red Cross) and local Fire and Rescue Services, to increase its capacity and maintain service delivery to meet the additional demand.

EEAST Service Targets

All NHS organisations are required to report against a set of Core Quality Indicators (CQIs) relevant to their type of organisation. For ambulance trusts, both performance and clinical indicators are set as well as indicators relating to patient safety and experience.

NHS organisations are also required to demonstrate their performance against these indicators to both their commissioners and Regulators (NHS England/Improvement).

It is important to note that EEAST is also measured on how quickly a patient is transported to an appropriate location for definitive care, often in time critical circumstances.

Failure to deliver against these indicators will result in a Contract Performance Notice and could result in payment being withheld, as prescribed in NHS Standard Contract 20/21 General Conditions (Full Length) GC9 9.15.

ANNEX 2

EEAST Operational Standards & Thresholds
Ambulance Service Response Times

Operational Standards	Threshold	Consequence of Breach
Category 1 (life-threatening) calls – proportion of calls resulting in a response arriving within 15 minutes	Operating standard that 90th centile is no greater than 15 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 15 minutes, £2.50 per 1,000 Category 1 calls received in the Quarter
Category 1 (life-threatening) calls – mean time taken for a response to arrive	Mean is no greater than 7 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 2 (emergency) calls – proportion of calls resulting in an appropriate response arriving within 40 minutes	Operating standard that 90th centile is no greater than 40 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 40 minutes, £2.50 per 1,000 Category 2 calls received in the Quarter
Category 2 (emergency) calls – mean time taken for an appropriate response to arrive	Mean is no greater than 18 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 3 (urgent) calls – proportion of calls resulting in an appropriate response arriving within 120 minutes	Operating standard that 90th centile is no greater than 120 minutes	Issue of a Contract Performance Notice and subsequent in process accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 120 minutes, £2.50 per 1,000 Category 3 calls received in the Quarter
Category 4 (less non-urgent "assess, treat, transport" calls only) – proportion of calls resulting in an appropriate response arriving within 180 minutes	Operating standard that 90th centile is no greater than 180 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 180 minutes, £2.50 per 1,000 Category 4 calls received in the Quarter

For All Indicators:

Method of Measurement:	See AQI System Indicator Specification at: https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/ Review of Service Quality Performance Reports
Timing of Application of Consequence	Quarterly for all indicators
Application	AM

Ministry of Defence

Defence Infrastructure Organisation

Jack Patten
Environmental Services
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Tel: [redacted]
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www.mod.uk/DIO

Your reference: EN020027
Our reference: DIO 10056874

30 November 2022

Dear Jack,

MOD Safeguarding – Wattisham Station

Proposal:	Scoping for development consent of East Anglia Green Energy Enablement. The proposal is to reinforce the 400kv high voltage power network to include 400kv connection substation in the Tendring district		
Location:	Norwich to Tilbury		
Grid Ref:	Start Point	Easting: 621811	Northing: 302258
	End Point	Easting: 566258	Northing: 176587

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This is a Scoping application for development consent of East Anglia Green Energy Enablement. The proposal is to reinforce the 400kv high voltage power network to include 400kv connection substation in the Tendring district. The line will stretch approximately 180km from close to the river Thames past Chelmsford, Colchester, Ipswich, Stowmarket, and Diss before reaching a point on the outskirts of Norwich. Between 500 and 550 steel lattice pylons will be required to implement the development, each pylon may be up to 50m agl in height.

The development route passes through, or close to, safeguarding zones designated in accordance with the provisions of the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 (Circular 01/2003). These safeguarded zones serve to ensure that the MOD is consulted on development that might affect operational capability.

The application route passes through statutory safeguarding zones associated with Wattisham Station and a technical asset known as the East 2 WAM network which contributes to air traffic management.

At this stage and on the basis of the information currently available, I can confirm that the MOD has concerns due to those aspects of the proposal set out below.

Wattisham Station

Aerodrome safeguarding

The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre. To enable assessments to be completed a series of three-dimensional surfaces known as Obstacle Limitation Surfaces are drawn around aerodromes, any tall structures that might penetrate those surfaces, whether independently or due to the topography on which they are to be sited, are of concern of the MOD.

The proposed route of the development passes close to Wattisham Station and through parts of the aerodrome safeguarding zone, this is a concern which might be addressed by additional data being made available. At this scoping stage, where no details are available for the design or location of the proposed pylons, MOD must identify that the location and height of the proposed pylons is a potential concern. The MOD should be consulted when further details of specific locations and heights of each of the proposed towers become available, this will enable a detailed assessment to be carried out.

Birdstrike

Within an eight mile or 12.87km radius of specific aerodromes the MOD has concerns that development might result in the creation of environments that might attract or support those large and/or flocking bird species hazardous to aviation safety. The proposed development route would pass through the birdstrike safeguarding zone drawn around Wattisham Station however, by virtue of the nature of the proposal, it is unlikely that the development would be of concern.

Technical

Safeguarding zones are drawn around various technical assets such as radar, communications, or navigation equipment to ensure that their operation and capability is not compromised by development.

The proposed development route passes through the area drawn to ensure the operation of the Instrument Landing System (ILS) serving the approach to the main runway at Wattisham Station. Depending on the location of pylons, the proposed high voltage power network may occupy safeguarding zones drawn to ensure that the operation and capability of the ILS is not impeded. At this scoping stage, where no details are available for the design or location of the proposed pylons, MOD must identify that the location and height of the proposed pylons is a potential concern. The MOD should be consulted when further details of specific locations and heights of each of the proposed towers become available, this will enable a detailed assessment to be carried out.

East 2 Wide Area Multilateration Network

Technical Safeguarding

The development route passes through would pass through safeguarding zones designated to preserve the operational and technical capability of the East 2 WAM network. Within these zones any development has the capacity to degrade or otherwise compromise the operation of the system.

To enable a detailed assessment of the development to be completed specific details for each pylon (to include a grid reference and elevation drawings/figured dimensions) as well as the likely cable height should be provided.

Low Flying

Fixed Wing military low flying training takes place throughout the United Kingdom down to a height of 250ft above ground level and in certain designated areas down to a height of 100ft above ground level. The introduction/erection of a new/replacement cable development of the type proposed has the potential to an impact on low flying operations and therefore aviation safety. It may be necessary for MOD to require that the development is fitted with aviation safety lighting and that sufficient data is provided to allow appropriate charting.

Summary

In summary, following review of the documents provided in this scoping consultation, the MOD has concerns to the principal of the development that occupies statutory safeguarding zones surrounding Wattisham Station and associated with the East 2 WAM network. The MOD should be consulted on any future iterations of the design and on the submission of any finalised or amended scheme in order that the impact on defence interests can be assessed and any necessary mitigations can be identified.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's document titled Scoping Report dated November 2022. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

[redacted]

[redacted]
Assistant Safeguarding Manager
DIO Safeguarding

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www.nationalgrid.com/gas-transmission

05 December 2022

Dear Sir / Madam

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

I refer to your letter dated 7th November regarding the proposed East Anglia Green Energy Enablement Project DCO. This is a response on behalf of National Grid Gas PLC (NGG).

NGG high pressure (major accident hazard) pipelines are located either within the Order limits or in close proximity to the order boundary including ancillary apparatus such as cathodic protection systems and above ground installations.

These pipelines form an essential part of the gas transmission network in England and Wales. NGG will need to obtain further information from the Promoter in order to identify specific interfaces and is already in dialogue with National Grid Electricity Transmission about possible impacts and protections required to NGG's network.

NGG advises that the Promoter undertakes independent assessments of impacted apparatus and contacts https://lsbud.co.uk/ for further information.

NGG has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGG's apparatus, NGG will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

Key Considerations:

- NGG has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

- Please be aware that written permission is required before any works commence within the NGG easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGG's easement strip subject to approval by NGG's plant protection team.

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- The below guidance is not exhaustive and all works in the vicinity of NGG's asset shall be subject to review and approval from NGG's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGG's Dial Before You Dig Specification for Safe Working in the Vicinity of NGG Assets. There will be additional requirements dictated by NGG's plant protection team.
- NGG will also need to ensure that its pipelines remain accessible during and after completion of the works.
- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGG representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of NGG High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGG representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGG's Plant Protection team is essential:
    - Demolition
    - Blasting
    - Piling and boring
    - Deep mining
    - Surface mineral extraction
    - Landfliing
    - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
    - Wind turbine installation
    - Solar farm installation
    - Tree planting schemes

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.

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- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with NGG prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGG pipeline without the prior permission of NGG
- NGG will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGG.
- An NGG representative shall monitor any works within close proximity to the pipeline to comply with NGG specification T/SP/SSW22

Cable Crossings:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- Where a new cable is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- Clearance must be at least 600mm above or below the pipeline
- An NGG representative shall approve and supervise any cable crossing of a pipeline.
- A Deed of Consent is required for any cable crossing the easement

Further Advice

We would request that the potential impact of the proposed scheme on NGG's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application. Please engage early with NGG's plant protection team to understand the specific requirements and constraints in relation to working close to high pressure pipelines.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGG apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGG requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection.

Adequate access to NGG pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Yours Faithfully

[redacted]

[redacted]
Land and Planning Consultant

Further Safety Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

http://www.hse.gov.uk/pubns/books/hsg47.htm

SSW22

https://www.nationalgrid.com/gas-transmission/document/82951/download

Tree Planting Guidance

https://www.nationalgrid.com/gas-transmission/document/82976/download

Working Near NGG Assets

www.nationalgrid.com/gas-transmission/land-and-assets/working-near-our-assets

Excavating Safely

https://www.nationalgrid.com/gas-transmission/document/82971/download

Dial Before You Dig Guidance

https://www.nationalgrid.com/gas-transmission/document/128751/download

From:	NATS Safeguarding
To:	East Anglia GREEN
Cc:	NATS Safeguarding
Subject:	RE: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation [SG34305]
Date:	08 November 2022 13:43:29
Attachments:	~WRD0003.jpg image001.png image002.png image005.png image006.png image007.png image004.png image008.png image003.png

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully

NATS Safeguarding

D: [redacted]
E: natssafeguarding@nats.co.uk

NATS Internal

From: East Anglia GREEN <EastAngliaGREEN@planninginspectorate.gov.uk>
Sent: 08 November 2022 11:09
Subject: [EXTERNAL] EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

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Dear Sir/Madam,

You were sent an email (with attached letter) from the Planning Inspectorate yesterday, regarding EIA scoping notification and consultation for the proposed **East Anglia GREEN project**.

Due to an administrative error, the cover email stated the wrong project name and deadline for consultation responses. The attached letter contained the correct details.

To confirm, the cover email should have stated the following details: *"Please see attached correspondence on the proposed **East Anglia GREEN project**. Please note the deadline for consultation responses is **5 December 2022**, and is a statutory requirement that cannot be extended".*

We have reattached the same letter (sent yesterday) to this email for ease or reference.

Please accept our apologies for any confusion caused.

Kind regards
Jack Patten

Jack Patten | EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring fairness, openness and impartiality across all our services

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DPC:76616c646f72



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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

Date: 01 December 2022
Our ref: 411876
Your ref: EN020027

eastangliagreen@planninginspectorate.gov.uk
BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T [redacted]

Dear Ms Cottam

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN)

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 07 November 2022, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Natural England has had pre-application engagement with National Grid Electricity Transmission (NGET, also referred to in this letter as 'National Grid'), including consultations on the preliminary siting and routeing study, and proposed documents for the EIA sections on Biodiversity, Landscape, Soils and Arboriculture. We have provided advice on potential impacts to specific designated sites, in particular impacts to wintering birds through functionally linked land. Natural England's main concern remains the impacts on Dedham Vale and Suffolk Coast and Heaths Areas of Outstanding Natural Beauty (AONBs), and these are discussed further in section 5 of Annex A. We have also advised on the need for detailed ALC soil surveys.

Detailed advice on scoping the Environmental Statement is available in Annex A.

For any further advice on this consultation please contact the case officer Joanna.parfitt@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours faithfully

[redacted]
Norfolk and Suffolk Team

Annex A – Natural England advice on EIA scoping

1. General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development (please refer to the request in the landscape section for the AONBs to be indicated on visual receptor figures)
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in-combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

Natural England considers that many of the general principles, as outlined above, have been or are going to be addressed through the Environmental Statement (ES). However, we have requested that additional information is provided with respect to designated landscapes. This is discussed in more detail in section 5 below.

Natural England was consulted during the non-statutory consultation for the Corridor and Preliminary Routeing and Siting Study and is satisfied that reasonable alternative options have been considered. We have also been consulted on draft documents for some chapters of the EIA scoping report. Our responses to these are attached separately to this document

for your information. And any outstanding issues or information required will be highlighted in the relevant section below.

2. Cumulative and in-combination effects

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in-combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects
b. approved but uncompleted projects
c. ongoing activities
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Table 1 below sets out any plans and projects that Natural England are aware of, and that we advise may need to be included in an in-combination assessment.

Table 1: Plans or projects that Natural England are aware of that might need to be considered in the ES	
Project / plan	**Status**
Anglian Water Strategic Pipeline from Bexwell to Bury St..Edmunds	Planning permission has not yet been applied for, for the sections relevant to East Anglia GREEN. However, this is expected to be applied for in 2023
Five Estuaries offshore wind farm and onshore substation	DCO submission date is estimated to be Autumn 2023
North Falls offshore wind farm and onshore substation	DCO submission estimated to be Autumn 2023
National Grid Bramford to Twinstead	DCO submission date is estimated to be Winter 2022/2023
National Grid Tilbury – Gravesend tunnel upgrade	Natural England was briefed on this project on 29th November 2022. We understand the project is at an early stage and anticipates a planning application in the Autumn 2023
Lower Thames Crossing	DCO application was submitted October 2022
North Thames Estuary & Marshes potential designation of an enlarged SSSI in the Tilbury area.	Natural England is undertaking an evidence review exercise to examine whether there is a case for SSSI notification as part of the published SSSI pipeline: 'Thames Estuary Invertebrates, Essex & Kent'. Should there be a case for notification, and if approved by our Chief Executive, this is expected during Spring 2023

Sea Link	EIA statutory scoping response has been provided November 2022
Thurrock Flexible Power Generation NSIP	Consented NSIP development. Build stage is uncertain
Thames Freeport	Natural England understands that the Port of Tilbury has expansion aspirations for the area west of the former Tilbury Power Station

3. Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx. In due course, Natural England will publish its commissioned surveys linked with the North Thames Estuary & Marshes SSSI notification project referenced above.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones (IRZs) are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. As set out in our prior consultations (our ref: 399301, dated 27 July 2022 and 17 August 2022), the IRZs may need additional consideration with regards to mobile species (such as birds) and further impact pathways.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account, such as the Local Nature Recovery Strategy (LNRS), Nature Recovery Networks (NRNs), Local Plans, Shoreline Management Plans (SMPs), Nutrient Neutrality (NN) and other Supplementary Planning Documents (SPDs).

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Section 8.3 of the EIA Scoping Report identifies different biodiversity receptors which will be considered within the ES, on the basis on their proximity to the project area. Natural England has previously advised National Grid that biodiversity receptors should not be identified by arbitrary distances and that our IRZs, available via MAGIC, should act as a starting point for

identifying potential impact pathways. It is noted that some Sites of Special Scientific Interest (SSSIs), that are outside the original scoping distance, have been included on the advice of Natural England. This is welcomed, and further advice on nationally designated sites can be found in section 4.2 below.

4.1. International and European sites

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPAs), Special Areas of Conservation (SACs), listed Ramsar sites, candidate SACs and proposed SPAs.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in-combination with other plans or projects.

The development site may impact on the following **European/ internationally designated nature conservation site(s):**

- Stour and Orwell Estuaries Ramsar and SPA
- Thames Estuary and Marshes Ramsar and SPA
- Norfolk Valley Fens SAC

Table 8.9 of the EIA scoping report has scoped Redgrave and South Lopham Fens Ramsar and Waveney and Little Ouse Valley Fens SAC out of the ES. Natural England is satisfied with the reasons given for this.

Table 8.9 also scopes Stour and Orwell Estuaries SPA and Ramsar and the Thames Estuary and Marshes Ramsar and SPA in for both construction and operational phases of the project. Norfolk Valley Fens SAC is scoped in at construction only. This is in line with our previous advice to the applicant, and Natural England agrees with this approach. Table 2 below outlines the sites that Natural England considers should be assessed further in the ES, along with potential impact pathways.

Table 2: Potential risk to international designated sites: the development is within or may impact on the following European/ internationally designated site(s)

Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/ assessment is required.**
Stour and Orwell Estuaries Ramsar and SPA European Site Conservation Objectives for Stour and Orwell Estuaries SPA - UK9009121 (naturalengland.org.uk)	• Avocet • Black-tailed godwit • Dark-bellied Brent goose • Dunlin • Grey plover • Knot • Pintail • Redshank • Waterbird assemblage - wintering	• Loss of functionally linked land • Risk of collision

Thames Estuary and Marshes Ramsar and SPA European Site Conservation Objectives for Thames Estuary & Marshes SPA - UK9012021 (naturalengland.org.uk)	• Avocet • Black-tailed godwit • Dunlin • Hen harrier • Knot • Redshank • Ringed plover • Grey plover • Waterbird assemblage - wintering	• Loss of functionally linked land • Risk of collision • Disturbance during construction • Groundwater pollution risk (pylons within landfill areas)
Norfolk Valley Fens SAC European Site Conservation Objectives for Norfolk Valley Fens SAC - UK0012892 (naturalengland.org.uk)	• Alkaline fens • Alluvial forests with alder and ash • Molinia meadows • Narrow-mouthed whorl snail	• Hydrological impacts from construction

4.2. Nationally designated sites

4.2.1. Sites of Special Scientific Interest

Sites of Special Scientific Interest (SSSIs) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSIs and their special interest features can be found at www.magic.gov .

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

The development site may impact on the following **SSSIs:**

- Forncett Meadows SSSI
- Aslacton Parish Land SSSI
- Shelfhanger Meadows SSSI
- Wortham Ling SSSI
- Gypsy Camp Meadows, Thrandeston SSSI
- Burgate Wood SSSI
- Gipping Great Wood SSSI
- Combs Wood SSSI
- Barking Woods SSSI
- Middle Wood, Offton SSSI
- Elmsett Park Wood SSSI
- Flordon Common SSSI
- Cattawade Marshes SSSI
- Stour Estuary SSSI
- Bullock Wood SSSI
- Marks Tey Brickpit SSSI
- River Ter SSSI
- Langdon Ridge SSSI
- Thorndon Park SSSI
- Hangman's Wood & Dene Holes SSSI

- Mucking Flats & Marshes SSSI
- South Thames Estuary & Marshes SSSI
- S. Thames Estuary Compensation (9003874)

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

The sites listed above, with the exception of the S. Thames Estuary Compensation and Marks Tey Brickpit SSSI, have all been identified in Table 8.4 of the submitted EIA Scoping Report. Marks Tey Brickpit and River Ter SSSIs have, instead, been considered in chapter 9: Geology and Hydrogeology. Natural England agrees with this approach but would refer you to our comments in the attached letter, our reference 389872.

Natural England has reviewed the proposed corridor again and noted there appears to be an additional SSSI within the route corridor – Newney Green Pit SSSI. Newney Green Pit SSSI is a site of geological interest and, as such, Natural England advises that it is considered within chapter 9 of the EIA.

In addition to the above sites, we have made National Grid aware of a potential new SSSI. Natural England is currently assessing whether areas around the Thames Estuary may be of special interest for their invertebrate assemblages – in particular, their populations of bees, wasps and ants, and also other potential features of interest including breeding and wintering birds and plants. This includes land within the Tilbury area. We have undertaken survey work throughout 2022 and are considering evidence already available against recently revised SSSI selection guidelines for invertebrates published in 2019.

Natural England expects to decide whether further areas are of special interest for their biodiversity in Spring 2023.

Natural England has informed National Grid of the work we are carrying out in the Tilbury area and have provided National Grid with further information relating to our areas of interest. We have requested that the preferred route avoids these areas. We will continue to share information with National Grid as appropriate as the project progresses. We note National Grid's intention to avoid areas of environmental sensitivity as part of the route selection process and we anticipate working with National Grid to extend these working principles to future notifications.

It is noted that in table 8.9, national sites designated for biodiversity are scoped out for the operational phase. Natural England would advise that those sites underlying the European sites scoped in for operation (Stour and Orwell Estuaries Ramsar and SPA and Thames Estuary and Marshes Ramsar and SPA) are also scoped in during operation, in line with internationally designated sites.

With respect to the figures included within the EIA Scoping Report, Natural England has noticed that some sites have been omitted. We have outlined these below to ensure that all documents are consistent:

- Figure 4.1 page 8 of 9: Thorndon Park SSSI is not shown
- Figure 4.1 page 9 of 9: Mucking Flats and Marshes SSSI is not shown
- Figure 7.1 page 11 of 11: South Thames Estuary and Marshes SSSI and Thames Estuary and Marshes SPA/ Ramsar are not shown correctly.

4.3. Regionally and locally important sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The ES should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trusts, geoconservation group or local sites body in the area for further information.

We have previously advised National Grid about a Nature Recovery Network project that is crossed by the proposed corridor. The project is aiming to create a habitat corridor along the Waveney and Little Ouse to the west of Diss. The ES should include consideration of the impact on this project, such as bird collision and the impact of pylon placement within the corridor. Suffolk Wildlife Trust is leading on this project, and we would advise the applicant to contact them about any potential impacts.

4.4. Protected species

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, hazel dormouse, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

The ES will need to consider the following **protected species:**

- Bats
- Otter
- Hazel dormouse
- Badger
- Water vole
- Reptiles
- Breeding birds
- Protected plants, fungi etc.

4.5. District Level Licensing for great crested newts

Natural England are aware that National Grid is applying to use the District Level Licensing scheme for great crested newts (GCN).

Where strategic approaches such as district level licensing (DLL) for GCN are used, a letter

of no impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The IACPC will also provide additional detail including information on the proposed development's impact on GCN and the appropriate compensation required.

By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

4.6. Priority habitats and species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as SSSIs, on the Magic website or as Local Wildlife Sites (LWSs). Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present (quantified by area)
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

4.7. Ancient woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees. Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Natural England has noted that the proposed corridor contains several areas of ancient woodland and is adjacent to many more. Some of these sites have names while others have simply been designated as areas of ancient woodland. It is noted that the project will be designed to avoid ancient woodland and veteran trees where possible, and that impacts to ancient woodland during construction have been scoped in in Table 8-9 of the EIA Scoping Report. This approach is welcomed.

4.8. Biodiversity net gain

We advise that it is imperative that the project as a whole avoids, mitigates and/ or compensates for impacts on habitats and species of high biodiversity value including designated sites, protected species and ancient woodland. As a first principle, the project should therefore represent no 'biodiversity net loss' in these regards.

However, it should be noted that a significant amount of other valuable and sensitive habitats and species are likely to be affected by the project, including priority habitats and species, County Wildlife Sites (CWS) and Local Nature Reserves (LNRs). Priority habitats and species listed under section 41 of the NERC Act are, in the Secretary of State's opinion, of principal national importance for the purpose of conserving biodiversity. The avoidance-mitigation-compensation hierarchy should also be clearly followed with respect to these habitats and species where they may be affected by this application.

In this regard, Natural England advises that a project of this scale has the potential to provide a positive environmental legacy for the area within which it is proposed, with considerable long-term benefits to people and wildlife. We welcome the applicant's commitment to providing Biodiversity Net Gain (BNG) in advance of it being a statutory requirement in the relevant National Policy Statements (NPS EN-1 and NPS EN-5) for Nationally Significant Infrastructure Projects (NSIPs) and we would be keen to work with the applicant in order to help realise any such ambition.

The ES should use an appropriate biodiversity metric such as Biodiversity Metric 3.1 together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain. The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development

- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site, through the purchase of BNG credits or through a combination of all. On-site provision should be considered first, and BNG credit purchase only where there are no suitable alternatives. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or LNRSs.

Opportunities for wider environmental gains should also be considered.

We advise that such an approach would be in line with:

- **The NPS for Energy (NPS EN – 1):** this provides the primary basis for decisions on applications for development consent for energy projects and acknowledges that development proposals "provide many opportunities for building-in beneficial biodiversity or geological features as part of good design" (EN-1, para 5.3.15, pg. 72) and that "the applicant should demonstrate that…opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals" (EN-1, para 5.3.18, pg. 72, also see para 5.3.4 on pg. 69).

- **The upcoming revisions to the NPSs:** The recent government response to the revised NPS consultation in relation to net gain[1] states that "the 2011 Natural Environment white paper set out an ambition to achieve net gain for biodiversity as opposed to net loss. The recently published 25 Year Environment Plan identified actions to both strengthen the commitment to biodiversity net gain and expand the approach over time to natural capital net gain and ultimately wider environmental net gains as appropriate metrics become available. The NPS will establish the need to consider the potential to achieve biodiversity net gain and will set the context for achieving this at a strategic level without analysis of impacts on individual sites. More detailed assessment, for example based on the Defra biodiversity metric, will be undertaken as part of the DCO application". We hope that the above is therefore useful in giving you some foresight on what the NPS revisions might include in terms of net gain requirements.

- **The Government's 25 Year Environment Plan**: Net gain is embedded in the Government's recently published 25 Year Environment Plan as a key action for ensuring that land is used and managed sustainably (see pp. 32-34 for general principles). As per the Advice Note 11, Annex C – Natural England and the Planning Inspectorate[2], "Natural England will seek opportunities for positive environmental outcomes from major infrastructure developments. NSIPs can make a significant contribution to delivering the environmental ambition in the Government's 25 Year Environment Plan (25YEP). This aims to deliver an environmental net gain through development and infrastructure. We can help applicants and the Examining Authority to better understand and value the benefits derived from the natural environment ('natural capital'). We may advise on opportunities to secure positive environmental benefits from NSIPs. Priorities include establishing more coherent and resilient ecological networks and providing and enhancing habitats for protected species. We can also advise on approaches and metrics that enable projects to achieve

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727628/NPS_Siting_Criteria_Consultation_-_Government_Response.pdf

[2] https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/10/PINS-Advice-Note-11_AnnexC_20150928.pdf

biodiversity net gain, as set out in the National Planning Policy Framework and the recent and developing National Policy Statements, and on approaches to achieving wider natural capital gains".

- **The recent mandatory biodiversity net gain consultation**[3]: The requirement for biodiversity net gain was also the subject of this consultation. The Construction Industry Research and Information Association (CIRIA), the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA) have launched Biodiversity Net Gain Best Practice guidance[4] to which Natural England provided input to and further best practice guidance is also now available. Many major infrastructure projects in the UK have now committed to delivering a biodiversity net gain and some examples of these are included in this guidance.

- The revised **National Planning Policy Framework (NPPF)[5]:** The NPPF identifies that one of the three overarching objectives to achieving sustainable development through the planning system is an environmental objective "to contribute to protecting and enhancing our natural…environment; including making effective use of land, helping to improve biodiversity…". The revised NPPF was published on 24 July 2018 and updated Planning Practice Guidance (PPG)[6] has also been issued by the Ministry of Housing, Communities and Local Government (MHCLG) to support various aspects of the revisions. Whilst broadly maintaining existing policies to protect and enhance the natural environment, importantly, it also includes strengthened policies on biodiversity and wider environmental net gain; specifically, planning proposals and decisions are to provide net gains for biodiversity and are to identify and pursue opportunities for biodiversity net gain (paras 170, 174,175) and wider environmental gain (paras 102, 118)

5. Landscape

5.1. Nationally designated landscapes

The development site is within and within the setting of the Dedham Vale Area of Outstanding Natural Beauty (AONB) and within close proximity to the Suffolk Coasts and Heaths AONB and has the potential to impact both of these nationally designated landscapes.

5.2. Landscape and visual impacts

5.2.1. General landscape planning advice

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

The Energy National Policy Statement EN-1 gives significant protection including within the

[3] https://consult.defra.gov.uk/land-use/net-gain/
[4] https://cieem.net/biodiversity-net-gain-guidance-published/
[5] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf
[6] https://www.gov.uk/government/collections/planning-practice-guidance

setting of the protected landscape. The latest versions should be checked as they are currently going through a review process.

Consideration should be given to the direct and indirect effects on the Dedham Vale and Suffolk Coasts and Heaths designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

5.2.2. General advice regarding landscape and visual impacts assessment in the ES

The ES should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* (3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

The National Infrastructure Commission has produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

5.2.3. Landscape comments in response to the East Anglia GREEN EIA scoping consultation document

Natural England's advice with regards to landscape is limited to the AONBs and to the area surrounding it which constitutes its 'setting'. Natural England's priority and focus in providing its advice is to uphold the statutory purpose of the AONB which is to conserve and enhance the area's natural beauty. We are providing this advice as the national landscape agency for England and as the designating authority for AONBs.

Paragraph 174 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. We advise National Grid to consult the relevant local planning authorities with regards to assessing landscape and visual impacts to locally designated landscapes and non-designated landscapes.

5.2.4. Chapter 13: Landscape and visual (p187-207)

AONBs special qualities and statutory purpose
Natural England welcome the acknowledgement at paras 13.9.3 and 13.9.4 that the project has the potential to affect the defining characteristics and 'special qualities' and setting of nationally designated Dedham Vale AONB and Suffolk Coasts and Heaths AONBs, respectively, during construction and operation. We are reassured to see that consideration of effects on the landscape character, defining characteristics and 'special qualities' of both Dedham Vale and Suffolk Coasts and Heaths, including their settings are proposed to be scoped into the EIA for both construction and operation (including maintenance).

It is important that an assessment of how the scheme would affect delivery of the AONB's statutory purpose is carried out which takes account of how the defined special qualities of the AONB would be affected. A significant effect on a special quality is likely to translate into a significant effect on how the area delivers that statutory duty (to conserve and enhance the area's natural beauty). This assessment can draw upon the findings of the LVIA and be included within it, but it may also need to draw on other parts of the ES depending on the nature of the special qualities particular to each of the Dedham Vale and Suffolk Coasts and Heaths AONBs. This is a standard request by Natural England, as the national landscape agency and designating authority for AONBs and is commensurate with the AONB's national designation and importance. The examining authority for this project will need to understand the consequences of the project for the AONB in upholding its statutory purpose.

General scope of the EIA
In general, Natural England agree with the proposed scope of the EIA for landscape and visual effects, as set out on p.267-268 of the Scoping Report. However, we would like to comment further on the proposal to scope out effects on visual receptors outside of the Zone of Theoretical Visibility (ZTV) during construction and operation.

Para 13.9.12 states *"The identification of visual receptors would be informed by ZTV mapping, which would indicate the areas from which the Project is theoretically visible. Field work would be undertaken to ground truth the ZTVs. The assessment would not consider effects on visual receptors that are located wholly outside the ZTV, as they are highly unlikely to have views of the Project. Effects on visual receptors located outside of the ZTV are therefore proposed to be scoped out of the ES, during construction and operation."*

We welcome the intention to ground truth the ZTV in relation to sensitive receptors. The identification of potential for adverse effects on the Dedham Vale AONB will be an especially important focus for this exercise. In addition, it should not be assumed that the ZTV would cover all potentially affected receptors within the AONB. Highly sensitive receptors in the AONB beyond the extent of the ZTV but with an open view of the development site could be significantly affected despite the distance involved. A desk-based review of the ZTV may indicate where this could be the case. The AONB Partnership and local authority may identify other locations known to be publicly accessible, well used and with open views towards the site. As a precautionary measure, both proportionate and commensurate with the high sensitivity and nationally designated status of the AONB, site visits should be made to any such locations or to any locations within the AONB or its setting where doubt exists as to the accuracy or reliability of the ZTV, prior to these visual receptors being scoped out of the ES.

Preliminary proposed viewpoints and visualisations
Para 13.9.26 states *"The selection of the final viewpoints would be informed by the ZTV analysis, ground truthing field work, desk-based research on access and recreation (including PRoW – i.e. long distance paths, footpaths, bridleways – and public land), tourism including popular vantage points, and by the distribution of the different groups of visual*

receptors." We welcome the statement on p.208 of the scoping report that further consultation will be sought to agree viewpoint locations and visualisation types. We strongly recommend that final viewpoint selection to ascertain visual impacts to the AONBs and their settings should be informed by the views of the AONB Partnership whose local knowledge will make a valuable contribution to the selection of appropriate viewpoints as they will have local knowledge of popular vantage points and PRoWs within the area. Additional viewpoints may be required in the south of the Dedham Vale AONB to check for views to the overhead lines (OHLs) proposed to the south, particularly where OHLs are proposed within 1-2km from the AONB boundary. As mentioned in our further comments below, it appears that the ZTV has not been made available to view within the EIA scoping report or its appendices. However, it would be helpful for stakeholders to be able to view a copy of the ZTV to facilitate a greater understanding of the likely intervisibility of OHLs with the AONB and its setting within this area.

Para 13.9.29 states *"A number of the viewpoint locations would be illustrated with photomontages. Photomontages show more detail than wireframes, including buildings, vegetation, colour, texture and lighting conditions."* Natural England requests that all Viewpoints within the AONB and its setting are illustrated as Type 4 photomontages (survey / scale verifiable) to AVR level 3 in accordance with LI Technical Guidance Note 06/19 'Visual Representation of Development Proposals.' This approach is commensurate with the high status and sensitivity of the AONB as a nationally designated landscape.

5.2.5. Chapter 17: Cumulative effects (p259-262)

Zone of influence (ZOI) for landscape cumulative effects
The Zone of Influence (ZOI) for cumulative effects for landscape is proposed as 3km (Table 17.2 p.260). Natural England would strongly recommend a 5km ZOI for assessment of cumulative effects is applied to the AONBs, unless cables are proposed to be undergrounded northeast of this area. This is because a 3km ZOI will effectively scope out consideration of cumulative effects of OHLs with the Bramford – Twinstead project. This is of concern because OHLs, once installed, will be permanently visible over the long duration of the project's operational phase. At this stage in the project, the exact substation location where OHLs will be undergrounded on the East Anglia GREEN project is unknown to Natural England. Uncertainty about this introduces the possibility that in areas to the northeast of the Dedham Vale AONB near to Barrow Hill and Raydon there exists potential for two sets of OHLs to be located within approximately 3.5km of each other either side of Dedham Vale AONB, which could give rise to combined cumulative effects from within the AONB which would be experienced in succession. However, if East Anglia GREEN cables are proposed to be undergrounded in a location to the north of this area, operational cumulative effects would be much less of a concern.

Given that details of undergrounding locations are yet to be announced, a precautionary approach to the assessment of cumulative effects in the AONBs within the LVIA and ES chapter is advised. If undergrounding is not proposed northeast of Raydon, a 5km ZOI would be an appropriate scope within which to assess the combined cumulative effects of the two projects, experienced in succession, (as described in Table 7.1, p.131 GLIVA) of these proposed OHLs.

Reversibility of operational visual effects associated with OHLs
Page 395 of the EIA scoping report pdf states *'Operational visual effects associated with the proposed overhead transmission lines would be considered reversible'.* Although this is factually correct to the extent that removal of pylons is technically possible, in practice, once installed, pylons are likely to remain in-situ for their expected service life. It is Natural England's understanding that the expected service life of a lattice pylon supporting OHLs is around 60 years and for a T pylon is 70-80 years. Please correct us if that is not the case.

Natural England would point out that the operational life of the OHLs and any visual impact arising to a nationally designated landscape from their installation and operation will be considerable in terms of the temporal duration of landscape and visual effects arising. In practical terms, it is reasonable to expect that the visual impacts will be in place for at least two generations. Our view is that it is unreasonable to consider an impact 'reversible' if in practical terms operational visual effects would not be reversible for a period of two generations at the minimum.

5.2.6. Appendix A – Figure 13.2 Visual receptors and Appendix H – preliminary viewpoints

Indicating the AONB on relevant figures
The following drawings do not indicate the extent of the Dedham Vale and Suffolk Coasts and Heaths AONBs:

- Figure 13.2 Visual Receptors Overview
- Figure 13.2 Visual Receptors p6 of 11
- Figure 13.2 Visual Receptors p7 of 11

As mentioned in our previous non-statutory scoping response in August 2022, it is necessary to assist the understanding of the Inspector and other key stakeholders, to indicate both the Dedham Vale and Suffolk Costs and Heaths AONBs and their defined settings (once work has been carried out to define their settings agreed) on all figures produced for the landscape section of the Preliminary Environmental Information Report (PEIR) and the LVIA ES chapter.

The ZTV mapping used to inform preliminary viewpoint selection does not appear to have been made available to consultees within the Scoping Report or its Appendices. Whilst some of the rationale for preliminary viewpoint selection is given in Appendix H, key stakeholders will need to have a copy of the ZTV made available to them to fully understand why the preliminary viewpoints have been selected and to guide their decision making as to whether they wish to propose further viewpoints.

Currently, the proposed locations for sealing end compounds for this project are not known by Natural England, and therefore the exact extent of undergrounding through the Dedham Vale AONB is also unknown – i.e. where undergrounding of cables will begin and end. As previously advised, we strongly recommend that sealing end compounds are located outside of both the AONB and the area identified as being 'the setting' to the AONB. Depending on the sealing end compounds' locations, viewpoints may be required from sealing end compound locations, to understand the landscape and visual effects arising from these on the AONB or its setting AONB.

5.2.7. Appendix I – LVIA assessment methodology

AONB setting study
On the Bramford – Twinstead network reinforcement project, National Grid have carried out a 'setting study' to identify and come to a shared understanding of those areas identified as being within 'the setting' to Dedham Vale AONB to inform the production of the LVIA and corresponding ES landscape chapter.

Natural England assume that, in consistency with this comparable NSIP project, a similar study, using the same methodology that has been agreed by Natural England, will be carried out for the East Anglia Green project which also passes directly though Dedham Vale AONB. This is particularly the case given the extent of OHLs proposed immediately to the south of

Dedham Vale AONB within 0-2km of its southern boundary. Of particular concern is the area around the Tendering Peninsula EAC substation - Ardleigh – Great Hawkesley/ Great Wormingford area. These areas, by virtue of their proximity are highly likely to be considered to be within 'the setting' of Dedham Vale AONB.

National Grid, like all public bodies and utility providers, has a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 which states that *in exercising or performing any functions in relation to, or so as to affect, land in and AONB, authorities "shall have regard" to their purposes*. This 'duty of regard' applies to developments outside the AONB which will nonetheless affect their statutory purpose. This is confirmed by the government's on-line Planning Practice Guidance https://www.gov.uk/guidance/natural-environment which states:

'This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection.'

That same planning guidance also deals with the 'settings' issue in the context of development management policy. The guidance is as follows:

How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?
Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

The approval and delivery of extensions to the National Grid are guided by the relevant National Policy Statements (NPS). These are the Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Electricity Networks Infrastructure (EN-5). EN-1 paragraph 5.9.12 reiterates the duty of regard and its application to the settings of designated landscapes.

5.9.12 'The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.'

Paragraph 2.8.9 of NPS EN- 5 directs the decision maker to 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'.* We note that this references areas 'such as' AONBs and isn't limited to only those covered by a statutory designation.

It would be helpful to understand National Grid's intentions with regards to the production of a setting study and the timescales proposed for this. Ideally, this would be completed ahead of final viewpoint selection and production of the LVIA, both of which should be informed by the findings of the study.

5.3. Heritage landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

6. Connecting people with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100 and paragraph 2.2.6 of NPS 5. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

7. Soils and agricultural land quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil

handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space)
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/ masterplan
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

Natural England has reviewed the methodology outlined in chapter 6 of the EIA scoping report, and has the following comments:

- Table 6.5 sets out the matters to be scoped in or out of the ES. Natural England broadly agrees with what is set out, and the methodology proposed is consistent with our previous advice
- Sufficient information should be collected during ALC surveys to prepare soil resource plans in line with the Defra Construction Code. Collection of additional soil data may be needed to characterise soils for soil resource plans where soil disturbance is proposed on non-agricultural land.
- Mitigation should also include remedial measures to be undertaken, such as subsoiling to alleviate compaction and, where appropriate, a period of sensitive 'aftercare' management
- Paragraph 6.9.8 states that "by the end of construction, all land required temporarily would be reinstated and impacts on agricultural operations would be dealt with through compensation agreements." Natural England advises that this should include a commitment to return the land to its former ALC grade

8. Air quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

It is noted that the affected road networks identified in chapter 16 of the EIA Scoping Report include sections of the A11 and the A14 which pass adjacent to, or through, sites which are sensitive to changes in air quality, namely Breckland SAC, Rex Graham Reserve SAC and Devil's Dyke SAC. There may be other such sites along construction routes. Natural England would advise the applicant to consult with us once further information on construction routes is available. When considering the impact of traffic on designated sites, Natural England refers you to our advice note NEA001 – Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations.

9. Water quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

Date: 17 August 2022
Our ref: 399301

[redacted]

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National Grid: East Anglia GREEN Wintering and Passage Bird Survey Scope Consultation

Thank you for your consultation on the above. This advice is being provided as part of the Service Level Agreement between National Grid and Natural England. National Grid has asked Natural England to provide advice and feedback on the scope for wintering and passage bird survey methodology to ensure sufficient data is captured to inform the impact assessment.

As the proposals are at an early stage, with full details of the scheme not yet available, the advice in this letter should be treated as preliminary advice which may be subject to change as more information is provided. The following advice is based upon the information provided within:

- Wintering and Passage Bird Survey Scope (22 July 2022)

Following on from my previous letter (dated 01 August 2022) which gave general advice in relation to birds and powerlines, I have now received comments from our ornithologists on the above survey scope. This advice is provided ahead of potential meetings between National Grid and Natural England, to allow discussions to be more focused.

The advice is as follows:

There are different Impact Risk Zones (IRZ) for different bird groups which are set according to their foraging distances. These can be accessed from the Natural England Open Data Geoportal. The report uses 3km for the 'core' IRZ, however, we advise that different zones should be used for different bird groups. For example, bird group 5 includes lapwings and golden plovers for which the IRZ is 5km. For other wintering waders, brent geese and wigeon, the IRZ is 2km. Therefore, where lapwings and golden plovers are part of the assemblage, we suggest a 5km IRZ is used. Note that the survey area could be limited by reference to suitable habitat; the IRZ is a simple buffer, so may include urban areas or small, enclosed fields that are unlikely to be used by plovers and can therefore be excluded.

Whilst the brent goose IRZ is 2km, their maximum foraging range is 5km, so existing data sources should be checked for records of this species further inland than 2km which would indicate the use of functionally-linked land (FLL).

The report states that the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site is not designated for species associated with open farmland and brent geese are not typically associated with inland sites (page 3). Whilst we agree that most of the qualifying species are associated with either the intertidal or terrestrial sites close to them, rather than inland FLL, the

species that make up the assemblage, e.g. lapwing and golden plover, that might forage further inland should also be considered. Also, as mentioned above, brent geese mainly forage within 2km of their roost but they can go further.

We are pleased to see use of the Scottish Natural Heritage (SNH) vantage point survey methodology which we would recommend. It is also noted that 2 surveys a month are proposed apart from September and March, when there will be one survey; we recommend 2 surveys a month for the full non-breeding season to be in line with best practice.

Natural England considers one season of survey to be the absolute minimum. Where there is a higher risk in relation to European site impacts, we would expect to see 2 years' worth of survey data.

Use of FLL depends on cropping regime, so it would be helpful to provide information on cropping within the IRZs to demonstrate how often the fields are planted with suitable crops, i.e. winter cereals/grass for brent geese and bare ground/grass for plovers.

I hope this is helpful.

☒ The advice provided in this letter has been through Natural England's Quality Assurance process

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Yours faithfully

[redacted]
West Anglia Team

Date: 05 August 2022
Our ref: 399301

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National Grid: East Anglia GREEN EIA Scoping Methodology Consultation

Thank you for your consultation on the above. This advice is being provided as part of the Service Level Agreement between National Grid and Natural England, ref: V2.01.056. National Grid has asked Natural England to provide advice and feedback on the draft EIA methodology documents for biodiversity, arboriculture, soils and landscape.

The Scope of our Advice
Our previous response letter, dated 27th July 2022 provided advice and feedback on the biodiversity, arboriculture and soils aspects of the consultation. The scope of this letter is to provide advice and feedback on the landscape aspects of the draft EIA, as agreed in the meeting between Arcadis and Natural England on 13 July 2022.

As the proposals are at an early stage, with full details of the scheme not yet available, the advice in this letter should be treated as preliminary advice which may be subject to change as more information is provided. The following advice is based upon the information provided within:

- Landscape and Visual Draft EIA Scoping Methodology - Draft for discussion with stakeholders and subject to ongoing engagement and review (July 2022)
- The information and slides provided within the meetings between Arcadis, Natural England and other stakeholders on 15th July 2022.

Natural England's advice with regards to landscape is limited to the AONBs and to the area surrounding it which constitutes its 'setting'. Natural England's priority and focus in providing its advice is to uphold the statutory purpose of the AONB which is to conserve and enhance the area's natural beauty. We are providing this advice as the national landscape agency for England and as the designating authority for AONBs.

Paragraph 174 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. We advise National Grid to consult the relevant local planning authorities with regards to assessing landscape and visual impacts to locally designated landscapes and non-designated landscapes.

