

LOCAL PLAN SUB-COMMITTEE AGENDA

Monday 13th June 2022 at 6.00pm

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

THIS MEETING IS OPEN TO THE PUBLIC

*(Please note this meeting will be broadcast via the Council's YouTube Channel,
webcast and audio recorded)*

www.braintree.gov.uk/youtube

**Members of the Local Plan Sub-Committee are requested to attend this meeting to
transact the business set out in the Agenda.**

Membership:-

Councillor J Abbott

Councillor K Bowers

Councillor G Butland

Councillor J Coleridge

Councillor T Cunningham

Councillor T Everard

Councillor D Hume

Councillor Mrs I Parker

Councillor Mrs W Scattergood (Vice Chairman)

Councillor Mrs G Spray (Chairman)

Councillor P Thorogood

Councillor J Wrench

Apologies: Members unable to attend the meeting are requested to forward their
apologies for absence to the Governance and Members Team on 01376
552525 or email governance@braintree.gov.uk by 3pm on the day of the
meeting.

A WRIGHT
Chief Executive

INFORMATION FOR MEMBERS - DECLARATIONS OF INTERESTS

Declarations of Disclosable Pecuniary Interest (DPI), Other Pecuniary Interest (OPI) or Non- Pecuniary Interest (NPI)

Any member with a DPI, OPI or NPI must declare the nature of their interest in accordance with the Code of Conduct. Members must not participate in any discussion of the matter in which they have declared a DPI or OPI or participate in any vote, or further vote, taken on the matter at the meeting. In addition, the Member must withdraw from the Chamber where the meeting considering the business is being held unless the Member has received a dispensation from the Monitoring Officer.

Public Question Time – Registration and Speaking on an Agenda Item

Members of the public wishing to speak are requested to register by contacting the Governance and Members Team on 01376 552525 or email governance@braintree.gov.uk by **midday on the second working day** before the day of the Committee meeting. For example, if the Committee meeting is on a Tuesday, the registration deadline is midday on Friday, (where there is a Bank Holiday Monday you will need to register by midday on the previous Thursday).

The Council reserves the right to decline any requests to register to speak if they are received after this time.

All registered speakers will have 3 minutes each to make a statement.

Members of the public who have registered to speak during Public Question Time are requested to indicate when registering if they wish to attend the Local Plan Sub-Committee meeting ‘in person’ at Causeway House, Bocking End, Braintree, or to participate remotely. People who choose to join the meeting remotely will be provided with the relevant link and joining instructions for the meeting.

Members of the public may speak on any matter listed on the Agenda for this meeting. Registered speakers will be invited to speak immediately prior to the relevant item.

All registered speakers are requested to send a written version of their question/statement to the Governance and Members Team by E-Mail at governance@braintree.gov.uk by no later than 9.00am on the day of the meeting. In the event that a registered speaker is unable to connect to the virtual meeting, or if there are any technical issues, their question/statement will be read by a Council Officer.

Public Attendance at Meeting: The Council has reviewed its arrangements for this decision making meeting of the Local Plan Sub-Committee in light of the Covid pandemic. In order to protect the safety of people attending the meeting, Councillors and Officers will be in attendance at Causeway House, Bocking End, Braintree. Members of the public may also attend the meeting ‘in person’, but priority will be given to those people who have registered to speak during Public Question Time. Members of the public will be able to view and listen to the meeting either as a live broadcast, or as a recording following the meeting, via the Council's YouTube channel at <http://www.braintree.gov.uk/youtube>

Health and Safety/COVID:

Causeway House is a Covid secure building and arrangements are in place to ensure that all visitors are kept safe. Visitors are requested to follow all instructions displayed at Causeway House or given by Officers during the course of their attendance. All visitors will be required to wear a mask or face covering, unless an exemption applies.

Anyone attending a meeting is asked to make themselves aware of the nearest available fire exit. In the event of an alarm you must evacuate the building immediately and follow all instructions provided by staff. You will be directed to the nearest designated assembly point until it is safe to return to the building.

