

## **BABERGH DISTRICT COUNCIL**

**FROM:** Head of Natural and Built Environment

**REPORT NUMBER:** **J178**

**TO:** STRATEGY COMMITTEE

**DATE OF MEETING:** 11 February 2010

### **BRAMFORD TO TWINSTEAD OVERHEAD LINE PROJECT: ROUTE CORRIDOR CONSULTATION STUDY (STAGE ONE) - RESPONSE TO NATIONAL GRID**

#### **1. PURPOSE OF REPORT**

- 1.1 To agree a response to National Grid in relation to their route corridor consultation study (Stage One).
- 1.2 To explain that Babergh's role is to act as a consultee in this process. It will be for the Infrastructure Planning Commission to decide which, if any, route is selected.

#### **2. RECOMMENDATIONS**

- 2.1 That subject to any amendments which the Committee may wish to make as a result of its consideration of this report, the comments set out below be approved as the District Council's formal response to National Grid.
  - a) National Grid has not yet demonstrated conclusively that the current proposals are the most appropriate means of achieving the required network improvements, and that further consideration is given to the use of under sea cables and other technological solutions to connect known and future energy generation schemes.
  - b) In the absence of such a conclusive study the District Council strongly objects to the proposals in their current form.
  - c) In the event that a case is made for a new power line within the area a route following Corridor 2b be used to lessen potential environmental damage with key sections through the Brett Valley south of Hadleigh, the Dedham Vale Area of Outstanding Natural Beauty, and the Stour Valley south of Sudbury being placed under ground.
  - d) the District Council strongly encourages National Grid to pay full regard to the views of local people and their elected representatives before embarking upon Stage Two of their consultation process.
  - e) the District Council strongly encourages National Grid to set up a community forum to support Stage Two of the consultation process.
- 2.2 The Committee is able to resolve this matter.

#### **3. FINANCIAL IMPLICATIONS**

- 3.1 None arising directly from the content of this report.

#### 4. **RISK MANAGEMENT**

4.1 This report is most closely linked with the District Council's Significant Business Risk No.4 (Governance), No.5 (Capacity) and No.10 (Local Response to National Issues). The key risks are set out below:

<b>Risk Description</b>	<b>Likelihood</b>	<b>Seriousness of impact</b>	<b>Mitigation Measures</b>
<ul style="list-style-type: none"><li>• Ability to provide community leadership during period of significant change.</li><li>• Having insufficient capacity and expertise available.</li><li>• Not taking the opportunity to inform and influence any subsequent decisions for the benefit of Babergh residents.</li></ul>	Significant	Critical	Engage key Members
	High	Critical	Ensure resource availability
	Significant	Critical	Respond to consultation

#### 5. **KEY INFORMATION**

5.1 Members will be aware that National Grid is proposing to construct a new 400kV power line through Babergh from the existing sub-station at Bramford, Suffolk, to Twinstead in Essex. The District Council will not be the determining authority for any subsequent Development Consent Order (DCO) application. This will fall to the new Infrastructure Planning Commission (IPC) that has been established following the enactment of the Planning Act, 2008. The District Council is, however, identified as a relevant local authority for the purposes of the Planning Act, 2008, and it is in that capacity that this report has been prepared and presented to the Strategy Committee for consideration.

5.2 The Suffolk County Council will be considering its response to the consultation at a Cabinet Meeting on 2 February, 2010. The Officer recommendation to the Cabinet is along similar lines to that given in Paragraph 2.1. If there are any revisions Members will be updated at the meeting.

5.3 The Halstead Local Committee to Braintree District Council considered their response to the consultation on 20 January, 2010 and resolved to object to the construction of an additional 400kV in the Stour Valley and request that it be placed underground.

5.4 A tour of the project area has been arranged for Members of the Strategy Committee and other Members representing the affected parishes on 3 February 2010.

## **Why is a new power line required?**

- 5.5 National Grid is responsible for the high voltage electricity transmission system in Great Britain and has a statutory obligation to develop and maintain an efficient and economical transmission system. It must offer to connect new power generators to the system.
- 5.6 The existing transmission system in East Anglia is adequate to meet current demands. There are, however, proposals to generate additional electricity in the region. Almost eight Gigawatts of new generation are programmed for connection to the system between 2011 and 2021 from a number of new power stations, including Sizewell C nuclear power station (3,600 Megawatts), Bradwell B nuclear power station (1,650 Megawatts), and gas fired powered stations at King's Lynn B (984 Megawatts), South Holland (840 Megawatts) and Thames Haven (840 Megawatts). In addition between 2014 and 2020 it is anticipated that a further 10 Gigawatts of offshore wind farm power generation around the Norfolk and Suffolk coast will require a connection into the high voltage network.
- 5.7 National Grid has indicated that there are limits to the extent that the existing network within the region can be upgraded and parts of the system are already operating at maximum capacity. Any additional loading of the system, without increasing capacity of the network, would therefore increase the risk of a major failure and jeopardise the quality and stability of existing electricity supplies.