Landscape and Visual Draft EIA Scoping Methodology Document

LVIA Assessment Scope
Paragraphs 2.1.1 - 2.2.1 and Table 1 sets out the proposed scope of the LVIA.

Natural England have the following comments to make on Table 1:

'The Site' – changes to topography should be mentioned in the 'potential significant effect' column. The potential for significant changes in topography are limited, however where sections of cable are undergrounded there is the need to ensure that excavated grounded is re-instated to its original topography. In addition, topographical screening features which may be employed, such as bunding around sealing end compounds are considered to have the potential to cause significant effects.

'Designated landscapes – Dedham Vale AONB' – In previous correspondence, dated 16th June we highlighted that the LVIA report should specifically consider the impact of proposals on each of the defining characteristics and 'special qualities' of the AONBs. This will help us and other interested parties, including the examining authority, to understand the effect on the AONBs statutory purpose. Assessing effects on the AONB's Special Qualities is particularly important to Natural England as the designating authority for the AONBs because a significant adverse effect on a special quality generally translates into a significant impact on how the area can deliver its statutory purpose to conserve and enhance natural beauty. We note that Table 1 proposes that effects on the on the landscape character and Special Qualities of Dedham Vale AONB, including its setting are proposed for the construction stage. Natural England strongly advise that that assessment of these effects must also be applied to the operational phase.

Undergrounding cables through the AONB is of course the principal mitigation measure to avoid significant adverse landscape and visual impacts at operational stage to the AONB. Natural England therefore strongly support this aim where the route utilises arable farmland and improved pasture which can cope with the major disturbance on the undergrounding process and can be generally expected to reinstate effectively. This may not be the case where more sensitive soils and habitats are affected. However, the undergrounding of cables does not guarantee that all significant effects on the AONB will be avoided. **At this stage it is not possible to rule out potential significant adverse landscape and visual effects to the Dedham Vale AONB at operational stage and therefore assessment of these effects should not be scoped out of the LVIA.** The reasoning given in Table 1 under the 'potential significant effect' column appears to only consider the operational stage effects on the AONB arising from underground cabling. However, several other relevant factors will exert an influence the operational effects arising from the project, including:

- the final routing corridor selection, which is still subject to change at this stage
- the locations of sealing end compounds, which are yet to be proposed, and their proximity to, and intervisibility with, the AONB is yet to be established,
- the siting of OHLs outside of the AONB, but within close proximity to the AONB. Current proposals are for extensive OHLs within 0-2km of southern boundary of the AONB in the area around the point at which the preferred option route exits the AONB to the Tendering Peninsula EAC substation - Ardleigh – Great Hawkesley / Great Wormingford area.

This advice is consistent with our previous non-statutory consultation response where we advised that assuming underground cabling though the Dedham Vale AONB is implemented that '*the longer term landscape and visual effects on the AONB in the operational phase will be determined to a large extent by the siting of substations, sealing end compounds and OHLs in areas adjacent to the AONB and the efficacy of screening for these visually intrusive elements*

within the landscape.' Therefore assessment of operational landscape and visual effects must not be prematurely scoped out of the EIA.

Methodology

Overall Natural England are broadly satisfied with the proposals for the methodology and scope proposed in paragraphs 3.1.1. – 3.1.5 and Table 2 of the document which describes levels of effect and significance. We assume that the reference to 'Table 1 below' in 3.1.5 is an error and should read 'Table 2 below.' Natural England agree with the statement at 3.1.4. that both 'moderate' and 'major' effects are considered significant in the context of the EIA regulations.

Study Area

Section 3.2 of the document sets out proposals for the geographical extents of various landscape study areas. The study areas given refer to the distance for which land either side of the proposed project that will be assessed for potential landscape and visual effects. The following distances are proposed; a 5km Zone of Theoretical Visibility map (ZTV), a 3km radius study area for LVIA where overhead line infrastructure is proposed and a 1km radius study area for the undergrounding element of the project. Natural England note that whilst ZTVs provide a very useful tool for identifying areas of land in which landscape and visual effects may arise as a result of the proposed project, the significance of effects cannot be accurately ascertained by ZTV alone and therefore site visits will be required to 'ground truth' visibility and to make judgements as to the likely significance of landscape and visual effects arising in areas where sensitive landscape and visual receptors have been identified.

Within sections 3.2.4 and 3.2.5 provision is made for more distant viewpoints will be considered, beyond the respective 3km and 1km study areas where there is the potential for significant visual effects to arise. Natural England is reassured by this and advise that when we are consulted on the number and location of viewpoints for the LVIA, along with the AONB partnership and Local Planning Authorities (LPAs), there may be a need for some viewpoints that are beyond the 1km, 3km and 5km study areas proposed for the project, to ascertain the landscape and visual effects arising from the project itself and not just to assess cumulative effects. This will be particularly important in relation to views from the AONB; to confirm that the effects from any key, publicly accessible viewpoints within the AONB are not significant.

We also request that to aid our understanding of viewpoint selection in relation to sensitive receptors that the AONB boundary and Stour Valley SLA should be shown on all relevant future maps and Zone of Theoretical Visibility (ZTV) modelling presented in consultation and evidence documents. The setting of the Dedham Vale and Suffolk Coasts and Heaths AONBs should also be shown on maps as soon as the work to define the setting has been completed and agreed.

At the landscape thematic meeting held on 15th July 2022, Natural England sought confirmation as to whether the 3km or 1km study area would be applied to sealing end compounds in locations where over headlines (OHL) transition into underground cables. Natural England strongly advocate undergrounding of cables within areas found to be in 'the setting' of the AONB and sealing end compounds should be located outside of these areas. However, since locations have not yet been proposed for sealing end compounds, it has not been confirmed at this stage that these will be located outside of areas considered to form 'the setting' to the AONB. Therefore we agree with Arcadis's confirmation at the 15th July meeting that the 3km study area will be applied to sealing end compounds as this represents are more precautionary approach to the assessment of landscape and visual effects. This is important because sealing end compounds will be permanent structures in the landscape with tall pylon elements and are likely to be sited in areas within relatively close proximity to the AONB.

Cumulative Assessment

Natural England agree that the assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, the cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

We appreciate that some major development proposals at scoping stage may not present the level of detail and certainty about their eventual design and delivery needed for the fullest cumulative assessment. The information should however, be sufficient for at least an indicative assessment which can be kept under review as the East Anglia GREEN project progresses towards examination.

We welcome the statement at 3.1.8 that *'National Grid will seek to agree a list of developments to be considered in the CLVIA with consultees through the EIA process'* since National Grid intend to limit the assessment of cumulative impacts to those developments which *'are likely to result in similar type, scale and extent of landscape and visual effects.'* Natural England advise that all major development proposals, by which we mean all development requiring a LVIA for the purposes of Environmental Impact Assessment (EIA) should be included for consideration within this list of developments to be considered within the CLVIA, regardless of whether or not the development is likely to result in similar type, scale and extent of landscape and visual effects. For example a combination of OHL and extensive new housing development within the setting of the AONB could produce a significant change in landscape character and visual amenity.

Mitigation measures

Natural England strongly support the statement at 4.1.2. that any mitigation measures identified within the LVIA to reduce potential residual landscape and visual effects will be detailed within the Landscape and Ecological management Plan (LEMP.)

Timescales for LVIA

In terms of providing advice for the next stages of the project, we would like to take the opportunity to re-iterate our previous advice that it would be extremely helpful if we could receive the LVIA prior to Statutory Consultation and in addition to a PEIR. This is because a PEIR will not present a full assessment of the landscape and visual impact of proposals needed to help us arrive at a fully informed position regarding the relative merits of undergrounding through the AONB and OHL within its setting.

We look forward to working with National Grid on the detailed landscape issues as the scheme moves into its statutory consultation phase as a Nationally Significant Infrastructure Project (NSIP).

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Yours faithfully

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National Grid: East Anglia GREEN EIA Scoping Methodology Consultation

Thank you for your consultation on the above. This advice is being provided as part of the Service Level Agreement between National Grid and Natural England. National Grid has asked Natural England to provide advice and feedback on the draft EIA methodology documents for biodiversity, arboriculture, soils and landscape.

As the proposals are at an early stage, with full details of the scheme not yet available, the advice in this letter should be treated as preliminary advice which may be subject to change as more information is provided. The following advice is based upon the information provided within:

- Biodiversity EIA Methodology Document – Draft for discussion with stakeholders and subject to ongoing engagement and review (July 2022)
- Draft Agriculture and Soils Assessment Methodology (June 2022)
- Arboricultural Methodology Document Draft for discussion with stakeholders and subject to ongoing engagement and review (July 2022)
- The information and slides provided within the meetings between Arcadis, Natural England and other stakeholders on 6th July 2022 and 15th July 2022

1) Biodiversity EIA Methodology Document

Baseline Methodology – Sources of information

Table 1 sets out the sources of information you intend to use to establish the biodiversity baseline. In order to gain a comprehensive baseline, Natural England advises that you also contact additional naturalist groups for survey records (who hold datasets which may not be shared with the Local Biological Records Centres), for example, the following groups:

- Suffolk Bat Group
- Norwich Bat Group
- Suffolk Mammals Group
- Suffolk Amphibian and Reptile Group

Note that Essex Field Club is now the only biological records centre for Essex.

Study Area

Table 2 sets out the desk study area and field study areas for EIA purposes. As discussed in our meeting on 06 July 2022, Natural England would like to make clear that biodiversity receptors which could experience a Likely Significant Effect (LSE) as a result of this project should not be identified by arbitrary distances. Instead, LSE (and therefore scope of the ES) should be identified by the consideration of any potential impact pathways. Impacts to sites of high biodiversity value can occur over larger distances than 2 km. Impact Risk Zones (IRZs), available via MAGIC, may provide a

useful starting point for identifying potential impact pathways on SSSIs, however, IRZs are only indicative and other impact pathways may exist.

International sites

The proposed study area for international and national sites is 5 km from the route. However, many of the bird species that are designated features of these sites, such as the Stour and Orwell Estuaries Special Protection Area (SPA), can travel up to 20 km. Therefore, Natural England advises that the proposed study areas are extended for international sites to account for this.

Biodiversity Net Gain

Natural England welcomes the commitment to achieving 10% Biodiversity Net Gain (BNG) in environmental value on all construction projects. As discussed in our previous letter to National Grid (our ref: 389872 dated 16 June 2022), we advise that a more ambitious target for BNG should be utilised for a scheme of this scale and nature (e.g. greater than 10% where appropriate).

Natural England understands that National Grid will be in contact with Local Planning Authorities (LPAs) to seek opportunities to deliver BNG locally to the project. We will continue to offer advice on achieving BNG as the details of this project are developed further.

Approach to Survey

Bats

In terms of the proposed survey methodology for bats, we have no further comments on the sections on Preliminary Roost Assessment, Tree Inspections and Emergence/Re-entry.

With regard to Bat Activity Surveys, Natural England has the following comments. At this stage, the project needs to collate information data from suitable sources, such as historic records, aerial / drone surveys and bat habitat suitability mapping as part of a PEA, and to use this information in conjunction with the project design to determine where there is a reasonable likelihood that roosting / foraging and / or commuting bats could be impacted.

If impacts can be avoided by design at this stage, then no further survey is required. Where a likely impact on roosting / foraging / commuting bats is identified, the type of activity survey used should be determined by the ecologists considering the aims and objectives of further survey work and should be proportional to the predicted impacts of the proposed development on bats. Transect surveys and automated surveys are complementary and have different benefits and limitations. In certain locations, a combination of both transect and automated surveys might be required to enable a full impact assessment to be carried out. Where automated surveys show a high level of activity, transects or other manual methods, such as spot counts, may also need to be carried out.

Hazel Dormouse

Page 21 shows that impacts on Hazel Dormouse populations are intended to be scoped in to the EIA during the construction phase. However, there is no survey methodology for them in the draft report. Natural England advises that this is included in the final scoping report, particularly as Hazel Dormouse are known to be found in south Suffolk. Suffolk Mammals Group should be able to provide current data which can inform the need and scope for future surveys.

Birds

Natural England welcomes the intention to survey for wintering and passaging birds along the River Waveney Corridor following our previous advice, as identified on slide 24 from the meeting on 06 July 2022.

As discussed above, and in the meeting on 06 July 2022, we currently have concerns over the approach for wintering and passage birds, with respect to those designated as features of international sites and how far they may travel. We are currently seeking internal specialist advice on your recently submitted Wintering and Passage Bird Survey Scope document and will respond to

this in a separate response letter. We will continue to engage with Arcadis and National Grid on this matter.

Scoping

Natural England agrees with the majority of the scoping set out in Table 4 of the report, in particular we welcome the scoping-in at operation of both bats and wintering birds. Natural England also welcomes the scoping-in of priority habitat and ancient woodland during construction phases, following the advice in our previous letter in response to the non-statutory routing consultation.

Internationally Designated Sites

All of the relevant international sites have been identified within the scoping table provided on slide 20 of the presentation given in the meeting on 06 July 2022, and these have been scoped-in at construction only. However, based on our previous comments relating to wintering birds functionally linked with international sites, it is Natural England's advice that there is currently not enough information to scope out Thames Estuary and Marshes Ramsar and SPA and Stour and Orwell Estuaries Ramsar and SPA at the operational phase, due to risk of bird collision.

Nationally Designated Sites (SSSIs)

Slide 20 from the presentation in the meeting on 06 July 2022 lists the nationally designated sites that will be scoped-in during construction. While Natural England recognises this may not have been an exhaustive list due to space restrictions, we wish to emphasise that all of the following sites should be scoped-in to the EIA at this stage:

- Forncett Meadows SSSI
- Aslacton Parish Land SSSI
- Shelfhanger Meadows SSSI
- Wortham Ling SSSI
- Gypsy Camp Meadows, Thrandeston SSSI
- Burgate Wood SSSI
- Gipping Great Wood SSSI
- Combs Wood SSSI
- Barking Woods SSSI
- Middle Wood, Offton SSSI
- Elmsett Park Wood SSSI
- Flordon Common SSSI
- Cattawade Marshes SSSI
- Stour Estuary SSSI
- Bullock Wood SSSI
- Marks Tey Brickpit SSSI
- River Ter SSSI
- Langdon Ridge SSSI
- Thorndon Park SSSI
- Hangman's Wood & Dene Holes SSSI
- Mucking Flats & Marshes SSSI
- South Thames Estuary & Marshes SSSI
- S. Thames Estuary Compensation (9003874)

Note that proposed SSSIs should also be included. We are currently carrying out ecological surveys in the Tilbury area in connection with a possible SSSI extension and we are happy to share our data with you when it is available and we advise this should be scoped-in in addition.

Mitigation

Natural England welcomes the adoption of the mitigation hierarchy where impacts are first sought to be avoided. If this is not possible, impacts are mitigated for and only as a last resort is compensation considered. We also welcome any opportunities to provide net benefits for biodiversity over and above this.

2) Draft Agriculture and Soils Assessment Methodology

Natural England broadly accepts the methodology proposed but has the following comments to make on the finer details.

Baseline Data
The methodology sets out the sources of desk-based data. Natural England wishes to clarify that this desk based data is only intended for assessing areas where no ground disturbance is anticipated.

Agricultural Land Classification (ALC) surveys in areas of ground disturbance (such as access tracks, substation and compounds and underground cabling) or land use change (e.g. for biodiversity net gain) will require detailed ALC surveys undertaken at a minimum sampling density of 1 soil observation per hectare with representative soil pits to provide further information to enable accurate ALC grading.

Natural England advises that it is important to ensure that sufficient information is collected during the ALC survey to prepare soil resource plans in line with the Defra Construction Code. Collection of additional soil data may be needed to characterise soils for soil resource plans where soil disturbance is proposed on non-agricultural land.

The baseline data should also include LandIS soil-site reports to identify relevant soil associations and associated soil series and other data, and not rely on broad-brush 'soilscapes' mapping for the assessment. Any published detailed soil mapping (e.g. at 1:25,000 or 1:50,000 scale) covering the scoping report corridor should also be considered within the baseline data.

Environmental Statement Assessment Methodology
Natural England welcomes the proposed use of the new IEMA (Institute of Environmental Management and Assessment) Land and Soil Assessment Methodology, as outlined in the meeting on 06 July 2022, for assessment of the sensitivity and magnitude of impact on agricultural land. We would advise that the IEMA guidance on 'significance' assessment using the IEMA matrix (Table 5) is also followed.

Mitigation
Natural England advises that mitigation should also include remedial measures to be undertaken, such as subsoiling to alleviate compaction, and where appropriate, a period of sensitive 'aftercare' management.

It is noted that in Table 1 of the Draft Agriculture and Soils Assessment Methodology (Arcadis, 30 June 2022), land required temporarily will be re-instated to its pre-construction condition. It is Natural England's advice that this should include a commitment to return the land to its former ALC grade.

3) Arboricultural Methodology Document

Natural England generally accepts the method set out in the arboricultural methodology document. In particular, the classification of ancient and veteran trees and ancient woodlands as irreplaceable habitat, and the loss of Category A and B trees as high and moderate impacts. However, Natural England advises that, when considering Category C trees, if a significant number of trees are lost, the impact may not necessarily be 'low' overall.

We welcome the adoption of the standing advice from Natural England and the Forestry Commission with respect to setting out root protection areas.

4) Landscape

As agreed between Arcadis and Natural England on 13 July 2022, our advice on the draft Landscape and Visual Impact Assessment (LVIA) Methodology will follow in a subsequent letter on or before 05 August 2022.

☒ The advice provided in this letter has been through Natural England's Quality Assurance process

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Yours faithfully

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Norfolk and Suffolk Team

Date: 16 June 2022
Our ref: 389872

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BY EMAIL ONLY

National Grid: East Anglia GREEN Non-Statutory Consultation

Thank you for your consultation on the above. This advice is being provided as part of the Service Level Agreement between National Grid and Natural England. National Grid has asked Natural England to provide advice and feedback on the Corridor and Preliminary Routeing and Siting Study and the preferred corridor swathe.

As the proposals are at an early stage, with full details of the scheme not yet available, the advice in this letter should be treated as preliminary advice which may be subject to change as more information is provided. The following advice is based upon the information provided within:

- Corridor and Preliminary Routeing and Siting Study April 2022
- The briefing meeting between National Grid and Natural England on 26th April 2022
- The shapefile of the preferred corridor as provided by National Grid on 29th April 2022
- The route map available on the public consultation website

To ensure that the advice provided in this letter is as clear as possible, following initial comments on the methodology used, the advice has been split into sections of the project as described in the Corridor and Preliminary Routeing and Siting Study (CPRSS), namely: Norwich to Bramford, Bramford to East Anglia connection substation, East Anglia connection substation, East Anglia connection substation to Tilbury. To avoid repetition, some common issues have been grouped into a separate section and advice on additional issues is provided towards the end of the letter. An outline of the sections can be found below.

1) Advice on Methodology **Pg 2**

2) Norwich to Bramford **Pg 2**

3) Bramford to East Anglia Connection Substation **Pg 4**

4) East Anglia Connection Substation **Pg 11**

5) East Anglia Connection Substation to Tilbury **Pg 12**

6) Common Issues **Pg 16**

7) Additional Advice **Pg 17**

1) Advice on Methodology

Natural England is broadly satisfied with the methodology followed in the CPRSS. Within the bounds of our remit and area of expertise, we acknowledge that alternative methods of reinforcement appear to have been suitably considered and we accept the conclusion of paragraph 1.3.36 that a reinforcement between Norwich and Tilbury forms part of the preferred solution when considering all factors. We also accept the conclusion in paragraph 1.3.41 that the project will comprise of an onshore reinforcement by a new 400kV double-circuit between Norwich main and Bramford, and a new 400kV double circuit between Bramford and Tilbury via a new East Anglia Connection Node substation to be located in Tendring District. Further comments on the chosen preferred corridor are included in the relevant following sections.

Identification of Constraints

Tables 3.1 and 3.2 of the CPRSS summarise the classification of constraints by National Grid as 'Seek to avoid' or 'Seek to minimise'. Natural England welcomes the classification of both internationally and nationally designated sites and landscapes, as well as ancient woodland, as 'seek to avoid'. However, it is noted that Priority Habitat Inventory has not been included at all for routeing constraints and is classified as 'seek to minimise' for substation siting constraints. It is Natural England's advice that in the more detailed routeing development process, any areas of Priority Habitat are avoided by both the routeing of the power lines and the siting of the substation. This would help to ensure "a halting, and if possible a reversal, of declines in priority habitats and species, with wild species and habitats as part of healthy, functioning ecosystems", a consideration in IPC decision making (National Policy Statement for Energy (NPS) EN-1, para 5.3.5 pg 69) [1].

2) Norwich to Bramford

Close Parallel

Natural England notes the consideration of a close parallel option to the existing 4YM route as a possibility for reducing impacts, and accepts that the constraints outlined in paragraphs 4.3.13 – 4.3.19 would make this an unviable option.

Chosen Preferred Corridor

Natural England accepts the choice of route NB1 above other options, on the basis of a larger number of heritage and engineering constraints. However, the preferred corridor still contains constraints that Natural England advises need to be carefully considered and avoided wherever possible in the more detailed routeing development, in order to comply with Holford Rule 2 and the Overarching NPS for Energy (NPS EN-1, section 5.3, pg 69). Our concerns are discussed below.

Protected Sites – Sites of Special Scientific Interest (SSSIs)

The chosen Norwich to Bramford route, NB1, triggers Impact Risk Zones (IRZs) for the following SSSIs:

- Forncett Meadow
- Aslacton Parish Land
- Sheflhanger Meadows
- Wortham Ling
- Gypsy Camp Meadows, Thrandeston
- Burgate Wood
- Gipping Great Wood
- Combs Wood
- Barking Woods
- Middle Wood, Offton
- Elmsett Park Wood

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf

- Flordon Common

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Any potential impact, from both construction and operation including maintenance, on the sites listed above should be fully assessed and, where necessary, mitigation should be proposed to ensure no negative impacts on the designated features of these sites. Further advice on mitigation can be found in the NPS EN-1 (para 5.3.7, pg 70) and the upcoming revision of the NPS Draft Overarching NPS for Energy (EN-1, para 5.4.18 – 5.4.23, pg 82-83).

The current preferred corridor runs directly adjacent to Wortham Ling SSSI and Middle Wood, Offton SSSI. Natural England offers the following comments with regards to avoiding impacts on these sites:

Wortham Ling is important for its lowland dry heath and grassland communities which have developed on a sandy, glaciofluvial drift deposit. Although the site is isolated from the Brecklands, lying as it does within a predominantly boulder clay area, the vegetation has close similarities with the Breckland grass-heaths.

Natural England advises that the pylons and cables are kept as far away from the site as possible with particular exclusion on both peat and sandy soils, which have the highest restoration potential. The main pathway of concern identified by Natural England is disturbance of the vegetation and soils of the site. Pylons, together with their foundations, have potential to adversely impact on the soils and thence the flora due to the possible introduction of lime into this lime poor habitat.

Middle Wood, Offton is a complete medieval wood with extensions of ancient secondary woodland and is under a Tree Preservation Order (TPO). The wood contains semi-natural stands of several different wood types and is predominantly of coppice-with-standards structure.

Natural England notes that the preferred route shows possible areas for the development to both the east and west of Middle Wood, Offton which then join up again to the south. It is assumed that the final route does not need to utilise both sides of this loop and that the route has been presented in this way to indicate that there is an option for the route to either pass to the west of the site or to the east, however we would welcome your confirmation that our understanding is correct. It is advised that the line runs to the east of the site to avoid the need to pass over woodland areas.

It is Natural England's advice that cables throughout the whole of the route should avoid passing over, or under, any woodland. This is due to wayleave works required along routes to maintain sufficient clearance for the cables, which would prevent trees and coppice from reaching their full potential.

Protected Sites – European Sites

As recognised in the CPRSS, NB1 passes within 100 metres of Norfolk Valley Fens Special Area of Conservation (SAC). Paragraph 4.5.5 recognises that there is a potential pathway for Likely Significant Effect (LSE), then proceeds to discuss possible measures to minimise the effects. Natural England advises that careful consideration is given to whether these measures are classified as mitigation and therefore will need to be considered at appropriate assessment when completing a Habitats Regulations Assessment (HRA).

The 2018 ruling referred to as '*People Over Wind*'[2] made by the Court of Justice of the European

[2] https://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN

Union concluded that, when interpreting article 6(3) of the Habitats Directive, it is not appropriate when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site. The ruling also concluded that such measures can, however, be considered during an appropriate assessment to determine whether a plan or project will have an adverse effect on the integrity of the European site.

Nature Recovery Network
The proposed corridor crosses an area that has been identified as being suitable for a Nature Recovery Network project, aimed at reconnecting isolated habitats and so enabling nature to recover. The project is aiming to create a habitat corridor along the Waveney and Little Ouse to the west of Diss. Natural England has concerns over the potential impact of the powerlines through this area, but advises that this could also provide opportunities for Biodiversity Net Gain (BNG) and further habitat enhancements which would demonstrate National Grid's due diligence to protect and enhance the natural environmental.

- ***Pylon Spacing:*** In order to avoid, or minimise, the impact of the proposed development Natural England advises that, where possible, pylons are spaced so as to avoid the main corridor identified for nature recovery. This is the area south of the A1066 and north of Low Road. Further details can be provided by the Suffolk Wildlife Trust who are overseeing the project. As previously discussed, areas of woodland within this project corridor should also be avoided where possible.
- ***Birds:*** The Waveney – Little Ouse corridor is routinely travelled by wintering wildfowl and studies have shown that birds are at risk of death by both electrocution and collision with power lines. Therefore, Natural England advises that any potential impacts on birds will need to be fully considered and suitable mitigation measures proposed. For a further discussion of the potential impacts of the proposal on bird species, please see the European Sites subsection on pages 5-6 of this letter. Although the advice below is given with respect to Functionally Linked Land (FLL) for European Sites, it is considered the same impact pathways exist for birds along this corridor and, as such, should still be avoided or mitigated for.
- ***Opportunities for BNG*****:** This project provides opportunities for National Grid to deliver BNG and the opportunity to connect and restore existing habitats (such as within the location of the proposed Waveney and Little Ouse NRN Zone) may be recognised through the metric as preferential to restoration / creation of new habitats in isolation. Further details are given on pages 17 - 20 in the Additional Advice chapter of this letter.

By having regard to the issues outlined above, Natural England advises that the development would be in line with the draft NPS-EN1 para 5.4.17 pg 82[3] which states that "Proposals should also consider any opportunities to maximise the restoration, creation, and enhancement of wider biodiversity. Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the government's strategy for nature for example." Natural England has recently produced a Biodiversity Net Gain Brochure to provide advice on applying BNG. Further discussion of biodiversity net gain can also be found in section 7 below.

3) Bramford to East Anglia Connection Substation

Chosen Preferred Corridor
For detailed discussion regarding the choice of route BE5 as the preferred corridor, please refer to the 'Landscape' sub-section of this letter. Our concerns with regards to the ecological and nature conservation implications of the BE5 route are discussed below.

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015233/en-1-draft-for-consultation.pdf

Protected Sites –SSSIs
The chosen route, BE5, triggers Impact Risk Zones (IRZs) for the following SSSIs:

- Cattawade Marshes
- Stour Estuary

Any potential impact on the sites listed above should be fully assessed and, where necessary, mitigation should be proposed to ensure no negative impacts on the designated features of these sites. Further advice on mitigation can be found in the NPS EN-1 (para 5.3.7, pg 70) and the upcoming revision of the NPS Draft Overarching NPS for Energy (EN-1, para 5.4.18 – 5.4.23, pg 82-83).

Protected Sites – European Sites
The IRZs triggered for the SSSIs overlap with the following European Sites:

- Stour and Orwell Estuaries Ramsar
- Stour and Orwell Estuaries Special Protection Area (SPA)

Any potential effect on the integrity of these sites will need to be considered through the HRA process. One impact pathway that should be considered in detail is that of impacting designated bird species through functionally linked land.

While much of the functionally linked land (FLL) for the Stour and Orwell Estuary is farmland and foreshore adjacent to the site, the birds for which the Stour and Orwell has been notified are capable of travelling further distances to forage. Therefore, there is still potential for disturbance of designated features from developments further away from the SPA. Impacts to FLL and associated SPA species, including direct loss of FLL and displacement / disturbance to species, need to be assessed. The IRZs identify swathes of potential FLL around SPAs, and relevant projects triggering the IRZ need to confirm the FLL status of their development site and surrounding land. As a minimum, this should include a thorough desk-study referencing bird records from key sources including BTO, WWT, RSPB etc. You may also wish to contact Suffolk Biodiversity Information Service to obtain records of the use of sites of interest.

This may be sufficient to confirm that the site and surrounding areas are not FLL but if records indicate any uncertainty this should be backed up by field survey work. We would also advise that surveys are carried out if there are insufficient records available for the sites of interest, to be able to fully determine whether or not the site is being used as functionally linked land.

A further impact pathway which should be considered is in conjunction with proposals to lay cables under the River Stour within the Dedham Vale AONB. The risk of lubricant clay or other materials used, or debris generated during construction operations has the potential to cause localised impacts but also to be carried downstream. The risk of adverse effects on water quality will need to be carefully considered, as will the risk of lubricating clays and other materials posing a potential risk to birds and invertebrates. Even if the materials used are chemically inert, there is a risk that these materials could smother the mudflats in the area and suffocate invertebrates which birds feed on.

More general construction impacts associated with drilling such as noise, visual disturbance and dust generated will need to be considered as these all have the potential to disturb birds. If SPA birds are found to be using FLL in the vicinity, guidance suggests that a change of more than 3dB above background noise levels could have a likely significant effect on birds under the Habitat Regulations ('A review of the Effects of Noise on Birds', Version 1, Allan Drewitt etc al, Natural England, October 2018). This document is attached separately to this response for your information. However, it should be noted that this was initially intended as an internal document and therefore is aimed at Natural England Advisers.

If there is a potential for works (removal and construction phases) to be undertaken when designated site birds are likely to be present, it is advised that a noise report is produced to assess the potential impacts on the designated site birds. This should include a baseline and predicted noise levels (measured in LAeq and LAmax) anticipated to be created by the works. This should present the expected noise at the sensitive receptor (designated site boundary or FLL) and set this in the context of the existing noise environment – i.e. how noise levels will change, including the type of noise e.g. consistent noise or sudden loud bangs etc. Any noise increase of 3dB or more is likely to be considered as significant, and appropriate mitigation measures (such as acoustic hoarding) will be required to negate/reduce any impact.

Taking a precautionary approach, Natural England strongly advise that the timing of particularly noisy works takes place outside of sensitive seasons for the Stour and Orwell Estuaries SPA and Ramsar birds i.e. outside of the wintering period November – March and that that removal of vegetation is avoided during the breeding season March- August inclusive.

Studies have shown that birds are at risk of death by both electrocution and collision with power lines. Should mitigation be required, measures such as coloured markers and bird scarers may be considered suitable to minimise the impact of this development on birds. For further advice on the avoidance and mitigation of adverse impacts to bird species in conjunction with Overhead Lines (OHLs), please refer to the 'Protected Species' subsection of this letter in Chapter 7, 'Additional Advice'.

Landscape

Designated Landscape Advice
The proposed development affects areas both within and close to the Dedham Vale AONB, and land which is close to the Suffolk Coast and Heaths AONB, both of which are nationally designated landscapes. Natural England's advice with regard to landscape is limited to the AONB and to the area surrounding it which constitutes its 'setting'. For the latter our focus is on how development within the setting would affect the designated area.

Natural England's priority and focus in providing its advice is to uphold the statutory purpose of the AONBs which is to conserve and enhance the area's natural beauty. We are providing this advice as the national landscape agency for England and as the designating authority for AONBs. Our advice is steered by national planning policy and reflects National Grid's own policy and practices, notably the Holford Rules.

Our advice at this stage is based on the high level information available in the Routeing Options Report and Appendices and without the benefit of a Preliminary Environmental Information Report (PEIR) or Landscape and Visual Impact Assessment (LVIA), nor an agreed definition of what constitutes the AONB's setting. We will add to and update our advice as further information is provided.

Routeing Options with Regards to Designated Landscapes
In accordance with the Holford Rules, Natural England would seek to avoid all significant landscape and visual impacts on the AONBs. Where, after a full search for and appraisal of alternatives has taken place, it is demonstrated that the route has to traverse the AONB, Natural England expects the fullest possible landscape and visual impact mitigation measures to be applied.

Natural England note that the possibility of off-shore marine cables has been investigated in order to reduce the landscape and visual impacts of OHL infrastructure. However, this option has not been taken forward as a preferred option by National Grid. Natural England accept this position as although adverse landscape and visual impacts would be avoided within the Dedham Vale AONB with this option, the Norfolk Broads nationally designated landscape would instead be adversely impacted by a cable between Norwich and the East Coast, which would cross the Broads at some point. In addition, a marine cable option would give rise to concerns that there is the potential for

Adverse Effects on the Integrity (AEoI) of multiple internationally designated marine sites located both onshore and offshore along the east coast between Norwich and Tilbury.

Natural England accept the reasons given in para 5.2.3 of the Routeing Options Document that a route to the east of the Dedham Vale AONB would be unlikely to offer any environmental benefit, given that a route would need to pass through the Suffolk Coasts and Heaths AONB and would directly traverse the Stour and Orwell Estuary SPA and Ramsar, both internationally designated sites of nature conservation.

"5.2.3 To the east, the Dedham Vale AONB is separated from the Suffolk Coast and Heaths AONB by an irregular corridor, generally less than 1km wide, that contains the settlements of East Bergholt, Brantham, Cattawade and Manningtree. The westernmost part of the Stour and Orwell Estuaries SPA extends for approximately 2km into the eastern part of the Dedham Vale AONB. The highly constrained nature of the area to the east of the Dedham Vale AONB led to the discounting of identification of options that would pass to the east of the Dedham Vale AONB, as, notwithstanding the additional engineering constraints associated with having to cross the Stour Estuary, any such route would have to pass through the Suffolk Coast and Heaths AONB as well as the Stour and Orwell Estuaries SPA and would therefore be unlikely to offer any environmental benefit."

Therefore, in order to connect Norwich to Tilbury, Natural England's understanding is that the remaining options are to pursue a route that either goes around the Dedham Vale AONB or a route that passes directly through it. Natural England's standard preference is for routes which avoid crossing nationally designated areas. However, the situation in this case is less clear cut, and more information will be required for us to come to a definitive view. The core issue is whether undergrounding the cables through the AONB (and it being demonstrated that the adverse effects would only arise during the construction phase) would be less harmful than cabling on pylons on permanent view to and from the AONB within its setting. The consultation information provided at this stage is very high level so does not allow for a proper assessment and evidence-based comparison between the landscape and visual impacts of the various routes proposed. We are therefore not able to comment in any detail prior to production of this information which will form the evidence base for systematic assessment of impacts.

Nevertheless, it is reasonable to expect, from the limited information available, that the routes proposed which go around the AONB (C-E-F and D-E-F) will give rise to some adverse landscape and visual effects within the setting to the AONB, impacting on views from within the designated area. This is due to both the extent of OHLs proposed and the proximity of the graduated swathe to the AONB boundary which makes it highly likely that the OHLs would pass through areas that Natural England consider to be in 'the setting' of Dedham Vale AONB.

Both options that avoid traversing the AONB pass though the Stour Valley, a Special Landscape Area (SLA) in its own right. You should consult the relevant local authorities about how the SLA (a local landscape 'designation') would be affected. The Dedham Vale AONB Partnership has a joint management plan for the AONB and the Stour Valley Project Area and may therefore also wish to provide advice on this matter. Crucially for Natural England this area provides part of 'the setting' to the Dedham Vale AONB. In the absence of an LVIA, the significance of landscape and visual impacts that would arise within these areas and effects on the AONB are yet to be properly assessed. However, given the proximity and extent of OHLs proposed to go around the western half of the AONB, it is reasonable to expect both noticeable and potentially significant changes to some views to and from the AONB. The most likely change is that pylons could be visible within some medium – long range views on the skyline, with a greater likelihood of changes being visible from areas of higher ground or close the edge of the AONB.

Given the landscape and especially visual impacts likely to be produced by OHL going around the AONB it is appropriate to consider an undergrounded scheme through the designated area. The undergrounding option does not however mean that all significant effects on the AONB will be avoided. There will of course be a significant impact during the construction phase which will involve

a wide trenching corridor, haul roads, construction compounds etc. This underlines the importance of completing those operations as quickly as possible and ensuring full restoration of the route. We know from other schemes that this can usually be achieved very effectively through arable farmland and improved pasture i.e. where more sensitive soils and habitats are not affected. If this route option is pursued, the precise alignment of the route will need to take full account of this.

The longer term landscape and visual effects on the AONB in the operational phase will be determined to a large extent by the siting of substations, sealing end compounds and OHLs in areas adjacent to the AONB and the efficacy of screening for these visually intrusive elements within the landscape. It is theoretically feasible that an undergrounded route passing though the AONB could give rise to fewer long-term adverse landscape and visual impacts than an OHL route around the edge of the AONB. However, any further comment at this stage would be speculative and therefore Natural England will await the production of the LVIA to inform evidence-based comments.

'The Setting' of the AONBs

All route options proposed for the Bramford – East Anglia substation connection at some point pass through areas which are highly likely to constitute 'the setting' of either the Suffolk Coasts and Heaths AONB or the Dedham Vale AONB, or indeed both of these AONBs. As previously noted, the routes proposed which go around the AONB (C-E-F and D-E-F) pass through the Stour Valley SLA. Should either of these routes be pursued, our previous advice issued for the Bramford – Twinstead project non-statutory consultation regarding avoiding adverse landscape and visual impacts within the setting to the AONB in the Stour Valley would apply to the Norwich - Tilbury project. For convenience, the relevant text is quoted below:

"The section of the Stour Valley affected by this scheme falls within the 'setting' of the Dedham Vale AONB. The area's landscape character complements that of the adjacent designated area and therefore supports the delivery of the AONB's statutory purpose i.e. to conserve and enhance the area's natural beauty. This is recognised locally with the AONB and Stour Valley Project Area being subject to joint management arrangements. That the area has not so far been formally assessed for possible inclusion within the AONB designation does not detract from the very important, mutually supportive relationship between the AONB and Stour Valley.

Natural England therefore strongly advises that, subject to any other overriding environmental hindrances, this section is fully undergrounded. Justification for this is provided by both the quality of the landscape and its relationship to the AONB, together with a combination of legal duties and national planning guidance."

General Advice Regarding 'The Setting' to AONBs

National Grid, like all public bodies and utility providers, has a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 which states that "*in exercising or performing any functions in relation to, or so as to affect, land in an AONB, authorities "shall have regard" to their purposes*." This 'duty of regard' applies to developments outside the AONB which will nonetheless affect their statutory purpose. This is confirmed by the government's on-line Planning Practice Guidance https://www.gov.uk/guidance/natural-environment which states:

"This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection."

That same planning guidance also deals with the 'settings' issue in the context of development management policy. The guidance is as follows:

"How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?

Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account."

The approval and delivery of extensions to the National Grid are guided by the relevant NPSs. These are the Overarching NPS for Energy (EN-1) and NPS for Electricity Networks Infrastructure (EN-5). EN-1 paragraph 5.9.12 reiterates the duty of regard and its application to the settings of designated landscapes.

"5.9.12 The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints."

Paragraph 2.8.9 of NPS EN- 5 directs the decision maker to factor in "*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".* We note that this references areas 'such as' AONBs and isn't limited to only those covered by a statutory designation.

Schedule 9 of the Electricity Act 1989 (as amended by the Utilities Act 2000) imposes specific obligations on electricity companies in respect of the environment. Extracts from Schedule 9 are printed below.
"1 (1) In formulating any relevant proposals, a licence holder or a person authorised by exemption to generate or supply electricity –
(a) shall 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
(b) shall do what he 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 again note that for this duty 'natural beauty' is not restricted to AONBs or National Parks.

We hope that, particularly in terms of a very clear steer from statute and planning policy, this helps to make a solid case for undergrounding within the setting of the AONB.

Sealing end compounds should be set back as far as possible from the edge of the AONB and ideally outside of 'the setting' to the AONB. It is plausible that a location may be found that takes advantage of topography just outside of the AONB boundary to largely screen their visibility from within the designated landscape. However, if this is not possible then the undergrounded section of the route across the AONB should be extended into the adjacent countryside so that the compounds and connecting OHLs can be visually removed from the AONB (or reduced visually to a below significant level) either by distance and/or allowing better topographical screening to be used.

Natural England understand that work to define 'the setting' to the Dedham Vale AONB is on-going for the Bramford – Twinstead project. We are yet to discuss the findings of this work with National Grid but recommend that in order to ensure consistency across projects it would be appropriate to carry out the same exercise for the Norwich – Tilbury project. Ahead of that work being carried out we do anticipate that the following areas will contribute to the setting of the AONBs simply due to their being adjacent to the AONB, with the potential for good views from and into the designated area:

- To the south, the area around the point at which the preferred option route exits the AONB to the Tendering Peninsula EAC substation - Ardleigh – Great Hawkesley / Great Wormingford area.
- To the north of Dedham Vale AONB, areas to the south of Capel St Mary are proximate to the boundary line for both the Dedham Vale AONB and Suffolk Coasts and Heaths AONB and therefore are likely to form the setting to either one of both of these AONBs.

In keeping with the Bramford – Twinstead project, Natural England strongly advocate undergrounding of cables within areas found to be in 'the setting' of the AONB and sealing end compounds should be located outside of these areas. This is consistent with planning and development management policies, as outlined above.

We also note that all options, including the preferred route option, have the potential to give rise to cumulative landscape and visual impacts in conjunction with the Bramford – Twinstead project. It would be useful to know how the phasing of delivery of these two projects will be sequenced, to better understand the potential impacts that could arise. Specific consideration of this issue will need to be a focus of the PEIR and LVIA.

Natural England request that the following information is provided at the earliest stage possible to facilitate a better understanding of landscape and visual impacts:

- Specific consideration of the cumulative impacts of the preferred route option in conjunction with the delivery of the National Grid Bramford – Twinstead project.
- The AONB boundary and Stour Valley SLA should be shown on all relevant future maps presented in consultation and evidence documents. The setting of the Dedham Vale and Suffolk Coasts and Heaths AONBs should also be shown on maps as soon as the work to define the setting has been completed and agreed.
- The LVIA report should specifically consider the impact of proposals on each of the defining characteristics and 'special qualities' of the AONBs. This will help us and other interested parties, including the examining authority, to understand the effect on the AONBs statutory purpose.

This part of eastern England is being asked to accommodate a great deal of major energy generation and distribution infrastructure. This ranges from offshore wind schemes within the seascape setting of the Suffolk Coast and Heaths AONB, the proposed and soon to be determined Sizewell C Nuclear Power Station again on the Suffolk Coast, the onshore cabling for offshore generation and extensions to the national grid to take the electricity across country to existing or new substations. Our advice for the East Anglia GREEN project highlights specifically the Bramford to Twinstead scheme in terms of cumulative effects because although it has not been determined it is another National Grid project. It would also be appropriate for the assessment of cumulative effects to also factor in any other approved and built or approved and pending construction schemes that may be relevant, particularly if any are approved whilst details of the East Anglia scheme continue to be developed during its pre-application phase.

In terms of providing advice for the next stages of the project, it would be extremely helpful if we could receive the LVIA prior to Statutory Consultation and in addition to a PEIR. This is because a PEIR will not present a full assessment of the landscape and visual impact of proposals needed to help us arrive at a fully informed position regarding the relative merits of undergrounding through the AONB and OHL within its setting.

We look forward to working with National Grid on the detailed landscape issues as the scheme moves into its statutory consultation phase as a Nationally Significant Infrastructure Project (NSIP).

4) East Anglia Connection Substation (EAC)

Chosen Substation Site
Natural England accept the conclusion that options associated with Clacton landing points and EAC locations on the Tendring peninsula are preferred as described in section 1.3 of the Routeing and Siting study.

Extensive internationally designated areas of nature conservation are present along the east coast, such as Hamford Water SPA and the Colne Estuary SPA and Essex Estuaries SAC. It is reassuring that these sites have been excluded from the Study Area in recognition of their importance for nature conservation as mentioned in paragraph 6.1.3 of the Routeing and Siting Study report.

The Routeing and Siting Study identifies four potential 'zones' for delivery of the EAC which were taken forward for Option Appraisal. Zone A is presented as National Grid's preferred option and, on balance, Natural England accept the reasoning for its selection in section 6.5 of the report.

A more detailed analysis of four Areas identified within Zone A is given in Appendix C of the Routeing and Siting Study report, however, there did not appear to be an accompanying plan within the consultation material provided labelled with the geographical location of these four Areas so it is not clear where these are located within Zone A.

We note that the preferred option EAC site is located approximately 1.3km south of the Dedham Vale AONB, at its closest point, adjacent to an existing 132Kv substation located immediately south of the junction between Grange Road and Ardleigh Road. Appendix C notes that Zone A is located within Tendring District Landscape Character Area (LCA) 7A, which is an open landscape with little tree cover and areas with long-distance views. Therefore there is the possibility of intervisibility between the preferred EAC substation site and areas within the AONB designated landscape and as such, we anticipate that this area will make contribution to the setting of the AONB, as previously outlined. For further comments on designated landscape issues, please refer to pages 6-10 of Section 3 of this letter above.