Mobile Phones: Please ensure that your mobile phone is switched to silent during the meeting in order to prevent disturbances.

WiFi: Public Wi-Fi (called BDC Visitor) is available in the Council Chamber; users are required to register when connecting.

Documents: Agendas, Reports and Minutes can be accessed via www.braintree.gov.uk

Webcast and Audio Recording: Please note that this meeting will be webcast and audio recorded. You can view webcasts for up to 6 months after the meeting using this link: <http://braintree.public-i.tv/core/portal/home>. The meeting will also be broadcast via the Council's YouTube Channel.

Comments and Suggestions: We welcome comments to make our services as efficient and effective as possible. If you have any suggestions regarding the meeting you have attended, you can send these to governance@braintree.gov.uk

1 Apologies for Absence**2 Declarations of Interest**

To declare the existence and nature of any Disclosable Pecuniary Interest, other Pecuniary Interest, or Non-Pecuniary Interest relating to Items on the Agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting.

3 Minutes of the Previous Meeting

To approve as a correct record the Minutes of the meeting of the Local Plan Sub-Committee held on 17th March 2022 (copy previously circulated).

4 Public Question Time

(See paragraph above)

**5 Nationally Significant Infrastructure Project (NSIP)
East Anglia Green****5-20****6 Urgent Business - Public Session**

To consider any matter which, in the opinion of the Chairman, should be considered in public by reason of special circumstances (to be specified) as a matter of urgency.

7 Exclusion of the Public and Press

To agree the exclusion of the public and press for the consideration of any Items for the reasons set out in Part 1 of Schedule 12(A) of the Local Government Act 1972.

At the time of compiling this Agenda there were none.

8 Urgent Business - Private Session

To consider any matter which, in the opinion of the Chairman, should be considered in private by reason of special circumstances (to be specified) as a matter of urgency.

Report to:	Local Plan Sub-Committee
Report Title:	Nationally Significant Infrastructure Project (NSIP) – East Anglia Green
Date:	13th June 2022
For:	Decision
Key Decision:	No
Decision Planner Reference Number:	N/A
Report Presented by:	Alan Massow
Report Author:	Alan Massow – Principal Planning Policy Officer
Enquiries to:	Alan Massow almas@braintree.gov.uk

1. Purpose of the Report

- 1.1 The following report considers the Non-Statutory Consultation under Section 42 of the Planning Act 2008 in respect of National Grid Electricity Transmission's (NGET) 400kV grid reinforcement between Norwich and Tilbury (known as EA GREEN). This project is a Nationally Significant Infrastructure Project (NSIP).
- 1.2 The purpose of this report is to provide Members an overview of the project and its likely impacts. Following this, Members are requested to endorse the Non-Statutory Consultation response to NGET attached in Appendix 1 to this report by 16th June 2022.
- 1.3 Detail documents containing the proposals can be found at;

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/east-anglia-green>
- 1.4 Seven documents have been released, they are a consultation strategy, project background document, April 2022 newsletter, the consultations exhibition banners, Corridor and Preliminary Routeing and Siting Study (CPRSS), and the Corridor and Preliminary Routeing and Siting Study (CPRESS) appendices.
- 1.5 As part of this reports preparation all Members were asked to provide any comments they may have to officers so they could help inform the response, these comments have been added to the response where possible.