## **Have any alternative solutions been considered?**

- 5.8 In order to respond to the demand for new connections National Grid has given consideration to a number of strategic options but these have been discounted because of environmental, technical and cost implications. They have included:
- the use of under sea cables between Sizewell and Bradwell with a new overhead line between Bradwell and Rayleigh,
  - a new overhead line between the following locations:
    - Bramford and Colchester,
    - Bramford and Burwell (Cambridgeshire),
    - Bramford and Rayleigh,
    - Sizewell and Twinstead (avoiding Bramford), and,
    - Sizewell to Walpole (Norfolk) via Norwich,
  - a technological solution involving the replacement of the existing 400kV line between Bramford and Twinstead and the upgrading of the overhead line between Bramford to Pelham to operate at 800kV (Ultra High Voltage).
- 5.9 The formation of a new overhead line between Bramford and Twinstead has therefore been identified by National Grid as the most appropriate solution. There have, however, been recent announcements (December 2009) concerning agreements reached with other European countries for the development of an offshore grid in the North and Irish Seas that need to be fully evaluated before any decision is made on the construction of a new over head line.

- 5.10 The construction of the line beneath ground was not considered as part of the strategic options assessment. National Grid's policy is that due to the very high relative costs of underground transmission it will only consider the use of underground cables in 'exceptionally constrained areas', including Areas of Outstanding Natural Beauty. The cost of placing a 400kV high voltage cable beneath ground is cited as being 12 to 17 times more expensive than an overhead line at £18–34 million per km. This compares with £1.5 – 2.0 million per km for a conventional overhead line (Source: National Grid).
- 5.11 It should also be noted that the installation of high voltage underground cables causes significant disturbance to a wide swathes of land (up to 100 metres in width) and creates difficulties in relation to subsequent after use with the risk of further disturbance should faults occur.
- 5.12 In response to comments that have been made during the consultation process about the possible use of High Voltage Direct Current (HVDC) transmission National Grid have indicated such networks tend to be more economic over longer distances, usually in excess of 100km, because of the need to provide costly converter stations. While such transmission networks have been established in Canada, the distances between substations in the UK are much shorter. As such National Grid does not regard the use of HVDC to be a viable alternative. National Grid has also indicated that the formation of a HVDC link between Sizewell and the Thames Estuary is not possible because of significant capacity constraints within the London area.
- 5.13 The construction of a tunnel between Bramford and Twinstead as suggested by some groups has also been discounted by National Grid on cost and construction grounds. In particular the formation of a tunnel would generate significant volumes of spoil and require the construction of access and ventilation towers at key points along the route.

### **What are the proposals?**

- 5.14 National Grid has identified four possible corridors for the construction of a new overhead line between Bramford and Twinstead. At this stage the precise alignment of any overhead line has not been determined. It is, however, envisaged that any new overhead line would be supported by towers having a conventional height of 47 metres and a base footprint of 10 metres by 10 metres. Power lines strung between the towers would have a typical span of 360 metres. The resultant appearance would be similar to the existing 400kV electricity line passing through the District.
- 5.15 In broad terms the route corridors are as follows:
- a corridor running parallel to the existing 400kV overhead line,
  - a corridor using the route of the existing 132kV line between Bramford and Twinstead, and,
  - two entirely new corridors.
- 5.16 A plan showing the four alternative route corridors is attached as Appendix 1 to this report.

Corridor 1 – Parallel to existing 400kV overhead line

- 5.17 This corridor is approximately 26 km long and the proposals would involve the construction of a new 400kV overhead line from Bramford to Twinstead, largely parallel to the existing 400kV overhead line and a smaller 132kV overhead line operated by EDF. This route runs south west from Bramford substation, north of Burstall and Hintlesham continuing over Hintlesham Woods Site of Special Scientific Interest and south to Hadleigh and Polstead Heath. The route corridor continues to Twinstead in Essex, passing through the Dedham Vale Area of Outstanding Natural Beauty (AONB) for a distance of 3km south of Boxford. This option would result in three closely located overhead lines, partly within the AONB.