Protected Sites – SSSIs
The chosen location for the EAC, Zone A, triggers Impact Risk Zones (IRZs) for the following SSSIs:

- Cattawade Marshes
- Stour Estuary

Any potential impact on the sites listed above should be fully assessed and, where necessary, mitigation should be proposed to ensure no negative impacts on the designated features of these sites.

Protected Sites – European Sites
The IRZs triggered for the SSSIs overlap with the following European Sites:

- Stour and Orwell Estuaries Ramsar
- Stour and Orwell Estuaries SPA

Any potential effect on the integrity of these sites will need to be considered through the HRA process. Paragraph 6.2.2 identifies that the EAC substation will require an area of land approximately 18ha for its delivery. The preferred option presented for the EAC site, in Zone A is located within approximately 3.5km of the Stour and Orwell Estuary SPA. There is potential for FLL used by mobile SPA birds to be affected by the proposals. Therefore, our advice regarding carrying out studies to determine whether land within the graduated swathe is functionally linked for the Stour and Orwell Estuary SPA birds, given on pages 5-6 in section 3 of this response (Bramford to East Anglia Connection Substation) also applies to the land identified for delivery of the proposed EAC substation.

Best and Most Versatile Agricultural Land and Soils (BMV)
We note that the Zone A preferred site is within an area of Grade 1 and 2 agricultural land, i.e. best and most versatile and is also within in a Sand and Gravel Minerals Safeguarding Area (Essex Minerals Local Plan).

Natural England advises that soil resources during project construction and BMV agricultural land are scoped into the Environmental Impact Assessment (EIA). A full soil survey and ALC field assessment of **all** land included in the project, including the EAC substation should be made.

Significant adverse effects can be anticipated where any soil is subject to construction activities, particularly where built development such as substations are involved or where extensive trenching for buried cables takes place. Given the potential for significant adverse effects over an extensive area due to large scale soil removal, handling and storage, trafficking etc. these activities should be scoped in for more detailed examination and assessment as part of the Environmental Statement, both in terms of the impact of the development on best and most versatile agricultural land and on the identified soil resources present and their associated delivery of ecosystem services.

A detailed ALC survey[4] is normally required to assess the land use implications of a proposed development where significant amounts of agricultural land are involved, in line with national planning policy including relevant NPSs. It also provides a baseline to ensure that land which is temporarily taken for development is returned back to its original grade, particularly where BMV agricultural land is affected by trenching associated with buried cables.

A soil resource survey (as required by the Defra Construction Code of Practice for the Sustainable Use of Soil on Construction Sites[5]) can utilise the site-specific soil data collected as part of a detailed ALC survey to inform the detail of a soil management plan based for the whole scheme (temporary and permanent disturbances), which should form a part of the Construction Environment Management Plan (CEMP).

For further advice on BMV agricultural land and soils, please refer to advice within section 7 of this letter 'Additional Advice.'

5) East Anglia Connection Substation to Tilbury

Chosen Preferred Corridor
Notwithstanding previous comments made in relation to designated landscapes, which are also applicable to the Tendering Peninsula - Tilbury chosen route ET1, to the north and north west of Colchester, Natural England is generally supportive of the section of a westerly corridor route. The advantage of a westerly corridor route being that it avoids impacts to multiple ecologically sensitive European Sites located along the Essex Coast in this section of the route. However, the preferred corridor still contains constraints that Natural England advises need to be carefully considered and avoided wherever possible in the more detailed routing development, to comply with Holford Rule 2 and the Overarching NPS for Energy (NPS EN-1, section 5.3, pg 69). Our concerns are discussed below.

Protected Sites – SSSIs
The chosen East Anglia Connection substation to Tilbury route option, ET1 (Sections F, G, K and R), triggers Impact Risk Zones (IRZs) for the following SSSIs:

- Cattawade Marshes
- Bullock Wood
- Marks Tey Brickpit
- River Ter

[4] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land
[5] https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites

- Langdon Ridge
- Thorndon Park
- Hangman's Wood & Dene Holes
- Mucking Flats & Marshes
- Goose & Swan Functional Land (UK9009031)
- South Thames Estuary & Marshes
- S. Thames Estuary Compensation (9003874)

It is generally preferable that within the preferred corridor swathe, detailed route selection is located as far as practicably possible from designated sites in order that the likelihood of adverse impacts is minimised. As previously outlined for SSSIs in other sections of the route, any potential impact on the sites listed above should be fully assessed and, where necessary, mitigation should be proposed to ensure no negative impacts on the designated features of these sites.

At this early stage, we wish to give more detailed comment in relation to particular SSSI sites outlined below, which appear to either overlap or to be immediately adjacent the preferred corridor route:

River Ter SSSI: The purple swathe of the preferred swathe corridor appears to either adjoin, or to slightly encroach onto the north western corner of the River Ter SSSI. The text in Appendix D (page D13) of the Corridor and Preliminary Routeing and Siting Study Report, suggests that the SSSI is not encroached upon, however, given the proximity of the preferred swathe to the SSSI, it would be useful if this could be confirmed.

The River Ter SSSI is notified for its fluvial geomorphology. It is a dynamic river characterised by high flow variability and a section of river which has been the subject of much research into how river flows affect the shape of the channel. This study is aided by the presence in fields adjacent to the river of former river channels and associated features, indicating various historic courses taken by the river.

The sensitivity of the site is classed as high and the main threat to the site is from any activity which would alter the natural flow regime and evolution of the river flow patterns. As such, engineering works and the placement of pylons either within the SSSI or immediately adjacent to the SSSI site should be avoided, as these could have the potential to damage the special interest of the site or interfere with the active processes of the river channel. Placement of pylons within the bounds of the SSSI must therefore be avoided.

There are two sets of pylons that have overhead cables crossing the River Ter downstream of the SSSI. The most proximate of the pylons is to the river is located at a distance of around 150 metres. We would therefore suggest that as an absolute minimum, that this 150m buffer from the site is retained in order to avoid likely damage to the special interest of the site.

It is pertinent to note that as the River Ter SSSI is a geomorphological site, it is vulnerable to channel disturbance within and upstream of the site, impacting on the active processes for which the SSSI is notified. The river is a ‘flashy’ river with a tendency to flood, and we expect this would impact on any plans to position a pylon close to the river unless engineering work was undertaken which, as previously outlined, should be avoided.

Note that impacts on the River Ter SSSI will need to be considered in combination with the Longfield Solar Farm NSIP [6].

Marks Tey Brickpit SSSI: The purple swathe of the preferred corridor appears to clip the north western edge of the Marks Tey Brickpit SSSI and extends into the IRZ for the site.

[6] https://infrastructure.planninginspectorate.gov.uk/projects/eastern/longfield-solar-farm/

The Marks Tey Brickpit is a SSSI designated for its geological interest. It has both exposed geological interest in the pit faces, as well as buried geological interest elsewhere beneath the site. Marks Tey Brickpit is an unique and internationally important site with lacustrine clays containing pollen in a deep basin. It is notified for its Ice Age deposits, which are a thick sequence of lake clays and organic deposits with associated glacial deposits, up to 35m deep. This site provides a detailed (and in some cases annual) record of climate, environment and vegetation changes from the end of the Anglian Glaciation approx. 450,000 years ago to the end of the Hoxnian interglacial period approx. 380,000 years ago. It is a valuable resource for modelling climate and environmental changes during the Ice Age, and the site is considered to be internationally important as a result. It is an active brickpit and working brickworks and extraction of clays in the pit continues. The brickworks and area of minerals safeguarding is picked up in the Corridor and Preliminary Routeing and Siting Study Report Appendices – in Appendix D on page D11, however, we note that the SSSI at Marks Tey Brickpit has not been identified here, which must be an oversight.

Due to its importance in the study of the earth's history Natural England would object to any digging or excavation on the site, as this would damage or destroy the notified features of the site. Similarly, Natural England would object to any permanent structure being built on the site as it has the potential to prevent, or cause difficulties in, access to the notified features for the purpose of research. The lake sediments extend beyond the SSSI to the north and west of the SSSI boundary into the swathe as demonstrated by a British Geological Survey borehole. Ideally we would not want any construction in the IRZ for the site given the extent of the clay and organic deposits, which also have the potential to contain Palaeolithic archaeology. The specific impact of concern which we wish to completely avoid, would be construction of pylons. Any pylon footings would damage the geology by removing, disturbing or preventing access to it (sterilisation). Ideally the route should follow the north western edge of the swathe to avoid impacts. If the route is further southeast towards the SSSI then as long as pylons are not constructed in or in the vicinity of the SSSI then impacts can be avoided. Given that the SSSI is an active pit with a very weak substrate of 18.5m of lake clays and organic material, we expect that it would not be a suitable place for constructing 45-50m high pylons given the geotechnical issues that would be encountered. If pylons are to be constructed in the neighbouring fields within the IRZ, then mitigation in the form of a geoarchaeology survey and watching brief may be required for recording and sampling. Essex County Council heritage service may have additional requirements given the archaeological potential associated with MIS 11 Hoxnian Interglacial deposits.

Thorndon Park and Langdon Ridge SSSIs: We note that the preferred route runs through the gap between the Thorndon Park and Langdon Ridge SSSIs, at its closest point, the preferred corridor swathe passes within 300m of Langdon Ridge SSSI. It also appears to run through part of the proposed Dunton Hills Garden Village development site in Brentwood Borough Council local authority area, planning ref: 21/01525/OUT. This is clearly a constrained area of the proposed route and careful consideration to the detailed siting of pylons in this area will be required to avoid the various constraints that exist in this locality.

Both Thorndon Park and Langdon Ridge are publicly accessible Country Parks with multiple SSSI units contained therein. Should adjustments to this section of the route become necessary, Natural England would wish to avoid the OHL route being moved significantly closer to either of these SSSIs, such that the special interest features are adversely affected or the high amenity value of the Country Parks is compromised, in accordance with Holford Rule 2.

Thorndon Park is an area of semi-natural broadleaved woodland and ancient parkland supporting a range of habitat types. Within Thorndon Park, the SSSI site supports an outstanding assemblage of invertebrate species, particularly beetles associated with the

many veteran trees and pollards on the site.

Langdon Ridge SSSI is of special interest for the following nationally important features that occur within and are supported by the wider habitat mosaic:

- species-rich neutral grassland
- fen-meadow
- ancient and long-established semi-natural woodland
- assemblages of invertebrates chiefly associated with open sward and scrub heath
- populations of the plant Deptford pink (*dianthus armeria*)

It is important to note that in addition to the qualifying features for which the SSSIs are notified, the Country Parks could be considered to be areas of 'high amenity value' under Holford Rule 2 in their own right due to the high annual visitor numbers each site receives and their importance in providing access to open green space for local communities. Thorndon Park and Langdon Ridge respectively receive 249,000 and 200,000 visitors on average annually, outside of Covid-19 years, when visitor numbers were significantly higher.

Protected Sites – European Sites

The IRZs triggered for the SSSIs overlap with the following European Sites:

- Stour and Orwell Estuaries Ramsar
- Stour and Orwell Estuaries SPA
- Thames Estuary and Marshes Ramsar
- Thames Estuary and Marshes SPA

Any potential effect on the integrity of these sites will need to be considered through the HRA process. As previously mentioned for other coastal designated European Sites, the impacts of FLL loss for designated bird species and introduction of OHL infrastructure should be examined in detail.

Thames Estuary SSSI Notification project

In our meeting with National Grid on 26th April, Natural England informed National Grid that we have notified land at Swanscombe Peninsular as a SSSI. Consistent with our SSSI notifications pipeline, we are continuing to assess whether additional areas around the Thames Estuary may be of special interest, for invertebrates in particular, but also other potential interests including birds and plants. This includes land within the Tilbury area, broadly to be found south of the A13, east of the A1089, and north and west of the River Thames.

A map of this 'area of interest' has been shared with National Grid on 29th April 2022. This map does not intend to define a future SSSI boundary, but rather an 'area of interest' within which areas of particular importance are expected to be found. Shapefiles were also shared on 25th May 2022.

Work to date has reviewed a large body of recent evidence and this is proving very helpful in identifying parcels of land that appear to be of particular importance. We are considering that evidence currently against recently-revised SSSI selection guidelines for invertebrates published in 2019 and are undertaking some further survey work to fill critical gaps. This survey work will cover a relatively broad area to ensure that we have all the evidence needed to determine properly the boundaries of any potential land to be notified.

Natural England is providing this information to National Grid in order that National Grid have the early opportunity to 'future proof' the Anglia GREEN connection to Tilbury in anticipation of an enlarged SSSI on a 'no surprises' basis, seeking to avoid introducing any unanticipated variables into your project at a late stage. At this point in time we are not in a position to propose a boundary, however we will continue to share information as appropriate with National Grid as the project progresses. We note and welcome your intention to avoid areas of environmental sensitivity as part of the route selection process and we anticipate working with you to extend these working principles to future notifications.

The preferred option BE5 graduated swathe approaches Tilbury from the north and forks into two 'legs' which circumnavigate around the settlements of Linford and East Tilbury, the 'Linford Loop'. One route (Route R on Figure 7.3) passes to the east of the settlements, and the other (Route S on Figure 7.3) to the west. It is assumed that the preferred route does not need to utilise both sides of the Linford Loop and that the route has been presented in this way to indicate that there is an option for the route to either pass to the west of Linford or to the east, however we would welcome your confirmation that our understanding is correct.

Natural England's strong preference is that the eastern leg of the 'Linford Loop' is excluded altogether from the preferred option route as this would pass through areas known to be of (both current and anticipated future) high ecological quality. The shapefiles shared with National Grid indicate areas of interest for SSSI notification and National Grid should seek to avoid these areas where possible, albeit Natural England has not yet formed a view on which areas will meet the published criteria for SSSI selection. We note that there are established transmission lines in the area, and generally we presume that appropriate siting of pylons could limit impacts (with an appropriate installation methodology) however, as you will note from the shapefiles there are pinch points where further discussions are likely to be needed to find an appropriate way forward.

In general, we would prefer that established OHL corridors are used around the Tilbury area as far as possible, keeping as close as possible to existing transmission routes. Natural England appreciates that the approach route to the Tilbury substation necessarily limits avoidance options in this area specifically, and so a bespoke solution is likely to be needed to integrate the line with high quality wildlife habitats. As you know, the mitigation hierarchy seeks to avoid adverse impacts first, and only if these cannot be reasonably avoided in the first instance, to provide mitigation, with compensation being the option of last resort. If sensitive areas cannot feasibly be avoided, then the possibility of 'bridging' these areas as a mitigating option should be explored – i.e. locating pylons outside of the sensitive area so as to avoid direct habitat losses.

We would welcome the opportunity to discuss the routeing alignment with you in more detail via the SLA DAS contract, to ensure that our respective projects can integrate appropriately.

6) Common Issues

Ancient Woodland, Ancient and Veteran Trees

Natural England notes that the preferred corridor has potential to impact ancient woodland identified by the Ancient Woodland Inventory. In some cases, these are also nationally designated sites, such as Gipping Great Wood SSSI and Barking Woods SSSI. In some instances, the proposed route is planned to come within close proximity to ancient woodland (outside the footprint of the woodland). In these circumstances, impacts may be avoidable or mitigation may be possible to prevent deterioration or loss of ancient woodland occurring. However, the current preferred corridor indicates that some of the route may cross ancient woodland likely resulting in loss or deterioration.

When developing the final route, Natural England refers you to Table 3.1 in the CPRSS where Ancient Woodland is identified as 'Seek to avoid'. Protection of Ancient Woodland should also be a material consideration in IPC decision making, as outlined in para 5.3.14 (pg 71) of the NPS EN-1.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. This may be useful to refer to when considering next stages of the project.

Priority Habitats

The preferred corridor contains considerable amounts of the following priority habitats:

- Deciduous Woodland

- Good Quality Semi-improved Grassland
- Lowland Meadows
- Lowland Calcerous Grassland
- Lowland Heath
- Traditional Orchard

As discussed above, avoidance of priority habitats is advised within the Overarching NPS for Energy (EN-1, section 5.3, pg 69). Therefore, it is Natural England's advice that when the more detailed routeing is decided, the mitigation hierarchy should be applied with respect to these habitats, with avoidance being the preferred option. If significant harm resulting from the development cannot be avoided, then adequate mitigation should be sought. As a last resort, compensation should be considered to replace any lost priority habitats. Further advice regarding local sites, priority habitats and species can be found on pages 71-72 (para 5.3.13, 5.3.16-18) of the NPS EN-1. A list of priority habitat and species can be found here[7] and can also be mapped using the habitat layers on MAGIC.

7) Additional Advice

In addition to the advice provided above, Natural England wishes to raise the following issues.

Protected Species

A guide on the effect of NSIPs on protected species can be found here[8] . Advice on the avoidance and mitigation in regard to bird species in the context of this project, can be found on pg. 11 section 2.7 of the NPS for Electricity Networks Infrastructure (NPS EN-5) .

We strongly advise that, for each protected species likely to be affected by the project, you obtain additional pre-licensing species advice from Natural England (consultations@naturalengland.org.uk) prior to the application submission to further reduce uncertainty and risk of delay at the formal application stage, please note there may be a charge for this service. The ideal situation would be for Natural England to review draft protected species licence applications and (if agreed) provide Letters of No Impediment (LoNI) ideally with or shortly after (which is sometimes the case) the Development Consent Order (DCO) application is made, to ensure the Examining Authority (ExA) has the required certainty. Indeed, Natural England created the LoNI process for this purpose, to enable developers to address any risks in advance and increase confidence in the application. The advice given by the Consents Service Unit (CSU)[9] states that "It is worth noting where developers choose to apply for non-planning consent later in the process, it may be difficult to provide the Examining Authority with reassurances about the likelihood of obtaining them" (page 5) and Annex 2 on page 8 includes examples of how the CSU has helped support developers in understanding the risks of not undertaking this process.

Biodiversity Net Gain

We advise that it is imperative that the project as a whole avoids, mitigates and/or compensates for impacts on habitats and species of high biodiversity value including designated sites, protected species and ancient woodland. As a first principle, the project should therefore represent no 'biodiversity net loss' in these regards.

However, it should be noted that a significant amount of other valuable and sensitive habitats and species are likely to be affected by the project, including priority habitats and species, County Wildlife Sites (CWS) and Local Nature Reserves (LNR). Priority habitats and species listed under section 41 of the NERC Act are, in the Secretary of State's opinion, of principal national importance for the purpose of conserving biodiversity. The avoidance-mitigation-compensation hierarchy should also be clearly followed with respect to these habitats and species where they may be affected by

[7] https://jncc.gov.uk/our-work/uk-bap/
[8] https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/10/PINS-Advice-Note-11_AnnexC_20150928.pdf
[9] https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/07/CSU-Prospectus.pdf

this application.

Natural England advises that a project of this scale has the potential to provide a positive environmental legacy for the area within which it is proposed, with considerable long-term benefits to people and wildlife. We welcome your commitment to providing BNG in advance of it being a statutory requirement in the relevant NPSs (NPS EN-1 and NPS EN-5) for NSIPs. As outlined above, we have identified potential opportunities for you to achieve BNG and we would be keen to work with you in order to help realise any such ambition.

As you are aware, the BNG approach has been developed to not only help halt declines in wildlife by conserving what habitats and species are left but begin the task of restoring some of what has been lost. In simple terms, BNG calculations should (ideally using the recently released Defra biodiversity net gain metric 3.0[10]) compare the current biodiversity value of the habitats within the project red line boundary to be lost (excluding designated sites and ancient woodland) with the biodiversity value of the habitats forecast to be created following development, with the intention being to demonstrate an overall increase in biodiversity (minimum 10 %). We consider that such an approach could, following completion of the project, provide significant benefits through:

- Enabling wildlife to adapt to the challenges of the future including habitat fragmentation, climate change etc.;
- Providing a wealth of natural capital benefits such as flood prevention, improved air quality, improved soils, clean water etc.;
- Providing inspiration and enjoyment for people through regular access to a high-quality natural environment, improving community health and wellbeing (both mental and physical). This should include enhancement of public access where practical (i.e. where it would not compromise the biodiversity interest, for example) and could also involve local stewardship of any new habitat creation;

More information can also be found in our Biodiversity Net Gain Brochure .

We advise that such an approach would be in line with: •

- **The NPS for Energy (NPS EN – 1):** this provides the primary basis for decisions on applications for development consent for energy projects and acknowledges that development proposals "provide many opportunities for building-in beneficial biodiversity or geological features as part of good design" (EN-1, para 5.3.15, pg. 72) and that "the applicant should demonstrate that…opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals" (EN-1, para 5.3.18, pg. 72, also see para 5.3.4 on pg. 69).

- **The upcoming revisions to the NPSs:** The recent government response to the revised NPS consultation in relation to net gain[11] states that "the 2011 Natural Environment white paper set out an ambition to achieve net gain for biodiversity as opposed to net loss. The recently published 25 Year Environment Plan identified actions to both strengthen the commitment to biodiversity net gain and expand the approach over time to natural capital net gain and ultimately wider environmental net gains as appropriate metrics become available. The NPS will establish the need to consider the potential to achieve biodiversity net gain and will set the context for achieving this at a strategic level without analysis of impacts on individual sites. More detailed assessment, for example based on the Defra biodiversity metric, will be undertaken as part of the DCO application". We hope that the above is therefore useful in giving you some foresight on what the NPS revisions might include in terms of net gain requirements.

- **The Government's 25 Year Environment Plan**: Net gain is embedded in the Government's

[10] http://publications.naturalengland.org.uk/publication/6049804846366720

[11] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727628/NPS_Siting_Criteria_Consultation_-_Government_Response.pdf

recently published 25 Year Environment Plan as a key action for ensuring that land is used and managed sustainably (see pp. 32-34 for general principles). As per the Advice Note 11, Annex C – Natural England and the Planning Inspectorate[12], "Natural England will seek opportunities for positive environmental outcomes from major infrastructure developments. NSIPs can make a significant contribution to delivering the environmental ambition in the Government's 25 Year Environment Plan (25YEP). This aims to deliver an environmental net gain through development and infrastructure. We can help applicants and the Examining Authority to better understand and value the benefits derived from the natural environment ('natural capital'). We may advise on opportunities to secure positive environmental benefits from NSIPs. Priorities include establishing more coherent and resilient ecological networks and providing and enhancing habitats for protected species. We can also advise on approaches and metrics that enable projects to achieve biodiversity net gain, as set out in the National Planning Policy Framework and the recent and developing National Policy Statements, and on approaches to achieving wider natural capital gains". Furthermore, the 2019 spring statement from the Chancellor (13th March 2019) also made specific reference to mandating biodiversity net gain, in which he said: "Following consultation, the government will use the forthcoming Environment Bill to mandate biodiversity net gain for development in England, ensuring that the delivery of much-needed infrastructure and housing is not at the expense of vital biodiversity".

- **The recent mandatory biodiversity net gain consultation**[13]: The requirement for biodiversity net gain was also the subject of this consultation. The Construction Industry Research and Information Association (CIRIA), the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA) have launched Biodiversity Net Gain Best Practice guidance[14] to which Natural England provided input to and further best practice guidance is also now available. Many major infrastructure projects in the UK have now committed to delivering a biodiversity net gain and some examples of these are included in this guidance.

- The revised **National Planning Policy Framework (NPPF)**[15]**:** The NPPF identifies that one of the three overarching objectives to achieving sustainable development through the planning system is an environmental objective "to contribute to protecting and enhancing our natural…environment; including making effective use of land, helping to improve biodiversity…". The revised NPPF was published on 24 July 2018 and updated Planning Practice Guidance (PPG)[16] has also been issued by the Ministry of Housing, Communities and Local Government (MHCLG) to support various aspects of the revisions. Whilst broadly maintaining existing policies to protect and enhance the natural environment, importantly, it also includes strengthened policies on biodiversity and wider environmental net gain; specifically, planning proposals and decisions are to provide net gains for biodiversity and are to identify and pursue opportunities for biodiversity net gain (paras 170, 174,175) and wider environmental gain (paras 102, 118)

National Grid has requested that Natural England make known to them any opportunities that we are aware of to make contributions to BNG for their further consideration with regards to the mechanism by which the mandatory minimum 10% BNG will be delivered. Natural England further advises that a more ambitious target for BNG should be utilised for a scheme of this scale and nature (e.g. 20% or more where appropriate).

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[12] https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/10/PINS-Advice-Note-11_AnnexC_20150928.pdf

[13] https://consult.defra.gov.uk/land-use/net-gain/

[14] https://cieem.net/biodiversity-net-gain-guidance-published/

[15] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

[16] https://www.gov.uk/government/collections/planning-practice-guidance

We have identified a number of potential projects where there may be an opportunity for National Grid to make a contribution. Due to the relatively recent introduction of BNG, all of these projects are in relatively early stages or are pilot schemes, and further options may come to light throughout the development of your proposal. However, we would be pleased to provide additional information and contacts should any of these prove to be of further interest.

Waveney - Little Ouse Corridor: As identified above, the proposed route passes through an area identified for nature recovery. There may be opportunities for National Grid to contribute towards projects that are restoring and improving habitats along the Waveney-Little Ouse Corridor. This work is being led by Suffolk Wildlife Trust in partnership with landowners and other organisations and Natural England advises you to contact the Suffolk Wildlife Trust for further details on the projects and to discuss potential opportunities. The metric is weighted such that contributing towards habitat restoration defined within a local strategy, achieves a higher score which, in turn, increases the credits achieved.

BNG Credit Pilot Schemes: There are two BNG Credit Pilot Schemes at Spains Hall and Abbotts Hall. There may be scope for investment in these two pilots as a purchaser of BNG credits.

Essex County Council Climate Action Focus Area: The graduated swathe passes through Essex County Council's Climate Action Focus Area which covers the entire Blackwater and Colne catchments. As part of this, there is the ambition to see all land holdings entering into stewardship agreements. Funding opportunities are being sought to enable this to be carried out.

Agri-environment Schemes

We advise that the preferred corridor swathe contains land parcels which form part of live agri-environment schemes which are currently delivering benefits for nature, including the management of priority habitats. Consideration must therefore be given to any permanent and/or temporary impacts from the proposals on the schemes and implications for the agreement holder in terms of any necessary relocation of options, derogations, pay back of grant funding, scheme penalties etc.

Land covered by, and within close proximity to, the preferred corridor is currently under Countryside Stewardship (CS) Higher-Tier and Mid-Tier schemes. Loss of this habitat may result in direct land take or damage to land under agreement. Any land removed from agri-environment schemes may result in repayment of subsidies dating back to year 1 of the scheme, and with additional penalty. Construction and operational activities that pose an impact to agreement land in terms of water resources and quality of habitat and species, loss and fragmentation and disturbance (noise, light and visual) should be considered. Timing and dates of work should be considered to ensure that habitats retained can be sufficiently maintained. Required mitigation should be included with the Code of Construction practise and secured in the DCO. It should also be noted that any compulsory land purchases which are subject to agri-environment schemes would also need to be repaid.

Rights of Way, Access Land, Coastal Access and National Trails

Natural England notes that the proposed cabling route crosses various public rights of way (PRoW). Further advice is provided on this topic within NPS EN-1 (pg. 102, para 5.10.24). Development should consider potential impacts on access land, common land, rights of way and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails. The National Trails website https://www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Best and Most Versatile Agricultural Land and Soils

The NPS EN-1 (para 5.10.8 pg 100) states that applicants should seek to minimise impacts on the BMV agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification)". Further information is contained in GOV.UK guidance. Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website.

Guidance on soil protection is available in the Defra *Construction Code of Practice for the*

Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

☒ The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours Faithfully

[redacted]

Norfolk and Suffolk Team

Norfolk County Council's Comments to the Planning Inspectorate on the:

East Anglia Green – Scoping Opinion

November 2022

1. Introduction

1.1. The County Council welcomes the opportunity to comments on the above Environmental Impact Assessment (EIA) Scoping Opinion/Report. The comments below are made on a without prejudice basis and the County Council reserves the right to make further additional comments on the Development Consent Order (DCO) application during the statutory consultation periods; and at the Public Examination stage.

1.2. Socio - Economic

1.3. The County Council would expect National Grid to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement. Whether through the formal DCO process or post DCO, there would be an expectation that National Grid will provide and take forward a Community Benefit Fund. Reference to a community benefit fund specifically designed to mitigate and compensate for any local impacts to residents and businesses should be scoped into the ES as part of any wider consideration of impacts on business as set out in para 15.8.2 of the Scoping Report.

1.4. The Environmental Impact Assessment (EIA) / Preliminary Environmental Information Report (PEIR) will need to assess the wider economic benefits arising from the above development both in terms of the scheme coming forward on its own and in combination with other major energy projects in the area. The EIA will need to indicate:

- Likely number of jobs created on this project – the County Council welcomes reference in paragraph 2.3.5 of the Scoping Report to the draft NPS for Energy (EN-1) and reference to job creation;

- Jobs likely to be generated locally (i.e. within Norfolk) – welcome reference in section 15.8 of the Scoping Report to the employment effects being scoped into the ES;

- An indication of the type of jobs created e.g. construction; engineering; and opportunities for training should be scoped into the ES. The County Council would expect the applicant to prepare a skills and employment plan/strategy as part of the DCO process and reference to this should be scoped into the ES;

- Likely duration of any construction work – should be scoped into the ES;

- Potential to use local supply chains – welcome reference in Section 15.8.

The County Council agree that the additional jobs created during routine maintenance and inspection (para 18.8.4) will not be significant and therefore can be scoped out of the ES.

1.5. The ES will need to consider the potential impacts on existing businesses; and the compensation needed. The County Council welcomes reference to this being included in the ES in para 15.8.2 of the Scoping Report. Also welcomed is reference to the impact on agricultural businesses (para 15.8.3) and need for this to be included in the ES.

1.6. Should you have any queries with the above comments please contact: Stephen Faulkner [redacted]

2. Highways

2.1. The EIA scoping report states that the precise alignment of the project, location of construction compounds and the haul roads are not yet known and are still under development. Accordingly there is insufficient detail at present to enable the Local Highway Authority to provide a full assessment of the project and the highway comments below are therefore of a general nature.

2.2. Works within Norfolk are identified as including works at the existing Norwich Main Substation (intended to be accessed via the existing access arrangements); Pylon works with associated overhead lines; together with crossing three public highways – the B1134; B1077 and the A1066. It is noted that the applicant intends to consult with the LPAs in relation to cumulative impact from committed development but ask that specific regard is also taken of the Equinor offshore wind farm proposal (i.e. the Sheringham Shoal Extension Project and Dudgeon Extension Project), which seeks to utilise the same access arrangements to Norwich Main substation. The Equinor Project will be going through the Examination stage in early 2023 and as yet does not have a DCO granted. However, for the purposes of the East Anglia Green Project it is felt that the Equinor Project must be considered in cumulative impact terms (i.e. presumed consent).

2.3. As part of our initial discussion with the applicant the Highway Authority have asked that the formal DCO application be accompanied by a Transport Assessment (TA) and a Construction Traffic Management Plan (CTMP). It is noted that the volume of construction traffic is not yet known but that a commitment is provided within the EIA scoping report to provide a TA and CTMP. The TA needs to assess the effects of the anticipated traffic upon driver delay; severance; pedestrian delay; pedestrian amenity; accidents; road safety; and impact from abnormal loads.

2.4. It is also noted that the project will consider the removal / diversion of existing National Grid infrastructure and third-party utilities, again the scope of which is not known. The Highway Authority ask that the highway impact of any associated works of this nature forms part of the TA so that a comprehensive view can be taken as to overall impact.

2.5. It is noted that the traffic and transport effects during operation (including maintenance) are out of scope and the Highway Authority is happy to agree on that point.

2.6. As a general point, the overall thrust of the EIA scope relates to examining increases in traffic volumes (in particular represented as a percentage figure) and the Highway Authority wish to point out that the public highways leading to the overhead cable corridor in Norfolk are predominantly narrow minor rural lanes. Accordingly even a small volume of traffic on these routes can have a significant impact if vehicles are unable to physically pass each other and this point needs to be considered within the CTMP

2.7. The ES will need to consider emergency access (to blue light services) associated with any temporary road closures; and/or temporary roadworks.

2.8. If you have any queries with the above comments, please contact John Shaw Developer Services Manager - John R Shaw [redacted]

3. Environment

3.1. General – The EIA will need to provide evidence as to the alternative options considered by National Grid ranging from:

- An offshore grid solution;
- Fully under-grounding between Norwich and Tilbury;
- Selective under-grounding in the most sensitive areas.

These options and any reasons for dismissing them should be scoped into the ES

3.2. **Landscape** -

3.3. The approach laid out in 13.1 of the Scoping Report is broadly acceptable and the County Council supports the cross-discipline considerations being made, specifically Ecology, Biodiversity and Historic Environment where it is felt that there are key cross overs in impacts and mitigation to be considered.

3.4. The authority welcomes the inclusion of draft EN-5 within the National Policy considerations (13.2.1-13.2.2); and have welcomed the opportunity to be involved in cross-boundary discussions with the applicant and other Local Authorities to identify locations where undergrounding may be appropriate due to particularly sensitive landscapes. The key cross-boundary issue in Norfolk relates to the Waveney Valley where consideration is being given as to balance of impacts on the natural and historic environment if overground/underground options are taken.

3.5. The study area discussed in 13.3 appears appropriate and the County Council supports the inclusion of a wider inclusion of viewpoints outside the 3km where significant effects are possible.

3.6. Baseline data should be increased to include items such as, but not limited to, Public Rights of Way, National Trails, Quiet Lanes, Cycle Routes, County Wildlife Sites, Roadside Nature Reserves, and Local Nature Reserves where these fall within the study area. Users of the Public Rights of Way (and associated) network are likely to be key receptors to be considered due to the nature of their usage of this network for

recreational purposes. It will be important to consider the sequential nature of their experience especially when some routes will coincide with large sections of the study area, and other cumulative impacts will also be experienced. The County Council is encouraged to see the inclusion of landscape planting as a mitigation measure to reduce visual impact and offset any residual harm through landscape restoration. The County Council looks forward to seeing more detailed proposals in the fullness of time.

3.7. At this point, while working hours and time periods are not yet defined, it is felt that it may be too premature to scope out the impacts of lighting at night on landscapes, both designated and undesignated. When more details are known regarding key locations and working hours, it may be that this could be scoped out, but at this stage it important to still be included. While it is understood that the EIA is only required to assess public views and not those of private interest, the applicant may find that, as the final proximity to residential properties has not yet been determined, there may be a need at later stages to consider impacts on residential amenity. This would only be the case if there is the potential of the magnitude of effect being to such a degree that the property/properties may become widely regarded as unattractive and thus unsatisfactory place to live, therefore becoming by circumstance, a public interest concern. (Covered by Landscape Institute Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19).

3.8. The County Council broadly supports the indicative preliminary viewpoints as contained within Appendix H, although we would appreciate further discussions regarding these and potentially additional viewpoints as the project progresses. Due to the public interest and potential impacts of the scheme the County Council would support, where possible, all viewpoints being illustrated with photomontages but where not possible wireframe included.

3.9. **Ecology** -

3.10. <u>Habitats Regulations Assessment (HRA):</u>
It is noted in section 8.1.4 that a HRA will be required, however, it has not yet been carried out, and will be undertaken in parallel with the Environmental Statement (ES).

3.11. <u>Biodiversity Net Gain (BNG):</u>
The commitment by National Grid to achieve 10% BNG is welcomed, noting it is not currently a mandatory requirement for NSIP's to achieve this under the Environment Act until 2025. Details regarding the BNG assessment provided in section 8.120 appear acceptable. The proposed BNG Technical Report should be submitted alongside the ES.

3.12. <u>Chapter 8 Ecology & Biodiversity:</u>
Details provided regarding the Approach to Scoping (8.1), Study Area (8.3) and Data Collection (8.4) appear acceptable. It is noted in relation to section 8.6 (Baseline Conditions) that no field work has yet taken place.

The proposed approach to carrying out ecological field surveys to identify areas of ancient woodland under 2ha as well as veteran and/ or ancient trees (as set out in section 8.6.11) is welcomed.

Embedded Measures to avoid or reduce potential ecological impacts, as summarised in section 8.8.2 and detailed in Appendix B: Initial Outline Code of Construction Practice (CoCP) appear broadly acceptable in relation to ecology and biodiversity. It is noted that an updated Outline CoCP is proposed to be submitted with the DCO application.

Likely Significant Effects (8.9) indicates in section 8.9.2 that the majority of biodiversity receptors would only be subject to negative effects during construction; however, it is important to note that operational negative effects are possible in relation to bird collisions (as later identified in Table 8.5 and section 8.9.7).

Survey Areas (as per Table 8.6) appear acceptable, and phase 2 botanical surveys (8.10.8) are welcomed.

The Proposed Scope of the ES (as set out in Table 8.9) appears broadly acceptable.

3.13. Appendix E Sites Designated for Biodiversity:
It is important to note that Table E1 only identified statutory designated wildlife sites, with no reference made to non-statutory wildlife sites, which it is felt should be included such as County Wildlife Sites (CWS).

3.14. Survey Methodology (Appendix F):
The approach to surveys appears broadly acceptable, noting that in the majority of situations, the need for detailed surveys is proposed to be scoped out due to the habitats affected and the temporary impacts predicted.

Where details of targeted surveys are provided (e.g. reptiles, breeding birds and Schedule 1 birds, badgers, bats, hazel dormouse, otter and water vole), survey methodologies appear acceptable.

It is noted that the scope of targeted surveys for terrestrial or aquatic invertebrates would be subject to agreement with consultees.

The use of great crested newt district level licensing (DDL) is noted and welcomed. The copy of the letter from Natural England in Appendix K provides reassurance that this option is expected to an appropriate option for this particular development.

Regarding wintering/ passage birds, reference is made to an agreed survey methodology being provided in Annex I, however, this document does not appear to have been provided by the applicant. **It is therefore advised that a copy of Annex 1 is provided by the applicant at the earliest opportunity.**

3.15. **Arboriculture** -

3.16. It is considered that the wording of the mitigation hierarchy with regard to ancient woodland, ancient and veteran trees is not sufficiently robust and not acceptable. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (ref NPPF section 180 c). It should also be noted that a review of ancient woodland inventory is taking place so it may be that designations change during the lifetime of this Project. Site assessment for ancient or veteran trees must be carried out as described in the approach to the walkover survey.

3.17. It is accepted that a pragmatic approach needs to be taken to data collection and the authority agree to limiting the collection of all tree data (as per BS 5837) to only Cat A and B trees. Adapting the Root Protection Area (RPA) to suit likely root morphology is acceptable (e.g. adjacent to roads, ploughed fields, streams etc). Category C trees may have a rooting area greater than 5m diameter. It is not considered overly onerous for an assessment to be made during the walkover survey when the tree / woodland categorisation is made, to determine an appropriate RPA for Cat C trees. If this is not carried out consent may be granted to development that harms trees suitable for retention. This would be particularly problematic for trees that are not in the developer's ownership.

3.18. Caution must be taken over the exclusive use of LIDAR (Light Detecting and Ranging) data for initial gathering of information on location of trees and hedges. LIDAR data will not detect the presence of low hedges or tree or hedge features that have recently been managed through coppicing or hedge laying at the time that the LIDAR data was captured.

3.19. Should you have any queries with the above Environment comments please contact: the Natural Environment Team NETI@norfolk.gov.uk

3.20. **Public Rights of Way**

3.21. At this stage the County Council would recommend that the applicant takes the following into account in the ES:

- Impacts during construction- If any Public Rights of Way need to be crossed; or are impacted by any construction of supporting infrastructure; or will require a temporary closure, then this would require consultation in advance to the Highway Authority;

- Impacts during operation- If any Public Right of Way will be impacted during the operation and servicing of the project then details should be provided in advance and any proposed mitigation measures be put in place.

The DCO will likely need a Planning Requirement to address the above matters along the lines:

Public Rights of Way Strategy.—(1) No phase of the on shore works that would affect a public right of way specified in Schedule 4 (public rights of way to be temporarily stopped up) is to be undertaken until a public right of way strategy in respect of that phase and in accordance with the outline public rights of way strategy, including the specification for making up of an alternative right of way (where appropriate) has been submitted to and approved by the relevant highway authority in consultation with the relevant planning authority.

(2) Any alternative public rights of way must be implemented in accordance with the approved public rights of way strategy.

3.22. Should you have any queries with the above comments please contact: Natural Environment Team NETI@norfolk.gov.uk

3.23. **Historic Environment**

3.24. The Historic Environment Team concur with paragraph 11.9.7 off the Scoping Opinion. Whether underground cable or overhead via pylons construction of the above scheme has the potential to impact on below ground archaeological remains. Impacts on below-ground archaeological needs to scoped into the ES, so that refinements of route and detailed design can be made so as to minimise any impacts.

3.25. The Team has already discussed with the applicant aspects of the approach to archaeological Desk-Based Assessment and walk-over survey. Our comments on the proposed methodology for the Desk-based assessment and walk-over survey are as follows;

- Paragraph 11.10.9 The walkover survey and the desk-based assessment in general should utilise existing historic aerial photographs and LIDAR data as well as the recent aerial imagery taken specifically for this project.

- Paragraph 11.10.11 Third bullet point. Fields that have only been subject to geophysical survey should be scoped into the walkover survey. Geophysical survey results can never be taken to be negative evidence. Geophysical surveys and their interpretations are far from 100% reliable indicators of the presence or absence of significant below-ground archaeological remains.

3.26. Should you have any queries with the above comments please contact John Percival (Historic Environment Senior Officer) [redacted]

4. **Public Health**

4.1. Public Health Norfolk will comment only on the impact of the project as it pertains to population health in Norfolk. Public Health Norfolk would expect to see a full health impact assessment (HIA) using an appropriate methodology carried out for the proposal to cover both the impacts during both the construction phase and operational phases of the project, and to set out appropriate mitigation measures if

required. This would be expected to particularly identify costs and benefits to vulnerable communities both immediately adjacent to the proposal and those in the surrounding area. Any assessment should consider both direct impacts on health from changes in air quality, dust, noise, vibration and increased traffic during construction, but also discuss the wider determinants of health such as temporary changes and disruption to public rights of way, for example, and consider both physical and mental wellbeing amongst local populations.

4.2. The UK Health Security Agency is the lead agency with responsibility for health threats from radiation in the UK and is a statutory consultee for Nationally Significant Infrastructure Projects. It should be consulted regarding the appropriateness of scoping out of the health impacts of Electro Magnetic Fields (EMF) from the Environmental Statement as suggested in 10.10.12. The report recognises public concern regarding EMFs (10.10.13) and says it will provide comprehensive information on EMFs and compliance of the proposed project with legal guidelines. As acknowledged, the scheme could give rise to potential anxiety in local populations therefore Norfolk Public Health requests that a mental health assessment (MHA) is carried out to evaluate this, and that appropriate mitigation measures are set out within the Environmental Statement.

4.3. It is noted that the Scoping Report proposes that no chapter on human health is included as part of the Environmental Statement. Instead reporting is proposed to be under chapters of Air Quality; Geology and Hydrogeology; Noise and Vibration; and Traffic and Transport; together with a separate report on EMFs and a section on health and wellbeing in the cumulative effects assessment. Norfolk Public Health would prefer to see the health elements drawn together into one chapter, supplemented by the results from the HIA and MHA, and appropriate mitigation measures detailed. Whilst this may result in duplication it will enable health considerations of the project to be understood more easily and show due regard and consideration for matters which will likely concern the local population.

4.4. Should you have any queries with the above comments please contact Jane Locke – Prevention Policy Manager – Places (Public Health) [redacted]

5. Minerals and Waste

5.1. The County Council as Minerals and Waste Planning Authority has the following comments to make on the Scoping Report regarding minerals and waste planning policy.

5.2. Figures 9.1 of the scoping report shows the superficial geology underlying the preferred corridor. Geological deposits containing sand and/or gravel are ubiquitous across large parts of Norfolk. However, only certain deposits have been safeguarded as mineral resources through the Norfolk Minerals and Waste Local Plan. This is where they contain sand and gravel of sufficient proportions and quality that would make them potentially commercially viable.

5.3. The preferred corridor is sparsely underlain by isolated areas of safeguarded sand and gravel resources.

5.4. As the proposed infrastructure in Norfolk would consist of overhead powerlines and pylon towers there would only be limited potential for safeguarded mineral resources to be sterilised where these intersect with the proposed location of a pylon base. It is considered that these would be exempt from the requirements of the Norfolk Minerals and Waste Core Strategy Policy CS16 – safeguarding or any successor policy by virtue of the site area of the bases. If as the project progresses it is amended to include any undergrounding of the powerlines within Norfolk, then Norfolk County Council in its capacity as the Mineral Planning Authority for Norfolk would need to be consulted regarding safeguarded mineral resources. If it is proposed for additional infrastructure (such as substations or extensions to substations) to be constructed where the site area is over 1ha the Mineral Planning Authority will need to be consulted on mineral resource safeguarding.