2. Project Overview

- 2.1 In summary, the EA GREEN project in its entirety proposes the following:
- A new 400 kV electricity transmission line over a distance of approximately 180km and a new 400 kV connection substation.
 - The reinforcement comprises mostly of overhead line (including pylons and conductors – the ‘line’ part) and underground cabling through the Dedham Vale Area of Outstanding Natural Beauty (AONB) and a new 400 kV connection substation in the Tendring district.
 - Cable sealing end (CSE) compounds to connect sections of the underground cable with the overhead lines.
- 2.2 A more detailed summary of the works specific to the Braintree District can be found in Section 5 below.
- 2.3 Braintree District Council (BDC) will be working with Essex County Council, Suffolk County Council, Norfolk County Council, Basildon District Council, Chelmsford City Council, Colchester District Council, Babergh District Council, Brentwood District Council, Thurrock Council and Rochford District Council, who are all impacted by this proposal, as well as the Dedham Vale Area of Outstanding Natural Beauty (AONB) Project.
- 2.4 In this case, BDC are not the determining authority. BDC, like the other impacted Councils, are classified as ‘Host Authorities’ for the purposes of the Planning Act 2008 and The Infrastructure Planning (EIA) Regulations 2017. As a Host Authority BDC play an important role in helping to shape and assess the impacts of the proposals. The Planning Inspectorate however ultimately are the determining authority for the development. According to the published timetable NGET will submit a Development Consent Order (DCO) likely in Q4 2024 to the Planning Inspectorate, with a public examination of the proposals to follow.
- 2.5 The project is currently at the ‘Non-Statutory Consultation’ stage. A Statement of Community Consultation is expected to be put forward by National Grid, which will inform the statutory consultation stage in 2023. Environmental Impact Assessments (EIA) will take place from 2022 until 2024. It is expected that National Grid will undertake extensive community engagement and liaison with the host authorities between now and the submission of the DCO. The Council will be seeking to agree a Planning Performance Agreement (PPA) with NGET which will reimburse the

authority for engaging in this process, and allow it to secure expert consultees on areas such as landscape impact.

3. Public Consultation Overview

- 3.1 NGET are currently undertaking an 8 week period of non-statutory consultation; it started on 21st April 2022 and finishes on 16th June 2022.
- 3.2 NGET have publicised the consultations via a range of measures including sending out newsletters of information to all those residents, Parishes, Members and businesses within a 1km radius from the edge of the preferred option corridor. The consultation also extends to those areas within 4km of the project area, but through indirect engagement such as local newspapers (e.g Halstead Gazette) advertising the consultation period.
- 3.3 The non-statutory consultation has also included webinars, face to face events and information points that anyone wishing to comment on the scheme could attend. There is also a website which includes a range of reports and information provided at the events for those unable to attend.

4. Recommendations

- 4.1 That members approve the letter set out in Appendix 1 to this report as the official BDC's response to the current EA GREEN consultation

SUMMARY OF ISSUES

5. Braintree District Council Project Proposals

- 5.1 The current proposals within Braintree District largely will be the focus of this report.
- 5.2 The proposed route area enters the district to the East of Coggeshall. The route then proceeds west between Coggeshall and Kelvedon and Feering, past Rivenhall Airfield, and to the south of Silver End crosses the B1018 close to Cressing Temple, and to the south of White Notley before exiting the district near Fairstead and Fuller St. It is stated that the proposed route will mostly be delivered by traditional steel lattice pylons and overhead powerlines.

- 5.3 National Grid are undertaking a phased options appraisal and assessment process when developing proposals for reinforcement of its network. The process used, seeks to to meet National Grids duties and follow relevant policy and guidance when deciding on the project. This includes National Policy Statements, the Holford Rules (For routeing and design of overhead lines and the Horlock Rules which relate to location and design of substations. National Grid are currently at the options identification and selection stage of the process and are seeking feedback during this consultation on the work carried out to date.
- 5.4 The Corridor and Preliminary Routeing and Siting Study Report, outlines a number of different types of alternative options available this included technology for offshore connections. However, the appraisal of strategic options has concluded that the EAG project should be comprised of onshore reinforcement with a new 400kV onshore line. The Council is concerned that the option of offshore connection has not been fully explored and the reasons for not being selected able to be scrutinised fully by the public. This is a point we raise within our consultation response.
- 5.5 The consultation does not provide sufficient information for the Council to make detailed comments about routing nor whether there is a case for some of the route to be underground. The impacts of undergrounding also need to be carefully considered and this is reflected in the draft response.