Corridor 2 – Using the route of the existing 132kV overhead line

- 5.18 This corridor is approximately 28.5 km long and the proposals would involve the removal of the existing EDF 132kV overhead line and the construction of a new 400kV line in its place. There are two variants of this scheme. Corridor 2a runs due south from Bramford sub-station following the 132kV line before turning west to the south of Hintlesham to join corridor 1. Under Option 2b the new line would run parallel to the existing 400kV line for its entire length. A number of parishes including the residents of Hintlesham would therefore benefit from the removal of the existing 132kV line that runs to the south of the village at present. If either of the route corridor 2 options were chosen, a new electricity sub-station would be needed between Twinstead and Castle Hedingham. This option would result in the construction of larger towers along the entire route, including those within the AONB, but the effects would be concentrated into an area which is already characterised by overhead lines.

Corridor 3 – New route directly to the north of Hadleigh

- 5.19 This corridor is approximately 26.5 km long and the proposals would involve the construction of a new 400kV overhead line in a south westerly direction from Bramford to Aldham, then in westerly direction north of Hadleigh and Boxford before heading in a southerly direction again towards Twinstead. The route would lie in close proximity to Hadleigh, Kersey, Boxford and Groton.

Corridor 4 – New route further to the north of Hadleigh

- 5.20 This corridor is approximately 30km long and the proposals would involve the construction of a new 400kV overhead line in a north-western arc from Bramford to the north of Elmsett, Whatfield, Lindsey and Edwardstone before turning south to the east of Great Waldingfield and Newton and then west towards Twinstead. This route runs across open countryside that is almost entirely free of significant visual detractors and provides the setting for historic settlements such as Milden, Monks Eleigh, Chelsworth and Semer.

## **Who has been consulted?**

- 5.21 The Planning Act, 2008, requires the promoter of a Nationally Significant Infrastructure Project (NSIP) to produce a Statement of Community Consultation (SOCC) and engage with local communities before it embarks upon the preparation and submission of any DCO application to the IPC. To this end Members will recall that they considered a report at their meeting on 8 October 2009 (Paper J107) which set out National Grid's consultation proposals which included amongst other things the notification of all households within the study area, the staging of exhibitions, and parish briefing sessions. Stage One of the formal consultation process commenced on 27 October 2009 and is due to end on 28 February 2010.
- 5.22 In addition to the consultation that has been undertaken by National Grid, Babergh has informed all parish councils in the affected area of the proposals and has invited them to share the content of any representations they intend to make to National Grid with the District Council. They have also been invited to nominate representatives to address the meeting.
- 5.23 National Grid have been requested to make the responses they have received to date in connection with the Stage One consultation exercise publicly available but have declined to do so for data protection and other reasons. As a result the views being expressed by residents and other groups will not be known for a few months. In the meantime parish councils, organisations, pressure groups and residents have been forwarding copies of their representations to the District Council. The comments received at the time of writing this report have been summarised for the benefit of Members and are detailed in Appendix 2.
- 5.24 Based upon the representations received to date it would appear that there is:
- unanimous objection to the use of Corridors 3 and 4,
  - a large body of support for undergrounding,
  - support for the use of alternative technologies, including an off-shore route, and,
  - some acceptance that the use of Corridor 2 would cause less damage but with the proviso that cables are placed beneath ground in the Dedham Vale AONB and other sensitive locations.
- 5.25 A local group has also been co-ordinating responses and has supplied copies of letters sent to National Grid. In addition a petition signed by approximately 300 Babergh residents has been received advocating that the power line is placed underground.

## **How will the proposals be considered?**

- 5.26 At this stage National Grid is seeking the views of residents, parish councils, local authorities and national bodies on the selection of a possible route for the construction of a new overhead power line. Once it has considered these views it will select a preferred route and proceed to the detailed design stage. There will then be a further opportunity to comment upon the detailed proposals (Stage Two) before National Grid presents a DCO application to the IPC for consideration.