5.5. Should you have any queries on the above comments please contact Richard Drake (Senior Planner – Minerals and Waste) – email [redacted]

6. Lead Local Flood Authority

6.1. The LLFA have reviewed the East Anglian Energy Enablement (Green) Scoping Report (November 2022) prepared by National Grid. The LLFA notes that the Scoping Report focuses on fluvial and coastal flood risk and has not considered other sources of flood risk such as surface water. The LLFA observes that currently the National Policy Statement for Energy (EN1 (2009)) has an outdated focus on flooding from rivers and the sea. The Draft National Policy Statement for Energy that is under Parliamentary review at present seeks to "encourage the relocation of infrastructure away from sites at risk of coastal change and includes new obligations to consider flood risk".

6.2. Furthermore, the current version of NPPF includes the requirement for all sources of flood risk to be assessed. Therefore, the LLFA expects all sources including surface water (pluvial) and groundwater to be considered in this scheme proposal.

6.3. The LLFA notes that Section 12.9.9 does not consider surface water flood risk and has not assessed whether there are any potential impacts. In addition, Figure 12.2 only maps the fluvial and coastal flood zones. A review of the Environment Agency's Risk of surface water flooding map shows a much wider extent of flood risk not associated with the areas identified in Figure 12.2. The LLFA supports the Scoping Report's proposal in section 12.9.12 that other sources of flood risk including surface water, groundwater, tidal and other sources, are all scoped into the Environmental Statement for assessment.

The LLFA notes that in relation to the construction activities of the scheme, the Scoping Reports indicates that potential of open cut watercourse crossing but does not say where this would be expected to potentially occur.

6.4. In addition, the Scoping Report indicates that "where construction activities to place in Flood Zone 3, construction compounds would be laid out in accordance with the

Sequential Test and incorporate flood resilience measures where necessary. Storage of construction equipment and materials would be done in such a way as to avoid forming barriers to floodplain flows." This approach should be extended to include areas at surface water flood risk too.

6.5. Furthermore, the Scoping Report states that "Surface water runoff from operation above ground infrastructure would be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority (LLFA), and adopt suitable sustainable drainage techniques, designed to allow for climate change resilience." The LLFA would also seek for the management of the surface water runoff from the temporary construction arrangements to be managed in accordance with the LLFA's developer guidance too that seeks for no increase in flood risk from the construction phase of activities.

6.6. The LLFA notes that some of the ordinary watercourses have been mapped in figures 12.1, however, it is noted that ordinary watercourses are all connected land drainage features, some of which are mapped, and some are not, even when they are shown on the base mapping (see page 3 of Figure 12.1). Therefore, once a scheme is developed, the applicant will need to assess in more detail all the ordinary watercourses that the preferred route alignment interacts with.

6.7. The Scoping Report has not used information from the Norfolk LFRMS Policy Review which was undertaken in 2021. This is available on our website at Local Flood Risk Management Strategy - Norfolk County Council

6.8. The LLFA notes that the applicant has confirmed that a flood risk assessment will be prepared in accordance with the requirements of NPPF and the associated guidance and requirements of the various LLFAs.

The LLFA notes that the proposed ascribing of value / sensitivity has incorporated the NPPF vulnerability classification approach, while the impact magnitude applies an increase in the peak flood level. This magnitude approach implies that hydraulic modelling will be undertaken. However, there is no indication of whether this will include the surface water modelling within this scope of works.

In the Scoping Report section 12.11, the proposed scope of the ES identifies that the effects on the surface water quality for the operational phase will be scoped out as SuDS will be included in the design. However, there has been no previous mention of this mitigation. In addition, the applicant has indicated they will prepare an FRA and drainage strategy in accordance with NPPF and LLFA requirements that will include undertaking this work. This work will need to remain in the scope of the ES.

6.9. In the Scoping Report section 12.11, the proposed scope of the ES identifies that Flood risk from other sources (sewers, artificial waterbodies) for the construction and operation stages will be scoped out. The LLFA would recommend that a screening activity is undertaken to confirm that these sources of flood risk can be scoped out. At present, no work has been undertaken to confirm whether the scheme has no potential to impact, or be impacted by, these sources of flood risk.

Subsequent to this review and whether or not an Environmental Impact Assessment (EIA) is required, we consider that the following issues should be considered and addressed;

We strongly recommend that any EIA includes, or any planning application for development is accompanied by a flood risk assessment (FRA) / surface water drainage strategy to address;

- all sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development
- how surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place
- how any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development during the construction, operation and decommissioning stages.

6.10. This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (paragraph 103).

6.11. In this particular case this would include appropriate information on;

- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.

- Appropriate assessment and mitigation of sources of fluvial (ordinary watercourse) flooding, surface water flooding originating from offsite that may affect the development and any potential for groundwater flooding.

- Provision of surface water modelling of overland flow routes and mitigation provided to show how flood risk will not be increased elsewhere. This may include ephemeral culverts sized for the 1% Annual Exceedance Probability (AEP) plus climate change allowance.

- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and, in many cases, supported by the inclusion of appropriate information. Onsite, infiltration testing, in accordance with BRE365 or equivalent should be undertaken to find out if infiltration is viable across the site and at the depth and location of any infiltration drainage feature. Infiltration testing should be undertaken 3 times in quick succession

at each location.

- A surface water drainage system must be provided for the construction, operation and decommissioning stages of the project.

- It is important that the SuDS principles and hierarchies have been followed in terms of:

    - surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level),

    - the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity.

    - Identifying and incorporating multifunctional benefits including amenity and biodiversity.

- Any drainage mitigation for the site should attenuate the post development runoff rate and volume to the equivalent pre-development greenfield rate and volume up to the 1% AEP plus climate change allowance using the latest available guidance.

- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

- As there are few watercourses marked on Ordnance Survey mapping any constructed (conveyance ditch) connection to an existing watercourse, including its connection to the wider watercourse network, must be clearly demonstrated to be feasible and provide the in principal agreements from any landowners. It would also have to clearly be shown what appropriate body would maintain it.

- Any watercourses proposed to be discharge locations must be confirmed as being connected to the wider drainage network to ensure a viable discharge route is available to the proposed development.

- We advise that any formal or informal drainage associated with existing developments or farmland should be maintained or diverted by the scheme to avoid future ponding against any infrastructure including embankments that may be created. If there is infilling of ponds, the inflows and outflows of these should be identified and diverted or other mitigation provided if they are found to be groundwater fed.

- In addition, should any Ordinary Watercourse Consent application be required, we will need to see how the flow in the watercourse will be maintained and how flood risk will not be increased elsewhere. This can be found on our website listed above.

6.12. We welcome that the applicant indicates that an FRA will include a drainage strategy and will design appropriate SuDS features in accordance with policy guidelines.

We also welcome that the applicant indicates that a Flood Risk Assessment (FRA) will be undertaken based on the requirements of the National Planning Policy

Framework (NPPF) and Section H of the Building regulations. However, we strongly recommend that the Planning Practice Guidance (PPG), the latest version of the LLFA Developer Guidance, the CIRIA SuDS Manual, the Strategic Flood Risk Assessment and the Local Flood Risk Management Strategy are all adhered to.

6.13. The LLFA suggest the following be considered:

- A site walkover to confirm the location of ordinary watercourses, overland flow paths and any modelling that is required to inform the design of culvert crossings;
- Any collected topographic survey data should extend across the watercourse / overland flowpath and any likely floodplain to enable modelling to accurately represent pre and post development scenarios;
- Any upgrades of culverts should aim to allow the flow of 1% AEP plus climate change design event but must also include an assessment to show how passing any additional flow downstream will not increase the current flood risk scenarios;
- If there are any surface water flowpaths identified crossing the development area, ephemeral culverts may need to be provide up to the 1% AEP plus climate change design event. This would prevent ponding against infrastructure and prevent an increase of flood risk;
- Any new drainage infrastructure should include appropriate sustainable drainage design and address the appropriate flood risk, water quality, biodiversity and amenity mitigation requirements;
- New drainage infrastructure that is designed to attenuate any additional surface water runoff should remain outside the 1% AEP plus climate change flood areas for any source of flooding. This is to prevent the drainage becoming overwhelmed by flood water prior to being available for the runoff from the development;
- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development

6.14. Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.

Further guidance for developers can be found on our website at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers

6.15. Should you have any queries with any of the above LLFA comments please contact the LLFA – LLFA@norfolk.gov.uk

From: [redacted]
To: East Anglia GREEN
Cc: [redacted]
Subject: RE: EXT:EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation
Date: 08 November 2022 11:19:50
Attachments: image004.png
image006.png
image009.png
image010.png
image011.png
image012.png
image013.png

Northern Gas Networks do not cover this area.

Please use this online tool to find out which gas distribution network you need to contact:

https://www.energynetworks.org/operating-the-networks/whos-my-network-operator

Kind regards,

[redacted]

Administration Assistant
Before You Dig
Northern Gas Networks
1st Floor, 1 Emperor Way
Doxford Park
Sunderland
SR3 3XR

Before You Dig: [redacted] (option 5)
[redacted]



Get involved! Have your say in the future of your gas network and win great prizes, by taking part in our BIG customer survey [redacted] Keep posted to take part in a range of activities from workshops to roadshows. Together, we are the network.

Northern Gas Networks Limited (05167070) | Northern Gas Networks Operations Limited (03528783) | Northern Gas Networks Holdings Limited (05213525) | Northern Gas Networks Pensions Trustee Limited (05424249) | Northern Gas Networks Finance Plc (05575923). **Registered address:** 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Northern Gas Networks Pension Funding Limited Partnership (SL032251). **Registered address:** 1st Floor Citypoint, 65 Haymarket Terrace, Edinburgh, Scotland, EH12 5HD. **For information on how we use your details please**



Get involved! Have your say in the future of your gas network and win great prizes, by taking part in our BIG customer survey at [redacted] Keep posted to take part in a range of activities from workshops to roadshows. Together, we are the network.

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From: East Anglia GREEN <EastAngliaGREEN@planninginspectorate.gov.uk>
Sent: 08 November 2022 11:09
Subject: EXT:EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation

You don't often get email from eastangliagreen@planninginspectorate.gov.uk. Learn why this is important

External email! - Think before you click

Dear Sir/Madam,

You were sent an email (with attached letter) from the Planning Inspectorate yesterday, regarding EIA scoping notification and consultation for the proposed **East Anglia GREEN project**.

Due to an administrative error, the cover email stated the wrong project name and deadline for consultation responses. The attached letter contained the correct details.

To confirm, the cover email should have stated the following details: *"Please see attached correspondence on the proposed **East Anglia GREEN project**.*

*Please note the deadline for consultation responses is **5 December 2022**, and is a statutory requirement that cannot be extended".*

We have reattached the same letter (sent yesterday) to this email for ease or reference.

Please accept our apologies for any confusion caused.

Kind regards
Jack Patten

Jack Patten | EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring fairness, openness and impartiality across all our services

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DPC:76616c646f72

i) The Planning Inspectorate consultation request - EN020027 EIA Scoping Notification - East Anglia

GREEN project, National Grid

Date

Dear Ms Cottam

We set out below Offton and Willisham Parish Council's response to National Grid's scoping report for East Anglia GREEN.

Offton and Willisham's historic landscapes and natural habitats will be dramatically affected by East Anglia GREEN, and we re-iterate our opposition to this proposal. Excess wind power from the North Sea must be transmitted via a coordinated offshore grid. Such a grid has been shown by National Grid ESO (in 2020) not only to be deliverable but hugely beneficial. 50% less infrastructure will be required for a coordinated grid than the current piecemeal approach. That results in cost savings for consumers of £6billion and benefits the environment and communities.

We submitted concerns to the non-statutory consultation but note that the scoping report makes no reference to these. We request that you take note of the Essex Suffolk Norfolk Pylons action group's note on the scoping report which we attach with this submission. It sets out topics which need to be scoped in and points to legal deficiencies with the process.

We have read the Scoping Report and can see no mention made of Monument record OFF 002 - Offton Castle, Castle Farm. heritage.suffolk.gov.uk/Monument/MSF5285 and would ask that this area be included in the scoping for environmental impact.

To ensure that the impact of the pylons on this sensitive parish is fully assessed, we request additional visual receptors for our parish. These are shown below.

View's from the Village Hall (loss of amenity)





Offton Church (historic building)



View from Offton towards Willisham within the proposed Purple Swathe





View from Wheat Hill Campsite (tourism)

No visual receptors have been given for either of our Parishes. The Parishes contain two Churches which are classed as historic buildings and should be included in the report. The pylons would also impact the view from Wheat Hill campsite which brings tourism and much needed employment to the area. No mention has been made of any impact on the village of Willisham, it has been entirely overlooked within the scoping report, despite the fact that the edge of the swathe is directly adjacent to a number of dwellings and an historic farmhouse.

The erection of further pylons to an area that already has an existing line, not to mention the other smaller overhead lines necessary in rural areas will have result in a ‘wirescape’ that is in direct contravention of the Holford Rules.

Offton and Willsham is in close proximity to Wattisham Flying Station home of the Apache Attack Helicopters, any restrictions the pylons would have on their operational training in the area would be a serious concern. If the Station were to close it would have a detrimental impact on an already fragile local economy.

Finally, we seek to ensure that National Grid takes fully into account the impact on the parish's priority habitats and listed buildings highlighted above.

We have attached a document prepared by Essex Suffolk Norfolk Pylon outlining why the Non Statuary Consultation is not valid and questioning the validity of the scoping report we have been asked to comment on, please take this into account when reading our reply.

RESPONSE TO THE EAST ANGLIAN GREEN ENERGY ENABLEMENT SCOPING DOCUMENT FROM RAYDON PARISH COUNCIL

The Essex-Suffolk border is world renowned for its beauty, wide open skies made famous by Gainsborough and Constable and connections to its historical wool-trade past. The erection of such pylons would be a stark, environmental stain on the whole area.

In response to your Scoping Document, Raydon Parish Council would like the inclusion of the following points:

Chapter 8: Ecology and Biodiversity

The area around Raydon is a particularly rich habitat for Stag Beetles, protected in the UK under the Wildlife and Conservation Act 1981, and a priority species under section 41 of the Natural Environment and Rural Communities Act 2006 and a priority species under the UK Post-2010 Biodiversity framework. Raydon Parish Council would strongly recommend engaging with The People's Trust for Endangered Species, ptes.org and The Suffolk Biodiversity Information Service, Suffolkbis.org.uk to gather further data as part of your desk study.

Chapter 10: Health and Wellbeing

The effects of electric and magnetic fields on human health is of immense concern to Raydon Parishioners. We would strongly recommend your proposed standalone report to be published for inspection **prior** to any Development Consent Order.

Chapter 11: Historic Environment

Raydon Airfield was constructed during the second world war, covering a large area from Raydon to Wenham for use by Bomber and Fighter Aircraft. **The risk remains of unexploded ordnance on this site.**

Chapter 12: Hydrology and Land Drainage

The scoping as it relates to the route south of Raydon has two considerations comprising:

1. Proximity to flood zones 2 & 3 – this is not applicable in the area immediately adjacent to Raydon since this area does not contain flood zones being on the high plain and is designated one 1 ie. <1:1000 probability of flooding;

2. Effect on land drainage – this is significant in this area being on a flat plain and with known existing problematic shedding of surface water due to the level topography.

12.9.7 Likely significant effects during construction are proposed to be scoped in. It has been noted that the surface water drainage relies to a large extent on open ditches**. The construction of haul roads and buried routes must incorporate measures to maintain the continuity of existing drainage systems.**

Chapter 13: Landscape and Visual

The ZVT should establish the viewpoints from the various relevant perspectives where the alignment is potentially to pass south of the village of Raydon.

There are numerous private residences which have a view across the open landscape and which would be adversely affected by the proximity of the line of pylons. In addition, the open countryside is crossed by numerous footpaths where a presence of pylon towers would be a significant intrusion on the enjoyment of the landscape. This area is adjacent to and provides a setting to the Area of Outstanding Natural Beauty centred around the Dedham Vale. The approach to this area would be significantly adversely affected by the large scale of the line of pylons as they pass through the area before proposed undergrounding at the edge of the AONB.

The placing of the undergrounding terminal would also have significant negative effect on the visual amenity from both the representative viewpoints around Raydon and the specific viewpoints of the numerous residents located on the south side of the settlement.

APPENDIX I – LANDSCAPE AND VISUAL IMPACT

Assessment Methodology

Table I1 refers to the susceptibility of landscape receptors.
It should be noted that **the landscape south of Raydon fits all the criteria for greater susceptibility to electricity transmission infrastructure** comprising:

- Being on the high plain has the absence of strong topographical features
- Limited woodland to conceal the view
- Absence of modern development with small scale historic settlement
- Highly visible skyline
- Remote from visible or audible human activity

Table I2 categorises the value of landscape receptors

It should be noted **that the landscape south of Raydon falls into the category of HIGH having high scenic quality**; providing a backdrop in the approach to the adjacent AONB; has high recreational value in use of footpaths, golf course, quiet lanes and local tourism to the commonly referred to Constable Country of which this area forms a part.

Table I3 refers to the sensitivity of the landscape receptors to change

It should be noted that the landscape south of Raydon has a HIGHER susceptibility to the change brought by the electrical structures proposed. The characteristic of open views and big skies around Constable Country would be lost for the lifetime of the infrastructure, being many decades.

The magnitude of the landscape effect would be LARGE.

The effect of the lines of towers would be very significant on an open country scene with little or no visual interruption.

The geographical extent of the effect would be LARGE being widespread on the open landscape.

The duration of the effect can be categorised as LONG TERM on the basis that the creation of screening by introducing mitigation planting would of itself be a change to the existing open hill top plain countryside.

Table I4 – reversibility of effect

Should there be no mitigation planting the effect of the pylons can be reversed on their decommissioning and removal. This would mean an unmitigated effect for the lifespan of many decades.

Mitigation planting reaching maturity in two decades would significantly change the landscape form open plain and would be a significant blight on the landscape at that time to remove the planting.

Either way **the effect can be seen as either unmitigated or irreversible**.

Table I5 Susceptibility of visual receptors
In this context of south of Raydon the susceptibility is HIGH being

- Views contribute to the landscape setting enjoyed by residents
- Users of national cycle route and footpaths
- Surrounding to heritage assets – Constable Country

Also people travelling on scenic routes.

Table I6
The value of the view and visual amenity is HIGH being associated with and forming a backdrop and approach to the internationally designated area of outstanding natural beauty enjoyed by a large number of visitors as well as locals.

Table I7
The sensitivity of visual receptors is HIGHER based on the criteria as cited in I6 comprising viewers whose interest is focussed on their surroundings.
The value is HIGH being associated with internationally designated adjacent landscape approached through this area and forming a backdrop to it.

Table I8
The magnitude of the visual effect will be HIGH in all categories comprising:

- A significant change to the scenic quality of the view
- Affects an extensive geographical area
- Will have a long term effect
- Forms a permanent change to the landscape even with mitigation and subsequent decommissioning

Table I9
The level and significance of the effect will be MAJOR having

- An obvious change in view affecting receptors with high susceptibility to the change
- The effect will be on the backdrop to the nationally recognised AONB
- The effect will be long term, affecting a large area and a relatively large number of people

The Visual Amenity of Raydon and the surrounding area is of huge importance to residents and visitors alike. Raydon Parish Council would like to see more viewpoints being taken into consideration. Specifically:

- Woodlands Road, Raydon, properties have open aspect views South-Easterly
- Dunningham Drive, Raydon, properties have open aspect views South-Easterly
- Bell's Meadow, Raydon, properties have open aspect views South-Easterly
- Properties close to Pipers Went, Raydon, properties have open aspect views South-Easterley
- The Quiet Lane starting from Snowdowns on Sulley's Hill
- The Quiet Lane of Noakes Road, Raydon/ Holton St Mary.

In addition, there is no mention of National Cycle Route 1 which passes through Stratford St Mary northwards before turning left on to Higham Road. Views both north and south from Higham Road near Higham Hall should be assessed.

Likewise Regional Cycle Route 48 from its junction with NCR1 at Lowe Hill House, north along Green Lane, crossing the B1068 and continuing north along Sandpits Lane to Bacons Green where it turns left and then right along Noakes Road into Raydon is extremely popular and viewpoints should be assessed at intervals along this route.

Chapter 15: Socio-Economic, Recreation and Tourism

In figure 15.2, page 6 of 11 you have failed to include the Community facilities in Holton St Mary, namely St Mary's Church Holton St Mary, Holton St Mary Village Hall and the Millennium Green

As well as the nationally significant cycle routes NCR1 and RCR48 mentioned above, due consideration should also be given to the Brett Vale Golf Course which lies on the edge of the Scoping Report Corridor in Raydon.

The skies above the old Raydon Airfield are regularly used by the Model Aircraft Flying Club, the erection of nearby pylons would be a danger to them.

The skies above Raydon are regularly used by light aircraft from Elmsett Airfield and Nayland Airfield and the risks to these users must be scoped in to your report along with the risk to low flying army training by the Joint Helicopter Command based at Wattisham Airfield.

The Women's Tour, Britain's longest running women's stage cycling race and part of the UCI Women's World Tour helped generate almost £1.1m of net economic benefit to the region according to an independent survey when the first stage was held here in June 2022. Loss of events such as this because the region is no longer deemed attractive would also have a huge financial impact.

ROXWELL PARISH COUNCIL

CHAIRMAN
Mr.C.Pavitt
[redacted]

CLERK
[redacted]

1st December 2022

The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sirs,

East Anglia Green Energy Enablement (Green) - Scoping Report
Your reference EN020027

The National Grid in issuing this scoping report seem to be disregarding the thousands of objections sent in after their non statutory consultation, which only had the one solution for all to study.
Why, when they have held consultations elsewhere in the country which included other options (which included Off Shore cabling), do they not do likewise on this proposal.
The points put forward by the Essex, Suffolk and Norfolk Pylons (ESPN) group in their submission on behalf of all affected communities along the route are fully supported by Roxwell Parish Council. It fully highlights the flaws in the preparation and presentation of the scheme.

Yours sincerely

Chris Pavitt
Chairman

Original signed copy posted 1st December 2022

Proposed DCO Application by National Grid Electricity Transmission (NGET) for East Anglia Green Energy Enablement (Green) Project

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping Report dated November 2022. There are nineteen operational Royal Mail properties within 15 miles of the proposed works.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, at this point Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

Holly Trotman (h[redacted], Senior Planning Lawyer, Royal Mail Group Limited

Daniel Parry Jones ([redacted]), Director, BNP Paribas Real Estate

Please can you confirm receipt of this holding statement by Royal Mail.

End

From: [redacted]
To: East Anglia GREEN
Subject: Roydon (Diss) Parish Council Response
Date: 05 December 2022 11:29:45

Please find below the comments regarding the National Grid: East Anglia Green scoping project:

Roydon Parish Council agrees with and supports the full and extensive Essex, Suffolk, Norfolk Pylons submission, especially the points relating to the following requests:
• that the first consultation be reopened so as to give respondents the full range of transmission options
• that the Scoping Report should include North Norfolk
• that the scoping should include many more "visual receptors" (viewpoints)

Kind regards,
[redacted]

--
[redacted]
Parish Clerk
Roydon Parish Council

From: [redacted]
To: East Anglia GREEN
Subject: RE: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation
Date: 05 December 2022 17:25:38
Attachments: image014.png
image015.png
image017.png
image018.png
image019.png
image001.png
image002.jpg
image003.jpg
image004.jpg
image005.jpg
image006.jpg
image007.png
image008.jpg

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development) Scoping consultation and notification

Thank you for your notification in respect of the scoping where you ask

- Inform the Panning Inspectorate of the information you consider should be provided in the ES or;
- Confirm that you do not have any comments

Whilst I South Norfolk Council does not have any comments in respect of the addition information that it considers should be provided, in an assessment of the documentation provided it is noted that at 10.6 Table 10.1 and 14.5 table 14.1 in the list of organisations and date, which is the Local Planning Authorities, South Norfolk Council is not included.

Yours faithfully

Claire Curtis

Claire Curtis (Mrs)
Area Team Manager
t [redacted]

One Team Beyond the Horizon logo | South Norfolk Council Logo | Ukraine Flag Logo

We have moved! South Norfolk Council is now based at Thorpe Lodge. Find out how you can access our services by visiting our website or by calling us on [redacted]

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From: East Anglia GREEN <EastAngliaGREEN@planninginspectorate.gov.uk>
Sent: 07 November 2022 16:22
To: Claire Curtis <[redacted]uk>
Cc: Planning (SNC) <Planning.snc@southnorfolkandbroadland.gov.uk>
Subject: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation

FAO Claire Curtis

Dear Sir/Madam

Please see attached correspondence on the proposed East Anglia Green Energy Enablement (GREEN).

Please note the deadline for consultation responses is **5 December 2022**, and is a statutory requirement that cannot be extended.

Kind regards

Jack Patten

Jack Patten | EIA Advisor
The Planning Inspectorate

@PINSgov | The Planning Inspectorate | planninginspectorate.gov.uk

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DPC:76616c646f72



Stoke by Nayland Parish Council

[redacted]

The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol BS1 6BN
By email

5 December 2022

Your Ref: EN020027

Dear Sir

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Stoke by Nayland Parish Council ("SBNPC") writes in response to your letter dated 7 November 2022 inviting consultees to respond to the Scoping Report submitted by the Applicant for the preparation of an Environmental Statement ("ES") for the above project.

We note that the proposed ES Scoping Report Corridor runs along the parish boundary in the vicinity of Higham in the Dedham Vale but does not encroach into the parish itself.

SBNPC's comments are confined to the landscape and visual impact assessment proposals. The Applicant has failed to note that due to our elevated location, most if not all of the parish is affected not just by the section of overhead power line close to the parish boundary between Holton St Mary and Higham in Suffolk **but also by the long section of overhead line passing Langham, Boxted and, most significantly, Great Horkesley and beyond in Essex.** For the record, most if not all of the parish will sit within the 3 km assessment boundary, and all within the 5km proposed for *"more distant viewpoints…...where there is potential for significant visual effects to arise.[1]"*

We note in particular that the applicant quotes national policy (Draft EN-5) relating to landscape and visual effects as follows

> *"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***

[1] ES Scoping Report, para 13.3.3

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."[2]

Since all of the SBN parish sits within the Dedham Vale AONB, we are firmly of the view that the proposed overhead line sections with 50-metre lattice towers will have a **significant impact on numerous protected views out of the parish**, affecting receptors in our settlements and communities,[3] recreational receptors using our many PROW's[4] and the visual amenity of people travelling through and along parts of our road network.[5] We note that all such receptors are to be *"scoped in"* to the assessment.

We note that the Applicant has identified a significant Viewpoint 17 in the parish[6] as an assessment point, presumably looking east towards Holton St Mary rather than south. The Parish Council wishes for further viewpoints to be selected, most notably pinpointing those locations within the parish where views to the south of the new overhead powerlines in Essex would be highly visible along the skyline across the Stour Valley. **We would welcome the opportunity to conduct the Applicant and its consultants around the parish and reach agreement on the most significant locations (amongst many) from which landscape and visual impacts of the Applicant's proposals should also be assessed in detail.**

Please also note that the parish is also impacted by the Bramford to Twinstead Reinforcement scheme that is also being promoted by the Applicant, where the existing 400kV pylon line that is a significant landscape and visual intrusion to the north and west of the parish is to be supplemented in the same corridor by second 400kV 50-metre-high lattice tower route.[7] We note that the Applicant intends to assess cumulative landscape and visual impacts and we **request that the cumulative landscape and visual effects of the two schemes on Stoke by Nayland be explicitly included.**

Finally, whilst SBNPC has recorded its objections in principle to the ATNC/AENC power line routing as currently envisaged, its comments on the scoping report should not be interpreted as any acceptance of the scheme as currently proposed.

Regards

[redacted]

[redacted], Clerk to Stoke by Nayland Parish Council

[2] ES Scoping Report, para 13.2.2 (emphasis added)
[3] ES Scoping Report, Para 13.9.15
[4] ES Scoping Report, Para 13.9.16
[5] ES Scoping Report, Para 13.9.17
[6] ES Scoping Report, Figure 13.2 Page 6 of 11 & Appendix H Table H1 Preliminary Viewpoints – Snow Hill Lane/Bradick's Hill
[7] ES Scoping Report, Para 13.6.15

STRATFORD ST MARY PARISH COUNCIL

[redacted]

E-mail: parishcouncil@stratfordstmary.org.uk
Website: www.stratfordstmary.onesuffolk.net/

Chairman
Bill Davies

Clerk to Parish Council
[redacted]

4th December 2022

To The Planning Inspectorate

In the application by NGET for the East Anglia Green Energy Enablement, Stratford St Mary Parish Council would like the following to be addressed in the environmental statement:

- Consider the visual impact assessment and justification on the AONB right in the centre.
- Visual scaring for indeterminate time through mature woodland.
- Constable painting views affected
- Noise of machinery in the AONB and noise impact assessment
- Open excavations for up to three years.
- Traffic management and narrow access roads all part of character of AONB
- Effect on wildlife and endangered species
- Effect on businesses and tourism in the AONB

Thanks & Regards

[redacted]
Clerk for Stratford St Mary Parish Council

NHS
Suffolk and
North East Essex
Integrated Care Board

Aspen House
Stephenson Road
Severalls Business Park
Colchester
CO4 9 QR

By email only: eastangliagreen@planninginspectorate.gov.uk

5th December 2022

Our Ref: EAG/JT051222

Applicant: National Grid Electricity Transmission (NGET)
Dear Sir / Madam

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Environmental statement scoping report consultation
East Anglia Green Energy Enablement (GREEN) Project

Introduction
This letter is a response prepared by the Suffolk and North East Essex Integrated Care Board (the ICB) on behalf of the health partners of the Suffolk and North East Essex Integrated Care System (the ICS), in response to the consultation on the environmental statement scoping report in relation to the **East Anglia Green Energy Enablement (GREEN) Project**. The ICS is responding in the capacity of strategic health authority for part of the area (the areas within the local authority districts of Colchester, Tendring, Ipswich, East Suffolk) where the development is located. Partner organisations such as the East of England Ambulance Service (EEAST) have wider geographical responsibilities and may have additional points to make, perhaps in association with the other emergency services.

In considering the whole of the report the chapters of the scoping report most relevant to the responsibilities of the ICS are Chapter 5: EIA Approach and methodology; Chapter 7: Air Quality, Chapter 10: Health and wellbeing, Chapter 16: Traffic and Transport and Chapter 17: Cumulative Effects. To this end our responses focuses on these particular areas:

Chapter 5: EIA Approach and methodology
The general methodology proposed in the scoping report is considered to be appropriate. The approach considers effects on people and the environment at different stages of the development including the construction phase, describes the use of embedded, standard and additional mitigation measures, assigns impact significance through considering receptor sensitivity and magnitude of impact, and identifies the need for monitoring.

The environmental topics that are identified for consideration include air quality, health and wellbeing, traffic and transport and socioeconomics, recreation and tourism. Consideration of these topics is felt to be appropriate; we have not identified any gaps in this consideration that would impact on health and wellbeing.

The report proposes whole topics to be scoped-out from the environmental statement either at construction or operational phase. Topics that are proposed for scoping out include major accidents and disasters. The assessment reviews the possibility of physical accident, electrical accident, fire/explosion/ground hazards, external industrial hazards, security threat, external interference, and adverse weather and concludes that their likelihood is so low as to be not significant. This conclusion is not accepted, the ICS considers that major accidents and disasters should be scoped into the environmental statement.

It is evident that a significant level and duration of construction phase work reliant on the use and deployment of heavy lift plant, specialist machinery and equipment, producing noise, heat, vibration and dust (with work periodically carried out during sub optimal weather and natural daylight conditions) is likely to present construction site hazards. Working on hilly and uneven, and in some instances poorly drained ground with challenging topography, affected by river features, road and railway line infrastructure crossing constraints, present potentially challenging and specialist work place considerations, particularly when needing to observe contractual timelines.

The presence of moving machinery, along with a requirement to lift and transport heavy materials, and working at depth, including the potential for trench collapse, for example, underline the risks associated with the construction led activities – requiring both urgent and other medical interventions and transport conveyance (including specialised airborne tasking/ conveyance) to be appropriately planned for and provided. Indeed, HSE's construction publications (for Great Britain) indicate that work related incidents involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate. This position is acknowledged in Section 5.7 of the Scoping Report (Major Accidents & Disasters) which indicates that the construction of the Project carries the risk of a physical accident occurring and leading to a low number of 'worker fatalities' (e.g. due to crane topple).

The Scoping Report does not provide a forecast for the number of major and less major accidents at this stage, which may be appreciable over the 4 – year construction period. Information to determine the effect of the construction phase and its impact on the East of England Ambulance Service Trust (EEAST) operational capacity, efficiency and resources is currently absent from the Scoping Report, along with any potential mitigation measure parameters.

In the event of a construction phase accident occurring, appropriate procedures would need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting. The processes and procedures developed by NGET, and any outsourced construction organisations, should refer to legislation and technical guidance which places a duty on NGET to have its own response and medical mitigation to take the patient to a place of 'normal access' and handover to EEAST crews. EEAST would expect any trench collapse to fall under the confined space regulations and NGET, the construction company and/or contractor(s) should have access to a confined space trained team that could extricate a casualty safely.

Plans and contingencies for facilitating emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders, whilst sustaining operationally optimal attendance times (noting the likely delay factors above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) and/ or Fire & Rescue Services (FRS) with lifting and cutting equipment, is therefore considered to be necessary.

The incidence and impact of major accidents (and disasters) on EEAST including its hazardous area response teams (HART) and its HEMS/ FRS partner operational capacity, efficiency and resources, needs to be presented and assessed, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Chapter 7: Air Quality

Chapter 7 of the scoping report considers impacts on air quality. The methodology recognises the interrelationships of the potential effects on other environmental topics, including health and wellbeing. The scoping report proposes scoping out construction dust, construction generators and operational vehicle emissions as it concludes that these matters will have no likely significant effects.

The ICB accepts that operational vehicle emissions are unlikely to have significant effects. However, the ICB asks that advice is sought from the public health team before scoping out construction dust and construction generators. The impact of air quality on population health can be significant and should be thoroughly considered.

Chapter 10: Health and wellbeing

Chapter 10 of the scoping report considers impacts on health and wellbeing. This includes the potential for effects on health and wellbeing in relation to air quality; geology & hydrogeology; hydrology & land drainage; noise & vibration; traffic and transport and concludes that effects would be limited to the construction phase. It states that no potential for effects in operational phase have been identified. The ICS accepts the report's conclusion that impacts on health and wellbeing could occur during the construction phase and not the operational phase of the development.

The report says that, given the type, temporary duration and level of potential construction phase effects, and recognising that any likely significant effects from various topics on health and wellbeing would already be reported within separate chapters, it is not considered that general health and wellbeing requires additional separate reporting in the ES. A health and wellbeing chapter is therefore, not proposed within the ES.

It is not accepted that a separate health and wellbeing chapter is not needed. While impacts on health and wellbeing do overlap with other topics, it is necessary to devote a separate chapter to health and wellbeing to ensure that the overall impacts of the scheme on health and wellbeing are assessed, and relevant impacts are not overlooked.

The scoping report should also assess the impact of the scheme on access to health and wellbeing services by the scheme workforce and the resident population. It is not possible to conclude from the scoping report whether significant effects are likely because this topic is not considered. A temporary workforce area should be provided with healthcare and wellbeing support. Their ability to access these services, as well as the impact of such demand on services should be assessed. To determine whether significant impacts are likely, the scoping report should consider the size of the non- permanent workforce, timing and duration of their employment, location during their stay, their health status and healthcare needs, and provide details of any healthcare and wellbeing facilities to be provided by the developer.

Access to healthcare services is also impacted by the availability of transport links to premises. It is important that routes to and between healthcare facilities are safeguarded. This is in relation to emergency and routine transportation of residents and healthcare workers. This should be addressed within the health and wellbeing chapter as well as the traffic and transport chapter.

The ICS requests that health and wellbeing is considered through a separate chapter and recommends that a health impact assessment (HIA) is undertaken to inform this chapter. The Essex Design Guide provides guidance on undertaking health impact assessments, which includes consideration of access to healthcare services.
The report explains that intra-project effects would be considered within Chapter 17: Cumulative effects, and that this assessment would include a specific section on health and wellbeing. This is considered appropriate as an addition to the separate chapter requested above and not in place of a separate health and wellbeing section.

Chapter 16: Traffic and Transport

As outlined above, it is necessary to safeguard access to and between healthcare facilities both for emergency and routine movement of residents and healthcare workers. The ambulance service has specific targets (set out in Annex 1 to this letter) for conveying patients to hospitals and the impact of the construction phase of the project on these standards should be considered.

Table 4.1 (Description of the Scoping Report Corridor north to south by section), identifies a significant number of principal and secondary road network locations that are to be crossed and directly impacted by the Project, potentially requiring temporary road closures, diversions with related highway network disruption. This would give rise to the potential for significant road network delay and service disruption from EEAST's perspective, taking place as part of a major 4-year construction phase program, required to implement the Project.

Information to determine the effects arising from the construction phase of the Project and the likely impact on EEAST's operational capacity, efficiency and resources (including the likely highway disruption and delay), therefore need to be included within the scope of the ES and/ or within a Technical Assessment accompanying the application for a DCO. Once this information is presented and assessed, any necessary mitigation and management measure should to be secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Reference specifically to the impact on health and wellbeing is not evident in the scoping report and should be included in the environmental statement.

Chapter 17: Cumulative Effects
The scoping report proposes that intra-project and inter-project cumulative effects are scoped in. This approach is supported and intra-project and inter-project impacts on health and wellbeing will be one topic to be assessed. However, this should not be an alternative to considering health and wellbeing in a standalone chapter. As described above, it is important that health and wellbeing is considered in a separate chapter

Conclusion

The ICB requests that:

1. Health and wellbeing impacts are considered in a separate chapter and not only within a chapter about cumulative effects
2. Health and wellbeing impacts considered include the capacity of health services to provide healthcare for the scheme workforce
3. Accidents and major incidents are scoped into the report.
4. The traffic and transport chapter considers impacts on access by residents, the scheme workforce and healthcare workforce to and between healthcare settings.
5. A health impact assessment (HIA) is undertaken to inform the health a wellbeing chapter, which should include consideration of access to healthcare services.
6. Advice is sought from the public health team before deciding to scope out construction dust and construction generators

Yours faithfully

[redacted]

[redacted]

Senior Estates Development Manager

Suffolk County Council



East Anglia Green

EIA Scoping

Comments of Suffolk County Council

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Introduction

1.1 These comments of Suffolk County Council (SCC) are in response to the EIA Scoping consultation held between the 7 November and 5 December 2022 by the Planning Inspectorate in respect of National Grid Electricity Transmission's (NGET) East Anglia Green (EAG) Scoping Report.

1.2 The proposed development is to build a new 400kV electricity transmission line between Norwich and Tilbury. The entire scheme is 179 kilometres (111 miles) in length and crosses parts of Norfolk, Suffolk, and Essex. The Suffolk section is 53 kilometres (33 miles in length) and crosses parts of Babergh and Mid Suffolk District Councils. The scheme also crosses the Dedham Vale Area of Outstanding Natural Beauty (Dedham Vale AONB) on the border with Essex.

1.3 This response contains the comments of SCC specifically on the question of the adoption of an EIA Scoping Opinion by the Planning Inspectorate and is not intended to make comments on the merits of the EAG project itself. The response includes an introductory section, including SCC's energy infrastructure policy, followed by some general comments on NGET's approach to scoping for its EAG project, then identifies key issues in overview, and then followed by specific detailed topic-based comments.

1.4 The SCC electoral divisions directly affected are as follows:

i) Hartesmere
ii) Thedwastre North
iii) Upper Gipping
iv) Stowmarket and Stowupland
v) Thredling
vi) Bosmere
vii) Cosford
viii) Gipping Valley
ix) Belstead Brook
x) Samford

SCC Energy Infrastructure Policy

1.5 SCC adopted its Energy Infrastructure Policy in February 2021, setting out its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy is relevant for the SCC's position on the EAG proposals, and states:

> "Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero Carbon for the UK. However, projects will not be supported

unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."[1]

1.6 SCC will follow this approach in this response, and throughout the subsequent DCO process.

1.7 SCC continues to be willing to work with NGET through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

General Comments

2.1 SCC has concerns about the approach taken in NGET's Scoping Report to the issue of scoping out environmental matters by reference to proposed or presumed mitigation, to the proposed assessment of alternatives, and to the proposed assessment of cumulative effects. These concerns apply generally and so are set out here. The comments on the individual environmental topics should be read in the light of these general concerns.

2.2 Section 5.2 of the Scoping Report explains its approach to mitigation and identifies three categories of mitigation: embedded, standard, and additional. These categories would appear to broadly correspond to the categories of primary, tertiary, and secondary (in that order) in the IEMA guidance referred to at para 5.2.14. The category of *"Additional"* mitigation measures is described (at para 5.2.12) as *"…measures over and above any embedded or standard mitigation measures, for which the EIA has identified a requirement to further reduce significant environmental effects…"*

2.3 Para 5.2.14 of the Scoping Report states "Embedded, standard and additional mitigation measures are assumed to be in place or at least achievable prior to undertaking the scoping of likely significant effects, in accordance with the guidance in the IEMA Guide to Shaping Quality Development (IEMA, 2016)."

2.4 SCC does not agree that the IEMA guidance (which dates from 2015, not 2016) advocates the assumption that all mitigation is in place or achievable before undertaking scoping. The IEMA guidance (in Box 1) only suggests that primary (embedded) and tertiary (standard) mitigation can be dealt with in this way, but expects that both pre-mitigation effects and residual effects are identified in an Environmental Statement (ES) whenever (additional) secondary mitigation is required. Necessarily, this will not happen if such effects are scoped out prior to the assessment of effects.

2.5 The need to ensure that the potential for additional mitigation to reduce significant effects is not relied on to scope matters out of the ES is also inherent

[1] See SCC Energy and Infrastructure Policy: https://www.suffolk.gov.uk/assets/suffolk.gov.uk/strategic-electricity-networks/SCC-Energy-Policy-230212.pdf

in the definition of such mitigation put forward in the Scoping Report. It is only if the EIA process is undertaken in relation to effects that it is possible to determine whether (and what) additional mitigation is required to reduce (or further reduce) significant effects. If the additional mitigation is assumed to be in place or achievable prior to the scoping of likely significant effects, there is a risk that effects (or potential effects) will be scoped out in reliance on such mitigation and so will not be assessed in the ES. Nor therefore will there be any EIA consultation on those effects or on the efficacy of the mitigation that has been relied on to scope out the effects.

2.6 The difficulties resulting from NGET's proposed approach are compounded by the absence at the present time of any detail in the Scoping Report as to which measures it is intended to treat as embedded or standard mitigation and which measures are intended to be treated as additional mitigation. Table 4.2 includes an outline of *"principle [sic] embedded measures"* but this is not intended to be comprehensive (para 4.3.2) and nor does it include any standard mitigation measures (despite the heading of section 4.3). Nor does the Initial Outline Code of Construction Practice (in Appendix B of the Scoping Report) contain this information or identify the additional mitigation. It is therefore not possible to determine to what extent the additional mitigation will be achievable in the circumstances of the EAG project (noting that by definition it will involve measures over and above 'standard' mitigation).

2.7 SCC would expect to see a coherent justification for reliance on mitigation to scope out of the ES any environmental effects that in the absence of that mitigation would have the potential to be likely significant effects. SCC would not agree that the justification offered in the Scoping Report is adequate or coherent, especially as regards any reliance on the category of additional mitigation.

2.8 Para 3.1.1 of the Scoping Report notes the guidance in Advice Note 7 recommending that a Scoping Report should include *"an outline of the reasonable alternatives considered and the reasons for selecting the preferred option."* Section 3.2 of the Scoping Report sets out a narrative to support how NGET identified its *"Strategic Proposal"* (which embraces the EAG project) and discarded/discounted other options. Substantially, this narrative relies on the earlier work carried out by NGET which was reported in its Corridor and Preliminary Routeing and Siting Study Report (CPRSSR) of April 2022, which was the subject of non-statutory consultation in May/June 2022. The narrative also refers to a more recent response (NGET letter dated 11 October 2022) to the Offshore Electricity Grid Task Force (OffSET). In the non-statutory consultation, SCC explained that it considered the assessment of offshore options in the CPRSSR to be opaque and difficult to follow. Nothing in the Scoping Report allays those concerns or provides a coherent explanation of the reasoning for discounting all offshore options other than Sea Link (which NGET is currently pursuing as a separate NSIP project).

2.9 SCC notes that para 3.3.9 of the Scoping Report refers to the NGET response to OffSET and states that it "explained why… the offshore strategic option is not being progressed, although none of the conclusions should be seen as final."

SCC does not agree that the response to OffSET adequately explains the reasons for discarding all offshore options (other than Sea Link), but if the position remains that all other offshore options have been discarded, SCC will expect the ES to provide a coherent and adequate justification for their rejection as reasonable alternatives and for the choice of the EAG project as the preferred option.