6. Specific Issues

- 6.1 Cable Sealing End Compounds (CSEC) are pieces of infrastructure which facilitate the transition between overhead and underground cables. They generally consist of a compound type structure housing the electrical equipment necessary to transition the electricity line.
- 6.2 Underground and therefore CSEC will be likely needed around Fairstead and Fuller St, as an existing high voltage line runs through that area. It is therefore important that these CSEC are appropriately sited and mitigated to mitigate any wider landscape impacts. Our broad views on this are set out within our proposed response but much more detail would be needed before a full assessment can be made as to the impacts and options.
- 6.3 The impact of the development proposals in this case will be considered within an Environmental Statement which will be submitted with the Development Order Consent application (DCO).
- 6.4 As the information in the consultation is broad at this stage, BDC will be expecting a great deal more information on the impact on communities, businesses, tourism, built heritage, landscape, archelogy etc before it can

provide any detailed comments as to how the scheme could be accommodated in the least damaging way within the District, and this is reflected within our proposed response. Our response also notes the requirement to sign up for PPA which will cover some of the costs of engaging including the appointment of some specialist consultants. This information should be provided at the Environmental Statement (ES) stage.

7 TIMETABLE

- 7.1 National Grid have published a timetable for the process as part of this consultation which is set out below. However further detail of public engagement through the process will be set out within the Statement of Community Consultation. The Statutory Consultation Response must be submitted to NGET by 16th June 2022.
- 7.2 The currently anticipated timescale for the DCO process is as follows:
- a) Statutory Consultation during Q2 2023
 - b) Environmental Impact Assessment during Q3 2022 to Q2 2024
 - c) Submission of DCO application to PINS during Q3 2024
 - d) Examination, recommendation by PINS and decision by Secretary of State during Q4 2024 to Q2 2026
 - e) Build by NGET commences during Q1 2027
 - f) Operation begins in 2030

8 OPTIONS AND IMPLICATIONS

Option 1 – Proceed as Drafted

- 8.1 Option 1 is that Members endorse the response to the Non-Statutory Consultation response as set out in the letter appended to this report.
- 8.2 Officers consider option 1 is the most appropriate course of action to respond to the consultation.

Option 2 – Proceed but with Amendments

- 8.3 Option 2 is that Members make changes to the response to the Non-Statutory Consultation response as set out in the letter appended to this report.
- 8.4 This option is appropriate if Members feel that the letter misses something that should be said about the project.

9 Next Steps

- 9.1 The letter response will be sent to National Grid, who will then proceed to the next stage of their NSIP process, allowing the Council to comment again as necessary.

10 Financial Implications

- 10.1 Braintree District Council and the other Host Authorities will commence by negotiations with National Grid to cover the costs of the project via a Planning Performance Agreement (PPA).

- This is to cover the Local Authority costs associated with assessing the impact of the project at the various stages.

11 Legal Implications

- None at this time.

12 Other Implications

- This project brings the total number of NSIPs in the District to 4, with a further NSIP potentially being worked up. Whilst some costs can be recouped as per the financial section above, they require significant officer, member and local Parish and resident time to consider and work through over the next 3-4 years.

13 Equality and Diversity Implications

- Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
 - (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not

- (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- The Equality Impact Assessment indicates that the proposals in this report will/will not have a disproportionately adverse impact on any people with a particular characteristic. *(Describe the specific equality and diversity implications of the proposal, any adverse findings and the proposed mitigation).*
- EQI not required as this is an external consultation.

14 List of Appendices

- *Appendix 1 – Formal Response Letter to National Grid*
- *Appendix 2 – Route Map*

15 Background Papers

- All supporting information is provided on the National Grid website; link below:

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/east-anglia-green>

Our ref:
Direct Dial: 01376 552525 ext. 2577
Ask for: Alan Massow
Date: 16 June 2022



Address

Development Management
 Causeway House Braintree
 Essex CM7 9HB

Tel: 01376 557779
 Email: planning@braintree.gov.uk

Dear,

PURPOSE OF LETTER: Braintree District Council response to Non-Statutory consultation on the East Anglia Green

Thank you for consulting Braintree District Council as a Host Authority on the East Anglia Green non-statutory consultation.