- 5.27 The IPC, not Babergh, will be responsible for the determination of any subsequent DCO application. Babergh is a consultee within the overall process. In determining whether to grant a DCO the IPC is required under the provisions of the Planning Act, 2008, to consider an application in accordance with the relevant National Policy Statement (NPS) having regard to any local impact report submitted by a relevant local authority under Section 60.
- 5.28 While the Government's NPS's relating to energy generation and electricity transmission are still in draft, Members may wish to note that the overarching NPS for Energy (EN-1) provides guidance on the consideration of proposals in landscape and visual terms as well as other matters. In particular EN-1 indicates that the IPC may exceptionally grant consent for projects in areas of high amenity value such as National Parks, Heritage Coasts, and AONB's where it has been demonstrated that there is a need for the development, detailed consideration has been given to the costs of developing elsewhere, and any detrimental effect of the proposal upon the environment can be moderated. Outside nationally designated areas, however, EN-1 advises that local landscape designations that appear in Local Development Documents should not be used in themselves to refuse consent as this may unduly restrict acceptable proposals.
- 5.29 The draft NPS for Electricity Network Infrastructure (EN-5) provides more detailed guidance and outlines that the consideration of proposals for new overhead lines should still be considered against the provisions of the Holford Rules<sup>1</sup>. While these have been reviewed and supplemented since their inception they suggest that:
- major areas of highest amenity value such as National Parks, Heritage Coasts, and AONB's should be avoided altogether,
  - smaller areas of higher amenity value or scientific interest should be avoided by deviation where this can be done without using too many angle towers,
  - the most direct route should be chosen, with no sharp changes of direction, to minimise the use of angle towers,
  - tree and hill backgrounds are used in preference to sky backgrounds wherever possible. Where a line has to cross a ridge it is recommended that this opaque background is retained as long as possible and the ridge is crossed obliquely when a dip in the ridge provides an opportunity. If there is no dip it is recommended that the ridge is crossed directly, preferably between belts of trees.
  - moderately open valleys with woods are used where the apparent height of towers will be reduced and views of the line will be broken by trees,
  - where land is flat and sparsely planted high voltage lines should be sited as far as possible away from smaller lines, converging routes and other masts and cables, and,
  - urban areas should be approached through industrial areas where they exist.

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<sup>1</sup> A series of planning guidelines first developed in 1959 by Lord Holford, advisor to the then Central Electricity Generating Board (CEGB) on amenity issues.

- 5.30 EN-5 goes on to advise that the IPC when considering whether lines should be placed underground will have to have regard to the economic, environmental and social costs of undergrounding and the technical challenges that will be faced. It points out that the cost of undergrounding electricity cables is between ten and twenty times as much per unit length as an overhead line and that the maintenance and repair costs are significantly higher. In addition it highlights the damage that can occur to sensitive habitats and heritage assets by placing cables underground. EN-5 therefore states that the IPC should not refuse consent for overhead line proposals on the basis that undergrounding is preferable unless it is satisfied that the benefits from undergrounding outweigh the extra economic, social and environmental costs and the technical difficulties can be overcome.
- 5.31 In addition advice is provided within EN-5 on the assessment of noise when considering applications and indicates that the IPC will be required to ensure that appropriate methodologies have been used in the evidence that is presented to them and that suitable mitigation options have been considered and adopted. The draft document also contains guidance on the assessment of Electric and Magnetic Fields (EMF's). In this respect the the draft NPS directs the IPC to guidance produced by the International Commission on Non-Ionising Radiation Protection (ICNIRP) and points out that there is no direct statutory provision in the planning system relating to protection from EMF's and the construction of new overhead power lines. There is, however, provision within other regulations that are applicable to the electricity industry. EN-5 also requires the IPC to take into account airfield safeguarding zones.

#### **What is Babergh's view?**

- 5.32 National Grid have conducted a strategic options assessment and have concluded that the construction of a new overhead line between Bramford and Twinstead is the most appropriate way of increasing the capacity of the high voltage electricity network within the region. The strategic options assessment was, however, undertaken prior to the announcements made in December 2009 about the establishment of an off shore electricity transmission network and the more recent announcements (January 2010) concerning licences for off shore electricity generation off the Norfolk and Suffolk coasts. In the circumstances the previous assumptions made about the need for a new overhead line and the route it should take would appear to require re-evaluation.
- 5.33 It is also of concern that the alternative routes identified in the strategic options report have been dismissed too readily on the grounds of cost without taking a more holistic view. On this basis it is recommended that Members do not accept the current rationale for the proposals and request that further consideration is given to the use of alternative routes, including the establishment of an off-shore network, and other technological solutions.