2.10 Chapter 17 of the Scoping Report explains NGET's approach to the proposed assessment of cumulative effects. In relation to inter-project effects, the Scoping Report explains that the first step (Stage 1A) has been to identify Zones of Influence (ZOI) for different environmental topics based on distances from the Scoping Report Corridor (as explained at para 1.2.5 and in section 4.2). However, as is apparent from Table 17.1 not all environmental topics have a ZOI and so will not inform this initial sift for other projects which may have cumulative effects. A notable omission is traffic and transport (Chapter 16 of the Scoping Report) where para 16.3.3 explains that the absence of traffic flows and routes means that no study area has been identified at the scoping stage. It is therefore unclear how NGET proposes to identify other projects which may have cumulative traffic and transport effects with the EAG project. Clearly, mere reliance on the ZOIs in Table 17.1 will not be sufficient. Given the remoteness of much of the Scoping Report Corridor from the strategic road network (A14, A11 and A12 in part, so far as relates to Suffolk) and the numbers of other large scale projects (NSIPs and non-NSIPs) which are approved or proposed within Suffolk, SCC would want to see an extensive geographic scope utilised to identify inter-project effects. Similar considerations apply in relation to socio-economic effects (Chapter 15 of the Scoping Report), where the proposed wider study area (para 15.3.1) includes two districts in Suffolk but SCC considers that inter-project effects by reason of projects in other parts of Suffolk (particularly in East Suffolk) also need to be considered (as explained further in the detailed comments below). SCC expects to see an evidence-based approach to the selection of the study area(s) used for the assessment of cumulative effects, and the proposed approach of using ZOIs of only selected environmental topics is not considered to be adequate.

2.11 On a point of detail, SCC would not agree that other projects identified in the long list as development plan allocations should only be shortlisted for assessment for inter-project effects where they are the subject of planning applications (as suggested at para 17.3.7 of the Scoping Report). Development plan periods and delivery trajectories in development plans and authority monitoring reports will provide information which can be used to assess the construction/operational timeframes for such allocations. They should therefore proceed to Stage 2 of the cumulative effects assessment.

Key issues

3.1 This section sets out extracts that highlight some of the key issues that arise out of the scoping consultation. This section must be read in conjunction with the remainder of this document which provides the full response from internal consultees and from Essex Place Services (EPS) who have been instructed to provide advice on specific matters, as identified below.

SCC Archaeology

3.2 Section 11.1.2 discusses the interrelationships related to the potential effects on the historic environment and other environmental topics, referencing the following chapters:

9: Geology and Hydrology

12: Hydrology and Land Drainage

3.3 However, these chapters do not refer to the interrelationships and potential impact on the historic environment. Furthermore, interrelationships and potential impacts between the historic environment and ecology need to be considered. As well as the implications of dust and spoil management during archaeological works need to be considered.

SCC Economy, Skills & Tourism

3.4 When identifying potential impacts as set out in chapter 15.10 and then in table 15.9 we expect the applicant to consider these impacts in more granular detail than presented in the scoping ~~opinion~~ report. The applicant has grouped together too many sources of impact and therefore will not correctly assess the impact. As a minimum the Council will expect the applicant to consider, separately, the impacts upon the following sources:

i) Employment – local opportunity

ii) Economic Development – Local investment

iii) Economic Development – Non home based spend

iv) Economic Development – Investor perception

v) Economic Development – Workforce and churn

vi) Economic Development – Journey time delays (including those that would effect a tourism asset carrying out its day to day activities)

vii) Tourism – Visual Impact

viii) Tourism – Visitor perception

ix) Tourism – Journey time delays (of a visitor to the region the actual and perceived impact)

x) Tourism – Accommodation displacement

3.5 The Councils disagrees with the applicant on the study areas used in the scoping opinion, the spatial scope for extent of effects for all phases of the project is far greater than the applicant is currently using.

SCC Highways

3.6 The Council would welcome discussions about the extent of the study area and would caution against a generic approach for determining the extent of the study area without specific consideration of local issues. The Council can only confirm agreement on the scope of the assessment once further details on vehicle numbers and routeing are provided by the Applicant.

3.7 The above being said, the geographical scope of the Traffic and Transport Study Area should remain flexible so that as more detailed information is made available, for example the sources of aggregates, the assessments limits can then be expanded or contracted as appropriate.

SCC Public Rights of Way

3.8 SCC's position is that the impacts on PRoW are a topic in their own right and should not be solely considered as an element of other topic area such as landscape and social economics and tourism. The current approach makes assessment fragmentary and will not reflect the true impact on users of the PRoW network. Therefor a separate PRoW Chapter is required as per other topic areas such as ecology.

EPS Landscape

3.9 Cumulative landscape and visual effects - The EAG scheme cannot be considered in isolation. Potential cumulative landscape and visual effects, need to be considered, particularly at and around the Bramford substation site. There is a suite of other energy connection and generation projects coming forward, including Bramford to Twinstead Pylons, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm. All of which should be considered in detail.

Detailed Technical Comments

SCC Archaeology

Scheme Impacts

3.10 The proposed scheme is for approximately 180km of electricity infrastructure between Norwich and Twinstead, comprising mainly steel lattice pylons but with undergrounding in the area of the Dedham Vale Area of Outstanding Natural Beauty (AONB). A substation is proposed at Tendring in Essex with a connection point within the existing substation compound at Bramford.

3.11 Aspects of the proposal with potential to impact on archaeological remains in Suffolk are:

i) Undergrounding in the Dedham Vale AONB, 65-100m corridor for up to 18 cables, with jointing bays and potential widening of the easement corridor for arrangement of joints (comprises the most significant in scale aspect of the scheme);

ii) Potential undergrounding to pass under the existing Bramford to Twinstead lines;

iii) Directional drilling compounds;

iv) Cable End Sealing Compounds and access tracks;

v) Construction compounds and other temporary land-take for construction, including HDD sites, offshore transport enhancement;

vi) Biodiversity offsetting areas and other offsite mitigation;

vii) Works around the Bramford substation, and;

viii) Pylons.

Baseline Information

3.12 The current area of the proposed corridor has, in most parts, not been subject to systematic archaeological investigation, and therefore the character, extent and significance of surviving above and below-ground heritage assets across the area has yet to be defined. There is high potential for additional, as yet unidentified, significant heritage assets to survive across much of the corridor. Some of these may be of national significance and worthy of preservation *in situ*. As such, without further assessment to fully characterise the heritage resource, the impacts of the development upon above and below-ground heritage assets cannot be fully understood. Archaeological evaluation should provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.

Specific considerations

3.13 Existing data regarding known heritage assets presented within the proposed corridor comes from information held within the county Historic Environment Record (HER).

3.14 There are numerous sites and finds recorded in the HER for the corridor and in the landscape around it. SCC offer some comments on certain sites at this stage, based on a high-level review, although this is not exhaustive and, as the area with the proposed corridor has largely not been subject to systematic archaeological evaluation, there is high potential for additional and as yet unknown heritage assets to be encountered.

3.15 Within the corridor for the currently proposed overhead lines, there are several sites where SCC would, on the basis of current information, advise that avoidance is appropriate. Further assessment should be undertaken to ensure that this is possible within the parameters of routing decisions. Sites include:

i) prehistoric funerary monuments at Cotton, Mendlesham, Creeting St Peter and Badley (COT 016, MDS 078, MDS 121 and MDS 122, CRP 008, BAD 005, BAD 006, BAD 007);

ii) prehistoric enclosures at Creeting St Peter (CRP 002);

iii) areas of prehistoric occupation at Wortham and Mellis (WTM 010, MLS 007);

iv) an area of Iron Age and Roman settlement at Stowupland (SUP 009);

v) Roman lead coffins may indicate a wider cemetery at Great Wenham (WMM 002);

vi) a probable Roman villa site at Wickham/Finningham, which is of sufficient size and scale that it may create a pinch point (WKS 013, WKS 003), situated on a south facing slope overlooking the River Dove, west of the Roman Road at Wickham Street – the extent and potential sensitivity of this site may present a constraint to micro-siting;

vii) A large scatter of finds indicating a Roman site at Barking (BRK 117), also associated with a Roman Road line (RGL 006);

viii) Iron Age/Roman/Saxon occupation at Badley (BAD 016 and BAD 020);

ix) finds scatters indicative of a Roman and Anglo-Saxon cemetery at Palgrave/Wortham (PAL 034 and WTM 050);

x) areas of Saxon occupation at Wortham (WTM 010);

xi) a possible church site at Wortham (WTM 036) and sites around the church at Creeting St Peter (CRP 004), and;

xii) moated sites at Creeting St Peter, which the authors note may be a possible Adulterine Castle (CRP 001).

3.16 SCC note several Scheduled Monuments within or near the corridor. Offton Castle (OFF 002) is mainly outside the current corridor, although some of the scheduled area lies within it. The route also passes very close to Wenham Castle (WMP 001). A scheduled monument is also present within the corridor at Stratford St Mary (mill mound, formerly thought to be a henge), SSM 011. Historic England will advise on impacts on the monuments and their settings.

3.17 For proposed undergrounding, there is high potential for impact on remains. In particular, the pinch-point where the route crosses the Stour Valley is an area of high archaeological complexity and sensitivity. It is likely that other/discounted options for crossing points in this archaeologically sensitive landscape would also have implications, but for the favoured route there is a complex of sites on the northern valley side of the Stour that requires further assessment. This comprises an extensive cropmark complex of rectangular and curvilinear enclosures and ring ditches of unknown date and significance, which likely represents early, multiperiod occupation (HGM 001, HGM 005 – HGM 013, HGM 017), and which spans the width of the corridor. The Church of St Mary is also in this area (HGH 014). Early assessment may inform

design options for HDD and the location of drill sites to minimise disturbance to archaeological remains. SCC therefore advise early geophysical survey of the whole width of the crossing point and someway northwards of Higham Road, to inform siting decisions, design and to inform on mitigation measures. SCC also advise early archaeological trial- trenching to ground truth the results. SCC note that further work would be undertaken to identify the most appropriate location for CESC sites and that further exploration of landscape features is proposed, and advise also that they should be subject to archaeological evaluation.

3.18 Finally, additional areas of undergrounding would affect valley sites. There is potential for well-preserved stratified sites in and on the valley sides, and for wet deposits that contain valuable organic remains, as well as complex sites in areas that are topographically favourable. The Waveney Valley has very high potential for archaeological sites for all periods, and high potential for preserved organic remains in the deep peat soils. There is also very high archaeological potential around the Gipping Valley, where there are high numbers of complexes of cropmarks. The cropmark complex at Creeting St Peter highlighted above is at a confluence of several tributaries of the Gipping. There is also particular sensitivity as the route approaches the lighter soils and contours of the tributary valleys of the Stour, which may be impacted by undergrounding further towards Raydon. Historic water meadows may also be a consideration. Early work should be undertaken in these areas.

General comments

3.19 SCC are pleased that archaeology and heritage have been included in the list of impacts to be considered as part of the EIA for the EA Green scheme and that the document recognised the need for archaeological assessment and mitigation.

3.20 SCC welcome that the scoping document recognises the potential impacts of the proposed scheme upon below ground heritage assets. From the information provided in the EIA, all elements of the scheme have the potential to damage or destroy any surviving archaeological remains. Therefore, SCC would expect sufficient geophysical survey and trenching upfront to inform on impacts, and to ensure that a robust programme and timetable for mitigation is proposed for any DCO application.

3.21 As shown with other national schemes, time will be a critical factor in delivery of the scheme. Archaeology and heritage assessments and mitigation phases must be programmed into projects at the earliest opportunity, with sufficient time allowed to enable fieldwork to be completed prior to the start of construction works, so to avoid any delays to the development schedule.

Section specific comments

3.22 SCC will only comment on below ground heritage, leaving comments regarding setting impacts on designated heritage assets to our colleagues in conservation and Historic England.

3.23 **11.1.2** The section discusses the interrelationships related to the potential effects on the historic environment and other environmental topics, referencing the following chapters:

9: Geology and Hydrology

12: Hydrology and Land Drainage

3.24 However, these chapters do not refer to the interrelationships and potential impact on the historic environment. Furthermore, interrelationships and potential impacts between the historic environment and ecology need to be considered. As well as the implications of dust and spoil management during archaeological works need to be considered.

11.2.7 This section needs to refer to SCC Guidance on undertaking archaeological works within the county:

i) Geophysical Survey

ii) Palaeoenvironmental Assessment

iii) Trenched Archaeological Evaluation

iv) Archaeological Excavation

v) Archiving

3.25 **11.3.1** The 250m study area for the DBA from the edge of the corridor is ok, however this needs to be more nuanced in some areas, such as river valleys, areas of more pronounced topography and corridor pinch points, to consider the potential sites have because of their position in the landscape and a better understanding of the archaeological potential.

3.26 **11.9.5** Archaeological assessment and mitigation must also be scoped in for any associated works outside of the redline boundary which will be necessary in association with this scheme.

3.27 **11.9.8** Any ongoing works during site operation must not take place within any areas where archaeology has been preserved *in situ* as part of the archaeological mitigation strategy. If any areas of archaeology are to be preserved *in situ* then a strategy for ongoing protection and preservation of the archaeology throughout operation must be agreed and included within the mitigation strategy.

3.28 **11.10.7** Any areas of undergrounding, CSES, and any areas of high archaeological potential will require geophysical survey and trenched archaeological evaluation to support the ES. The decision on scope of archaeological works will need to be discussed and agreed with the local planning authority archaeological advisors. The ES will need to clearly set out where non-intrustive and intrusive archaeological assessment has been undertaken and where mitigation requirements have been identified. As well as any areas where further evaluation is required to inform on mitigation strategies.

3.29 **11.10.8** LiDAR data should be used in any areas of dense scrub or tree cover preventing physical walkover survey.

3.30 **11.10.11/11.10.14** Walkover should scope in military remains, including former airfields and pillboxes.

3.31 **11.10.22** Pinch points and any areas of high archaeological potential should also be considered for geophysical survey within the area of the overhead cable route. Additionally, the results of previous archaeological works within the corridor (geophysical surveys, trenched archaeological evaluation and excavation) should be included in the DBA.

3.32 **11.10.23** During the last Thematic Heritage Group meeting it was highlighted that the 2022 aerial survey wasn't undertaken at the best time of year for cropmarks to be identified. The 2022 survey data will need to be supported with all available aerial photographic data, including Cropmark data available from the county HER's, Historic aerial photographic survey data, Historic England National Mapping Programme, Google Earth and Bing Maps.

3.33 **11.10.24** The scope of intrusive evaluation will need to be agreed with the local authority archaeological advisors and undertaken under approved WSI/s.

3.34 **11.10.25** The geo-technical programme should involve experienced palaeoenvironmental and geoarchaeological specialists at the initial stages to allow for appropriate assessment of the collected data.

3.35 **11.10.26** Is this the title of the next subsection for intrusive archaeological survey?

3.36 **11.10.28** The intrusive trenched archaeological evaluation would be required to support the ES.

3.37 The results of the trenched archaeological evaluation will inform a robust mitigation strategy which will need to be agreed by the time the ES is produced and submitted with the DCO application.

3.38 The trenched evaluation strategy will need to target potential archaeology identified from the DBA, AP and LiDAR assessment and geophysical survey results. The trenching strategy will also need to target areas where the above have not been successful in identifying archaeology. Targeting blank areas is an essential part of determining the archaeological potential across the proposed scheme, 'groundtruthing' by trenched evaluation should be considered essential, as different types of archaeology, geology and ground conditions may limit or mask the effectiveness of non-intrusive archaeological evaluation techniques.

3.39 **11.10.29** In addition, areas of highest potential should also be identified for fieldwork at an early stage, to allow for redesign where appropriate. SCC would be happy to engage on a prioritised approach in relation to logistics of evaluation planning, but there are some very sensitive areas included within the scheme, and overall, SCC will expect systematic assessment and evaluation of all areas of ground impact (5% is our generally specified

trenching amount, subject to review based on information from geophysical survey).

3.40 **11.10.31** The Outline WSI will need to be a fixed document for the DCO determination. The Outline WSI therefore should be a process document outlining the principles of archaeological mitigation for the scheme.

3.41 The outline WSI will need to be submitted to SCC for approval.

3.42 SCC will advocate that all evaluation work should be undertaken up front to support the ES. However, if there is, after discussion, post-consent evaluation required, the EIA and Outline WSI should make clear the evaluation work that is still required to allow mitigation strategies to be determined.

Methodology

3.43 In accordance with National Policy Statements for Energy, EN-1 and EN5, SCC would expect an Environmental Impact Assessment to be informed by a suite of evaluation techniques – including trial trenched evaluation - so that it fully assesses the character, extent and significance of the heritage resource and allows the impacts of development to be comprehensively understood and mitigation proposed. There is high potential for additional and to date unknown heritage assets to survive across much of this area. Some of these may be of national significance and worthy of *preservation in situ*.

3.44 In advance of EIA scoping, SCC advise that it should include the following:

i) **Desk-Based Assessment**, based on a commissioned HER search, which draws on landscape, soil type, historic landscape character and topography to provide critical assessment of potential as well as known sites. DBA should draw on the HER's supporting archives and should include a historic map regression (including tithe and estate maps), a study of aerial photography (including historical imagery) and any other multi-spectral data, an assessment of LIDAR data. Datasets held by the County Records office and other archive sources should also be consulted where features merit more detailed research. SCC would be happy to discuss a search buffer in more detail.

ii) **Landscape** should be considered for assessment as an aspect of the historic environment and to set the archaeological resource into context. Assessment of the impact of the proposals upon historic hedgerows, boundaries, protected lanes, historic water meadows and other historic landscape elements such as moats, tracks, woodlands, routes and settlements should also be considered

iii) Specialist modelling and assessment for impacts on Palaeolithic/Mesolithic sites.

iv) **Deposit modelling and palaeoenvironmental work** to provide further information on likely waterlogged sites with correspondingly good organic preservation, particularly in river valleys. This would also identify whether there are likely to be sensitive sites in the vicinity

of the scheme where the potential impact of changes in water-level should be considered.

v) **Earthwork survey and building assessment** should be undertaken of upstanding remains, so that extant earthwork sites can be avoided - the significance of any earthworks should be assessed, alongside the impacts of proposals on them.

vi) **Geophysical survey** (a combination of magnetometry and resistivity as appropriate), across areas of major impact and other areas, subject to sensitivity – including survey of a widely buffered area to allow consideration of options. a single Written Scheme of Investigation should be prepared that all contractors adhere to. This must include appropriate quality control measures to ensure consistency of the data recovery across the project. In the event of multiple contractors, separate reports for each contractor should be supplied in full, and the project consultant will supply the local authorities with a comprehensive and robust overarching report presenting the combined results as this will inform on the subsequent evaluation trenching.

vii) Fieldwalking/metal detecting of key sites

viii) SCC advise that it is best practice for all sites which will be impacted on by any element of the works should be subject to a full programme of **trial trenching** at EIA stage. This will inform design, project programming and risk management, avoiding unexpected costs and delays post-consent that would arise from a poor understanding of the impact on below ground archaeological remains. It will also inform timescales, and reveal any implications for other EIA topic areas. Overall, SCC would expect trial trenches equivalent to 5% by area survey of the area of ground impacts, although would consider the results of non-intrusive survey to finalise advice on the scope and timing of trial trenching, where appropriate. There may be different assessment requirements for overhead lines and undergrounding. Large areas, fixed elements, river crossings and other hotspots and pinch points are all of high priority. Sites considered to be of local importance would also require mitigation.

ix) **Proposals for mitigation**. Detailed evaluation may reveal as-yet-unknown sites of local, regional and national significance. Mitigation may include avoidance, preservation in situ (including archaeological management plans), or excavation, recording and publication of the results to allow for the enhancement of public understanding of heritage assets to be impacted by development. Open area excavation will likely form the most appropriate methods for mitigation. SCC would expect an EIA to demonstrate clearly that archaeological work has been factored in to project programmes, with sufficient time allowed to enable fieldwork to be completed and avoid delays to the timetable

x) **Consideration of interactions** with other topic areas. SCC would expect cross linking in the EIA between archaeology and other subject areas (e.g. Construction Management Plans, Ecology, Spoil and Dust Management).

xi) **Proposal for outreach,** potentially linking up with other projects in the area.

General notes

i) No archaeological works shall commence without an approved Written Scheme of Investigation (WSI)

ii) The impact assessment must also consider the impacts of decommissioning work

iii) The Historic England Regional Science Advisor should be consulted on the project as well as providing advice on the geoarchaeological and palaeoenvironmental assessment.

EPS Ecology

3.45 EPS are satisfied that that nationally agreed CIEEM guidelines will be followed for the ecology surveys and all survey work will be undertaken in the appropriate season by appropriately qualified ecological consultants.

3.46 In accordance with Regulation 14 of the EIA Regulations, the Environmental Statement should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

3.47 EPS agree with the scoping for likely significant effects on biodiversity after mitigation measures have been embedded into the Project design. EPS are satisfied with the identification of impact pathways identified for further assessment in the ES to support the DCO submission as shown in Table 8.9 of the Scoping Report.

SCC Economic Development, Tourism and Skills

3.48 The following section on EAG's socio-economics and tourism impact identifies the further work required to ensure that there is an appropriate understanding of the impacts of the scheme prior to the development being submitted as an application.

3.49 The upsurge of energy development in the East of England, making it the epicentre of low-carbon energy developments in the UK, has, and will, create many potential opportunities for growth within the county. These opportunities have been identified in the Government's, Levelling Up the United Kingdom White Paper, specifically with regards to nuclear power, offshore wind power and integrated electricity networks in our region.

3.50 For Suffolk, the energy opportunities are due in large part to the geographical benefits the county offers. For example, the shallow seas and the existence of ports, makes it an ideal location for the development of offshore wind. The flat open landscapes and relatively higher rate of sunny weather in the county,

also makes it attractive for solar farm installations. Whilst existing nuclear generation, and available grid connections, support new nuclear build.

3.51 This attractiveness and suitability of Suffolk for energy development, makes it a critical region for the UK and the Government as it delivers on its Net Zero commitment to cut emissions, decarbonise energy generation, bolster energy security and seize green economic opportunities. Given these conditions, the challenge for Suffolk is to effectively shape these extensive energy developments, extracting the best and most sustainable value from them, for the communities and businesses of the county. Simultaneously, the sensitivity and importance of the environment of Suffolk in terms of; place, tourism, and ecosystems, needs to be protected and enhanced, and not undermined by the delivery of Net Zero projects.

3.52 The challenge for any developer is delivering benefit and enhancing sense of place in a very congested market. National Grid are proposing a construction period between 2027 and 2031, a time where Suffolk alone is expecting to see the construction of offshore wind projects:

i) East Anglia Three

ii) East Anglia One North

iii) East Anglia Two

iv) Five Estuaries

v) North Falls

Further construction work from National Grid:

vi) National Grid Ventures Eurolink

vii) National Grid Electricity Transmission Bramford to Twinstead

viii) National Grid Electricity Transmission Sealink

ix) Construction of the new nuclear plant Sizewell C, alongside significant rail and road infrastructure projects and house building.

3.53 The cumulative impact of these Suffolk projects alone, coupled with similar projects in the neighboring authorities of Norfolk and Essex will place significant pressures on workforce availability, supply chain demand and cumulative impact on tourism which the Council expect the applicant to reference when conducting their assessment.

3.54 For reference, see the Planning Inspectorate's project sites for recently consented projects as follows:

i) The Sizewell C Project: https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/

ii) East Anglia One North Offshore Windfarm https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/

iii) East Anglia Two Offshore Windfarm https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/

3.55 A large amount of information and data is available from these projects, and this should be considered as part of the development of the EAG proposals. SCC would recommend that there is close collaboration between National Grid Plc, ScottishPower Renewables, Sizewell C Co., Babergh and Mid Suffolk District Councils and Suffolk County Council.

3.56 Whilst the scoping report provides information on the high-level emerging proposals for the scheme, limited information is provided on socio-economics, particularly the scale of impact and opportunity associated with the workforce. On this basis SCC is seeking to establish a set of principles that will be used to guide impact assessment ensuring all impacts are fully analysed and mitigated appropriately. Alongside expectations of information to be provided and the details that SCC would encourage the Applicant to provide as part of future submissions, and comments on the proposed assessment methods.

3.57 Once specific details are available, SCC must reserve the right to alter, amend and add to any comments made herein. The additional details that are requested would help in our ability to comment and to address our concerns. The comments below should be considered together with those from the following topic areas due to the interaction of impacts:

i) Traffic and Transport

ii) Landscape and Visual

iii) Noise and Vibration

iv) Air Quality

v) Cultural Heritage

3.58 When considering traffic and transport impacts it is considered that substantial consideration needs to be given to the availability of a workforce, the origin of the workforce and therefore its traffic impact. Any assumptions around workforce origins within the socio-economic assessment should be reflected in the assessment of transport impacts.

3.59 Due also to the interaction with the topic areas above the SCC expects the agreed study areas for impacts relating to those areas to be reflected in the socio-economic, recreation and tourism effects.

3.60 There will also need to be additional study areas identified to address the following different conditions:

i) Areas accommodating the transition between underground and pylon routes.

ii) The impact of substations and supporting infrastructure on the surrounding communities for the construction, commissioning and lifetime of the facility, including maintenance and decommissioning.

iii) The AONB forms a significant ecological and visitor amenity to the region – the study area should reflect the impact of construction and of maintaining the route for the lifetime of the infrastructure noting potential for permanent scarring, the impact of the undergrounding process and the impact on the connectivity of the AONB area.

iv) The modelling for impact across all levels of study area need to consider cumulative impact of developments, not be limited to impact linked directly to this scheme.

3.61 Chapter 15 of the EIA Scoping Report considers the potential significant socio-economic, recreation and tourism effects of the project during construction, operation, maintenance and decommissioning.

Employment, workforce and supply chain

3.62 At this point in the process workforce numbers and phasing spatially and construction type are unconfirmed and therefore, any areas that workforce will interact or impact upon cannot be scoped out of the Environmental Statement as there is not enough information to make an informed decision. This will need to include:

i) Effects on Tourist Accommodation During Construction

ii) Effects on the Local Economy During Construction

iii) Effects on Local Businesses, Jobs and Employment During Construction

iv) Effects to Planning and Development During Construction

v) Effects to Community Services During Construction and Operation

vi) Effects on Tourism and Recreation During Construction

vii) As part of future submissions, a workforce profile should be provided outlining:

viii) Peak workforce numbers

ix) Average daily workforce numbers

x) Broad competencies of workforce (i.e. civils, mechanical, electrical etc)

xi) Anticipated split of home based and non home based workforce

xii) These profiles will need to be set against the construction timeline and spatial context.

3.63 The Environmental Statement will also need to consider the impact and opportunities the development may have on the local labour market. It should set out clearly the expected number and nature of employment opportunities during each phase of the development. It should relate this to the availability of labour in the area and identify how any mismatch between supply and demand will be addressed.

3.64 Furthermore, the applicant has defined two study areas, a local study area defined as the scoping report corridor and a wider study area defined as the spatial area of the Local Authority that the scoping report corridor travels through from which it will consider socio-economic, recreation and tourism effects.

3.65 The applicant has recognised that socio-economic, recreation and tourism effects occur at different spatial scales, however, the defined study areas are not appropriate and will not ensure that all effects of construction, operation and decommissioning.

3.66 When considering workforce effects as part of any future submissions the Council expect a new study area to be defined using relevant and evidenced travel to work data for the appropriate locations to arrive at an employment zone of influence that will reflect where home based workers are located and will be most likely to travel from and where non home based workers are most likely to be distributed.

3.67 This is alongside a supply chain assessment, that would identify propensity and opportunity for local supply for construction and decommissioning, being conducted over a far greater geography ensuring areas such as Ipswich and Lowestoft, where a significant supply chain supporting other infrastructure builds, is located. Maximising the use of local and regional supply chains should be a priority for the applicant, this is consistent with SCC corporate objectives as set out in Suffolk County Councils Energy Infrastructure Policy and the applicants own corporate objectives.

3.68 Consideration needs to be given to the potential impact of a mobile workforce on the availability of tourist accommodation. The spending patterns of a transitory labour force are fundamentally different to those of a static workforce and benefits do not accrue in a normal manner. Spending patterns are also vastly different to visitors that may be displaced, thus this might impact trade for other related tourist businesses, such as restaurants and visitor attractions.

3.69 As mentioned above in all cases, the impact of this project must be considered alongside others in the region – particularly other Nationally Significant Infrastructure Projects, for example, ScottishPower Renewable East Anglia Hub onshore construction and Sizewell C.

3.70 It is acknowledged that the likely demands on the workforce and the supply chain are likely to be less than those of other infrastructure projects in the region. However, it is vital that the workforce assessment considers the different skill and competency demands on the different phases of the project and assess these cumulatively with other potential major construction projects.

3.71 The project is also likely to be in construction at the same time as other Nationally Significant Infrastructure Projects, such as, Sizewell C and ScottishPower Renewable East Anglia Hub, will be reaching the peak of their construction employment. There is a very high likelihood that achieving any

substantial home-based labour will be extremely difficult as these projects will be well established. SCC expects the applicant to take this into consideration when developing a workforce profile and its origins and will need to strongly evidence all their assumptions. SCC also expects the applicant to reflect these findings within all topic areas where workforce origin will have an impact, such as:

i) Traffic and Transport

ii) Communities

iii) Accommodation

Tourism

3.72 A large proportion of tourist trips are associated with the natural and historic beauty of the area as a whole. Therefore, it is more relevant to consider the extent to which the impact of construction in the landscape detracts from the environmental quality for recreational activity more broadly and the perception and propensity of people to visit the area.

3.73 The Environmental Statement needs to consider the perception and propensity of negative impact upon tourism from the negative cumulative impact set out in chapters:

i) Landscape and Visual

ii) Historic Environment

iii) Traffic and Transport

iv) Air Quality

v) Noise and Vibration

vi) Socio-Economics, Recreation and Tourism

vii) Perception and propensity for people to not visit due to construction

3.74 First time visitors to Suffolk may be unaware (or be able to distinguish) between different areas of the county. If they are aware of large-scale capital developments in Suffolk, both in terms of the actual construction site and the the increased use of construction HGVs on Suffolk's highway network, there could be a perception that they will simply assume that Suffolk is "one big building site" and this could result in visitors going elsewhere. Sizewell is the most high-profile example of a large construction project, but a variety of other construction schemes taking place simultaneously could undoubtedly have a negative effect on Suffolk's image as a tourist destination.

Noise impacts on tranquil tourism offer

3.75 A large amount of Suffolk's appeal to urban visitors is its 'peace and tranquility. Visit Suffolk's website describes the county as follows:

i) "A county filled with natural beauty situated on the east coast of England, bordered by 50 miles of glorious coastline and topped with breathtakingly beautiful open skies, it's the perfect holiday and short

> break destination. Whether you are looking for a quiet 'get away from it all holiday' or one that's full of adrenaline and adventure, Suffolk will not disappoint. Here you will discover quaint villages and medieval towns that for centuries have drawn in artists and writers.."

3.76 Any large-scale infrastructure works are clearly going to have an impact, or will be perceived to have an impact, on many of these elements. In addition to deterring people from visiting, they may result in a negative experience for people who do come to Suffolk and leave them with a lasting impression that deters them from returning or recommending the county to others.

Visual impact during construction

3.77 Similar to many of the points raised above, Suffolk's large open skies are a key selling point, along with Constable Country, beaches, countryside etc. People visiting the county for these may be deterred by the thought of construction hoardings, road closures, cables etc. Images count and where everything is instantly shared online via social media. The long-term damage that a single negative image of a building site (for example) can do would be significant.

Long term visual impact

3.78 Suffolk is renowned for its scenery and wide open skies etc. If this is to be impacted by permanent or semi-permanent construction, then mitigation measures will need to be put in place to ensure that adverse effects are kept to a minimum, that any environmental damage to the natural environment is prepared for (eg removals of trees, hedgerows etc).

Use of accommodation

3.79 Large scale infrastructure projects such as this will require accommodation for the workforce. It is unlikely that all labour will be sourced locally. Given that some of this work could be occurring at the same time as the construction of Sizewell C and other large infrastructure projects, this will place an enormous strain on the both the local labour market and the accommodation sector. The latter will be even more pronounced if works are taking place during the peak summer months and could result in visitors being unable to find accommodation.

3.80 If works were to take place outside of the main season however, it could extend the opportunities for accommodation providers and increase revenue. Whilst Suffolk benefits from a healthy year-round weekend breaks market, it could be enormously advantageous if accommodation could be occupied during the week by visiting labour etc.

3.81 This would need to be balanced against the negative perception that *"all the accommodation is full*" because of the capital works (necessitating a "Suffolk is open for business"-type campaign) as well as energy costs. Some self-catering properties are simply not opening over the winter because of prohibitively high heating/ electricity costs. Whilst all year-round demand would be beneficial, providers need to ensure that it is financially viable too.

3.82 Economic Development

Impacts on businesses

3.83 Worker spend – The catering and hospitality sector could see some benefit enormously, as could other sectors such as fuel, takeaway/fast food etc. However, this potential positive impact has to be balanced against any reduced spend from visitors. Although this has to be balanced against the change in spending behavior when compared to visitor spend, if non home based labour displaces visitors then SCC expects the applicant to consider this change in spending and mitigate accordingly of there is an overall negative impact.

3.84 SCC considers that this approach to Socio-Economics, Recreation and Tourism is entirely consistent with their experience of infrastructure projects in similar sensitive landscapes where the visitor economy is economically significant.

Detailed Comments on scoping

3.85 When identifying potential impacts as set out in chapter 15.10 and then in table 15.9 SCC expect the applicant to consider these impacts in more granular detail than presented in the scoping opinion. The applicant has grouped together too many sources of impact and therefore will not correctly assess the impact. As a minimum the Council will expect the applicant to consider, separately, the impacts upon the following sources:

i) Employment – local opportunity

ii) Economic Development – Local investment

iii) Economic Development – Non home based spend

iv) Economic Development – Investor perception

v) Economic Development – Workforce and churn

vi) Economic Development – Journey time delays (including those that would effect a tourism asset carrying out its day to day activities)

vii) Tourism – Visual Impact

viii) Tourism – Visitor perception

ix) Tourism – Journey time delays (of a visitor to the region the actual and perceived impact)

x) Tourism – Accommodation displacement

3.86 The Councils disagrees with the applicant on the study areas used in the scoping opinion, the spatial scope for extent of effects for all phases of the project is far greater than the applicant is currently using. The Council expects at any future submission that the applicant use the following:

i) Effects on employment and supply chain – bespoke travel to work zones based on the different construction sites using travel to work data to arrive at an informed employment zone for effects on labour.

Workers willingness to commute is dependent on an number of factors, time, distance and travel allowances for example, SCC expect the applicant to consider these and set a realistic daily commute zone to assess the potential for home based workers. This is also applicable to assessing the opportunity for a local supply chain to respond to the opportunities available.

ii) Effects on local businesses, visitor attraction for tourism & tourism businesses – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below)

iii) Effects on development land – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below)

iv) Effects (indirect and direct) on severance – informed by the traffic and transport access plan

v) Effects of cumulative impact on all of the above especially where construction phases of combined competencies overlap. i.e. where civils phases of construction coincide and have the potential to exhaust the local labour market and temporary accommodation

vi) All baseline assumptions (employment and labour market, business premises, visitor attractions, open spaces and development land) will then have to be revisited to include this new spatial scope.

vii) The Council recognise that when considering this project as a single entity there are only minor positive opportunities for economic development and employment, skills and education. However, SCC expects the applicant to consider all the National Grid plc projects located within Suffolk and the wider region to develop an approach that encompasses this project as part of their meta project. This will have a transformational approach when considering the positive impacts of the project.

3.87 SCC expects the applicant to mitigate impacts and maximise opportunities for local benefits, including to:

i) Deliver and fund, in collaboration with the Councils and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project;

ii) Work collaboratively with the Councils to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment;

iii) Set an ambition for 5% of the roles required by the project to be filled through ‘earn and learn’ positions (the majority of which will be

apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be created for local people.

iv) Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally

v) Deliver activities with the aim to increase the size and diversity of the labour market pool

vi) Put into place clear plans (e.g., commitments within contracts) to drive the behaviors of their associated supply chain(s) to achieve skills and employment outcomes

vii) Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible.

viii) Clearly set out via a Skills Plan, incorporating, supply chain skills plans a strategic approach to developing and supporting the project's workforce requirements. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of Suffolk's economics, in particular local opportunity that meets skills legacy for the region

ix) Adopt and fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise and LMI to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat any negative churn effects.

SCC Emergency Planning

3.88 No comments.

SCC Floods

3.89 The applicant should do the following:

i) Consult the SCC Preliminary Flood Risk Assessment;
ii) Consult the Babergh Mid Suffolk Strategic Flood Risk Assessment;
iii) Consult the SCC Historical Flood Mapping;
iv) Assess all predicted flood with the Flood Risk Assessment, and;
v) Produce a Construction Surface Water Management Plan.

SCC Highways

3.90 SCC will be the local Highway authority for Sections 2 and 3 of the East Anglia Green scheme corridor, as defined at Table 4-1 of the EIA Scoping Report. The two sections form broadly 46km of the East Anglia Green

proposals. The following comments relate to SCC's position on transport matters set out within the EIA Scoping Report.

3.91 SCC notes that no reference is made in the table to major utility pipelines or cables and considers that the presence or absence of these should be included within the scoping document.

3.92 Where permanent access to CSECs are required (4.5.14) the access routes from the SRN to the permanent access should be included within the scope of the assessment to ensure that they are fit for the forecast use.

General Comments on Overarching Method

3.93 SCC considers that robust data should be used for assessing impacts rather than relying on professional judgement as a substitute (5.1.3 and 5.3.7). In transport terms overreliance on professional judgment can miss key local sensitivities.

3.94 Paragraph 5.2.5 identifies that short term is defined as up to 2032. The origin of this definition is not understood, as it could include a significant time of impact depending on the extent of the construction programme. How this relates to transport impacts, and what is considered to be a short term impact should be clarified. SCC are also concerned that whilst some impacts may be short term, they need to be seen in the context of other short term contiguous impacts in the local and wider area. For example, repeated road closures, PRoW closures and traffic management affecting journey times and repeated increases in HGV movements on rural roads.

3.95 Paragraph 5.2.10 sets out that *'standard mitigation measures'* can include management activities and control measures. SCC expects measures to control the number of construction movements to/from the site for both freight and workforce to be included within the relevant management plans (referenced at paragraph 16.11.4). A realistic worst-case scenario should be reflected in the management, controls and monitoring processes that are put in place for the project. All mitigation measures should be secured by requirement or within the appropriate management plans. Where reliance is placed on working methods (eg shift patterns) or restrictions (eg peak vehicle movements) these should be expressed in precise terms to ensure that they are fit for purpose (ie Must, shall, will not could, should would and may). Where control measures are exceeded or in case of non-compliance SCC would regard these as being 'adverse' and trigger enforcement or 'remedial actions' as described in 5.4.1.

3.96 Paragraph 5.3.4 sets out the general process for determining the sensitivity of receptors. SCC strongly recommend that the Applicant looks to agree the link sensitivity for the highway network with the relevant authority at as early a stage as possible to avoid extraneous work and potential disagreement through the examination.

3.97 Reference is made to intra project effects at Section 17.2. Consideration needs to be given to the relationship between impacts on Public Rights of Way (PRoW) and impacts on vulnerable road users on the highway network

i.e. total impacts on severance, amenity and delay. This means the proximity of receptors on PRoW need to be consider with regards to impacts on the highway network.

3.98 For inter project effects, the Applicant will be aware of the scale and number of projects in the wider area, and consideration needs to be given to the range of potential impacts as project programmes crossover. For highways the area of significant impact can be wide and impacts as a result of HGV movements will be felt on communities, which needs to be considered as part of the assessment. Consideration also needs to be given to the availability and origins of the workforce given the number of large projects.

3.99 As transport is not included in Table 17.1 it is assumed that determining cumulative impacts will be project specific ie intra-project rather than inter-project. With the number of NSIPs planned for East Anglia and significant local projects SCC considerers the latter should also be assessed.

Air Quality

3.100 SCC note that diverted traffic is proposed to be scoped out of the assessment (7.9.10). This would not be acceptable if a highway carrying significant volumes of traffic were diverted through a sensitive receptor for a long duration although based on the details provide this appears to be unlikely for this project.

Approach to Scoping

3.101 In 16.1.2 chapters 7 air quality and noise would also appear to interrelate with transport.

Policy

3.102 Section 16.2 sets out the details on the assessment of traffic and transport and includes reference to the National Policy Statements EN-1 and EN-5, a number of paragraphs are quoted. The Applicant should also fully consider the following paragraphs of EN1:

i) Paragraph 5.13.9: “The IPC should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures”.

ii) Paragraph 5.13.10: “water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective”.

iii) Paragraph 5.13.11: “The IPC may attach requirements to a consent where there is likely to be substantial HGV traffic that:

iv) control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;

v) make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid ‘overspill’ parking on public

roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and

vi) ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force."

3.103 The Draft National Policy Statement for Electricity Networks Infrastructure (EN-5) also includes the following statement at paragraph 2.8.1:

i) "When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the Applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.5) with recognition that the linear nature of electricity networks infrastructure allows excellent opportunities to: i) reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii) connect people to the environment, for instance via footpaths and cycleways constructed in tandem with biodiversity enhancements."

3.104 The Applicant should consider the opportunities that the development offers regarding green corridors and sustainable transport. The provision of resilient access, including that to substations, for HGVs and AILs is also an area of opportunity (and concern to SCC).

Chapter 14: Noise and Vibration

3.105 It is proposed to scope out 'Effects from traffic vibration during construction'. I don't have an informed position on this to say whether it is reasonable or not, but know that it can be a sensitive subject politically in some locations, so thought it best to flag. IT is best on the summary here:

> 14.9.10 Vibration from traffic on the public highway is caused by irregularities in the road surface. Where the road surface is free from irregulates, such as potholes, significant vibration effects would not be expected, even at relatively short distances. This is based on guidance in DMRB LA 111: Noise and vibration (National Highways, 2020). For this reason, vibration from construction on the public highway is proposed to be scoped out of the ES.

For Chapter 16: Traffic and Transport

3.106 Whilst we recognise daily traffic flows for operation will be very low, we do not currently support the scoping out of the operational phase without further data being provided on maintenance activities, including the need for temporary access arrangements for maintenance during operation.

Scope of Area

3.107 SCC would welcome discussions about the extent of the study area and would caution against a generic approach for determining the extent of the study area without specific consideration of local issues. The Council can

only confirm agreement on the scope of the assessment once further details on vehicle numbers and routeing are provided by the Applicant.

3.108 The above being said, the geographical scope of the Traffic and Transport Study Area should remain flexible so that as more detailed information is made available, for example the sources of aggregates, the assessments limits can then be expanded or contracted as appropriate.

Rail and Marine Transport

3.109 The use of rail (and sea) to move materials wherever practical should be regarded as an opportunity for this project as both are regularly used for this purpose in the region. These movements have not been considered within table 16.3.

Existing baseline

3.110 Given the limited details on routeing, no details are provided on the extent or location of traffic or PRoW surveys. This should be agreed with the Council prior to undertaking any surveys to avoid extraneous work.

3.111 Care should be taken that the data taken from DfT records (16.7.3) is actual counts and not estimated volumes provided in data tables for years where surveys are not undertaken.

3.112 PRoW surveys (16.7.6) should reflect use outside the hours of 0700 and 1900 to reflect the use of these routes at latter or earlier times particularly during the summer periods.

3.113 Early engagement with the LHA structures teams is recommended to identify any requirement for survey and assessment of structures on routes required for HGV and AIL movements (16.7.13).

Controls and Management Measures

3.114 As set out at paragraph 16.10.5, the assessment would take account of a number of factors to assess traffic levels. The Council strongly supports the inclusion of controls, monitoring, enforcement and reporting for construction vehicle movements to reflect those figures assessed. This is considered of critical importance for determining the acceptability of the environmental assessment, and so the measures and methods should be agreed at as early a stage as possible.

3.115 No management measures are currently identified; however, they should include HGV movements and routing, HGV peak hour movements, workforce movements and mode share, and AILs.

3.116 Further information will be needed on construction working hours and therefore hours of traffic movement, as well as shift patterns. These will need to be reflected in relevant controls, especially where they affect the outcomes of the assessment.

3.117 Where impacts are mitigated through measures included within management documents thresholds (controls), the measurement and enforcement methodology should be clearly explained as should the relationship between

such plans and requirements included within the dDCO. The enforcing authority should also be clearly identified. SCC would usually expect to be the authority discharging transport related requirements or management plans.

Pre-commencement, Operation and Decommissioning

3.118 Typically, a number of operations such as ground investigation, archaeology and site clearance are considered as pre-commencement works in advance of commencement that typically triggers the measures within management plans. Based on experience with recently permitted NSIPs, SCC requests that the transport impacts of pre-commencement activities are considered by relevant management plans (code of construction practice, pre commencement transport plans) as unforeseen impacts such as inappropriate HGV movements, parking and unsafe temporary access can occur already at this stage within local communities. SCC would expect either sufficient evidence to show that impacts of pre-commencement activities are minimal or that a separate management plan is provided, as was secured for EA1(N) and EA2.