1. Understanding the Need for the Project

- 1.1. The UK government has indicated that it would seek to achieve net zero carbon emissions by 2050. As such additional connections are required to enable off-shore wind generated to be delivered to where it would be used. In this case we understand that electricity generated by wind farms and future nuclear power stations off the coast of East Anglia needs to be transmitted to the London area.
- 1.2. Braintree District Council has recently declared a climate emergency, and as such is supportive of proposals which benefit the fight against climate change, including support for renewable energy production in the right places. However, this does not mean that all proposals which assist in reducing climate change are approved at any cost; each application must be considered in the context of its benefits weighed against its harms. If the harms are deemed to outweigh the benefits, then BDC would consider it appropriate to object to proposals.

2. What the Project Involves (emerging proposals)

- 2.1. BDC understand that the project has two aims. First, to provide capacity over the next 10 years to the grid enabling electricity generated by offshore windfarm and other generation developments to get to where it is needed, and secondly to provide the electricity network with reinforcement. That is to ensure that the network has sufficient redundancy in it if something were to happen. The option to consider increasing the capability of the existing network is also be undertaken separately, which includes the installation of additional power control devices, increasing voltage capacity, and rewiring overhead lines with higher power conductors.
- 2.2. As set out above, the project involves the creation of a new 400kv (high voltage) electrical line between Norwich Main in Norfolk and Bramford in Suffolk and Tilbury in Essex, as well as providing connection to new offshore wind generation. This would increase the capacity of the network but would still be insufficient to deliver the

necessary capability needed.

- 2.3. As in common with other NSIP proposals, the Council would expect National Grid to commit to the signing of Planning Performance Agreement which would reimburse the Council for any costs incurred in fully engaging with these proposals throughout the NSIP process, including bringing on expert consultants, to assist, as necessary.
- 2.4. The Council would also expect National Grid to have a detailed consultation and engagement strategy with Parish Councils and local residents and businesses in effected areas and ensure that all those who wish to participate have access to the right information, through a variety of consultation processes. The Council looks forward to discussing this in more detail with National Grid as the project progresses

3. Principle of the Option shown

- 3.1. The route corridor area of search which has been published at this stage, is broad however it shows that the route enters Braintree District east of Coggeshall and North-East of Feering and continues for approximately 12 miles, passing south of Silver End, Cressing Temple, and White Notley, before exiting the District to the north of Fuller Street.
- 3.2. As this is a very early stage in this project, the documentation which has been released by National Grid in this consultation is very high level. Through the course of the project we would expect National Grid to work with the impacted local planning authorities and the communities to ensure that detailed information is available to comment on through formal and informal engagement workshops and sessions, as well as the statutory periods of public consultation. In this consultation therefore, the Council can only provide in principle comments, and highlight particular areas of concern which should influence the ultimate route decision.
- 3.3. Decision on NSIPs are made based on the relevant National Policy Statement (NPS). In this case the relevant NPS are the Overarching NPS for Energy (EN-1) and the NPS for Electricity Networks (EN-5).
- 3.4. Both EN-1 and EN-5 contain guidance on the undergrounding of electrical cables. In particular, section 2.8 of EN-5 provides guidance on Landscape and Visual issues. Paragraph 2.8.9 within this section provides details on the use of undergrounding to minimise landscape and visual impacts, we would draw particular attention to the section of the paragraph which states:
- 3.5.