- 5.34 If it is demonstrated conclusively that a new power line is required between Bramford and Twinstead there are strongly held views within the communities affected that the line should be placed beneath ground in order to minimise the visual impact of the proposals. While the guidance contained within draft NPS EN-5 suggests that such an approach is unlikely to be supported by the IPC when it comes to consider the DCO application, there are areas of exceptionally high landscape value throughout the District, including the Dedham Vale AONB, where the use of underground cables should be considered. Although those areas outside the AONB are not afforded statutory protection they are identified in Development Plan Documents as Special Landscape Areas and should be afforded appropriate protection from insensitive proposals. As such the selection of a future route based upon strict adherence to the Holford Rules could prove to be perverse and cause greater environmental harm than the selection of a route that passes through a designated area.
- 5.35 National Grid's route corridor selection study does not, however, contain a systematic landscape and visual impact assessment of the study area and relies instead on constraints mapping. As a consequence the potential impact of the proposals upon settlements and significant views has not been fully addressed. It is therefore difficult to comment objectively on the proposals.
- 5.36 In the event that a new power line cannot be placed beneath ground it is evident that a third overhead line following Corridor 1 would result in an unacceptable intensification in the amount of 'wirescape' within the landscape. It is for this reason that Members are invited to discount this option. A new overhead line following the routes identified as Corridors 3 and 4 would pass through an area of landscape that has retained much of its historic pattern and many of its traditional features. As such this largely intact and unspoilt landscape provides a setting to a number of historic settlements including Boxford, Groton, Kersey, Monks Eleigh, Semer, Chelsworth, Aldham and Whatfield and includes a number of significant views. The construction of a new overhead line following one of these routes would therefore be highly undesirable given that there is an option to replace the existing 132kV overhead line that forms the subject of Corridor 2.
- 5.37 Members are accordingly invited to accept that if, and only if, the need for a new line is demonstrated conclusively the use of Corridor 2 would cause the least environmental damage. Such an approach would also be consistent with the draft NPS which favours the reconfiguration of existing power line networks. It is, however, acknowledged that the use of Corridor 2 would require the construction of a new sub-station in Essex which will cause further environmental harm.
- 5.38 Notwithstanding the cost implications there are visually sensitive locations along the route of Corridor 2 where any new line should be placed beneath ground. These sections include the Brett Valley south of Hadleigh, the Dedham Vale Area of Outstanding Natural Beauty, and the Stour Valley south of Sudbury. In addition there are opportunities to rationalise the 'wirescape' around Hintlesham and the selection of a route to the north of the village would appear to be more appropriate.
- 5.39 As well as placing the line beneath ground in the most sensitive landscapes a full range of compensation measures, including structural landscaping and screening should be provided by National Grid in line with current good practice.

5.40 In the light of the observations contained within this report, and the additional costs that would be associated with placing greater lengths of the power line under ground, it is evident that the current proposals put forward by National Grid require further evaluation before the commencement of Stage Two of the consultation process.

**6. APPENDICES**

Appendix 1: Route Corridor Plan

Appendix 2: Summary of Responses

**7. BACKGROUND PAPERS**

None

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**SPEAKING ARRANGEMENTS AT STRATEGY COMMITTEE MEETING 11 FEBRUARY 2010**

90 BRAMFORD TO TWINSTEAD OVERHEAD LINE PROJECT – NATIONAL GRID'S CONSULTATION (STAGE 1)

Members had before them a recommendation relating to the consideration of Babergh's response to National Grid's Consultation and the way in which representatives of affected Parish Councils and the National Grid might be afforded the opportunity to speak when the Committee considers its response.

Members had before them a revised Recommendation (2) to that which appeared on the original agenda which took into account concerns raised about the detail of the original proposal suggested by the Political Leaders' Group.

**RESOLVED**

**(1) That Babergh's response to National Grid's Consultation (Stage 1) be determined by Strategy Committee at its meeting on 11 February 2010.**

**(2) That the opportunity be provided for representatives of Parish Councils affected and National Grid to speak at the Strategy Committee meeting on 11 February on the following basis:-**

**(a) The number of speakers to be restricted as follows:**

- **One speaker to represent the interests of the communities affected by each of the four proposed routes, i.e. up to four speakers.**
- **One speaker to represent the interests of those communities who wish to propose undergrounding of whatever route is chosen.**
- **One speaker from National Grid.**

**(b) It will be a matter for the Parish Councils to confer and agree who should speak on their behalf. The time limit for each of the speakers representing the interests of the communities to be 3 minutes. The time limit for the speaker from National Grid to be 6 minutes.**

Members noted that a letter would be sent to all affected Parish Councils with a copy to all Members setting out details of the proposed arrangements.

## APPENDIX 2

### SUMMARY OF RESPONSES RECEIVED FROM TOWN AND PARISH COUNCILS, ORGANISATIONS, PRESSURE GROUPS AND BABERGH RESIDENTS

Name/Organisation	Town/Parish	Summary of comments
Assington Parish Council	Assington	Comments that all four corridors pass through the parish. Considers Corridor 1 to be totally unacceptable as it would result in a third parallel line. Equally Corridors 3 and 4 would result in further power lines in close proximity to existing lines. Corridor 2 is seen as the least damaging solution but on the proviso that any lines are placed beneath ground in the AONB.
Boxford Parish Council	Boxford	Recognise the need for the efficient delivery of electricity but are of the view that the use of Corridors 3 and 4 would have a negative impact upon the countryside. The use of Corridor 3 would have an adverse visual impact upon the area to the north of the village. Less disruption would be caused by using Corridor 2 providing the lines are placed beneath ground in the AONB. Alternative technologies should be explored.
Burstall Parish Council	Burstall	Supports Corridor 4. Express disappointment that undergrounding has not been presented as an options. Consider the use of Corridor 4 would have the least impact on the resident population as it would pass through less densely populated areas thereby minimising health risks. Corridor 4 also provides further opportunities for increasing capacity and would be less expensive. Suggests Corridor 4 could be used for the construction of a 'super route' to replace existing lines.