3.119 SCC requests that the National Grid provide data to evidence whether it is appropriate to scope out transport impacts during the operational phase (16.9.7), specifically for locations such as substations where infrequent but intense traffic may be generated by maintenance activities. This may be also necessary where, for example, temporary traffic management is required during the construction phase to make an access safe but then removed for the operational phase.

3.120 It is noted in 5.7.14 that the likely impacts of decommissioning are difficult to estimate being so far in the future. If that remains the case SCC would expect that a suitable method for agreeing management plans to assess and mitigate such impacts would secured through a suitable requirement within the DCO.

Methodology

3.121 The Council notes that the Applicant plans to use the Guidelines for the Environmental Assessment of Road Traffic (GEART) Methodology. Applying GEART, sometimes supplemented by DMRB document LA 112, methodology in the assessment of transport in recent DCOs has, in the SCC's opinion, required greater flexibility in the approach particularly in terms of sensitivity of receptors and application of thresholds to reflect local circumstances. The thresholds within the document are not designed to be applied rigidly, and consideration needs to be undertaken of the local characteristics. In view of the uncertainties inherent in transport data and assessment SCC would consider that the thresholds stated in 16.3.1 should not be taken as absolute and should not be used to scope out locations marginally below these limits.

3.122 Clarity is sought on paragraph 16.9.3, which states that it is proposed to assess links where traffic flows are expected to increase by 30% or by 10% in sensitive areas. This should clarify that this includes the proportional change in HGV movements (as indicated at Paragraph 16.10.6) as well as general traffic, noting that the cumulative impact of consented and developing NSIPs

complicates such assessment i.e. where an in combination affect between two projects results in the breeching of a threshold. It should also clarify the timescales for which the changes are being assessed, which should include the following as per the *Guidelines*:

Hour of greatest change

Peak hour.

Daily.

3.123 The use of professional judgment forms part of the assessment, as indicated at Paragraph 16.10.2 and 16.10.6, however the Council would caution against overreliance on professional judgement, especially where evidence could be collected.

3.124 Information is sought on the methodology for determining the workforce origins, which ultimately affects the traffic impacts of the workforce. The assessment of traffic and transport should reflect any assessments undertaken in the socio-economic chapter. This approach should be agreed at as early a stage as possible given its implications for other workstreams. Any assessment should take into consideration the number of large infrastructure projects in the area and therefore the availability of a local workforce depending on which project comes forward and when. It is considered that substantial thought needs to be given to the availability of a workforce, the origin of the workforce and therefore its traffic impact.

Transport Assessment Scope

3.125 The scope of the Transport Assessment should include details on the access arrangements including drawings showing vehicle swept paths and visibility splays that would be appropriate for a planning submission.

3.126 Depending on the assessed impacts, junction modelling may be required. However, it is recognised that this will only be determined after significant further work has been undertaken. It is important that the whole access route is considered, particularly in rural areas where the nature of the highway can vary significantly and localised constrains may prevent access or require mitigation.

3.127 If any abnormal loads use SCC maintained roads the authority would require structural assessments in addition to swept path analysis.

3.128 Table 16.7 only appears to consider the impacts for the operational phase in terms of pylons. This project includes sealing end compounds, new and modified substations which, in the view of SCC, the transport impacts of these should be scoped in unless evidence can be provided to the contrary.

3.129 Table 18.1 does not refer to a travel plan. While recognising that the geographical extent, length and rural nature of the project makes use of sustainable travel difficult it should none the less be explored and any opportunities to provide more sustainable transport considered.

Sensitivity of Links

3.130 Table 16.4 provides an indication of the proposed method for determining sensitivity of receptors. The Council is concerned about how many elements would need to be triggered to determine the sensitivity of a location e.g. is a highly sensitivity location one that has a school, an accident blackspot and roads without footways? Due to the location of the project the sensitivity of rural roads without footways is a specific concern to SCC in terms of sensitivity. Further clarity is sort on how these different elements are valued within the assessment method.

3.131 At a high level the Council does not disagree with the broad approach, albeit further consideration will be needed when looking at specific locations, especially when defining sensitive users and the need for crossing roads to access facilities. Consideration is also needed over the quality of the existing vulnerable road user infrastructure e.g. width of footways and presence of crossing facilities. Wherever possible sensitivity should be based on evidence rather than just professional judgement. As above, the Council would strongly recommend agreeing link sensitivity at as early a stage in the process as possible, especially given the potential large number of links to be reviewed.

Magnitude

3.132 The Council makes the following comments for each of the proposed assessments of magnitude:

3.133 Severance: The Council would caution against general application of the thresholds proposed e.g. why is a 55% change any different to a 65% change in traffic flow.

3.134 Pedestrian Delay: Further information is sought on how the changes being measured inform changes in vulnerable road user delay.

3.135 Pedestrian and Cycle Amenity: It is recognised that the thresholds suggested are ‘tentative’ and so should be treated as such when drawing conclusions of impacts.

3.136 Fear and Intimidation: The Council welcomes consideration on the basis of the users that are being impacted but would caution overreliance on professional judgement without supporting evidence. In the rural areas of Suffolk, a key factor is the general absence, or limited width, of footways along many roads or lack of formal crossings.

3.137 Driver Delay: It is not understood why proportional changes of 30% etc are relevant to driver delay, as small proportional changes can result in increased delay if the route is already congested. This metric is not considered to be agreed.

3.138 Accident and Road Safety: Consideration needs to be given to the time period being used given the potential impacts of recent changes to travel patterns. SCC would also consider the threshold of 10 collisions in a three period to be too high and would consider that three collisions over a three year period is more aligned with local practice, particularly where the low levels of traffic may hide a high rate per vehicle km.

3.139 The thresholds provided to assess impacts, whilst indicative and providing a helpful starting point should not be treated as absolutes given the varying characteristics of locations, that proportional differences can be very different if the baselines are different, and as data collection and forecast assumptions have a degree of uncertainty.

3.140 Paragraph 16.10.12 includes reference that the “significance of effects would be based on professional judgement as to whether the magnitude and duration of impacts, when combined with the characteristics of the road network and the sensitivity of receptors would cause any adverse effects”. Whilst it is recognised that professional judgment is required for the assessment, the Council would recommend that where impacts are considered to be dismissed due to being short term, this is based on evidence. The Council is also particularly concerned about the potential for repeated ‘short-term’ effects on local communities associated with other projects in the area, and the Applicant should consider this as part of their cumulative assessment.

3.141 SSC’s position is that the impacts on PRoW are a topic in their own right and should not be considered in others such as landscape and social economics and tourism. To do so makes assessment fragmentary and will not reflect the true impact on users of the PRoW network

Cumulative Impacts

3.142 SCC notes that transport (may want to also consider economic effects) does not appear to be a topic considered with respect to inter project cumulative impacts (table 17.1). SCC would consider that this is a significant omission considering the number of NSIPs in Suffolk that have been consented (EA1(N), EA2, EA3, SZC), are within the planning process (Sunnica) or in preparation (East Anglia Green, SEALink, EUROLINK, Nautilus, A12/A14 Copdock). Cumulative these will have a significant impact on workforce (travel distance), materials (sources) and hence transport routes.

EPS Historic Environment

3.143 The EIA Scoping Report for East Anglia Green (EAG) Energy Enablement (GREEN) (National Grid, November 2022) has been reviewed (in particular Chapter 11: Historic Environment, Appendix C – Competent Experts, and Appendix G – Key Characteristics of Landscape Character Assessment), in relation to the likely significant impacts of the proposed development on built heritage.

3.144 In accordance with Regulation 14 of the EIA Regulations, the ES should provide details regarding the relevant expertise or qualifications of the competent experts involved in its preparation. It is noted that the proposed competent expert(s) for the Historic Environment does not include a Historic Buildings Specialist/Built Heritage Consultant; it is highly recommended that a specialist in historic buildings be appointed to assess the significance of the identified heritage assets and their setting, and the impact of the proposals on that significance.

3.145 As highlighted within the submission documents, the potential impacts to built heritage have been discussed during two virtual meetings, with most of the recommendations to date having been addressed. Generally, the EIA Scoping Report provides for the assessment of the majority of heritage assets which have the potential be impacted by the scheme, although there are a number of elements which do cause concern. These are highlighted below (against the relevant paragraph number of the submitted EIA Scoping Report), and it is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved.

3.146 **11.6.6:** The Planning Policy Guidance states that 'in comes cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications' (040 Reference ID: 18a-040-20190723). No methodology/criteria for identifying, assessing, and recording potential non-designated heritage assets has been provided. This would be particularly helpful for areas which do not have a current local list or an adopted and publicly accessible criteria.

3.147 **11.9.10**: An increase in construction traffic has the potential to directly impact historic buildings. If heritage assets within the site boundary are to be scoped out, it must first be adequately demonstrated that they are not located in close proximity to any vehicular or access routes and will not be affected by any increase in construction traffic.

3.148 **11.10.03**: It is welcome that the baseline setting of heritage assets will be informed by the Landscape and Visual Impact Assessment (LVIA) and Zone of Theoretical Visibility (ZTV). This is particularly important given the likely associative and historic relationship between heritage assets and the historic landscape.

3.149 **11.10.15:** Reiteration of comments made in response to 11.9.10. An increase in construction traffic has the potential to directly impact historic buildings. If heritage assets within the site boundary are to be scoped out, it must first be adequately demonstrated that they are not located in close proximity to any vehicular or access routes and will not be affected by any increase in construction traffic.

3.150 **11.10.19:** Any heritage assets within the agreed study areas which are scoped out should be listed in an appendix to the Desk-Based Assessment (DBA). A full justification for scoping out must also be provided within the appendix; where there is no adequate justification for scoping out, a full assessment and description within the main body of the DBA will be expected.

EPS Landscape

3.151 Overall, the proposed scoping report covers the areas that would be required for assessment of landscape and visual matters. That said, there are a number of areas which do cause concern that need to be amended or altered to ensure that a full understanding of the landscape and visual impact of the

scheme is achieved. The following table provides specific comments by section:

3.152 **13.1 Approach to scoping** The approach to scoping set out at 13.1 is broadly satisfactory. It's also appreciated that the interrelationship between the landscape and visual chapter and other environment topics has been made clear in Para. 13.1.2.

3.153 **13.3 Study Area** The respective buffer zones identified for the above ground and below ground elements of the project and the substations and sealing end compounds are generally deemed acceptable. SCC note that more distant viewpoints up to 5km from the Project are to be considered where there is the potential for significant visual effects to arise beyond the 3km study area. If a considerable number of viewpoints beyond the 3km study area are identified, it may be useful to consider a 5km study area instead.

3.154 **13.4 Data Collection** Para 13.4.2 states that the Scoping Report has been informed by targeted field work undertaken in August 2022. For viewpoint photography visits, would advise these are taken in the winter months to ensure leaf cover is reduced and therefore representing a 'worst case scenario'. It may be that both summer and winter views are used to help provide representation all year round, however winter views would be the minimum requirement.

3.155 **13.5 Engagement with Stakeholders** Table 13.5 is a reasonable reflection of engagement with Place Services to date.

3.156 **13.6 Baseline conditions** The baseline conditions at 13.6 as set out in the scoping report do not appear to recognise the network of promoted routes, that is locally and regionally promoted footpaths and other rights of way, cycle routes, or other identified routes.

Landscape Value

3.157 SCC welcome the reference to Technical Guidance Note 02-21 'Assessing the Value of Landscapes Outside National Designations', which was published by the Landscape Institute. This builds on the details within GLIVIA3 (Box 5.1) and strengthens the argument that landscape value is not always signified by designation: 'the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value' (paragraph 5.26).

3.158 In determining value, SCC would expect to see a critical analysis of landscape value criteria (including cultural and natural heritage) for all chosen landscape receptors. Along with susceptibility, these findings should then inform any sensitivity judgements.

Landscape Character (Table 13.2)

3.159 The landscape baseline is discussed in detail within the document, with reference to the national, regional and district Landscape Character Areas (LCAs), as well as designated Dedham Vale AONB and Stour Valley Project Area. In Suffolk, the primary source of information for the landscape baseline

is the Suffolk Landscape Character Assessment. To ensure a consistent baseline throughout, the use of the East of England landscape typology would be welcome. This can then be enhanced and refined by reference to local landscape studies and designations.

13.9 Likely significant effects

Residential amenity

3.160 SCC accept that visual effects on individual private views is not within the remit of EIA (Para 13.9.13). However, given that the transmission tower locations have not yet been identified it may be necessary, in specific locations, for the applicant to assess impacts on residential amenity where there is a risk that the “lavender test” principles may be breached. This approach would be consistent with paragraph 16.17 of GLIVIA 3 and the Residential Visual Amenity Assessment Technical Guidance Note (Landscape Institute, 2019).

Visual amenity at night

3.161 The Scoping Report concludes that lighting will be scoped out on the Environmental Statement during both construction and operation. Although the Scoping report highlights that there is no anticipation of significant effects from lighting on designated landscapes or landscape character at night, SCC are yet to see any information regarding the size, location and operating hours for any construction areas for key sites substations and sealing end compounds, as well as laydown/compound areas, On this basis, SCC do not consider it appropriate to scope out the impact on visual amenity at night during construction until details of operation are fully understood.

Sequential visual effects

3.162 The methodology does not appear to deal specifically with sequential visual effects. Given the scale and repetitive nature of this project, combined with varying visibility of pylons, this will clearly be a significant matter for users of highways and rights of way networks, where there is a general expectation of higher levels of visual amenity and tranquillity.

13.9 Viewpoints and Visualisations

3.163 Currently there is 41no. proposed preliminary representative viewpoints. Whilst the emerging approach to viewpoint selection may be acceptable for the upcoming s42 Preliminary Environmental Information Report (PEIR) consultation, the overall number of representative viewpoints is considered to be inadequate and therefore SCC reserve the right to ask for further or amended viewpoints, prior to preparation of the EIA that will support the DCO application once further site visits and survey work has been undertaken.

3.164 Similarly, given the extent and complexity of this project, it may be deemed necessary to include both specific viewpoints and illustrative viewpoints (Para 16.19 GLVIA3).

3.165 As the document suggests, the LI Visual Representation of Development Proposals Technical Guidance Note 06/19 provides best practice for ensuring

best practice. SCC welcome the use of wireframes and photomontages (Type 4 AVR level 3) as visualisation representation.

3.166 SCC would advise that an enlargement factor of 150% is used. This is because, for a 50mm FL image printed at A3 and held at comfortable arm's length, the scale of the viewed image is smaller than reality. Whereas, increasing the printed image size by 150% (as if a 75mm FL lens had been used) provides a better impression of scale for most viewers using two eyes (binocular vision).

Cumulative landscape and visual effects

3.167 The EAG scheme cannot be considered in isolation. Potential cumulative landscape and visual effects, particularly at and around the Bramford substation site. There is a suite of other energy connection and generation projects coming forward, including Bramford to Twinstead Pylons, North Falls and Five Estuaries (onshore infrastructure). All of which should be considered in detail.

3.168 Schemes of mitigation and offsetting are likely to be required given the accumulation of adverse impacts, and the baseline conditions. Plans should also be appropriately co-ordinated to ensure there are no discrepancies and to ensure the best solutions for the landscape can be secured.

Appendix J

3.169 The arboricultural survey will identify impacts to trees potentially subject to significant arboricultural impacts as a result of the project. In addition to this SCC would expect to see a comprehensive assessment of important hedgerows under the Hedgerow Regulations 1997 to be undertaken. This should identify all hedgerows along the routes that are important under the various historic, ecological and designation related criteria.

3.170 Furthermore, all hedgerows along the route to be removed to facilitate construction should be surveyed in detail in advance to inform specific and appropriate planting schemes for their restoration.

3.171 **Figure 13.2 Visual Receptors** As stated in the comments above, there is 41no. proposed preliminary representative viewpoints, which is considered to be inadequate and does not fully represent the impacts that this project will introduce on communities. For example, communities in Stowupland, Bacton (Page 4 of 11), Offton, Burstall, Washbrook (Page 5 of 11), Capel St Mary and Great Wenham (Page 6 of 11) have not been represented. SCC understand that it may be judged that impacts are not significant in locations such as these, however until further details of the project are made available and further site survey work is undertaken, they should be scoped in.

3.172 SCC would also expect to see additional viewpoints from PRoWs and Promoted Routes within the Study area. To support NG, suggested viewpoints will be reviewed in detail and recommend as soon as possible to help with the preparation of the ES.

SCC Health - Community Wellbeing

3.173 The only recommendations are:

i) To ensure there is good communication for the residents in the area of the pylon installation; with information of the pylons and any impact that they may face during the development.

ii) If there are any cases of demolition; to ensure that all mitigations are risk assessments are done to make sure no dust particles impact on the local residents.

SCC Public Rights of Way

Planning Policy

3.174 The NPPF refers to the Public Rights of Way network specifically:

> 100. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Local Planning Policy

3.175 Suffolk County Council Green Access Strategy 2020-2030 (Rights of Way Improvement Plan) should be included as relevant local planning guidance. The plan sets out the council's commitment to ensuring and promoting sustainable travel options for all. The strategy focuses on walking and cycling for commuting, accessing services and facilities, and for leisure reasons. Specifically, 2.1 "Seeks opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils and partnership working."

3.176 The council will expect enhancements to the network in addition to mitigation, compensation, and management strategies that will ensure that the public; residents and tourists alike, retain the quantity and quality of access provision.

Methodology

3.177 The EIA does not holistically consider how the potentially significant effects that may arise from construction and operation on the public rights of way & access network and its amenity value, will be assessed. The access network includes public rights of way, permissive access, open access land and promoted routes.

3.178 The assessment considers aspects of this access network within the assessments for landscape & visual, traffic and transport, socio-economics, recreation and tourism, noise, air quality and health & wellbeing.

3.179 This potentially gives rise to a weakness in the EIA process, as recognised in PINS advice note 9, that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. A walker, cyclist or

horse rider using a public right of way or on open access land experiences the countryside, and hence any impacts, holistically; namely the quality and diversity of the views, wildlife and natural features, the sense of wildness, peace and quiet, the presence (and absence) of traffic, noise, lighting and air quality, and the connectivity of the network.

3.180 Therefore, SCC's position is that the impact on both the physical resource and the amenity value of the public rights of way and access network should be addressed as a separate theme within an Environmental Assessment. This should include the effect on the physical resource from temporary or permanent closures and diversions, and on the quality of user experience.

3.181 Consideration should be given to the assessment methodology and cover:

i) physical changes to resources (for example, changes to PRoW through diversions or creation of new road crossings);

ii) changes to the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality or traffic movements;

iii) changes to the experience people have when using recreational resources due to increases in the numbers of people using them.

Cumulative Impact

3.182 The cumulative impact of this proposal with the other existing energy projects consented and proposed in this area is concerning, particularly around the Bramford area. It is highly likely that there will be inter-project effects that will impact on the access network and its users. The lack of a single assessment approach for public rights of way, access and amenity could weaken the recognition of, and assessment of the cumulative effects, in particular the repeated closure or diversion of public rights of way, and the increased duration of these impacts as a result of the stream of NSIPs in a relatively small geographical area

3.183 The impact of temporary closures of PRoW should not be underestimated, as their value for local amenity could be severely reduced or removed during works. It will be unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects.

3.184 There will need to be mitigation, compensation, and management strategies to ensure that the public; residents and tourists alike, retain the quantity and quality of access provision

Pre-commencement works

3.185 These can typically include archaeological, ecological, site investigations and site clearance and in other NSIPS have not been included in the post commencement plans or within the DCO controls for temporary closures of PRoW. This raises concerns as to the potential impact of these works on the access network specifically the level and control of traffic using PRoW for site access, and how PRoW will be managed during survey and site clearance

works. It is suggested that the applicant consider a pre-construction management plan as was provided for EA1N and EA2.

PRoW Agreements & Decision Making

3.186 Discussions/decisions and agreements relating to public rights of way and open access land should be with the Highway Authority and Access Authority respectively, namely, SCCl.

3.187 SCC as Highway Authority should be the discharging authority for any highway works.

13 Landscape and Visual

3.188 Paragraph 13.6.8 The assessment refers to PRoW throughout and it in needs to be clear that this should include wider recreation access. It should include PRoW, open access land, permissive access, promoted routes, cycle routes, and their users. This full range should be used in subsequent sources and impact tables.

3.189 Paragraph 13.9.16 Viewpoints need to be agreed with local authority for recreational use and impact on the PROW network. This needs to be through level of use and beyond promoted routes, particularly focusing on dense areas of the network and proximity to residential areas.

3.190 Paragraph 13.9.26 Consideration needs to be given for the perspective of viewpoints for all users. Covering not only pedestrian access but also increased height for cyclists and equestrian use where applicable.

3.191 SCC welcomes the PRoW and recreational network being scoped in as per table 13.4.

14 Noise and Vibration

3.192 Table 14.6 Consideration should be given to higher use PRoW to be desirable. SCC does welcome that PRoW are deemed as a leisure facility and included as a medium sensitivity.

15 Socio-Economic, Recreation and Tourism

3.193 Paragraph 15.6.1 SCC welcomes survey usage data being captured for further assessment as part of a wider transport and travel assessment.

3.194 Paragraph 15.7.2 Suitable diversions where there could be temporary or permanent disruption to PRoW & recreational routes should be agreed with the Highway Authority. This should include the management of these routes covering alternative routes and communication to third parties. SCC welcomes the approach within the EIA scoping report.

3.195 Paragraph 15.8.1 SCC welcomes the inclusion of the PRoW and recreational network being scoped into the ES. This is covered with table 15.9.

16 Traffic and Transport

3.196 Paragraph 6.2.5 Suffolk County Council Green Access Strategy (Rights of Way Improvement Plan) should be included as relevant local planning guidance.

3.197 Paragraph 16.7.5 SCC agree to identify the affected routes. Please ensure all Rights of Way spatial data is shown on future plans The legal record for PRoW, the Definitive Map & Statement is held by SCC and so the applicant is advised to acquire the digital data directly from the SCC.

3.198 Paragraph 16.7.6 Consideration should be given to extending the hours of the surveys to cover full use of the network. Routes are often used earlier and later in the summer months to cover daylight hours.

3.199 Paragraph 16.10.4 to 16.10.6 Consideration must be given to road restriction in relation to non motorised users and accessing the ProW network. The council seeks a firm commitment to minimising disruption to the access network and its users. In addition Please refer to Appendix 1 for the SCC guidance.

APPENDIX 1

Principles for working with Public Rights of Way

3.200 The Council expects the following principles to be adhered to for this development at all sites; landfall, converter sites, extension to the National Grid substation and the terrestrial corridor: -

i) Early engagement with the SCC PRoW & Access Team to discuss the impact on and management of the PRoW & access network. SCC is the Highway Authority for public rights of way and the Access Authority for Open Access land and the National Trail.

ii) The Applicant must obtain the Definitive Map and Statement from the PRoW & Access Team at SCC. This is the only source of the up-to-date record of the PRoW (supplied digitally).

iii) Public rights of way should be marked on plans using the SCC digital data and labelled as per the Definitive Map and SCC convention (Area -parish number - path number)

iv) Where PRoW are directly impacted, a pre and post condition survey must be carried out including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with SCC as Highway Authority. This should include pre-construction work where PRoW might be used to gain access to the corridor and reinforcement works might be required prior to use by vehicles.

v) Where impacted by the works, any PROW will be restored to original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with SCC.

vi) Where PRoW cross the cable corridor, haul road, access tracks and other sites, the surface must be always kept in a safe and fit condition for all users to the satisfaction of SCC.

vii) Pre-construction works must not obstruct or disturb any public rights of way (e.g., newt fencing, archaeology surveys etc) unless otherwise agreed with SCC. Management measures or temporary closures not covered in the DCO must be by application to SCC.

viii) Public rights of way that are used for any stage of construction access should remain open, safe, and fit for the public to always use with management measures put in place with the agreement of SCC.

ix) Any temporary closure of a PRoW must be agreed with SCC and the duration kept to the minimum necessary

x) An alternative route must be provided for any public right of way that is to be temporarily closed prior to closure to a standard agreed with SCC

xi) The location of alternative routes to be agreed with the Council.

xii) Any alternative route must be safe and fit for the public to always use – suitable surface, gradient and distance with no additional road walking between the natural destination points.

xiii) Any temporary closure and alternative route will be advertised in advance on site and in the local media, and to the local parish councils including a map showing the extent of the closure and alternative route – process and cost to be agreed between applicant and SCC.

xiv) There will be no new gates or stiles erected on any public rights of way that are impacted by the cable corridor and any other associated site.

SCC Planning Authority

3.201 SCC as minerals and waste planning authority welcomes the approach taken in Chapter 9 to safeguarding known waste facilities and mineral resources.

SCC Property

3.202 Digital mapping is required to establish if there is ant interaction with County land holdings.

East of England Ambulance Service Trust (EEAST)

3.203 SCC understands that EEAST have submitted a response to this scoping consultation separately.

From:	[redacted]
To:	East Anglia GREEN
Subject:	Re: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation
Date:	05 December 2022 11:23:45
Attachments:	image001.png image008.png image003.png image005.png image007.png

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"GREEN" Pylons scoping report comments from Swainsthorpe Parish Council

Whilst supporting the very necessary development of alternative power generation, the East Anglia area in general, and our environs in particular, seem to be becoming so productive of green energy that we now have the problem of transporting it to where it is more needed.

To address this scoping report in general, we concur with the very thorough responses and reports from Essex Suffolk Norfolk Pylons group, supported by the legal opinion of Charles Banner KC, in that the "consultation" is not adhering to the Gunning Principles, and is therefore invalid.

We have been offered no alternative to the pylons, the under-sea and underground (with small exceptions) possibilities having been ruled out pre the non-statutory consultation.

Swainsthorpe and the surrounding parishes are particularly affected by the ***cumulative impacts*** of energy projects in the vicinity.

One of the largest solar farms yet is proposed, encompassing Swainsthorpe, Mulbarton and Newton Flotman, together with associated substation and battery storage on a separate site, a substation for off-shore wind farms and a another area of battery storage in Stoke-Holy-Cross, all requiring cabling work to the main Norwich substation.

The proposed pylons and the existing line of pylons are necessarily closest where they connect to the substation thus having a hugely greater impact on the environment and visual amenity than further south, where they are projected to be 4Km apart.

The cumulative impacts of all this must be taken into consideration.

The Planning Inspectorate guidance on cumulative impact states:

5. NPS EN-1 para 4.2.6
The Secretary of State should consider how the ***"accumulation of and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis"***

Given this, if, after due consideration, the undersea option were discounted, there would be a very strong case for at least the first stretch from the substation to be put underground.

Kind regards, Nicola

[redacted]
Parish Clerk
Swainsthorpe Parish Council
[redacted]

On Tue, Nov 8, 2022 at 11:09 AM East Anglia GREEN <EastAngliaGREEN@planninginspectorate.gov.uk> wrote:

Dear Sir/Madam,

You were sent an email (with attached letter) from the Planning Inspectorate yesterday, regarding EIA scoping notification and consultation for the proposed **East Anglia GREEN project**.

Due to an administrative error, the cover email stated the wrong project name and deadline for consultation responses. The attached letter contained the correct details.

To confirm, the cover email should have stated the following details: *"Please see attached correspondence on the proposed **East Anglia GREEN project**. Please note the deadline for consultation responses is **5 December 2022**, and is a statutory requirement that cannot be extended".*

We have reattached the same letter (sent yesterday) to this email for ease or reference.

Please accept our apologies for any confusion caused.

Kind regards

Jack Patten

Jack Patten | EIA Advisor

The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring fairness, openness and impartiality across all our services

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DPC:76616c646f72



To the Planning Inspectorate,

As a Statutory Body Tacolneston Parish Council strongly rejects the Scoping Report (SR) as it is currently presented. We consider it to be based on a flawed process which would result in a legally deficient Environmental Statement (ES).

As a council we have had many complaints from our parishioners about the East Anglia Green (EAG) proposal, and no messages of support. Our residents are supportive of green energy, but they are very unhappy at the prospect of 50m high pylons blighting the landscape. Particularly in areas adjacent to the village Conservation Area. The Conservation Area in Tacolneston is unique in that it encompasses land without buildings which embraces views over the Tas Valley. Our residents are particularly angry at what is seen as a 'sham' or 'pseudo' consultation process. They feel that they were presented with a decision already made and that alternative solutions were not properly considered or costed. Many residents have written to our MP and joined protest groups. Both councilors and parishioners feel aggrieved that no consideration of an offshore option was made at all. Furthermore, they question the use of pylons, a form of transmission technology now over a century old, which they feel does not sit well with the new, more environmentally sound, technologies available. If built the pylons, will stand as a being a monument to ill-advised investment and wasted opportunity. Our children and their children will inherit a spoiled landscape and the high cost of restoration.

Tacolneston Parish Council believe that the National Grid's (NG) process for establishing the EAG project should be deemed legally deficient because it fails to observe the Gunning Principles. Firstly, the consultation in South Norfolk occurred after the formative state of the EAG project. Secondly, insufficient information was given during the consultation process to allow for intelligent consideration and rationalisation of alternatives to the proposal. Thirdly, there has not been adequate time allowed for informed response. And lastly, it seems that time for conscientious consideration before a decision is made has not allowed and this project has been presented to the people of South Norfolk as a 'fait accompli'.

It is clear from the Scoping Report that the National Grid is doubling down on it's after-the-event rationalisation. We consider that there are relevant and important topics that have been removed from the report which need to be replaced which we list here.

1. The high risk to overground infrastructure to extreme weather events, overhead pylons are especially vulnerable to lightening and high winds.

The number and severity of these events are increasing with climate change.
2. The impact on surface water have not been considered.
3. No consideration of the impact of the proposal on the loss of habitat for brown hares, hedgehogs and harvest mice has been made. The provision of haul routes and topsoil loss during the construction period will also negatively impact on habitat.
4. No consideration of the impact the project will make on the visual landscape. The views of our beautiful landscape are important to visitors and to those travelling through our landscape by rail and car. The loss of these views will impact on tourism and thus the local economy.
5. Tacolneston has a nationally important maternity roost of Barbastelle bats yet no mention is made in the SR of the need to conduct an impact assessment of the proposal on this population.

Tacolneston Parish Council also consider that the following topics, previously overlooked in the SR should be considered as part of the ES, namely.

1. The negative physical and mental health impacts on our parishioners who will be sandwiched between existing infrastructure of pylon lines and the proposed 50 m high network. These parishioners will suffer the cumulative effect of the visual intrusions, noise interference and anxiety surrounding the prospect of living in a web of electromagnetic fields.

2. There are an additional four visual receptors with in our parish in addition to those outlined in the SR. One north of All Saints Tacolneston Church, looking northeast, one south of the church looking southeast, and two from the listed building known as St Mary's Farm looking both north & south. These add considerably to the experience of parishioners and ramblers using the network of footpaths within our village.

3. An assessment for underground cabling should be made and costed for consultation.

4. An environmental assessment considering a construction swathe width of 100m is required. This would allow for construction impacts on ecology, habitat, and archaeology.

5. The impact of the twelve-metre access roads required for construction and maintenance on farming and wildlife habitats.

South Norfolk is a beautiful and largely unspoiled part of our county. It is an environment rich in ancient buildings, wildlife and mature, diverse woodlands. As a statutory body, Tacolneston Parish Council, finds it wholly unacceptable that a proper consultation process, such as that undertaken in 2012 for North West Coast Connections in Cumbria, has not been allowed to us. We consider the EAG consultation process to be so flawed as to be unfit to inform future consultations. We ask NG to start a fresh consultation which adheres to the Gunning principles. We ask that NG demonstrate a need for this project. That the decision criteria are set out in advance, and that the results are justified and testable. We ask that all options are fully costed and presented in a transparent, accurate and unbiased way. We ask that environmental, socio-economic, heritage and health impacts, are all considered. Furthermore, we ask that a new consultation takes into account the Offshore Review, the New Network Options Assessment and the Sea Link consultation.

Yours faithfully,

[redacted]
Paris Clerk
Tacolneston Parish Council

Tendring District Council

SENT VIA EMAIL

Office of the Leader of the Council
Tendring District Council
Town Hall
Station Road
Clacton on Sea
Essex CO15 1SE

Tel: [redacted]
Email: [redacted] and [redacted]
Please ask for Gary Guiver or Graham Thomas

EAST ANGLIA GREEN Lands Team
Fisher German
The Estate Office
Norman Court
Ivanhoe Business Park
Ashby de la Zouch
LE65 2UZ

Thursday 16th June 2022

Dear Sir or Madam

East Anglia Green – Non-statutory consultation

On behalf of, and with full authority and support from, the elected Leaders from the twelve Essex District, Borough and City Councils, Thurrock and Southend Unitary Councils and Essex County Council, I write to you in respect of National Grid's East Anglia Green project to express our objection, in the strongest terms, to the proposals published for the purposes of non-statutory consultation.

As a group of Leaders, we are extremely disappointed that as councils who are statutory consultees we have had very little if any pre-engagement with the proposed Twinstead to Tilbury section of the proposed route. This would have, for instance, drawn attention to the fact the route cuts through the Dunton Hills Garden Village which has only recently be approved in the Brentwood Local Plan.

You will be receiving individual responses to the consultation from each of the affected authorities along with a technical response coordinated by Essex County Council expressing significant concerns about the proposals including the overwhelming impact they will have on communities and the environment in affected areas and the failure to properly consider other obvious and more appropriate alternatives.

Whilst we fully understand that this non-statutory consultation represents an early stage in the overall Nationally Significant Infrastructure Projects (NSIP) and Development Consent Order (DCO) process, we feel it vitally important that our objections and strong reservations are expressed now in order to ensure the project does not proceed down an unsuitable, regrettable and unpalatable route from which it could be difficult or impossible to return.

As local authority Leaders, we support green energy and the government drive to achieve Net Zero Carbon by 2050, but this must be achieved in an appropriate manner and not at any cost – particularly when there are clearly more appropriate and less damaging ways in which the necessary infrastructure to facilitate that change can be achieved.

The proposal for a 400kV powerline extending from Norwich to Tilbury connected to a major 400kV substation (and potentially two further 132kV customer substations) in the Tendring area of Essex is ill-conceived. Whilst it seeks to create the capacity for green energy generated off the Essex coast, the technology it seeks to employ in the form of substantial overhead pylons, is more than 100 years old, inefficient, susceptible to damage and extremely harmful to the beauty of the countryside and to the health and wellbeing of affected communities that will lie within close proximity.

There are serious questions over the carbon footprint that will be left as a legacy of this development and how much it will realistically be offset by the benefit of green energy generation for which it is purported to facilitate.

Insufficient consideration has been given to an alternative approach that would be far less damaging to the environment and detrimental to communities. The alternative approach is that of a powerline routed around the coast either on or below the seabed which could avoid all the physical constraints of an above or below-ground solution, retain ease of access for ongoing maintenance and provide a more direct point of connection for any current or future off-shore wind farms.

Until it can be fully demonstrated that this or any other alternative approach has been properly considered and/or the impacts and concerns highlighted in the responses from the Essex authorities have been addressed, it will be our intention to continue to object to the proposals in the strongest terms through the future stages of the NSIP/DCO process. As local authorities we are working together, with technical, consultancy and legal support as necessary, to ensure coordinated participation in the planning process and to demonstrate the overwhelming concerns expressed in our communities.

We welcome the opportunity to discuss our concerns in an appropriate forum with representation at the most senior level within your organisation to ensure this project progresses down a more appropriate path for which you may achieve your objective and with much more local support.

Yours sincerely

[redacted]

Councillor Neil Stock OBE
Leader of the Council and
Chairman of the Essex Leaders and Chief Executives Group

TERLING AND FAIRSTEAD PARISH COUNCIL

Parish Clerk: Frankie Killby

[redacted]

Tel: [redacted]

5th December 2022

Terling and Fairstead Parish Council's Response to HMPI on East Anglia GREEN Scoping Report

We bring issues to the attention of the Inspector that we believe render this entire consultation invalid. As a consequence, **this SR, if accepted, would result in a legally deficient ES and consultation**. We are supportive of the Essex, Suffolk, Norfolk Pylon Action Group (ESNP), and following legal opinion to the ESNP from Charles Banner KC, which has been forwarded to National Grid (NG), along with our response to the non-statutory consultation in June 2022, we set out our three main areas of concern, which we detail in the following pages.

Main alternatives to East Anglia GREEN (EAG) & continuing deficiencies in National Grid's Process

Charles Banner KC's opinion concluded that the non-statutory consultation was deficient due to 'after-the-event rationalisation of alternatives and failure against two of the Gunning Principles. Mr Banner warned that unless remedied, the consultation risked infecting later stages. That is what we see now, in the Scoping Report. It is a continuation of a deficient process. It addresses none of the issues raised relating to selection of, or consultation on alternatives. NG now breaches a third Gunning principle – the requirement to give conscientious consideration to consultation responses. We continue to maintain that the consultation must be re-opened to give stakeholders a full range of alternatives for consultation at a stage when options have not already been foreclosed.

Cumulative impacts of energy transmission infrastructure in the region

ESNP is supportive of wind energy. However, excess power from North Sea wind farms must be transmitted out of East Anglia to London and southern England. That power makes landfall in Norfolk, Essex and Suffolk, with adverse impacts on the environment & communities. Despite evidence from National Grid ESO in 2020 that a fully integrated offshore grid would be a deliverable alternative that is better for consumers, the environment and communities, instead, EAG is the proposed solution (and an offshore option not consulted on). These energy projects and EAG cannot be considered in isolation. They are functionally interdependent and inextricably linked. There is a clear causal connection between the two. The ES must therefore scope in the cumulative, in combination effects with wind farms that connect into EAG.

Topics that should be scoped in to the Environmental Statement (ES)

We set out which scoped-out topics we believe must be scoped into the ES and recommend others to be scoped in.

TERLING AND FAIRSTEAD PARISH COUNCIL
Parish Clerk: Frankie Killby
[redacted]

1. Main Alternatives to EAG and continuing deficiencies in NG's process

Deficiencies with the consultation process mean that the SR cannot be considered valid.

Legal deficiencies

It is clear from the SR that NG is doubling down on its 'after-the-event rationalisation' and failure against two of the Gunning Principles which led Charles Banner KC in an opinion for ESNP to conclude that the non-statutory consultation was deficient. Mr Banner further concluded that the deficiencies of the consultation meant that it cannot be relied upon at statutory consultation stage:

> *"Further, there is a real risk that the legal deficiencies in the current consultation will, if left uncorrected, infect the later statutory consultation (which would in turn mean that the intended DCO application cannot lawfully be accepted by the Planning Inspectorate). As a minimum, the options which have already been improperly foreclosed would need to be revisited and consulted upon with a demonstrably open mind, providing the public with sufficient information to have a fair opportunity to advocate the alternatives discussed above."*

Specifically, Mr Banner noted that the rationale given so far for discounting the alternatives would not justify excluding them from the category of "reasonable alternatives" for the purposes of the EIA Regulations.

The result is that the contents of the Scoping Report cannot be relied upon and that an ES which results from this process will be deficient.

Summary of relevant conclusions in ESNP submission

In brief, to assist the Inspector, in the ESNP submission to the non-statutory consultation it was concluded:

> *"12.1 The East Anglia GREEN consultation must be abandoned. As demonstrated in this document, and supported by the opinion of Charles Banner QC, it is significantly and fundamentally deficient. It cannot be used to inform future consultations, nor to support a Development Consent Order application to the Planning Inspectorate.*
>
> *12.2 We have the following recommendations:*
>
> *12.2.1 National Grid must first demonstrate the need for this project.*
>
> *12.2.2 Decision criteria must be objective and set out in advance. Results must be justified and testable. Any new consultation must be re-run and adhere to the Gunning Principles.*
>
> *12.2.3 A new consultation must take into account the Offshore review, the new (accompanying) Network Options Assessment and the Sea Link consultation.*
>
> *12.2.4 National Grid must present options with full cost breakdown, setting out environmental, socio-economic, heritage and health impact of each, plus impact to the AONB. Cost must be presented in a transparent, accurate and unbiased manner. Cost of mitigation must be*

included and comparison of risks of each project with climate change and extreme weather must be set out. Stakeholders need to see an evidenced appraisal of options covering lifetime costs, technical complexity, impact on security of supply, delivery and planning risks.

12.2.5 The following options must be presented for consultation: Strategic offshore grid; options such as following existing power lines or infrastructure (rail/A12); undergrounding; T pylons. National Grid profitability for each option must be presented for transparency. Ofgem and independent review must be performed throughout the process."

NG's Main Alternatives Considered

Despite the legal opinion provided by ESNP to NG and the submission of this Parish Council dated 16th September 2022 the SR demonstrates that NG is continuing to move forward with the very same process which was found to be deficient.

<u>New alternative proposed by NG post-consultation but not consulted on</u>

Since the closure of the non-statutory consultation, NG has prepared a quasi-offshore option for MPs of the OFFSET group. That has not been consulted on and there was very limited information to support the option.

In fact, the letter to OFFSET states *"It would have been disingenuous for us to present an offshore option to the public for consultation feedback, knowing this did not comply with the framework requirements."* It is referred to in paragraph 3.3.9 of the Scoping Report as an alternative dismissed. The 'framework', relates to the National Policy Statement (NPS) EN-5, which does *not* as stated by NG, prevent offshore development. It merely says that overhead lines will often be a starting point.

NG goes on to say, *"…decisions made will be reconsidered and back checked throughout the process, having regard to consultation responses and other relevant information (policy and regulation), none of the conclusions should be seen as final."*

So, in fact, the post-consultation, quasi offshore option, continues NG's post-justification of a prior decision to choose an onshore, overhead lines option, with consultation limited to the 'purple swathe' preferred route.

NG continues to fail to acknowledge that the alternatives it has dismissed have never been presented to the public for consultation. All decisions have been made by NG without external stakeholder review. The result is that NG also now falls foul of a third Gunning Principle: *"conscientious consideration must be given to the consultation responses before a decision is made."*

This is despite NG noting the requirement in NPS EN-5 to set out cost and benefits of alternatives, particularly economic and environmental, in paragraph 2.3.2 of the Scoping Report yet has neglected to do so to date:

"2.3.2 Section 3.7 in EN-1 states that current scenarios show significant potential increases in generation and changes in direction of net electricity flows from Eastern England to centres of demand in the Midlands and South-East England and that these kinds of flows of power cannot be accommodated by the existing network and new lines would have to be built. It also acknowledges in paragraph 3.7.10 that "in most cases, there will be more than one technological approach by which it

is possible to make such a connection or reinforce the network (for example, by overhead line or underground cable) and ***the costs and benefits of these alternatives should be properly considered as set out in EN-5*** *before any overhead line proposal is consented"*

This is in distinct contrast from the approach taken in the north of England by National Grid. We set out in Appendix A a case study of an EIA in Cumbria. It demonstrates that alternatives were properly considered with stakeholders from the outset. Ruling out alternatives on the basis of cost without first subjecting them to environmental assessment and consultation, means that the "costs and benefits" cannot properly be considered as the scoping report acknowledges is required by EN-5. Without an EIA and consultation informed assessment of the environmental differentials between the alternatives, it cannot properly or lawfully be determined if the difference in cost outweighs the difference in environmental impacts, or vice versa.

Solution?

We believe that the SR as submitted will lead to a deficient ES. NG cannot continue its pre-determined course of action in breach of Gunning Principles.

We re-iterate the words of Charles Banner KC, *"As a minimum, the options which have already been improperly foreclosed would need to be revisited and consulted upon with a demonstrably open mind, providing the public with sufficient information to have a fair opportunity to advocate the alternatives discussed above."*

2. Cumulative Impacts of energy infrastructure in the region

NG must ensure that the cumulative impacts of energy projects in the region are considered fully.

Scoping Report Chapter 17, Cumulative Impact

The SR states that there are intra- and inter-project impacts, and it is inter-project impacts that concern us in relation to this Scoping report, *"Inter-project effects (also referred to a 'cumulative effects', Planning Inspectorate, 2019) occur when a resource or receptor or group of receptors is potentially affected by more than one development at the same time and the impacts act together additively and/or synergistically (IEMA, 2011)"*

Guidance and background

Planning Inspectorate guidance on cumulative impact sets the background, saying:

"1.5 NPS EN-1 paragraph 4.2.6 goes on to state that the Secretary of State should consider how the "accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place."

1.6 The NPSs variously state that applicants should, amongst other matters, consider mitigation for cumulative effects in consultation with other developers; assess cumulative effects on health; give due consideration to other NSIPs within their region; consider positive and negative effects; and consider environmental limits (e.g. the potential for water quality effects to arise due to incremental changes in water quality)."

NG itself notes (under section 13.2 Regulatory and Planning Policy context) that NPS EN-5 says;

"2.8.2 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."

Functional interdependence of projects

EAG cannot be considered in isolation from many of the other energy infrastructure projects in the region.

The project is required to remove excess power generated by offshore wind farms from the region. In all NG Future Energy Scenarios the East of England will be a power exporting region.