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

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

- 3.6. The authority considers that it is likely to be technically feasible to transfer electricity from the coast, closer to its final destination via undersea cables. The authority acknowledges that all possible options will give rise to impacts on the local environment, whether that be marine or land, and will have wider costs and benefits that need to be carefully considered. However as can be seen in the policy statement above, each case for overhead proposals versus underground or under sea cables should be considered on an individual basis and that
- 3.7. The information made available to date does not provide fully considered proposals for the undersea option, which may or may not have already been considered by National Grid. As such it could be argued that the consultation has missed the first step in engaging with a wider community on possible options for transmission and instead has already narrowed its focus to a single overground overhead powerline option. This options analysis must be carried out and public engagement undertaken on it, before any further detailed consideration can be given to the overground option forward.
- 3.8. Notwithstanding the statement above, the remaining part of this consultation response, sets out the local authority's views about the overground route corridor which was included as part of this consultation.
- 3.9. The above sections of paragraph 2.8.9 of EN-5 make it clear that decisions on when to overhead or underground cables should be assessed at the project level, taking into account specific circumstances and *'that Government has not laid down any general rule about when an overhead line should be considered unacceptable'*.
- 3.10. Bullet point one of paragraph 2.8.9 describes how decisions to underground cables should consider *'the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads)'*. Although this paragraph makes specific reference to *'National Parks, AONBs and the Broads'* the use of the phrases 'in particular' and 'such as' make it clear that these areas are not an exhaustive list and that undergrounding in other areas of natural beauty or historic importance may well be justified and this is best placed to be decided upon at the project / local level.
- 3.11. On this point, paragraphs 1.7.3 – 1.7.5 of NE-5 considered *'the adoption of a presumption that electricity lines should be put underground (generally, or in particular locations, such as Areas of Outstanding Natural Beauty (AONBs)'* when assessing reasonable alternatives as required by the SEA directive. Paragraph 1.7.5 explains how this approach was rejected due to it being *'considered preferable to adopt the policies in EN-5 because the range of factors to be taken into account means that decisions on undergrounding are best taken within a more flexible policy framework using case by case evaluation.'*
- 3.12. The Council notes that both overland transmission by pylon or underground have significant impacts on the communities and environments within which they occur. Whilst on the face of it undergrounding cables seems like the least impactful, there is a requirement to clear and maintain large swathes of land under which the cables lay, which also has a significant landscape and environment impact. Within this context and having regard to all of the above, Braintree District Council considers that if the on land route is considered the only feasible option then a mix of pylons and undergrounding of cables will be necessary to deal with the differing landscapes, communities and historic assets that the line will travel through in the District. For example there is a point at which the new line will cross an existing line and therefore underground cabling would be

necessary at that point. Undergrounding cables is not likely to be necessary across the whole of the district, but may be appropriate in respect of locations close to important heritage assets.

4. Pylons/Compounds

- 4.1. The consultation currently indicates that traditional style pylons would be used on this scheme. It would make sense that the newer style low visual impact pylons to be used on all new schemes to minimise landscape impact, rather than installing older style pylons and replacing them later. This would minimise disruption in the countryside and be a much more sustainable use of materials. It would also help minimise the impact on local residents especially if they were located as far away from residential properties as possible. In due course the Council will require detailed landscape visual impacts for all proposed pylon locations to be produced and consulted upon.
- 4.2. Any sections of undergrounding would require sealing end compounds above ground at either end. These are usual 30m x 80m in size and surrounded by security fencing. Two would therefore be required in the vicinity of Fairstead/Fuller Street as an existing powerline runs through this area which any new line would need to go underneath. It is important that they are appropriately separated as to not cause undue industrial appearance in a rural area, and that they can be properly landscaped to avoid visual intrusion. If a section of undergrounding is required where the cables cross (existing and proposed), then the length of undergrounding should be determined by best possible locations for the cable sealing end compounds (within the wider locality where mitigation is already prevalent), as opposed to the shortest and cheapest option.
- 4.3. **Cumulative Impact**
- 4.4. The route crosses through an area which has been identified as a climate action zone by Essex County Council climate commissioners but is subject to considerable development pressures. These include proposals for significant mineral extraction and solar farms. The route also crosses the preferred proposed new route of a dual A120 known as route D. It should also be noted that a proposal for a 35m incinerator chimney at Rivenhall Airfield was rejected by Essex County Council on grounds of landscape impact. These proposals are for a series of 50m pylons, and therefore the likely significant landscape impact is clear to see. The Council would therefore expect that the impact of the proposed transmission route be carefully considered in light of other existing and proposed developments in the vicinity of it as its cumulative impact and not in isolation.