Name/Organisation	Town/Parish	Summary of comments
Chilton Parish Council	Chilton	Supports the use of Corridor 2 as this option would not require the construction of a third overhead line. The Parish Council is however of the view that as a minimum both sets of lines in the AONB should be placed beneath ground.
Great Waldingfield Parish Council	Great Waldingfield	Objects to Corridors 3 and 4. The proposals would have an adverse impact upon the surrounding landscape, the Conservation Area, numerous listed buildings, SSSI's, County Wildlife Sites and Ancient Monuments. The alignment of the Corridor 4 will necessitate the use of ugly angle tower and create a 'wirescape'. The proposals would undermine the quality of life enjoyed by 1470 village inhabitants.
Lindsey Parish Council	Lindsey	Objects to Corridor 4. Considers the use of this corridor would have a highly negative visual impact on the area which contains unspoilt countryside. In addition proposals would have an adverse impact upon Conservation Areas, numerous listed buildings, SSSI's, County Wildlife Sites and Ancient Monuments. It would also impact upon the local economy and tourism and give rise to health issues. The Parish Council's preferred option is Corridor 2.
Little Cornard Parish Council	Little Cornard	Objects. Points out that all Corridors cross the Stour Valley in close proximity to Little Cornard and adjacent to the AONB and within an area that has been considered as a possible extension to the AONB. Whichever route is chosen there will significant and permanent damage to the landscape. The proposals will give rise to health risks and loss of property values. Undergrounding appears to have been dismissed on cost grounds. This is unacceptable and requires further consideration.

Name/Organisation	Town/Parish	Summary of comments
Milden Parish Meeting	Milden	Object to Corridor 4. This is the longest route and would cause most harm. Milden is the second highest point in Suffolk and the pylons would be particularly intrusive within the landscape, spoiling the setting of villages. Corridor 3 would be equally intrusive. Considers the new line should be placed beneath ground but if this is not possible Corridor 2 should be selected given that a power line already exists with some undergrounding.
Nayland with Wissington Parish Council	Nayland with Wissington	Considers all new transmission lines should be placed underground. If this is not possible then Corridor 2 should be selected.
Newton Parish Council	Newton	Accept the need for additional 400kV power line. Do not however see how the construction of a new line in Corridors 1, 3 and 4 can be justified as it will result in additional pylons and power lines. The replacement of the existing 132 kV overhead lines in Corridor 2 would result in a reduction in the number of pylons by 15% and is the least damaging option. Power lines crossing the AONB should be placed underground.
Dedham Vale and Stour Valley Partnership	-	Objects to the use of all of the identified corridors as two pass through the AONB and all four pass through the Stour Valley. Consider alternative methods for achieving network reinforcement have not been fully explored and insufficient consideration has been given to the evaluation of the landscape in visual, historic and cultural terms. In the absence of this information it is not possible to fully evaluate the proposals. There is overwhelming national, regional and local policy against such developments in protected landscapes. Stress that their response should not be interpreted as support for Corridors 3 and 4.

Name/Organisation	Town/Parish	Summary of comments
Stour Valley Underground	Various	<p>Objects to the use of all over ground corridors. Suggests that a comprehensive solution is required involving the use of underground cables/cables placed on the sea bed. Are of the view that the upgrading of the existing 400kV line would produce a 30% increase in capacity to meet immediate demands. Given possible delays in the delivery of Sizewell C and off shore wind farms a longer-term solution is required making use of HVDC cables beneath the sea. Are of the view that if the new line has to come through the area it should be placed underground or in a tunnel.</p>
Groton Pylon Alliance	Various	<p>Objects to Corridors 3 and 4. Considers Corridor 2 would be the least damaging option but acknowledges that no community would willing accept a new overhead line. They consider the proposals would have an adverse visual impact upon the landscape that is of historical value, it would harm conservation areas, numerous listed buildings, SSSI's, county wildlife sites and ancient monuments. In addition the proposals would harm the local economy and community life, conflict with planning policies and devalue properties.</p> <p>The Groton Pylon Alliance has also commissioned an independent Landscape and Visual Assessment which concludes that the use of Corridors 3 and 4 would have the greatest adverse impact. Corridors 1 and 2 are considered to be less sensitive to change but mitigation is recommended within the AONB.</p>