EAG's website states that, *"A need was identified to resolve electrical boundary issues in East Anglia. There are three onshore power boundaries where additional system flexibility is required to ensure that power generated in the area from offshore wind farms and nuclear generation has more ways to flow into the wider transmission network during maintenance or faults on the system."*

EAG has 'functional interdependence' with projects such as North Falls and Five Estuaries, currently at non-statutory consultation stage, who have been told by NG that their connection point will be EAG. Equinor's two projects currently at DCO stage with PINS are also dependent on EAG. Functional interdependence is set out in case law. *(Burridge v Breckland DC 2013 and Winfield, R v Canterbury City Council 2019).*

For example:

"63. The question as to what constitutes the 'project' for the purposes of the EIA Regulations is a matter of judgment for the competent authority, subject to a challenge on grounds of Wednesbury rationality or other public law error." and *"64. Relevant factors may include: iii) Functional interdependence - where one part of a development could not function without another, this may indicate that they constitute a single project (Burridge at [32], [42] and [78]);"*

In addition, a Scoping Opinion by the Planning Inspectorate for a Proposed North Wales Connection found that, *"The ES should give equal prominence to any development which is related with the proposed development to ensure that all the impacts of the proposal are assessed."*

It also said that, *"In assessing cumulative impacts, other major development should be identified through consultation with the local planning authorities and other relevant authorities on the basis of those that are [*amongst others*]:*

• *Projects on the National Infrastructure's programme of projects."* There are a number of NSIPs energy projects in East Anglia.

Therefore, EAG cannot be considered in isolation and offshore wind farms at consultation and DCO stage must be scoped in to the Environmental Statement.

Thus we also believe that the Zones of Influence identified by NG in its Scoping report (in particular 30km Ecology and Biodiversity and 3km for Landscape and Visual) will have to be extended to include coastal north Norfolk and coastal Suffolk and Essex.

We believe that EAG cannot be considered in isolation of the upstream projects it supports. This must be factored in to the cumulative impacts.

3. Topics that should be scoped in to the ES

We set out below:

- Whole topics to be scoped back in
- Sub topics to be scoped back in
- Additional topics to be scoped in
- Additional comments relating to scoped in topics

i <u>Whole topics scoped out and which should be scoped back in</u>

Vulnerability to Climate Change

We disagree with NG that risk to infrastructure from climate change should be scoped out – it must be scoped in and alternatives including offshore and underground compared. Our reasoning is that on 27 October 2022, a Parliamentary Committee concluded:

- The UK's net-zero targets require the electrification of huge amounts of energy demand across the country and that this exposes the power system to enhanced vulnerabilities: electricity pylons

and cables are more prone to disruption from extreme weather than gas, which relies mainly on underground pipes rather than overhead power cables.

• The energy sector was subject to an "adaptation shortfall" in relation to lightning, high winds and storms.

ii. <u>Sub topics scoped out that should be scoped in</u>

We list below elements scoped out of the SR that we believe must be scoped in.

Scoped out:	**Why scope in?**
Potential impacts on surface water are scoped out for biodiversity receptors in the ES during construction.	Watercourses are already stressed and in poor condition and this should be scoped in, irrespective of CoCP. Directional drilling should be considered in sections where cut trenches for underground cable are near watercourses.
Other notable mammals (brown hare (Lepus europaeus), hedgehog (Erinaceus europaeus), and harvest mouse (Micromys minutus)	The fact that NG notes that negative impacts could occur to 'other notable mammals' during construction (loss of habitat/habitat fragmentation/noise/light) means that this must be scoped back in. This, from the SR, indicates the level of disruption expected just for the haul roads*: "A temporary haul route would be constructed to provide access for construction vehicles along the working areas and to minimise impacts of construction traffic using the local road network. The position of the haul route would be determined as the Project evolves, the location would be assessed and presented in the ES. It is currently assumed that temporary haul route would have the topsoil stripped and hard-core placed on top of the subsoil, this would be delivered to site by Heavy Goods Vehicles (HGV). It would be sited where possible to make use of existing access tracks where possible and avoid sensitive ecological locations and water crossing where possible. 4.5.6 The haul route for the OHL would be typically 12m wide to allow for a running track, topsoil storage and passing places where required (formed with imported stone and geogrid)". Underground sections require a swathe of up to 100 metres wide (according to a National Grid webinar, Spring 22).*

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[redacted]

Existing environment and views – construction and operation (inc. maintenance) 13.9.12 Effects on visual receptors located outside of the ZTV are therefore proposed to be scoped out of the ES.	The 41 visual receptors selected by NG are wholly inadequate for a 180km project with 50-metre high pylons. The ENSP group have mapped NG's receptors and supporters across Essex, Suffolk and Norfolk have added key visual receptors that NG must include irrespective of Zone of Theoretical Visibility. Local residents have the knowledge of lines of sight and areas of greatest impact.
"Significant visual effects on people travelling by train on the Greater Anglia railway network are not anticipated due to the speed of travel, therefore this is proposed to be scoped out." (Scoped in, Wales)	This is clearly ludicrous. It must be scoped back in and we note that the visual receptors refer to trains anyway. Note that in North Wales, visual impact of pylons on rail travellers was scoped in. It must include the Sudbury to Marks Tey line – the famous Lovejoy line.
Bat activity surveys. Where it is considered that habitat impacts would have a significant potential adverse effect on bats, bat activity surveys would be undertaken to establish a baseline. Based on the information outline in Section 8.12.42, it is considered that impacts on foraging and commuting bats can be scoped out for the sections of overhead line	Bats forage over a very wide area. They will be impacted by the construction of the pylons due to loss of habitat (specifically, in SR: Direct severance/ fragmentation of woodland and linear habitat features (e.g., hedgerows and watercourses). Direct loss of woodland with good connectivity to the wider landscape), noise and light. There can be no sections of the line scoped out and a 10km assessment area must be set – as in North Wales's pylons project scoping. So-called temporary impacts could have permanent impact on bat colonies. Some impacts will be permanent, when habitat is lost for good. The habitat avoidance policy set out by NG is already proposed to be breached in at least one place: in Aldham, Essex, where the pylons will pass directly over woodland. There needs to be a full assessment of habitat impact and it is imperative that bat activity surveys must be scoped back in.

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[redacted]

iii. <u>Additional topics to be scoped in</u>

Existing infrastructure

The Scoping Report must scope in impact of existing infrastructure on communities who risk being sandwiched between the proposed pylons and existing pylons or roads/rail e.g:

- There is existing electricity transmission and distribution equipment in the study area including 400kV and 132kV OHL's and the 400kV substations at Norwich Main, Bramford and Tilbury
- Thurrock section EAG - there are also three existing OHL which run through this area along the Scoping Report Corridor.
- The Braintree section contains existing 400kV OHL's and near to Chelmsford in our Parish of Terling and Fairstead there are existing 400kv and 132k OHL's.
- The Babergh section west of Ipswich and the Great Leighs section north of Chelmsford contain two OHL's within the corridor of search.

It is imperative, too, that the ES will consider the impact of the doubling back effect of pylons at Ardleigh, which leaves residents living in a 'V' of pylons.

iv. <u>Additional comments relating to scoped in topics</u>

Visual receptors

We believe that the 41 visual receptors put forward by NG are wholly insufficient. They leave huge unassessed gaps along the route and many very key sites of importance unaccounted for.

We are, however, encouraged that the Scoping Report states that as the Project design evolves additional viewpoints may be required and that they would be discussed and agreed with the applicable consultees. Should Parish Councils not be considered 'applicable consultees' we wish to state, on record, that we consider that the following Viewpoints must be included:-

- The Essex Way PROW, south of St Mary's Church, Fairstead; Recreational receptors on the Essex Way, residential receptors in Fairstead. This is a more suitable VP than the selected one (numbered 26) for the simple reason being the higher footfall at this part of the Essex Way and a very fine and important view of Grade 1 listed St Mary the Virgin Church, Fairstead, in it's agricultural setting.

- The Essex Way PROW, south of Fuller Street; Recreational receptors on the Essex Way, residential receptors in Fuller Street.

- The Essex Way PROW, west of Fuller Street; Recreational receptors on the Essex Way, residential receptors from Church End/Cole Hill, Great Leighs. There is a high footfall at this part of the Essex Way and an important view of Grade 1 listed Church of St Mary the Virgin, Great Leighs, in its agricultural setting on Boreham Road.

- PROW at Fairstead Lodge, Fuller Street; Recreational receptors on public footpath and users of the lane (popular cycle route), residential receptors in Fuller Street,

There are currently no VPs identified in the hamlet of Fuller Street which should be rectified.

The ESNP Action Group have created map with input from supporters along the proposed route, and they would be delighted to supply the full list to the Inspector if required.

Map of visual receptors submitted by the public:

https://www.google.com/maps/d/u/0/edit?mid=1cu

HdnJdQKeHpzCiH0TWokTQmpSlAyY&usp=sharing

Undergrounding of cables – swathe width

The area of impact for the purposes of assessment of undergrounding cables must be set at the maximum of the several set out by NG. The SR report states a swathe of only 40-m wide is required for undergrounding. The non-statutory consultation documentation noted c60m-wide. At a NG webinar, Spring 2022, we were told that a swathe of up to 100m-wide is required. For the purposes of the ES, the swathe width must be assumed to be 100-m to ensure that all construction damage to ecology, habitats and archaeology is factored in.

Impact on farms

The impact of the 12-metre wide access roads must be scoped in to the ES. These roads will damage habitat and lead to security issues for landowners. The impact of walkers using these roads to access previously undisturbed areas of countryside on wildlife must be assessed.

Community Facilities

15.6.10 in the Scoping Report lists community facilities located within the SR Corridor which have been initially identified as being within the local study area. They are presented in figure 15.6. However, this contains at least one error. St Mary the Virgin Church (St Mary and St Peter) in Fairstead has been incorrectly listed under Chelmsford Local Planning Authority Area. It actually falls under Braintree. This community facility may have been confused with St Mary the Virgin Church at Great Leighs which is in the Chelmsford Local Planning Authority Area. This church not listed in Table 15.6; presumably as it falls just outside the SR Corridor.

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[redacted]

Operational Noise from OHLs

We note this has been scoped out with the justification there are 'no likely significant effects'. We also note the OHL system is a 'triple araucaria' conductor bundle, which the applicant regards as 'practically quiet during all weather conditions'. However, there are residential properties less than 50 metres of the proposed pylon route. It is well known that during certain atmospheric conditions there is considerable audible noise (indeed the applicant states in 14.9.13 that 'where noise does occur it is likely to be localised'). Operational Noise should therefore be scoped in so that mitigating measures may be considered for residential receptors in close proximity to OHLs.

Electric and Magnetic Fields

We accept the applicant's comments in 10.10.12 on EMFs and applaud their intention to publish a standalone EMF report to be published as part of the DCO application, which we hope will alleviate the concerns of members of the public.

Protected Lane Status / Important Hedgerows

We note that under the construction phase of the project sections of hedgerow would require removal and that important hedgerows are scoped in for further assessment.

There are many designed Protected Lanes within the Parish of Terling and Fairstead and close to the Zone of Influence. Additionally, there are several important Protected Lanes with historic hedgerows within the Scoping Report corridor in our Parish. These include;

Terling Hall Road, Rolls Farm Lane, Gambles Green Lane, Terling Hall Road/Church Road, Waltham Road, Noakes Farm Road, Terling Road, Witham Road, Peg Millars Lane, Fairstead Road, Fairstead Hall Road, Braintree Road, Pole Road/Fairstead Lane, Fairstead Lodge Road and Boreham Road/Cole Hill.

Historic Environment Assessment

There are potentially important Roman or Saxon archaeological sites which have been identified either side of Cole Hill, north of the river (in the Parish of Great and Little Leighs). We would expect these to be considered in the Historic Environment Assessment.

Other DCOs and SIPs

We wish to point out that Terling and Fairstead has several other Development Consent Orders and Strategic Infrastructure Projects within the parish presently, or very soon to be, under examination by HMPI including the A12 widening scheme, Longfield Solar Farm, and the Chelmsford Garden Community development. We would expect there to be joined-up thinking between EAG and these other significant projects affecting our Parish.

TERLING AND FAIRSTEAD PARISH COUNCIL

Parish Clerk: Frankie Killby

[redacted]

TERLING AND FAIRSTEAD PARISH COUNCIL
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[redacted]

Appendix A

Cumbria – how alternatives *should* be consulted on

The below is taken from National Grid's Environmental Impact Assessment Scoping Report and Appendices for North West Coast Connections, Cumbria, in 2012. It highlights starkly the difference between the approach taken in East Anglia, where only one route has been pre-determined and presented for consultation. In Cumbria, by way of comparison, a variety of alternatives were discussed with stakeholders from the outset and those alternatives narrowed down through the process of consultation:

> *"Strategic Options (2009 to 2012)*
>
> *After establishing the need for new 400kV connections, National Grid worked together with local authorities from across Cumbria and Lancashire, as well as many prescribed and non prescribed organisations, to explore the different options available for connecting the new generating capacity to the NETS. The outcome of this work helped to identify six high level options that represented potential solutions for making the connections needed in the Northwest.*
>
> *2.2.3 In October 2012, following the completion of consultation on the possible strategic reinforcement options to meet the connection need, National Grid published a Strategic Options Report (SOR) (Ref. 2.4) for the Project. The SOR outlined six Strategic Options for*
>
> *electricity transmission system reinforcement in the Northwest identified by National Grid and set out National Grid's appraisals of each of the options.*
>
> *2.2.4 The six options were:*
>
> *1. Option 1 – Twin South Onshore (four onshore circuits south from Moorside);*
>
> *2. Option 2 – Twin South Offshore (four offshore circuits south from Moorside);*
>
> *3. Option 3 – Cumbria Ring Onshore South (two circuits north from Moorside, either onshore (3a) or offshore (3b) and two onshore circuits south from Moorside); Chapter 2 The Proposed Development 2-3*

4. Option 4 – Cumbria Ring Offshore South (two circuits north from Moorside, either onshore (4a) or offshore (4b) and two offshore circuits south from Moorside);

5. Option 5 – Twin North and North-South (four circuits north from Moorside, either onshore (5a) or offshore (5b) and two circuits south from Harker); and

6. Option 6 – Twin North and East-West (four circuits north from Moorside, either onshore (6a) or offshore (6b) and two circuits east from Harker plus 275kV to 400kV uprating of Northeast ring.

2.2.5 The appraisals reported in the SOR considered the Strategic Options in terms of environmental, socio-economic, technical and cost factors, and took into account consultation feedback."

Civic Offices, New Road, Grays Essex, RM17 6SL

Development Management

Applicant: Emma Cottam
Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our Ref: 22/01498/SCO

E-Mail: [redacted]

Date: 5th December 2022

Dear Ms Cottam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid (the Applicant) for an Order granting Development Consent for the East Anglian Green Enablement (GREEN) Project (the Proposed Development)

Scoping consultation – LPA Response

Your Reference: **EN20027**
Our Reference: **22/01498/SCO**
Proposal: **Planning Inspectorate Consultation - Scoping Report for future Development Consent Order [DCO] known as East Anglia Green (ref EN020027) - Proposal: A 400 Kilovolt (kV) electricity transmission overhead line (OHL) over a distance of approximately 180 Kilometres (km) from Norwich Substation to Tilbury Substation. For Thurrock this includes 400 Kilovolt (kV) electricity transmission overhead line (OHL) corridor from Tilbury Substation to the northern Borough boundary to the west of Lower Dunton Road, an extension to the existing Tilbury Substation and its compound, new Cable Sealing End Compounds (CSEC) to connect the OHLs to the underground cables and temporary works associated with construction of the project.**
Location: **Sub Station Tilbury Power Station Fort Road**

I refer to your letter dated 7 November 2022 regarding the above matter and to your request that the local planning authority (LPA):

- inform the SoS of the information we consider should be provided in the ES; or
- confirm that we do not have any comments.

I also refer to the 'Regulation 10(1) Scoping Report' (November 2022) submitted by the National Grid.

By way of background information, I can confirm that representatives of National Grid's Project Team have met with Council officers to explain the proposed project and to discuss timelines for the project.

Scope of the Proposed Environmental Statement

The general purpose of the Scoping Report is to determine, from all the project's likely effects, those that are predominantly significant with respect to impacts on the environment. The contents of the Scoping Report are generally endorsed by the LPA, subject to the comments contained in this letter and of those comments made by the various consultees.

The ES must include the information reasonably required to assess the environmental effects of the development and to which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile. The proposed structure and content of the ES is set out at chapter 18.3 of the Scoping Report, and I consider that this generally accords with the provisions of the Regulations.

Chapter 18.2 of the Scoping Report provide a list of those environmental topic areas which are "scoped-in" to the ES as follows:

- Agriculture and Soils
- Air Quality
- Ecology and Biodiversity
- Geology and Hydrogeology
- Historic Environment
- Hydrology and Drainage
- Landscape and Visual
- Noise and Vibration
- Socio-economic, Recreation and Tourism
- Traffic and Transport
- Cumulative Effects

I am satisfied that this list of topics will enable a thorough assessment of the likely significant environmental impacts of the proposals. I note that chapter 17 of the Scoping Report refers to Cumulative Effects but this doesn't include a list of other projects that have been considered and this couldn't be found in the Scoping Report. The proposal shall need to take into consideration the Tilbury 2 project, the Lower Thames Crossing and the Thurrock Flexible Generation Plant – all either permitted or live DCO's, plus any other 'significant' non-DCO projects as part of cumulative effects consideration.

Consultation

In response to both your letter dated 7 November 2022 and the accompanying EIA Scoping Report the LPA consulted internally within Thurrock Council. All consultation responses received are included below:

THURROCK COUNCIL: ARCHAEOLOGY

Overall, the sections identified within the scoping report cover the areas that would be required for assessment of the historic environment on a scheme of this nature. There are, however, a number of specific areas which do cause concern that need to be amended or altered to ensure that an appropriate understanding of the impact of this scheme on the historic environment will be achieved.

The Historic Environment impacts have been discussed with the applicants' consultants on two occasions at heritage specific meetings as described within the document. There are specific points especially within sections 11.9 and 11.10 within the present document which still cause concern. These are:

11.9.7: There should be consideration to the proposed haul roads and their impact within the OHL stetches. This will be a 12m corridor running the length of the scheme and would have archaeological implications.

11.9.10: Increase in construction traffic within an area would need to be considered in relation to its impact on historic buildings especially with regard vibration.

11.10.7 Any undergrounding areas would require trial trenching as the most appropriate method to assess such a wide corridor to support the ES. No trial trenching methodology is included within the document.

11.10.8 With regard the location of the site walkover, Lidar survey data should be used to assess areas of scrub, woodland etc to identify potential assets which would help to inform the locations for the walkover survey.

11.10.17: Roads, railways etc should not be used as a pre-existing barrier as these are low features in the landscape when considering the height of the proposed pylons. Any setting assessment must take into account the impact of such large features within the present agricultural landscape.

11.10.18-19: It would be beneficial if there was communication at an early stage regarding the decision to scope out certain designated heritage assets so that there is agreement with the local authority advisors.

11-10-23: It seems that the high-quality aerial survey was not undertaken at the best time for aerial cropmarks to be identified. Therefore, it is recommended that a detailed aerial photographic survey looking at all available historic and modern sources should be undertaken for the whole route with the results appropriately rectified. This will help define where previously unknow sites are located as well as refining existing information.

11.10.25: In relation to the assessment of palaeo-environmental and geoarchaeological potential it is recommended that the appropriate specialists are embedded within the geo-technical programme at the initial stage not using secondary data and then needing to undertake further fieldwork at a later date either pre submission or as post submission work.

A section on intrusive archaeological evaluation has not been included within section 11.10 of the Scoping document although this has been discussed at the meetings and is mentioned earlier in the document. Archaeological trial trenching should be expected for use in areas of undergrounding, main compounds and sub stations.

Finally, although the Historic Environment section identifies a relationship with chapters 9 and 12 neither of these indicate heritage impacts. The de watering of archaeological sites, especially in those areas of undergrounding will need to be considered

THURROCK COUNCIL: BUILT HERITAGE

The EIA Scoping Report for East Anglia Green (EAG) Energy Enablement (GREEN) (National Grid, November 2022) has been reviewed (in particular Chapter 11: Historic Environment, Appendix C – Competent Experts, and Appendix G – Key Characteristics of Landscape Character Assessment), in relation to the likely significant impacts of the proposed development on built heritage.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide details regarding the relevant expertise or qualifications of the competent experts involved in its preparation. It is noted that the proposed competent expert(s) for the Historic Environment does not include a Historic Buildings Specialist/Built Heritage Consultant; it is highly recommended that a specialist in historic buildings be appointed to assess the significance of the identified heritage assets and their setting, and the impact of the proposals on that significance.

As highlighted within the submission documents, the potential impacts to built heritage have been discussed during two virtual meetings, with most of the recommendations to date having been addressed. Generally, the EIA Scoping Report provides for the assessment of the majority of heritage assets which have the potential be impacted by the scheme, although there are a number of elements which do cause concern. These are highlighted below (against the relevant paragraph number of the submitted EIA Scoping Report), and it is recommended that these concerns are addressed at this early stage to ensure that a full understanding of the impact of this scheme on the historic environment will be achieved.

11.6.6: The Planning Policy Guidance states that ‘in comes cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications’ (040 Reference ID: 18a-040-20190723). No methodology/criteria for identifying, assessing, and recording potential non-designated heritage assets has been provided. This would be particularly helpful for areas which do not have a current local list or an adopted and publicly accessible criteria.

11.9.10: An increase in construction traffic has the potential to directly impact historic buildings. If heritage assets within the site boundary are to be scoped out, it must first be adequately demonstrated that they are not located in close proximity to any vehicular or access routes and will not be affected by any increase in construction traffic.

11.10.03: It is welcomed that the baseline setting of heritage assets will be informed by the Landscape and Visual Impact Assessment (LVIA) and Zone of Theoretical Visibility (ZTV). This is particularly important given the likely associative and historic relationship between heritage assets and the historic landscape.

11.10.15: Reiteration of comments made in response to 11.9.10. An increase in construction traffic has the potential to directly impact historic buildings. If heritage assets within the site boundary are to be scoped out, it must first be adequately demonstrated that they are not located in close proximity to any vehicular or access routes and will not be affected by any increase in construction traffic.

11.10.19: Any heritage assets within the agreed study areas which are scoped out should be listed in an appendix to the Desk-Based Assessment (DBA). A full justification for scoping out must also be provided within the appendix; where there is no adequate justification for scoping out, a full assessment and description within the main body of the DBA will be expected.

THURROCK COUNCIL: ENVIRONMENTAL HEALTH

Contaminated Land

Disturbance and mobilisation of existing contamination has been scoped in for the construction phase and has been scoped out for the operational phase and the approach is agreed. Discovery of unexpected contamination and the introduction of new contamination have both been scoped out because these issues will be addressed by the proposed Code of Construction Practice (CoCP) and the approach is agreed.

Noise:
Noise effects from construction activities are to be scoped into the ES, as well as vibration from construction activities (related to effects on humans not structures), operational noise is to be scoped out the report. All in all this approach is agreed.

Air Quality:
Dust caused from construction will be addressed in the CoCP includes several standard measures which would reduce the generation of dust during construction. Therefore, this is proposed to be scoped out of the ES. Generators have also been scoped out; good practice measures have been outlined within the CoCP therefore this seems reasonable. Operational noise has been scoped out, this again, seems reasonable. Finally, construction traffic has been scoped into the ES. Overall, the methodology described in the EIA scoping report seems reasonable so no adverse comments to make.

THURROCK COUNCIL: FLOOD RISK MANAGER

The site is located in Flood Zones 1, 2 and 3, in an area benefitting from the Thames Tidal Defences. The FRA should include a full review of flood risk (including residual risks) from all sources of flooding (fluvial/tidal, pluvial, groundwater, sew and reservoir flooding). Where the site is found to be at medium or high risk of flooding from at least one source, the FRA should also consider the need for flood resilience and emergency planning measures. Due to the previous use of the site (chemical), the FRA should include the likelihood of groundwater contamination.

A drainage strategy designed up to the 100-year event plus the required climate change allowance (see https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances for the latest EA guidance on climate change allowance) should also be submitted. The strategy should be in line with the requirements outlined in the Essex SuDS Guidance. This should include an assessment of greenfield runoff rates, current and proposed discharge rates and attenuation volumes. As per the Essex SuDS Design Guidance, discharge rates should be restricted to the 1 in 1-year greenfield rate or, if this is not possible, they can be limited to a range of equivalent greenfield discharge rates. The strategy should also show the proposed discharge location and demonstration the SuDS hierarchy outlined in the NPPF has been followed; correspondence with the relevant authority should be shown to confirm that there is capacity to support the design volume.

The drainage strategy should also include an assessment of exceedance flood flow routes above the design event demonstrating how it will be conveyed within the development, without increasing flooding elsewhere. The Applicant should incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits (e.g. rainwater harvesting, green roofs, rain gardens, permeable paving).

THURROCK COUNCIL: HIGHWAYS

The EIA Scoping Report It indicates that the most significant impact of the proposal will be during the construction phase. It is expected that a Traffic and Transport chapter of the Environmental Impact Assessment and a full Transport Assessment would be provided with a more detailed Transport Assessment Scoping Report to be produced and agreed with Thurrock Council and National Highways and other local Highway Authorities bounding Thurrock.

This proposal will not only impact on roads around Tilbury but other local roads in borough particularly those of a rural nature and thus raising issues of road safety particularly around construction access points, parking for construction works and HGV traffic routing for construction materials and therefore there will also be the need to provide a Construction and Environmental Management Plan to ensure proper control of construction traffic.

It will also likely impact on Public Rights of Way within the borough thus there is a need to

understand whether potential temporary diversions may be required or potentially permanent diversions.

THURROCK COUNCIL: LANDSCAPE AND ECOLOGY ADVISOR

The Scoping Report has provided good levels of detail to enable an assessment as to what subjects should be covered by the ES. It is agreed that Ecology and Landscape and Visual effects have been scoped in.

Ecology and Biodiversity

The approach follows best practice guidance and addresses statutory and non-statutory designated sites and priority species and habitats. The Study Area is within 330m of the Thames Estuary and Marshes SPA/Ramsar and therefore the potential effects on birds during construction and operation within the area will be critical.

The matters scoped in or out of the ES have been justified within Table 8.1. The rationale is considered appropriate for the nature of the development.

Landscape and Visual

The Landscape and Visual Impact Assessment methodology set out in Appendix I follows best practice guidance and so is considered acceptable in principle.

The Appendix H lists a total of 41 preliminary viewpoints along the 180 km route. These are proposed as representative of the various receptors along the route; however, this number is considered insufficient to enable an assessment of specific visual effects on residents and other sensitive receptors including public rights of way. It will be essential for the applicant to liaise with Thurrock Council to agree an appropriate suite of viewpoints.

It is agreed that night-time visual effects can be scoped out. The matters scoped in or out of the ES have been justified within Table 13.4 and are considered appropriate. In developing the mitigation package, it will be important to ensure measures such as planting reflect the local landscape character; for example, the marshland landscape around Tilbury has a low level of tree cover therefore extensive tree planting would be out of character.

The Arboricultural Strategy set out in Appendix J is considered appropriate.

Cumulative Effects

The Scoping Report has scoped Cumulative Effects during construction and operation into the ES which is supported. Within Thurrock there is already a significant ‘wirescape’ within the Study Area. The effects on this scheme, particularly landscape and visual, will need to be assessed against this.

In addition, the study area contains other proposed major schemes including Lower Thames Crossing and Freeport. The cumulative effects of these need to be considered.

THURROCK COUNCIL: PUBLIC RIGHTS OF WAY OFFICER

It would appear there may be possibly 18 Definitive Public Rights of Way affected by this application within the Scoping Corridor shown between the Brentwood boundary southwards through to and concluding at the Tilbury substation.

Thurrock PROW are pleased to see it is stated the Scoping Route shall endeavour to avoid, where possible disruption to the rights of way network...particularly during any construction period thereby taking into account the potential effects on health and wellbeing in relation to those users of the Thurrock's PROW network. Therefore, any expected disruption be it even construction access crossing the definitive route shall need to be managed via prior discussion with the Thurrock PROW Team. PROW@thurrock.gov.uk.

Should any temporary diversions be required PROW will need to ensure alternative diversion routes are first of all agreed upon and then clearly marked along the length of the diversion requiring additional direction signage along with notices explaining the reason for the diversion, the intended duration of the diversion and a contact number for any concerns.

Public Rights of Way request once the construction areas are finally identified and following the applicant having carried out their stated user surveys of Thurrock's rights of ways over the stated 12-hour period (typically 07:00 to 19:00hrs) and at a weekend ...where the usage would reflect the higher level of demand the PROW Team then be contacted to discuss further the survey's results so we can discuss the findings and work together to ensure as much of the PROW network can remain open for public use.

This will or may also include the route of the Thames Estuary Path travelling through Thurrock between Tilbury Ferry eastwards through to the Basildon boundary which may or may not be affected once the route has been finally determined along with also the Government's newly opened section of the Nationwide Coastal Path may also be affected travelling through Thurrock.

THURROCK COUNCIL: URBAN DESIGN

The following comments are provided based on the submitted EIA Scoping Report and appendices. Comments provided have focused on chapters 11 (historic environment) and 13 (landscape and visual) within the main EIA Scoping report.

- Paragraph 11.6.7 states that Thurrock does not have any Protected Lanes. However, two Protected Lanes in the east of the Borough are inscribed within Thurrock Core Strategy Policies Map. This includes Old Church Hill and Hoford Road. We would seek assurance that these are properly included within the future assessment, particularly as Hoford Road intersects the identified route corridor.

- The proposed route has the potential for significant impact on the setting of the listed Bata factory buildings in East Tilbury, as well as the wider Conservation Area there (which is designated by Historic England as being 'Heritage at Risk'). However, there is some ambiguity as to whether the wider heritage setting of East Tilbury would be properly considered within the scheme given the criteria intended to scope out within the EIA's historic building approach as described in paragraph 11.10.17. For instance, it is intended to scope out 'listed buildings and non-designated historic buildings that are separated from the Project by other major infrastructure (e.g., motorways, major dual carriageways, active mainline railways) where it can be reasonably concluded that the infrastructure is a pre-existing barrier that the setting of a building would not extend beyond'. East Tilbury comprises large listed modernist factory buildings that are highly prominent within the landscape with established international heritage importance as part of the Bata legacy. Although major infrastructure currently exists within the immediate area of East Tilbury and outside the designation boundary of the Conservation Area, there is a concern that the current EIA proposed scoping may not properly appreciate the extent of 'setting' appropriate to these very tall and prominent listed structures.

- There is a question as to what design guidance, standards or coding the Project is intending to abide by in relation to visual impact (in terms of views, townscape, and amenity) from residential communities within proximity to the Project. Paragraph 13.9.14 states a commitment to consider these views as the design of the Project evolves, but no clear reference has been provided as to what guidance or otherwise would underpin the assessment of these impacts.

- There is concern that the Minerals and Geo-conservation Sites in Thurrock have not been identified in Figure 9.4 page 11 of 11. Thurrock lies on a geological important Jurassic coastline and records indicate that three Category A Geo-conservation Sites which fall within the Study Area and one of which is sits at the centre of the Scoping Corridor Area. Thurrock has a long history of gravel and shale quarrying. Thurrock records of live permissions for Aggregate Quarry and Recycling sites which lie within the Study and Scoping Areas are not identified in the submitted mapping information.

- It is understood that the scope of viewpoints for representative character and visual receptors selected for the Landscape Character and Visual Impact Assessment will be informed by ZTV analysis. However, is it of great concern that recreational receptors do not appear to be included and the Preliminary Viewpoints appear to give little regard to the nature of long views across sensitive landscapes in Thurrock.

- The Landscape and Visual Assessment has scoped out impacts to train passengers, however the proposed pylon route follows the main C2C rail line within Thurrock. This section of the railway journey passes rural villages, coastal terraces and views to the River Thames. It is expected that an increase in the number and scale pylons or introduction of a new design of pylons will be a noticeable change and recommend that this be scoped into the LV&A assessment.

Summary

Whilst I am satisfied that this list of topics will enable a thorough assessment of the likely significant environmental impacts of the proposals, I draw your attention to the consultation responses with regard to the preparation of the Environmental Statement.

I trust that the above comments are of assistance. The above information is given without prejudice to the LPA's future comments or position in relation to a formal submission pursuant to the 2008 Act.

I hope this information is of assistance and should you wish to discuss any aspect of this letter please contact me via the email address stated in this letter.

Yours sincerely



Major Applications Manager

From: [redacted]
To: East Anglia GREEN
Cc: [redacted]
Subject: East Anglia Green Energy Enablement (GREEN) Scoping Opinion
Date: 11 November 2022 11:56:08

Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments in response to the Scoping Opinion request

Best wishes

[redacted]

[redacted] **I Principal Planner - Spatial Planning (He/Him/His)**
TfL Planning, Transport for London
E: [redacted]

I work part time and so there may be a short delay in responding to emails

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process

For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services

This message has been scanned for malware by Forcepoint. [redacted]

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN020028
Our Ref: 60505CIRIS

Emma Cottam,
Senior EIA Advisor
Environmental Services Central Operations
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

24th November 2022

Dear Ms Cottam,

Nationally Significant Infrastructure Project
East Anglia Green Energy Enablement (GREEN) Project EN020027
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health
We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be

covered elsewhere in the Environmental Statement. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent. Particular focus should be made to the areas of the Project that fall within Air Quality Management Areas.

Yours sincerely,

On behalf of UK Health Security Agency
nsipconsultations@ukhsa.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

[1] https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

From:	Planning Department
To:	East Anglia GREEN
Cc:	Pippa Purser-Ward
Subject:	RE: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation
Date:	05 December 2022 12:28:39
Attachments:	image001.png image002.png image005.png image006.png image007.png image008.jpg image004.jpg image009.png image010.png image011.png image012.png image013.png image014.png

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Dear Sir/Madam,

Thank you for consulting the WMA on the EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation.

As noted within the EIA Scoping Report, the development corridor passes through three Internal Drainage Boards within the WMA consortium – Norfolk Rivers IDB (NRIDB), Waveney Lower Yare and Lothingland IDB (WLYLIDB) and East Suffolk IDB (ESIDB).

We note that the proposed works are highly likely to affect ordinary watercourses within the Boards' networks, and we welcome the opportunity to discuss our regulation within the Boards' areas moving forward. As you yourself mention within your scoping report, any alterations to watercourses will require consent under Section 23 of the Land Drainage Act 1991 from the Board within their districts. Consent may also be required for the discharge of surface water / ground water / treated foul water to a watercourse, and any works within 9 metres (or 7 metres in WLYLIDB) of a Board Maintained watercourse also require consent.

You should be aware that when consenting cable crossings of watercourses within the district the Board generally requires the cable to be placed a total of 2m below the hard bed of the watercourse. Depending on the location and watercourse in question we may also ask that a strike plate be placed 1m above the cable, at 1m below the hard bed. In some instances, we also ask that this level be maintained for min. 3m either side of the current watercourse brink in case of a future need to widen the watercourse for extra capacity. We are generally less stringent when consenting crossings over riparian watercourses (not maintained by the Board).

If you require a shapefile of our district and our Board maintained watercourses, please e-mail my college Pippa (CCed) and she can provide you with the shapefile request form to fill in and return.

Please feel free to contact me should you require any further help.

I look forward to working with you.

Kind Regards,

[redacted]

Eleanor Roberts, BSc (Hons), MCIWEM
Senior Sustainable Development Officer
Water Management Alliance
m: [redacted] e: [redacted]

Registered office: Pierpoint House, Horsley's Fields, King's Lynn, Norfolk, PE30 5DD
t: [redacted] | e: [redacted] | www.wlma.org.uk

WMA members: Broads Drainage Board, East Suffolk Drainage Board, King's Lynn Drainage Board, Norfolk Rivers Drainage Board, South Holland Drainage Board, Waveney, Lower Yare and Lothingland IDB in association with Pevensey and Cuckmere Water Level Management Board.

[redacted]

Your feedback is valuable to us, as we continually review and work to improve our services. So, if you have any suggestions, recommendations, questions, compliments or complaints, please complete one of our online forms: Feedback Form | Complaint Form

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From: East Anglia GREEN <EastAngliaGREEN@planninginspectorate.gov.uk>
Sent: 07 November 2022 16:05
To: Info <info@wlma.org.uk>
Subject: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation

FAO East Suffolk Internal Drainage Board, Norfolk Rivers Internal Drainage Board and Waveney Lower Yare and Lothingland Internal Drainage Board

Dear Sir/Madam

Please see attached correspondence on the proposed East Anglia Green Energy Enablement (GREEN).

Please note the deadline for consultation responses is **5 December 2022**, and is a statutory requirement that cannot be extended.

Kind regards

Jack Patten

Jack Patten | EIA Advisor

The Planning Inspectorate

@PINSgov The Planning Inspectorate
planninginspectorate.gov.uk

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DPC:76616c646f72



WEST BERGHOLT PARISH COUNCIL

LOCAL COUNCIL AWARD SCHEME QUALITY

FAO: Emma Cottam - Senior EIA Advisor
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref: EN020027

By email: eastangliagreen@planninginspectorate.gov.uk

21st November 2022

Dear Ms Cottam,

Re: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.

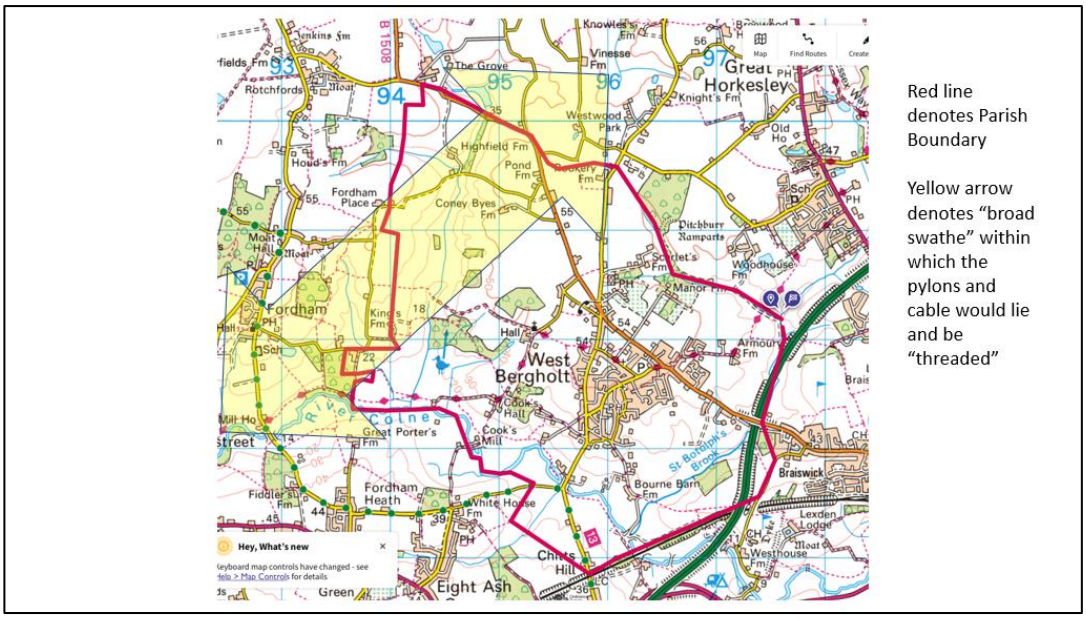
Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Response from West Bergholt Parish Council:

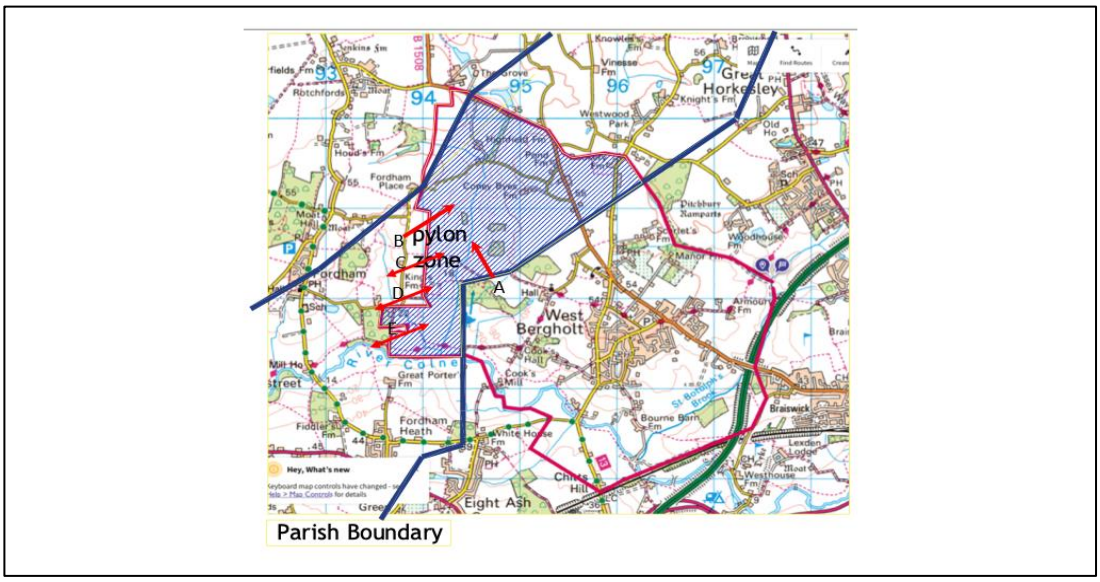
West Bergholt Parish council has had sight of a Scoping Report relevant to the above named project and after due consideration the Council finds the Scoping report, and project, to be inadequate and detrimental to the village and its environs generally and thus the Council objects in the strongest of terms to the Scoping report, and project; we detail below the principal areas of objection.

The Project, if implemented, would impinge very heavily on the visual amenity of the village and its environs. As can be seen from the map Figure 1 below, the red line denotes the parish boundary, and the yellow arrow denotes the broad swathe within which the pylons would lie.



Parish Clerk - Laura Walkingshaw - 80 Chapel Road, **West Bergholt, CO6 3HL** Tel: 07726 424419
E-mail: **westbergholtpc@gmail.com** - Parish Council website: **www.westbergholt.org**

Figure 2 below, denotes the general pylon zone within the Parish boundary which would the most severely affected should the project be implemented. Note that this figure denotes certain aspects of this area which relate to the photographs detailed in appendix A below and which are of particular environmental importance.



With further reference to the environmental aspects of this matter, reference is made to the West Bergholt Neighbourhood Plan adopted by Colchester Borough Council on 16th October 2019/minute ref.19/148. Section14.3.2 of the Neighbourhood Plan advises in the landscape surrounding the village, the views to the west and southwest of the village are particularly noted as containing numerous footpaths extensively used by residents. In that regard the Inspector's attention is drawn to Neighbourhood Plan Community Ambition Policy CA7 and map CA7, the Neighbourhood Plan can be found on westbergholt.org. The overall area benefits from general protection by Colchester Borough Council countryside environment policies. Section 14.3.7 also states 'there are ten local wildlife sites of importance for nature conservation within the area which are protected within the local planning system'.

In addition to the environmental aspects, the Parish Council would reiterate further its objections to the project, as set out in the letter in Appendix B. The principle of these concerns the fact that National Grid has chosen a single preferred route to be consulted upon. The Parish Council objects in the strongest terms to this approach which it considers to be in contravention of standard planning procedure and of the Gunning Principles in particular. In that regard the Parish Council would have anticipated seeing alternative routes/options considered alongside with the overhead pylon route.

The Parish Council has had sight of correspondence between Sir Bernard Jenkin and the Offshore Electricity Grid Task Force (OffSET) in which cost comparisons between the overhead route and an offshore route were made. The Parish Council has no way of verifying the disparity of the costs quoted by National Grid in this regard. Accordingly, The Parish Council would urge the Inspector to require National Grid to provide a detailed and independently verified analysis of any alternative route costings which may be considered, but with particular reference both the offshore route and an underground route.

However, in summary West Bergholt Parish Council urge the Inspector to reject the Scoping report in that it fails in its proposals to consider adequately the impact of the pylons on West Bergholt.

Yours Sincerely

[redacted]

[redacted]

Chair – West Bergholt Parish Council

cc Rosie Pearson, Frances Torrington & Sir Bernard Jenkin enc. Appendix A & B

Appendix A

View from Fossets Lane towards Rams Hall Lane (location B on map)



View from Footpath leading from the Old Church towards Hillhouse Wood (location A on map). Stitchling Wood is the larger spinny. Photos sequence from Stitchling Wood in the east to a view of Rams Hall Road in the west.



Appendix A (cont.)

View from point C – Fossetts lane, Hill Top Cottage









View from point D – Fossetts Lane Kings Vineyard access track and Essex Waay





View from point E– Footpath









Appendix B

Attached as separate document (*Appendix B - Pylons 1 letter to Rosie Pearson 071122*)

APPENDIX B



WEST BERGHOLT PARISH COUNCIL

LOCAL COUNCIL AWARD SCHEME QUALITY

Rosie Pearson, only by email

7th November 2022

Dear Rosie

Re: Offshore Electricity Grid Taskforce (OffSET) v. National Grid Electricity Transmission (NGET)

The members of West Bergholt Parish Council have recently had sight of the letter dated 11th October 2022 from the National Grid (NG) addressed to Sir Bernard Jenkin in his capacity as Chair of OffSET, which you kindly forwarded, concerning the siting of an array of pylons, some of which as you know would be situated to the north of West Bergholt and as such, would impinge considerably on the visual amenity of this village.