5. Other comments

The remaining part of our response, details the areas that we have identified within the published route corridor which will require particularly detailed consideration in any further iterations of the overland transmission options.

5.1. PRow

- 5.2. The area has a significant concentration of public rights of way including Bridleways and National Cycle Routes. The presence or increased number of powerlines could be detrimental to the recreational experience of the countryside, and new pylons, underground cables and/or maintenance access points should not impact on the availability of these public rights of way and the links that they provide local communities for commuting and leisure. BDC would expect planning gain to be secured to improve

the network of footpaths in these areas which are affected by the pylon routes.

5.3. Heritage Assets

- 5.4. Within the area of search there are multiple heritage assets all of whom would potentially have their settings impacted by overground transmission routes. Of particular concern are the ancient monuments such as Cressing Temple, which while adjacent to the route corridor, hold significant cultural and historic interest and could be negatively impacted by it. Other monuments such as that located at Frame Farm near Feering could also be impacted.
- 5.5. There is also a cluster of archaeological sites between Coggeshall Hamlet and the Kelvedon and Feering areas. Transmission routes would have to be carefully considered in this area in order to avoid disturbing archaeological remains, particularly if undergrounding is being proposed.
- 5.6. Other notable impacted heritage assets include; Rivenhall Church (Grade I) and Scheduled Ancient Monument, Rivenhall Place and Park (Grade II*), Faulkbourne Hall (Grade I) Fairstead hamlet and church (Grade I)
- 5.7. BDC consider that the route should be designed to avoid conflict with as many of these heritage assets as practically possible, although notes that given the volume of heritage assets in the areas, there is no route that will have no impact on heritage assets and that any route would need to balance a range of other factors.
- 5.8. If the overland route were to be built, detailed archaeological survey and recording work would need to be undertaken prior to construction and all opportunities to engage local interest groups and communities should be taken, with any artifacts uncovered given to local museums to display.

5.9. Landscape Character Areas

- 5.10. The area of search runs through 5 landscape character areas as shown in the Council's Landscape Character Assessment 2006. They are;
- Terling Farmland Plateau
 - Brain River Valley
 - Silver End Farmland Plateau
 - Blackwater River Valley; and
 - Langley Green Farmland Plateau.
- 5.11. Taking each area in turn, Terling Farmland Plateau is generally characterised as rolling arable farmland, with irregular pattern medium to large scale fields. It is considered to be most tranquil away from the A12 and A131. It is noted that the existing pylons in the area create a long liner feature within the skyline and are therefore quite prominent. As such adding additional pylons could have a significant impact on this area. The cluster of woodlands also provide an illusion of sorts which gives the impression of a wooded horizon. Removal of any areas of woodland would therefore impact on this characteristic.
- 5.12. For the Brain River Valley the skyline of the valley slopes in particular on the edges of Black Notley, White Notley and Cressing are visually sensitive to new development. The route corridor passes close to White Notley.

- 5.13. The Silver End Farmland Plateau is generally open to allowing long-distance views, with a dispersed settlement pattern with small villages. The area is considered to be tranquil away from major roads.
- 5.14. The Blackwater River Valley is shallow with arable farmland on its slopes. Around Coggeshall the valley floor becomes more wooded. Views along the valley corridor are considered important. The skyline of the valley is also considered to be visually sensitive.
- 5.15. Langley Green Farmland Plateau is generally gently sloping agricultural land east of the river Blackwater. The landscape is considered to be relatively open with views only constrained by trees and hedgerows. These views are on occasion panoramic. The open nature of the skyline of several areas of the plateau is visually sensitive with new development potentially visible within expansive views across the plateau.
- 5.16. Overall BDC reserve judgement at this time on the overall landscape impact that the development would have (due to insufficient information) – however consider that the proposal if not properly mitigated could have significant detrimental impacts. Careful consideration will be required on the siting and type of pylons used, or the locations of underground routes.