Name/Organisation	Town/Parish	Summary of comments
Notcutts	Whatfield	The use of Corridor 4 would thwart residential development on land owned by the company. The promotion of Corridors 3 and 4 would appear to conflict with the requirements placed upon National Grid under Schedule 9 of the Electricity Act, 1989 in relation to the protection of the countryside and flora and fauna. It would affect the highest number of settlements, heritage assets, and SSSi's. The use of Corridor 2 would be more appropriate and less environmentally damaging. Any cables passing through AONB should be placed underground.
Mr Clarkson	Kersey	Objects to Corridors 3 and 4. The proposals would have an adverse impact upon Kersey and the surrounding countryside resulting in a loss of outlook and health issues. Accepts the need for efficient delivery of electricity but not at the expense of the environment.
Mr and Mrs Cooper	Elmsett	Object to Corridor 4. Accepts the need to electricity transmission but concerned that the proposals will impact on land farmed by them. Points out that the area is of high landscape value and the proposals will have a detrimental impact. All lines should be placed underground
Dr C M Squire	Aldham	Objects to the possible construction of a new overhead line. Is of the view that any line should be placed underground.
Mr and Mrs Line	Kersey	Objects to Corridors 3 and 4. Considers the use of Corridors 1 and 2 would be more appropriate and less harmful with cables being placed beneath ground in the AONB. Suggests that existing and proposed cables should be placed under ground. Comments also made in connection with the loss of property value and potential health impacts.

Name/Organisation	Town/Parish	Summary of comments
Mr and Mrs Cumming and family	Kersey	Object to Corridor 3. Consider the selection of this route will have an adverse impact upon the landscape, be visually intrusive and adversely affect the setting of listed buildings. They also express health concerns. Are of the view that the consultation process is divisive. Consider the selection of Corridor 2 would cause less harm.
Mr and Mrs Hart and family	Whatfield	Objects to Corridors 3 and 4. Considers the use of Corridor 2 would be less intrusive. Of the view that the proposals would damage the local economy and tourism, harm the quality of the countryside, compromise the setting of villages and important listed buildings, conflict with planning policies and the Holford Rules, and lead to a loss of property value.
Mr and Mrs Hart	Aldham	Objects to Corridors 3 and 4. While recognising the need to upgrade the electricity transmission network, considers the use of Corridor 2 would be less intrusive. Points out that the AONB was designated after the existing pylons were constructed. Object specifically to Corridor 3 because of the adverse impact of the proposals upon the landscape, Conservation Areas, wildlife sites and the local economy. Also cite conflict with planning policies and the Holford Rules.
Fiona Johnston	Monks Eleigh	Objects to Corridor 3 and 4. The proposals would be visually intrusive, have an adverse impact on wildlife, create noise and health issues, and have a detrimental impact on the local economy. Suggests that consideration is given to the use of Corridor 2 with some undergrounding.

Name/Organisation	Town/Parish	Summary of comments
Karen Bark	Monks Eleigh	Objects to Corridors 3 and 4. The proposals would conflict with current guidance, cause noise and pollution, give rise to health issues, have a negative visual impact on the landscape and conservation areas, impact on nature conservation interests and historic feature and be detrimental to the local economy. Concern also expressed about the impact on Wattisham Airfield. The use of Corridor 2 would cause less damage but the opportunity should be taken to place cables beneath ground in the more sensitive locations.
Mr J M Ralph	Aldham	Objects to Corridors 3 and 4. Accepts the need for new power lines but considers they should be sympathetically sited in Corridor 2. Express concern about the impact of the proposals upon the landscape, cultural and heritage assets, and agriculture. Suggests that an alternative solution is required.
Iona Romer-Lee	Semer	Objects to Corridors 3 and 4. Considers the proposals will have an adverse impact upon the local economy and tourism. Suggests the proposals conflict with current guidance and the Holford Rules. Indicates that the use of Corridor 2 would have less impact and requests that National Grid places any cables underground.
Sir R and A Mountfield	Kersey	Objects to Corridors 3 and 4. The proposals would have an adverse impact upon the character of the landscape and conflict with planning guidance and the Holford Rules. The use of Corridor 2 would be less damaging but consideration should be given to undergrounding, especially through sensitive areas.