Since the said letter was received, members of the parish council have appraised themselves in some detail with the technical details of the scheme and needless to say, apart from the general disquiet felt by many in this area, the response from NG raises further questions. The foremost of these are:

1. The huge disparity in costs between the overland route and the offshore route is nowhere justified in detail. We would suggest you therefore ask Sir Bernard to request that a truly independent audit of the scheme be carried out so that the detailed costings can be justified (or not).

2. The comparative costings of an underground routing do not seem to have been considered. So that all alternatives can be included in the equation and an all-round view of the scheme can be formed, an additional study should be undertaken to include an underground routing. Needless to say, such a further proposal should be accompanied by detailed and independently verified costings.

It is very apparent from a study of the information, which is presently in the public domain, that NG has already chosen it's favoured routing for this project and any attempt to force through a pre-ordained solution should be firmly resisted.

Please be assured of the full support of West Bergholt Parish Council for OffSET in this endeavour and we look forward to hearing from you in due course.

Kind regards

[redacted]

p.p.

[redacted]

Chair – West Bergholt Parish Council

cc Francis Torrington
cc Sir Bernard Jenkin



WEST BERGHOLT PARISH COUNCIL

LOCAL COUNCIL AWARD SCHEME QUALITY

FAO: Emma Cottam - Senior EIA Advisor
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref: EN020027

By email: eastangliagreen@planninginspectorate.gov.uk

30th November 2022

Dear Ms Cottam,

Re: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Further response from West Bergholt Parish Council:

We would refer to our letter of 21st November and for the avoidance of doubt, ask that the following views shown in the photographs included in Appendix A to that letter, and as shown of Figure 2 in that letter, be added to those noted in the Scoping Report's Appendix H, as views that would impact, in our opinion, West Bergholt's residents, road and recreational users if the pylons were installed within the corridor as advised by National Grid:

Location A: view from footpath leading from the Old Church toward Hillhouse Wood.

Location B: view from Fossetts Lane towards Rams Hall Lane.

Location C: view from Fossetts Lane, Hill Top Cottage.

Location D: view from Fossetts Lane, Kings Vineyard access track, and the Essex Way.

Location E: view from public footpath at location E.

With this addition, West Bergholt Parish Council would reiterate it's urge to the Inspector to reject the Scoping report in that it fails in its proposals to consider adequately the impact of the pylons on West Bergholt.

Yours Sincerely

[redacted]

[redacted]
Chair – West Bergholt Parish Council

cc Rosie Pearson, Frances Torrington & Sir Bernard Jenkin

Parish Clerk - Laura Walkingshaw - [redacted] Tel: [redacted]
E-mail: [redacted] - Parish Council website: **www.westbergholt.org**

From: [redacted]
To: East Anglia GREEN
Cc: [redacted]
Subject: Re: EN020027 - East Anglia GREEN - EIA Scoping Notification and Consultation
Date: 13 November 2022 15:33:44
Attachments: image001.png
image008.png
image003.png
image005.png
image007.png

Dear Planning Inspectorate,

West Horndon Parish Council has been identified by the Planning Inspectorate as a body that needs to be consulted regarding the East Anglia GREEN Project before it adopts its Scoping Opinion.

West Horndon Parish Council has already been approached by the National Grid regarding the East Anglia GREEN Project and provided comments which it is believed have been helpful in assisting the future planning of the project. However, for the benefit of clarity it is thought helpful by the Parish Councillors that these views are reiterated.

Within West Horndon Parish it is proposed that a development known as Dunton Hills Garden Village is built. It is envisaged that this will eventually comprise as many as 6,000 homes. The development is identified in the Brentwood Borough Council, Local Development Plan 2016-2033, which has recently been adopted by the Borough Council. The land on which the development is proposed to be built is part of the East Anglia GREEN Project. At the present time the land is used for agricultural and leisure purposes - golf courses - with very few homes or industrial units. Electricity is supplied to the land via pylons and overhead cabling. As part of the proposed Dunton Hills Garden Village development it is planned that all electricity supplied will be by cabling contained within the ground. Therefore, as the ground in this area needs to be excavated to accommodate the electric cabling for the new homes, service infrastructure and light industry as part of the Garden Village development it is thought prudent that the additional power supply and cabling required as part of the East Anglia GREEN Project should also be undertaken at the same time. This would eliminate unnecessary additional excavation works, ensure all power cables in and around the new development are non-visible and allow for power needs within this part of Essex to be suitably addressed.

If you require any further information please do not hesitate to contact me.

Yours sincerely,

Kim Harding (Mr)

Kim Harding
Clerk to West Horndon Parish Council

Address: [redacted]
E-Mail: [redacted]
Telephone: [redacted]

On Tue, 8 Nov 2022 at 11:09, East Anglia GREEN <EastAngliaGREEN@planninginspectorate.gov.uk> wrote:

> Dear Sir/Madam,
>
> You were sent an email (with attached letter) from the Planning Inspectorate yesterday, regarding EIA scoping notification and consultation for the proposed **East Anglia GREEN project**.
>
> Due to an administrative error, the cover email stated the wrong project name

and deadline for consultation responses. The attached letter contained the correct details.

To confirm, the cover email should have stated the following details: *"Please see attached correspondence on the proposed **East Anglia GREEN project**. Please note the deadline for consultation responses is **5 December 2022**, and is a statutory requirement that cannot be extended".*

We have reattached the same letter (sent yesterday) to this email for ease or reference.

Please accept our apologies for any confusion caused.

Kind regards

Jack Patten

Jack Patten | EIA Advisor

The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring fairness, openness and impartiality across all our services

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responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72

WHITE NOTLEY & FAULKBOURNE PARISH COUNCIL

[redacted]

The Planning Inspectorate
Environment Services, Central Operations
Temple Quay House
2 The Square
Bristol BS1 6PN

1 December 2022

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

The following response to the above Scoping Consultation has been taken directly from ***Pylons East Anglia Ltd, (****75 Church Road, CO5 0HB, Tiptree, Essex) with their agreement, and is the view of White Notley and Faulkbourne Parish Council.*

The concerns to be raised around the Environment Statement are:

1. Vulnerability to Climate Change (pylons vs offshore).
2. Impact to watercourse and mammals during construction work.
3. Effect on visual receptors (National Grid has not considered any visual receptors in White Notley and Faulkbourne).
4. Visual effects on people travelling by train.
5. Bat activity survey.
6. Impact on communities with existing infrastructure (I believe this does not involve our Parish).
7. Impact on farmland (underground cables as well as pylons).

Topics that should be scoped in to the ES

We set out below:

• Whole topics to be scoped back in

• Sub topics to be scoped back in

• Additional topics to be scoped in

• Additional comments relating to scoped in topics

i. Whole topics scoped out

Vulnerability to Climate Change

We disagree with NG that risk to infrastructure from climate change should be scoped out – it must be scoped in and alternatives including offshore and underground compared. Our reasoning is that on 27 October 2022, a Parliamentary Committee14 concluded:

- the UK's net-zero targets require the electrification of huge amounts of energy demand across the country and that this exposes the power system to enhanced vulnerabilities: electricity pylons and cables are more prone to disruption from extreme weather than gas, which relies mainly on underground pipes rather than overhead power cables.
- the energy sector was subject to an "adaptation shortfall" in relation to lightning, high winds and storms.

ii. Sub topics scoped out that should be scoped in

We list below elements scoped out of the SR that we believe must be scoped in.

Scoped out:	**Why scope in?**
Potential impacts on surface water are scoped out for biodiversity receptors in the ES during construction.	Watercourses are already stressed and in poor condition and this should be scoped in, irrespective of CoCP. Directional drilling should be considered in sections where cut trenches for underground cable are near watercourses.
Other notable mammals (brown hare (Lepus europaeus), hedgehog (Erinaceus europaeus), and harvest mouse (Micromys minutus))	The fact that NG notes that negative impacts could occur to 'other notable mammals' during construction (loss of habitat/habitat fragmentation/noise/light) means that this must be scoped back in. This, from the SR, indicates the level of disruption expected just for the haul roads*: "A temporary haul route would be constructed to provide access for construction vehicles along the working areas and to minimise impacts of construction traffic using the local road network. The position of the haul route would be determined as the Project evolves, the location would be assessed and presented in the ES. It is currently assumed that temporary haul route would have the topsoil stripped and hardcore placed on top of the subsoil, this would be delivered to site by Heavy Goods Vehicles (HGV). It would be sited*
	where possible to make use of existing access tracks where possible and avoid sensitive ecological locations and water crossing where possible. 4.5.6 The haul route for the OHL would be typically 12m wide to allow for a running track, topsoil storage and passing places where required (formed with imported stone and geogrid)". Underground sections require a swathe of up to 100metres wide (according to a National Grid webinar, Spring 22).

Existing environment and views – construction and operation (inc. maintenance) 13.9.12. Effects on visual receptors located outside of the ZTV are therefore proposed to be scoped out of the ES.	The 41 visual receptors selected by NG (Appendix H) are wholly inadequate for a 180km project with 50-metre high pylons. We have mapped NG's receptors and supporters across Essex, Suffolk and Norfolk have added key visual receptors that NG must include irrespective of Zone of Theoretical Visibility. Local residents have the knowledge of lines of sight and areas of greatest impact.
"Significant visual effects on people travelling by train on the Greater Anglia railway network are not anticipated due to the speed of travel, therefore this is proposed to be scoped out." (Scoped in, Wales)	This is clearly ludicrous. It must be scoped back in and we note that the visual receptors refer to trains anyway. Note that in North Wales, visual impact of pylons on rail travellers was scoped in. It must include the Sudbury to Marks Tey line – the famous Lovejoy line.
Bat activity surveys Where it is considered that habitat impacts would have a significant potential adverse effect on bats, bat activity surveys would be undertaken to establish a baseline. Based on the information outline in Section 8.12.42, it is considered that impacts on foraging and commuting bats can be scoped out for the sections of overhead line	Bats forage over a very wide area. They will be impacted by the construction of the pylons due to loss of habitat (specifically, in SR: Direct severance/ fragmentation of woodland and linear habitat features (e.g., hedgerows and watercourses). Direct loss of woodland with good connectivity to the wider landscape), noise and light. There can be no sections of the line scoped out and a 10km assessment area must be set – as in North Wales's pylons project scoping. So-called temporary impacts could have permanent impact on bat colonies. Some impacts will be permanent, when habitat is lost for good. The habitat avoidance policy set out by NG is already proposed to be breached in at least one place: in Aldham, Essex, where the pylons will pass directly over woodland. There needs to be a full assessment of habitat impact and it is imperative that bat activity surveys must be scoped back in.

iii. Additional topics to be scoped in

Existing infrastructure

The Scoping Report must scope in impact of existing infrastructure on communities who risk being sandwiched between the proposed pylons and existing pylons or roads/rail e.g:

- There is existing electricity transmission and distribution equipment in the study area including 400kV and 132kV OHL's and the 400kV substations at Norwich Main, Bramford and Tilbury
- Thurrock section EAG There are also three existing OHL which run through this area along the Scoping Report Corridor.
- The Braintree section contains existing 400kV OHL's and near to Chelmsford there are 400kv and 132k OHL's.
- The Babergh section west of Ipswich and the Great Leighs section north of Chelmsford contain two OHL's within the corridor of search.

It is imperative, too, that the ES will consider the impact of the doubling back effect of pylons at Ardleigh, which leaves residents living in a 'V' of pylons:



iv. Additional comments relating to scoped in topics

Visual receptors

We believe that the 41 visual receptors put forward by NG are wholly insufficient. They leave huge unassessed gaps along the route and many very key sites of importance unaccounted for. We have therefore asked our supporters to log key visual receptors in their own area that should be scoped in to the ES.

Undergrounding of cables – swathe width

The area of impact for the purposes of assessment of undergrounding cables must be set at the maximum of the several set out by NG. The SR report states a swathe of only 40-m wide is required for undergrounding. The non-statutory consultation documentation noted c60m-wide. At a NG webinar, Spring 2022, we were told that a swathe of up to 100m-wide is required. For the purposes of the ES, the swathe width must be assumed to be 100-m to ensure that all construction damage to ecology, habitats and archaeology is factored in.

Impact on farms

The impact of the 12-metre wide access roads must be scoped in to the ES. These roads will damage habitat and lead to security issues for land-owners. The impact of walkers using these roads to access previously undisturbed areas of countryside on wildlife must be assessed.

Yours sincerely

[redacted]

Clerk to White Notley and Faulkbourne Parish Council

Winfarthing Parish Council

[redacted]

To whom it may concern,

Winfarthing Parish Council would once again like to voice their objection to the proposed East Anglia GREEN pylon route and comment on the deficient Scoping Report.

Alternatives to East Anglia GREEN

- The Scoping Report is a continuation of a deficient process by National Grid. It addresses none of the issues raised relating to selection of, or consultation on, alternatives to overheard power lines / pylons.

- It is based on a deficient non-statutory consultation (due to 'after-the-event rationalisation of alternatives' and failure against two of the Gunning Principles).

- In our opinion the deficient non-statutory consultation is infecting later stages of this proposed project as we see now in the Scoping Report.

- National Grid now breaches a third Gunning principle – the requirement to give conscientious consideration to consultation responses.

- **We continue to maintain that the consultation must be re-opened to give stakeholders a full range of alternatives for consultation at a stage when options have not already been foreclosed.**

Cumulative impacts of energy infrastructure in the region

We argue that North Sea energy projects and East Anglia GREEN cannot be considered in isolation. They are functionally interdependent and inextricably linked. There is a clear causal connection between the two. The Environmental Statement must therefore scope in the cumulative, in-combination effects with wind farms that connect into East Anglia GREEN.

Topics that have been scoped in and out of the Environmental Statement

Comments on scoped in topics:

- **Visual Receptors:** 41 visual receptors selected by National Grid for an 180km project with 50 meter high pylons is wholly inadequate. Although one of these was the B1077 near Shelfanger, our neighbouring Parish, there has been no visual receptors selected in Winfarthing where the view of residents will be affected when driving in and out of the village, from their homes and recreationally when using the numerous footpaths and public rights of way in the village. Many of these public rights of way would run adjacent or underneath the proposed pylons or would impact the view from them. Residents in the village have logged key visual receptors on a map circulated by Essex Suffolk Norfolk Pylons which we believe should be scoped into the report. This can be supplied if requested.

- **Impact on Farms:** We also believe that the impact of the 12 meter wide access road must be scoped into the Environmental Statement. These roads will damage habitat and lead to security issues for land-owners in Winfarthing. Also

the impact of walkers using these roads to access previously undisturbed areas of countryside on wildlife must be assessed.

Comments on elements scoped out of the Scoping Report that we believe should be scoped in:

- Potential impacts on surface water are scoped out for biodiversity receptors in the Environmental Statement during construction. Water courses are already stressed and in poor condition and this should be scoped in.

- Other notable mammals (brown hare (Lepus europaeus), hedgehog (Erinaceus europaeus), and harvest mouse (Micromys minutus)) have been scoped out. The fact that National Grid notes that negative impacts could occur to 'other notable mammals' during construction (loss of habitat / habitat fragmentation / noise / light) means that this must be scoped back in. This following quote, from the Scoping Report (4.5.5 and 4.5.6), indicates the level of disruption expected just for the haul roads: "*A temporary haul route would be constructed to provide access for construction vehicles along the working areas and to minimise impacts of construction traffic using the local road network. The position of the haul route would be determined as the Project evolves, the location would be assessed and presented in the Environmental Statement. It is currently assumed that temporary haul route would have the topsoil stripped and hardcore placed on top of the subsoil, this would be delivered to site by Heavy Goods Vehicles (HGV). It would be sited where possible to make use of existing access tracks where possible and avoid sensitive ecological locations and water crossing where possible. The haul route for the OHL would be typically 12m wide to allow for a running track, topsoil storage and passing places where required (formed with imported stone and geogrid)*".

We are extremely concerned of the ecological affect of the proposed project on the countryside and wildlife in our village and think this should be scoped in.

- Again due to our concern for the wildlife in our Parish we believe that Bat Activity Surveys can not be scoped out on any section of the line and a 10km assessment area must be set – as in North Wales's pylons project scoping. So-called temporary impacts could have permanent impact on bat colonies in our village and therefore this should be scoped in.

As a Parish Council who will be directly affected by East Anglia GREEN's proposed pylon route we find the Scoping Report inadequate.

Yours Sincerely

Winfarthing Parish Council – Eric Cole (Chairperson), Lynne Rogers (Vice Chairperson), Jim Collins (Councillor), William Cole (Councillor), Lucy Kemp (Councillor), Lorraine Tinkley (Councillor) and Peter Frost (Councillor)

From:	[redacted]
To:	East Anglia GREEN
Subject:	EN020027 - East Anglia GREEN - EIA Scoping Consultation Response
Date:	05 December 2022 14:10:19
Attachments:	08 06 22 Wortham & Burgate PC National Grid response letter.pdf

Dear Sirs,

Wortham and Burgate Parish Council strongly object to the National Grid's East Anglia Green Energy Enablement proposal to reinforce the high voltage electricity network from Norwich main substation to Tilbury substation, by way of a new line of 400kv pylons. We do not believe, and have seen no evidence, that National Grid has either recognised or considered the effects on the environment, visually significant open spaces, or cultural assets of Wortham and Burgate, or neighbouring parishes.

The parish of Wortham and Burgate includes over 250 acres of common land which will be directly affected by the proposed pylon route. This common land includes Wortham Ling which is a SSSI (Site of Special Scientific Interest), Long Green which is a VIOS (Visually Important Open Space), fenland to the west of Wortham Ling which is both a SSSI, a NNR (National Nature Reserve), and a RAMSAR (Wetland of International Importance under the Convention of Wetlands of International Importance) site of which there are only 2,453 worldwide. Burgate Wood is a SSSI. The pylons would irrevocably damage these environmentally important assets, also affecting the visual amenity they provide.

In addition there are 75 listed buildings in Wortham and Burgate including both churches. Wortham church being a grade 1 listed building, and one of only 158 surviving round tower churches in the country. The pylons would cause immeasurable harm to the setting of these cultural assets, and again affect the visual amenity.

The value of the pylons does not supersede or override the value or importance of these sites, or cultural and visual assets. The pylons will be hugely detrimental and damaging, and have a negative impact on property values and businesses linked to tourism in the parish. We believe the environmental, visual, and cultural constraints of the proposed pylon route will in fact be much, much higher than the alleged budget savings of an overland route.

We instead support an offshore option which we do not believe has been fairly or transparently presented for public consultation by the National Grid, and for which there are precedents nationwide. Suffolk County Council has also confirmed its intention to object to the proposals, stating its belief that there are better ways to meet the

demands of energy projects, such as an undersea network which it claims has not been fully investigated. We are aware that National Grid has finally conceded that they did not present the viable alternative options for public consultation, so do not feel it is even appropriate to be conducting this Scoping consultation.

National Grid has in fact started to remove pylons and overhead cable as it heads towards the conclusion of its first Visual Impact Provision, to transform views of the Dorset AONB (Area of Outstanding Natural Beauty). It is inconceivable that National Grid's Visual Impact Provision does not extend to East Anglia.

We are including our letter dated 8th June 2022 sent to John Pettigrew CEO of National Grid, in response to the non statutory East Anglia GREEN Energy Enablement consultation, and would also refer you to the map created by the Essex, Suffolk, Norfolk Pylon Group, which pin points over 450 visually important viewpoints which will be negatively impacted by the proposed pylon route:

[redacted]

Kind regards

Jane

[redacted]
Wortham & Burgate Parish Clerk and RFO
[redacted]

Wortham & Burgate Parish Council

John Pettigrew FEI FIET
Chief Executive
National Grid
1-3 Strand
London
WC2N 5EH

8th June 2022

Dear Mr Pettigrew,

Wortham & Burgate Parish Council's Response to National Grid's East Anglia GREEN Energy Enablement non statutory consultation

Wortham and Burgate Parish Council **strongly object** to the National Grid's East Anglia GREEN Energy Enablement proposal to reinforce the high-voltage electricity network from Norwich Main substation to Tilbury substation, and connect new offshore wind generation, by way of a new line of 400kv pylons. We believe that what we have been presented is a quasi-consultation lacking either transparent proposals or comparative costings, which is biased towards an overland solution without providing a cost benefit analysis. We instead support an undersea option, and believe National Grid have failed to provide a fair and just consultation by omitting the Sea Link 2 (SCD2) option from the public consultation.

The Parish of Wortham and Burgate has over 250 acres of registered common land in eight separate and distinct areas including Wortham Ling, which is an SSSI (Site of Special Scientific Interest) and a popular nature area visited by many people, and the Long Green which is designated as a VIOS (Visibly Important Open Space). Each of the eight areas has a unique character and considerable landscape and conservation value. They are havens for wildlife because they have been managed the same way for hundreds of years by way of light grazing and cutting of the grass for hay. Fenland to the west of Wortham Ling is also an SSSI, and an NNR (National Nature Reserve) and RAMSAR site (Wetland of International Importance under the Convention on Wetlands of International Importance). It is of high ecological value and a managed habitat for birds, winter waders and wildfowl. The village of Wortham includes 58 Grade II listed buildings and is famous for being home to the author Richard Cobbold between 1825 and 1877, who published *The Biography of a Victorian Village – Wortham* in 1860. Burgate Wood is also an SSSI. Its 75 acres are a particularly good example of the type of oak-hornbeam woodland characteristic of this part of north Suffolk. It is ancient, with a coppice-with-standards structure and continues to support entirely semi-natural stands. Many giant coppiced stools are present which indicate its great antiquity. Close by is Gittings Wood, an ancient woodland, also with many rare species.

The environmental and socio-economic damage to the parish caused by the proposed pylon route would be devastating.

We support and recognise the drive for green energy to achieve net zero by 2050, and are in agreement with Sir Bernard Jenkins and OffSET that the offshore grid, which the Government has already committed to delivering, is the most reasonable and effective route. National Grid estimates savings of £6bn per year for consumers from a coordinated offshore grid, making a nonsense of their argument that the proposed pylon route has an advantage for being financially less expensive. Undersea electricity cables are already being built to route electricity south from Scotland to protect Scottish

countryside, and we believe this precedent should be followed to protect our own parish, and all those affected by the proposed route from Norwich Main substation to Tilbury substation in Essex.

The proposals as they stand, take no account of the impact they will have on individuals' enjoyment of existing leisure activities or on amenities.

This letter has been copied to Jo Churchill MP, Richard Bacon MP, James Cartlidge MP, Sir Bernard Jenkin MP, Dr Dan Poulter MP and Kemi Badenoch MP. The Parish Council has seen a copy of the letter sent by the above mentioned MP's to the Rt Hon Greg Hands MP dated the 20th May 2022, the contents of which the Parish Council are in complete agreement with.

Additionally, the Rt Hon Greg Hands MP has also been copied in to the Parish Council's response.

Yours sincerely,

[redacted]
Proper Officer Wortham & Burgate Parish Council

[redacted]

Response to National Grid (NG) Scoping Report[1]

15 November 2022

Essex Suffolk Norfolk Pylons (ESNP) is the umbrella group for communities along NG's 180km 'East Anglia GREEN' (EAG) pylons route. Our petition, signed by 22,000, called for an offshore grid. On 16 June we submitted an 80-page response[2] to the non-statutory consultation. It detailed numerous environmental (and other) issues. With it we submitted a legal opinion[3] from Charles Banner KC and a survey completed by 2,500 people[4]. We are yet to receive a response from National Grid. Our submissions have not been referred to or the issues addressed in the Scoping Report[5] (SR).

We bring issues to the attention of the Inspector that we believe render the entire consultation invalid. As a consequence, **this SR, if accepted, would result in a legally deficient ES and consultation**. We set out three main areas of concern, with details in the pages that follow:

- **Main alternatives to EAG & continuing deficiencies in NG's process**
  Charles Banner KC's opinion concluded that the non-statutory consultation was deficient due to 'after-the-event rationalisation of alternatives' and failure against two of the Gunning Principles. Mr Banner warned that unless remedied, the consultation risked infecting later stages. That is what we see now, in the Scoping Report. It is a continuation of a deficient process. It addresses none of the issues raised relating to selection of or consultation on alternatives. NG now breaches a third Gunning principle – the requirement to give conscientious consideration to consultation responses. We continue to maintain that the consultation must be re-opened to give stakeholders a full range of alternatives for consultation at a stage when options have not already been foreclosed.

- **Cumulative impacts of energy transmission infrastructure in the region**
  ESNP is supportive of wind energy. However, excess power from North Sea wind farms must be transmitted out of East Anglia to London and southern England. That power makes landfall in Norfolk, Essex and Suffolk, with adverse impacts on the environment & communities. Despite evidence from National Grid ESO[6] in 2020 that a fully integrated offshore grid would be a deliverable alternative that is better for consumers, the environment and communities, instead, EAG is the proposed solution (and an offshore option not consulted on). These energy projects and EAG cannot be considered in isolation. They are functionally interdependent and inextricably linked. There is a clear causal connection between the two. The ES must therefore scope in the cumulative, in-combination effects with wind farms that connect into EAG.

- **Topics that should be scoped in to the Environmental Statement (ES)**
  We set out which scoped-out topics we believe must be scoped in to the ES and recommend others to be scoped in.

[1] EAG Energy Enablement (GREEN) Project | National Infrastructure Planning (planninginspectorate.gov.uk)
[2] 220616_ESNPFinalSubmission.pdf (pylonseastanglia.co.uk)
[3] 220616_CharlieBannerOpinion.pdf (pylonseastanglia.co.uk)
[444] 220616_Pylons_EA_2500_Responses.pdf (pylonseastanglia.co.uk)
[5] EN020027-000012-EAGN - Scoping Report (including appendices B to K).pdf (planninginspectorate.gov.uk)
[6] download (nationalgrideso.com)

1. Main Alternatives to EAG and continuing deficiencies in NG's process

Deficiencies with the consultation process mean that the SR cannot be considered valid.

Legal deficiencies

It is clear from the SR that NG is doubling down on its 'after-the-event rationalisation' and failure against two of the Gunning Principles which led Charles Banner KC in an opinion for ESNP to conclude that the non-statutory consultation was deficient[7]. Mr Banner further concluded that the deficiencies of the consultation meant that it cannot be relied upon at statutory consultation stage:

> *"Further, there is a real risk that the legal deficiencies in the current consultation will, if left uncorrected, will infect the later statutory consultation (which would in turn mean that the intended DCO application cannot lawfully be accepted by the Planning Inspectorate). As a minimum, the options which have already been improperly foreclosed would need to be revisited and consulted upon with a demonstrably open mind, providing the public with sufficient information to have a fair opportunity to advocate the alternatives discussed above."*

Specifically, Mr Banner noted that the rationale given so far for discounting the alternatives would not justify excluding them from the category of "reasonable alternatives" for the purposes of the EIA Regulations.

The result is that the contents of the Scoping Report cannot be relied upon and that an ES which results from this process will be deficient.

Summary of relevant conclusions in ESNP submission

In brief, to assist the Inspector(s), in our submission to the non-statutory consultation we concluded:

> *12.1 The East Anglia GREEN consultation must be abandoned. As demonstrated in this document, and supported by the opinion of Charles Banner QC, it is significantly and fundamentally deficient. It cannot be used to inform future consultations, nor to support a Development Consent Order application to the Planning Inspectorate.*
>
> *12.2 We have the following recommendations:*
>
> *12.2.1 National Grid must first demonstrate the need for this project.*
>
> *12.2.2 Decision criteria must be objective and set out in advance. Results must be justified and testable. Any new consultation must be re-run and adhere to the Gunning Principles.*
>
> *12.2.3 A new consultation must take into account the Offshore review, the new (accompanying) Network Options Assessment and the Sea Link consultation.*
>
> *12.2.4 National Grid must present options with full cost breakdown, setting out environmental, socio-economic, heritage and health impact of each, plus impact to the AONB. Cost must be presented in a transparent, accurate and unbiased manner. Cost of mitigation must be included and comparison of risks of each project with climate change and extreme weather*

[7] in an opinion for Essex Suffolk Norfolk Pylons on 10 June 22 220616_CharlieBannerOpinion.pdf (pylonseastanglia.co.uk)

must be set out. Stakeholders need to see an evidenced appraisal of options covering lifetime costs, technical complexity, impact on security of supply, delivery and planning risks.

12.2.5 The following options must be presented for consultation: Strategic offshore grid; options such as following existing power lines or infrastructure (rail/A12); undergrounding; T-pylons. National Grid profitability for each option must be presented for transparency. Ofgem and independent review must be performed throughout the process.

NG's Main Alternatives Considered

Despite the legal opinion and our detailed submission, Chapter 3, Main Alternatives Considered, in the SR demonstrates that NG is continuing to move forward with the very same process which was found to be deficient.

<u>New alternative proposed by NG post-consultation but not consulted on</u>

Since the closure of the non-statutory consultation, NG has prepared a quasi-offshore option[8] for MPs of the OFFSET group. That has not been consulted on and there was very limited information to support the option.

In fact, the letter to OFFSET states *"It would have been disingenuous for us to present an offshore option to the public for consultation feedback, knowing this did not comply with the framework requirements."* It is referred to in paragraph 3.3.9 of the Scoping Report as an alternative dismissed. The 'framework', relates to the National Policy Statement (NPS) EN-5, which does *not* as stated by NG, prevent offshore development. It merely says that overhead lines will often be a starting point.

NG goes on to say, *"…decisions made will be reconsidered and backchecked throughout the process, having regard to consultation responses and other relevant information (policy and regulation), none of the conclusions should be seen as final."*

So, in fact, the post-consultation, quasi offshore option, continues NG's post-justification of a prior decision to choose an onshore, overhead lines option, with consultation limited to the 'purple swathe' preferred route.

NG continues to fail to acknowledge that the alternatives it has dismissed have never been presented to the public for consultation. All decisions have been made by NG without external stakeholder review. The result is that NG also now falls foul of a third Gunning Principle: *"conscientious consideration' must be given to the consultation responses before a decision is made."*

This is despite NG noting the requirement in NPS EN-5 to set out cost and benefits of alternatives, particularly economic and environmental, in paragraph 2.3.2 of the Scoping Report yet has neglected to do so to date:

"2.3.2 Section 3.7 in EN-1 states that current scenarios show significant potential increases in generation and changes in direction of net electricity flows from Eastern England to centres of demand in the Midlands and South-East England and that these kinds of flows of power cannot be accommodated by the existing network and new lines would have to be built. It also acknowledges in paragraph 3.7.10 that "in most cases, there will be more than one technological approach by which it is possible to make such a connection or reinforce the network (for example,

[redacted]

by overhead line or underground cable) and ***the costs and benefits of these alternatives should be properly considered as set out in EN-5*** *before any overhead line proposal is consented"*

This is in distinct contrast from the approach taken in the north of England by National Grid. We set out in Appendix A a case study of an EIA in Cumbria. It demonstrates that alternatives were properly considered with stakeholders from the outset. Ruling out alternatives on the basis of cost without first subjecting them to environmental assessment and consultation, means that the "costs and benefits" cannot properly be considered as the scoping report acknowledges is required by EN-5. Without an EIA and consultation informed assessment of the environmental differentials between the alternatives, it cannot properly or lawfully be determined if the difference in cost outweighs the difference in environmental impacts, or vice versa.

Solution?

We believe that the SR as submitted will lead to a deficient ES.

NG cannot continue its pre-determined course of action in breach of Gunning Principles.

We re-iterate the words of Charles Banner KC, *"As a minimum, the options which have already been improperly foreclosed would need to be revisited and consulted upon with a demonstrably open mind, providing the public with sufficient information to have a fair opportunity to advocate the alternatives discussed above."*

2. Cumulative Impacts of energy infrastructure in the region

NG must ensure that the cumulative impacts of energy projects in the region are considered fully.

Scoping Report Chapter 17, Cumulative Impact

The SR states that there are intra- and inter-project impacts, and it is inter-project impacts that concern us in relation to this Scoping report, *"Inter-project effects (also referred to a 'cumulative effects', Planning Inspectorate, 2019) occur when a resource or receptor or group of receptors is potentially affected by more than one development at the same time and the impacts act together additively and/or synergistically (IEMA, 2011)"*

Guidance and background

Planning Inspectorate guidance on cumulative impact[9] sets the background, saying:

> *"1.5 NPS EN-1 paragraph 4.2.6 goes on to state that the Secretary of State should consider how the "accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place."*
>
> *1.6 The NPSs variously state that applicants should, amongst other matters, consider mitigation for cumulative effects in consultation with other developers; assess cumulative effects on health; give due consideration to other NSIPs within their region; consider positive and negative effects; and consider environmental limits (e.g. the potential for water quality effects to arise due to incremental changes in water quality)."*

NG itself notes (under section 13.2 Regulatory and planning policy context) that NPS EN-5 says,

> *"2.8.2 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."*

Functional interdependence of projects

EAG cannot be considered in isolation from many of the other energy infrastructure projects in the region.

The project is required to remove excess power generated by offshore wind farms from the region. In all NG Future Energy Scenarios[10] the East of England will be a power exporting region.

EAG's website states that, *"A need[11] was identified to resolve electrical boundary issues in East Anglia. There are three onshore power boundaries where additional system flexibility is required to ensure that power generated in the area from offshore windfarms and nuclear generation has more ways to flow into the wider transmission network during maintenance or faults on the system."*

[9] Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects | National Infrastructure Planning (planninginspectorate.gov.uk)

[10] *https://www.nationalgrideso.com/research-publications/etys/electricity-transmission-network-requirements/east-england-boundaries*

[11] EAG frequently asked questions | National Grid ET

EAG has 'functional interdependence' with projects such as North Falls and Five Estuaries, currently at non-statutory consultation stage, who have been told by NG that who have been told that their connection point will be EAG. Equinor's two projects currently at DCO stage with PINS are also dependent on EAG. Functional interdependence is set out in case law. (Burridge v Breckland DC 2013[12] and Wingfield, R v Canterbury City Council 2019[13])

For example:

"63. The question as to what constitutes the 'project' for the purposes of the EIA Regulations is a matter of judgment for the competent authority, subject to a challenge on grounds of Wednesbury rationality or other public law error." and *"64. Relevant factors may include: iii) Functional interdependence - where one part of a development could not function without another, this may indicate that they constitute a single project (Burridge at [32], [42] and [78]);"*

In addition, a Scoping Opinion by the Planning Inspectorate for a Proposed North Wales Connection found that, *"The ES should give equal prominence to any development which is related with the proposed development to ensure that all the impacts of the proposal are assessed."*

It also said that, *"In assessing cumulative impacts, other major development should be identified through consultation with the local planning authorities and other relevant authorities on the basis of those that are [*amongst others*]:*

• *Projects on the National Infrastructure's programme of projects."* There are a number of NSIPs energy projects in East Anglia.

Therefore, EAG cannot be considered in isolation and offshore wind farms at consultation and DCO stage must be scoped in to the Environmental Statement.

Thus we also believe that the Zones of Influence identified by NG in its Scoping report (in particular 30km Ecology and Biodiversity and 3km for Landscape and Visual) for will have to be extended to include coastal north Norfolk and coastal Suffolk and Essex.

We believe that EAG cannot be considered in isolation of the upstream projects it supports. This must be factored in to the cumulative impacts.

[12] Burridge v Breckland District Council | [2013] EWCA Civ 228 | England and Wales Court of Appeal (Civil Division) | Judgment | Law | CaseMine

[13] Wingfield, R (On the Application Of) v Canterbury City Council [2019] EWHC 1975 (Admin) (24 July 2019) (bailii.org)

3. Topics that should be scoped in to the ES

We set out below:

- Whole topics to be scoped back in
- Sub topics to be scoped back in
- Additional topics to be scoped in
- Additional comments relating to scoped in topics

i. Whole topics scoped out

Vulnerability to Climate Change

We disagree with NG that risk to infrastructure from climate change should be scoped out – it must be scoped in and alternatives including offshore and underground compared. Our reasoning is that on 27 October 2022, a Parliamentary Committee[14] concluded:

- the UK's net-zero targets require the electrification of huge amounts of energy demand across the country and that this exposes the power system to enhanced vulnerabilities: electricity pylons and cables are more prone to disruption from extreme weather than gas, which relies mainly on underground pipes rather than overhead power cables.
- the energy sector was subject to an "adaptation shortfall" in relation to lightning, high winds and storms.

ii. Sub topics scoped out that should be scoped in

We list below elements scoped out of the SR that we believe must be scoped in.

Scoped out:	**Why scope in?**
Potential impacts on surface water are scoped out for biodiversity receptors in the ES during construction.	Watercourses are already stressed and in poor condition and this should be scoped in, irrespective of CoCP. Directional drilling should be considered in sections where cut trenches for underground cable are near watercourses.
Other notable mammals (brown hare (Lepus europaeus), hedgehog (Erinaceus europaeus), and harvest mouse (Micromys minutus))	The fact that NG notes that negative impacts could occur to 'other notable mammals' during construction (loss of habitat/habitat fragmentation/noise/light) means that this must be scoped back in. This, from the SR, indicates the level of disruption expected just for the haul roads*: "A temporary haul route would be constructed to provide access for construction vehicles along the working areas and to minimise impacts of construction traffic using the local road network. The position of the haul route would be determined as the Project evolves, the location would be assessed and presented in the ES. It is currently assumed that temporary haul route would have the topsoil stripped and hardcore placed on top of the subsoil, this would be delivered to site by Heavy Goods Vehicles (HGV). It would be sited*

[14] Readiness for storms ahead? Critical national infrastructure in an age of climate change (parliament.uk)

	where possible to make use of existing access tracks where possible and avoid sensitive ecological locations and water crossing where possible. 4.5.6 The haul route for the OHL would be typically 12m wide to allow for a running track, topsoil storage and passing places where required (formed with imported stone and geogrid)". Underground sections require a swathe of up to 100metres wide (according to a National Grid webinar, Spring 22).
Existing environment and views – construction and operation (inc. maintenance) 13.9.12 Effects on visual receptors located outside of the ZTV are therefore proposed to be scoped out of the ES.	The 41 visual receptors selected by NG (Appendix H) are wholly inadequate for a 180km project with 50-metre high pylons. We have mapped NG's receptors and supporters across Essex, Suffolk and Norfolk have added key visual receptors that NG must include irrespective of Zone of Theoretical Visibility. Local residents have the knowledge of lines of sight and areas of greatest impact.
"Significant visual effects on people travelling by train on the Greater Anglia railway network are not anticipated due to the speed of travel, therefore this is proposed to be scoped out." (Scoped in, Wales)	This is clearly ludicrous. It must be scoped back in and we note that the visual receptors refer to trains anyway. Note that in North Wales, visual impact of pylons on rail travellers was scoped in. It must include the Sudbury to Marks Tey line – the famous Lovejoy line.
Bat activity surveys Where it is considered that habitat impacts would have a significant potential adverse effect on bats, bat activity surveys would be undertaken to establish a baseline. Based on the information outline in Section 8.12.42, it is considered that impacts on foraging and commuting bats can be scoped out for the sections of overhead line	Bats forage over a very wide area. They will be impacted by the construction of the pylons due to loss of habitat (specifically, in SR: Direct severance/ fragmentation of woodland and linear habitat features (e.g., hedgerows and watercourses). Direct loss of woodland with good connectivity to the wider landscape), noise and light. There can be no sections of the line scoped out and a 10km assessment area must be set – as in North Wales's pylons project scoping. So-called temporary impacts could have permanent impact on bat colonies. Some impacts will be permanent, when habitat is lost for good.The habitat avoidance policy set out by NG is already proposed to be breached in at least one place: in Aldham, Essex, where the pylons will pass directly over woodland. There needs to be a full assessment of habitat impact and it is imperative that bat activity surveys must be scoped back in.

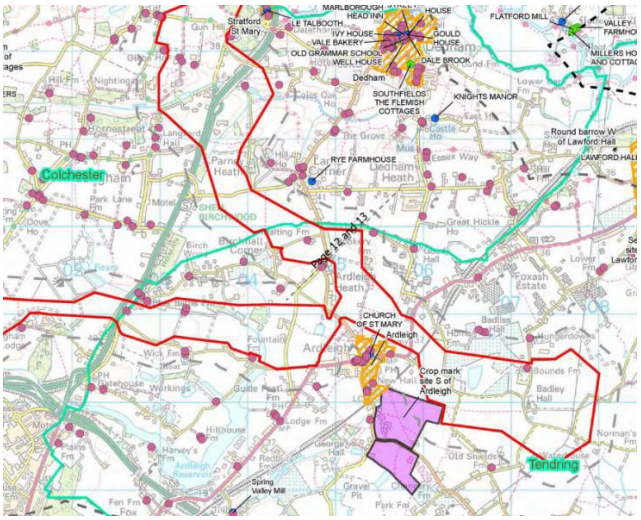
iii. Additional topics to be scoped in

Existing infrastructure

The Scoping Report must scope in impact of existing infrastructure on communities who risk being sandwiched between the proposed pylons and existing pylons or roads/rail e.g:

- There is existing electricity transmission and distribution equipment in the study area including 400kV and 132kV OHL's and the 400kV substations at Norwich Main, Bramford and Tilbury
- Thurrock section EAG There are also three existing OHL which run through this area along the Scoping Report Corridor.
- The Braintree section contains existing 400kV OHL's and near to Chelmsford there are 400kv and 132k OHL's.
- The Babergh section west of Ipswich and the Great Leighs section north of Chelmsford contain two OHL's within the corridor of search.

It is imperative, too, that the ES will consider the impact of the doubling back effect of pylons at Ardleigh, which leaves residents living in a 'V' of pylons:



iv. Additional comments relating to scoped in topics

Visual receptors

We believe that the 41 visual receptors put forward by NG are wholly insufficient. They leave huge unassessed gaps along the route and many very key sites of importance unaccounted for. We have therefore asked our supporters to log key visual receptors in their own area that should be scoped in to the ES.

The results are available on a map that we have created, and we would be delighted to supply the full list to the Inspector(s) if required.

[redacted]

Undergrounding of cables – swathe width

The area of impact for the purposes of assessment of undergrounding cables must be set at the maximum of the several set out by NG. The SR report states a swathe of only 40-m wide is required for undergrounding. The non-statutory consultation documentation noted c60m-wide. At a NG webinar, Spring 2022, we were told that a swathe of up to 100m-wide is required. For the purposes of the ES, the swathe width must be assumed to be 100-m to ensure that all construction damage to ecology, habitats and archaeology is factored in.

Impact on farms

The impact of the 12-metre wide access roads must be scoped in to the ES. These roads will damage habitat and lead to security issues for land-owners. The impact of walkers using these roads to access previously undisturbed areas of countryside on wildlife must be assessed.

Appendix A

Cumbria[15] – how alternatives *should* be consulted on

The below is taken from National Grid's Environmental Impact Assessment Scoping Report and Appendices for North West Coast Connections, Cumbria, in 2012. It highlights starkly the difference between the approach taken in East Anglia, where only one route has been pre-determined and presented for consultation. In Cumbria, by way of comparison, a variety of alternatives were discussed with stakeholders from the outset and those alternatives narrowed down through the process of consultation:

> *"Strategic Options (2009 to 2012)*
>
> *After establishing the need for new 400kV connections, National Grid worked together with local authorities from across Cumbria and Lancashire, as well as many prescribed and non-prescribed organisations, to explore the different options available for connecting the new generating capacity to the NETS. The outcome of this work helped to identify six high level options that represented potential solutions for making the connections needed in the North West.*
>
> *2.2.3 In October 2012, following the completion of consultation on the possible strategic reinforcement options to meet the connection need, National Grid published a Strategic Options Report (SOR) (Ref. 2.4) for the Project. The SOR outlined six Strategic Options for electricity transmission system reinforcement in the North West identified by National Grid, and set out National Grid's appraisals of each of the options.*
>
> *2.2.4 The six options were:*
>
> *1. Option 1 – Twin South Onshore (four onshore circuits south from Moorside);*
>
> *2. Option 2 – Twin South Offshore (four offshore circuits south from Moorside);*
>
> *3. Option 3 – Cumbria Ring Onshore South (two circuits north from Moorside, either onshore (3a) or offshore (3b) and two onshore circuits south from Moorside); Chapter 2 The Proposed Development 2-3*
>
> *4. Option 4 – Cumbria Ring Offshore South (two circuits north from Moorside, either onshore (4a) or offshore (4b) and two offshore circuits south from Moorside);*
>
> *5. Option 5 – Twin North and North-South (four circuits north from Moorside, either onshore (5a) or offshore (5b) and two circuits south from Harker); and*
>
> *6. Option 6 – Twin North and East-West (four circuits north from Moorside, either onshore (6a) or offshore (6b) and two circuits east from Harker plus 275kV to 400kV uprating of North East ring.*
>
> *2.2.5 The appraisals reported in the SOR considered the Strategic Options in terms of environmental, socio-economic, technical and cost factors, and took into account consultation feedback."*

[15] EN020007-000050-NWCC EIA Scoping Report (Main Report and Appendices).pdf (planninginspectorate.gov.uk)

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