5.17. **Protected Lanes**

- 5.18. There are a number of lanes within the District which have been identified as having a particular historic and landscape value of the countryside. Protected Lanes were originally designated by Essex County Council in the 1970s. A review of Protected Lanes within Braintree District was undertaken in 2013. This resulted in a number of lanes being designated for protection through the Local Plan
- 5.19. Under Local Plan policy proposals which would have a materially adverse impact on the physical appearance of these lanes or generate traffic of a type or amount inappropriate for the traditional landscape and nature conservation character of a protected lane, will not be permitted.
- 5.20. In the identified route corridor, they are;

- Fairstead Lodge Road,
- Fairstead Road,
- Pole Road,
- Peg Millars Lane; and
- Fairstead Hall Road.

Of these protected lanes Fairstead Lodge Road extends northwards from Fuller Street all the way up to Ranks Green. It is likely to be significantly impacted by pylons as the proposal would have to cross it the same is true for Fairstead Road.

5.21. **Local Wildlife Sites, Ancient Woodlands, SSSI**

- 5.22. Numerous environmental designations are within the route corridor. It is noted that as the corridor exits the district to the west it narrows significantly. This limits options in a sensitive area which includes several Ancient Woodlands which are also Local Wildlife Sites, and the River Ter SSSI. Undergrounding would be difficult in this area as it is narrow and the presence of ancient woodland would limit options for the required vegetation buffer. If sections of the route are to be undergrounded this could have a significant impact on local ecology, which would require very careful consideration. The

Council will expect detailed landscape and wildlife surveys of these areas to indicate what the impacts from this proposed development may be.

5.23. **Tourism**

- 5.24. The proposal is likely to have significant impacts on local tourist destinations. This increased “industrialisation” of the countryside could put people off visiting which is traditionally a largely tranquil area with historic areas, and recreation opportunities. This could have a serious impact on local businesses associated with the tourism trade or other rural businesses. There are many small local businesses in this sector within the areas impacted.

5.25. **Economic Impact**

- 5.26. If the overground transmission route is taken forward to construction, then we would look to National Grid to ensure that jobs, apprenticeships and other training and skills provision would be available to local people who would work directly on the project, and that local businesses would also be used in the supply chain for the project. It would also be beneficial for National Grid to liaise with local schools and education providers in the area to provide real life career examples of engineering, construction and the many other roles which may be associated with this type of project, and which could provide potential career paths for pupils.

5.27. **Summary**

- 5.28. Whilst Braintree District Council is supportive of measures which help reduce climate impact, each proposal should be considered on its merits. The proposed route runs through an important area of the district, which is home to many heritage assets, wildlife sites, ancient woodland among others. It has also been identified as a climate focus area by Essex Climate Commissioners. The route is not sufficiently justified as no information has been provided on alternative options such as an offshore route. Undergrounding can have a significant impact on local ecology as it requires a large strip of lands to be cleared, and limited vegetation can be re-introduced after. This would have to be assessed against any landscape impact or impact on historic asset so that the most appropriate option can be used depending on the particular circumstances in any given location.
- 5.29. As shown above the area has many important landscapes and heritage assets, recreational routes e.t.c. As such pylons should be the new style “T” shape low impact design. Siting of compounds should be done so that they cause minimal impact and be appropriately landscaped.
- 5.30. The area has significant development pressure, as such alternatives such as offshore routes need to be fully considered before opting for an on-shore route.
- 5.31. Finally, the impact of these proposals on local residents needs to be fully considered, as well as local business and tourism.
- 5.32. Due to the nature of these proposals, the public interest in them and the numerous parts of the District that are impacted by the identified route corridor, this response has been approved by the Councils Local Plan sub-committee, who have responsibility for considering NSIP proposals in the District.

Yours faithfully,

Councillor G Spray
Portfolio Holder for Planning and Infrastructure
Chairman of the Local Plan Sub Committee