Name/Organisation	Town/Parish	Summary of comments
Mr and Mrs McDonald	Edwardstone	Objects to Corridors 3 and 4. Points out that National Grid have a duty to mitigate the impact of their proposals under the Electricity Act, 1989. The use of Corridors 1 and 2 would cause less harm, especially if consideration was given to the use of alternative technologies/undergrounding. The use of Corridors 3 and 4 would adversely affect the landscape, conservation areas, ancient monuments, historic buildings and the setting of a number of villages. It could also have an impact upon the operation of local airfields.
Mr and Mrs M C Boon	Aldham	Object to Corridors 3 and 4. The proposals would have a detrimental effect upon the countryside. Other services are placed underground and National Grid should do the same. The lines should be placed underground using either Corridor 1 or 2.
Mr and Mrs J Maynard	Monks Eleigh	Objects to Corridors 3 and 4. The use of these corridors would cause the most significant harm and damage to the landscape. The use of Corridors 1 and 2 would cause less damage subject to the line being placed underground in the AONB. Urges that consideration is given to the use of alternative technologies.
Mr and Mrs J Alleston and family	Aldham	Prefer Corridor 2. Very concerned that the use of Corridors 3 and 4 would blight the countryside and the setting of settlements such as Kersey, Chelsworth and Boxford
Mr and Mrs Walker	Great Cornard	Object to Corridor 3 and 4. Consider the selection of Corridor 2 represents the least damaging option but suggest National Grid should give consideration to the use of alternative technologies and undergrounding. The use of Corridors 3 and 4 would have an adverse impact upon the landscape, nature conservation interests, the local economy, and heritage assets. The proposals would also be noisy and conflict with the Holford Rules.

Name/Organisation	Town/Parish	Summary of comments
Mr P Kievenaar	Lindsey Tye	Objects to Corridor 4. The upgrading of Corridor 2 represents a logical solution but there must be an enhancement by undergrounding certain sections notably in the AONB and other sensitive locations, such as the river valleys.
Mr M Wincer	Chelsworth	Objects to Corridor 4. The proposals would have an adverse impact upon a landscape that is afforded special protection. Consideration should be given to the use of alternative technologies to replace and upgrade the power lines that already exist in Corridor 2.
Mr and Mrs Davis	Groton	Considers the existing and proposed lines should be placed underground.
Mr J Hanmer	Edwardstone	Objects to Corridor 4. Recognises the need to transmit electricity but considers a route some 30km long would have an adverse impact upon the countryside. The use of Corridor 2 would have less net impact. To address the impact on the AONB undergrounding should be considered. Questions why alternative design solutions and technologies have not been considered.
Mrs B Stacey	Assington	Objects to Corridors 3 and 4. Considers any new line should be placed underground for safety and environmental reasons. In view of the damage that has already taken place the use of Corridor 2 would cause less harm. Important views should, however, be afforded protection.
Mr and Mrs Mills	Lindsey	Object to the project. Consider any new lines should be placed underground in order to safeguard the character of the countryside.

Name/Organisation	Town/Parish	Summary of comments
Mr and Mrs Higton	Hadleigh	Object to Corridors 3 and 4. Consider the use of these routes would have a devastating impact on the landscape, including a large tract that is afforded protection. Suggest the use of Corridor 2 would be less damaging and present opportunities to right previous harm.
Mr M Emptage	Aldham	Prefers Corridor 2. Questions how the views of the public will be taken into account. Points out that the public have been asked to choose between four routes and have not been asked whether they want pylons in the first instance. Any new lines should be placed beneath ground.
Mr M Prevost	Aldham	Considers the new line should be placed underground. Suggests that active consideration is given to the use of cables beneath the North Sea to link energy generating projects around the coast and those proposed off-shore. If an above ground solution has to be found then Corridor 2 would cause the least disruption to the countryside. Points out that the AONB was designated after the construction of the existing lines.
Mr and Mrs J Limond	Elmsett	Object to Corridors 3 and 4. The construction of overhead lines would scar the countryside and alter unspoilt views. Accept the need for progress and acknowledge that no one wishes to live in close proximity to power lines but consider the use of Corridor 2 would not add to the overall number of lines.

In addition to the individual letters of representation that have been received by the District Council, the Groton Pylon Alliance have submitted a further 315 letters of objection. Most of the letters have been written by local residents but some have come from addresses further afield. In summary the comments raised are as follows:

- Object to Corridors 3 and 4 (315)
- The existing overhead line should be up-graded (240)
- Would cause disruption to the landscape/countryside (237)
- The lines should be placed underground (187)
- Would damage the local economy/tourism (139)
- Adverse impact on wildlife (98)
- Would harm historic buildings (72)
- Would conflict with national policy/the Holford Rules (69)
- Create noise problems (54)
- Create health risks (52)
- Impact on the operation of local airfields (48)
- Would have an adverse impact on community life (47)
- Lead to the creation of a 'wirescape' (25)
- Result in a loss of property value (20)
- Consider 'smart grid' technology should be used (18)

NB  
Copies of all the representations received are available for inspection by Members on request. Please contact the case officer.