



## **Suffolk County Council**

**Response to the Targeted Consultation 2025**

**Norwich to Tilbury (EN020027)**

Targeted Consultation

3 March 2025

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## Glossary of Acronyms

<i>CSWMP</i>	<i>Construction Surface Water Management Plan</i>
<i>CWS</i>	<i>County Wildlife Site</i>
<i>LHA</i>	<i>Local Highway Authority</i>
<i>LLFA</i>	<i>Lead Local Flood Authority</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>

*“The Council” / “SCC” refers to Suffolk County Council; “The Suffolk Host Authorities” refers to Suffolk County Council, Babergh District Council, and Mid Suffolk District Council.*

## Purpose of this Submission

The purpose of this submission is to provide responses to the Norwich to Tilbury Targeted Consultation running from 30 January 2025 to 3 March 2025. This document contains commentary on the Suffolk Locations (1 – 6), and the Waveney Valley Alternative. Appended to this document are a series of maps to aid readers and illustrate the Council’s position.

# 1 Introduction

- 1.1. Suffolk County Council (SCC) understands that the targeted consultation (30 January to 3 March 2025) includes six locations in Suffolk where National Grid, the promoter, is proposing changes from those in the statutory consultation which took place from 10 April to 26 July 2024.
- 1.2. The County Council considers that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure in Suffolk should be explored fully. If this approach can deliver an alternative to Norwich to Tilbury in a timely manner, without risking wider Net Zero, renewable generation, and decarbonisation targets, it would be welcomed by the Council and the communities it represents.
- 1.3. SCC also notes that this targeted consultation does not include reference to the proposals for the Waveney Valley Alternative, as consulted on during the statutory consultation and that a decision was made prior to this targeted consultation not to take forward this alternative proposal. Instead, SCC understands that National Grid has taken the decision to pursue overhead line in this sensitive landscape. SCC regrets this outcome and will comment on the Waveney Valley Alternative decision in this targeted consultation response document.
- 1.4. Although again not mentioned specifically in this consultation, SCC is also keen to see the removal of an existing 132kV local distribution overhead line which runs through both the Suffolk and Essex Coast and Heaths the Dedham Vale National Landscapes. This includes a section that runs close to Willy Lott's Cottage featured in John Constable's famous painting "The Hay Wain" and removal would also serve offset the impacts of the proposed undergrounding of 400kV cables across the National Landscape. SCC considers that removal would go a long way towards meeting section 85 of the CRoW Act, which requires relevant authorities to "seek to further the purpose of conserving and enhancing the natural beauty of the area" when discharging their functions in Areas of Outstanding Natural Beauty (locally known as National Landscapes).
- 1.5. SCC notes that some of proposed changes may lessen the impacts on a number of airfields along the route from overhead lines and underground cables. Not all of these amendments are sufficient to overcome previous concerns and are now the subject of ongoing discussion between the National Grid, the Civil Aviation Authority and airfield owners. SCC reserves its position pending the outcome of these discussions.

## 2 Summary of Technical Comments

- 2.1. For a full account of SCC’s views and commentary from our technical specialists, separated by discipline, please see the Annex to this document. It is noted that some technical responses state that they have insufficient information to be able to come to an informed view as to the suitability of the proposed changes.

### *Waveney Valley Alternative*

- 2.2. Although there was a clear preference from all four local authorities (Suffolk County Council, Babergh District Council, Norfolk County Council, South Norfolk District Council) for undergrounding, technical issues seemingly make this an unrealistic proposition. To offset the undoubted visual and landscape impacts that will result from the use of overhead lines, SCC asks for a compensatory approach. This should entail a programme of landscape enhancements and undergrounding of existing 132kV lines.

### *Suffolk 1*

- 2.3. In brief, SCC understands that the proposal at this location is to reposition a line of pylons between Palgrave and Mellis to the south-east of the proposals at statutory consultation, between pylons RG94 and RG102 (previously at statutory consultation RG095 to RG102).
- 2.4. SCC welcomes, in principle, the additional undergrounding of the 132kV powerline, and the closer alignment of the proposed 400kV line with the route alignment of the former 132kV line, as this would reduce over-sailing of the park at St John’s House, make residential properties around The Grange and Spring Cottages less hemmed in by powerlines west and east, and would reduce adverse effects on a Brook Farm airstrip.
- 2.5. Recognising at least part of the alignment within the proposed change will be closer to residential properties, SCC suggests that there could be reasonably be an increased risk of Public Health impacts to the localised community including examples of stress and anxiety of Electromagnetic Field (EMF) concerns, increased noise.
- 2.6. The proposed changes are likely to cause greater ecological impact than the previous scheme design, particularly due to the impacts at Thrandeston Marsh County Wildlife Site (CWS). It is noted that the CWS is not only designated for its wet grassland but a range of associated habitats and its connections via hedgerows to the wider landscape. All features of interest at the CWS should be assessed with regard to impacts upon them and mitigated appropriately.

- 2.7. Because of the high archaeological potential of this area, Suffolk County Council's Archaeological Service (SCCAS) would recommend pre-determination archaeological evaluation comprising geophysical survey and trenched archaeological evaluation, of both the compounds and undergrounding of the 132kV in this area as this has the potential to impact delivery of the overall scheme.
- 2.8. There are no changes to PROW.

### *Suffolk 2*

- 2.9. In brief, SCC understands that the proposal at this location is to reposition the overhead line alignment, away from Gislingham and to the west of the railway track, between pylons RG114 and RG119 (previously at statutory consultation RG114 to RG118).
- 2.10. SCC welcomes the proposed changes, in principle, as they would put the 400kV line at a greater distance from some parts of Gislingham.
- 2.11. SCC also welcomes the alteration of line which would reduce potential impacts on veteran trees.
- 2.12. However, the proposed changes have the potential to increase the probability of encountering as yet unknown Early medieval and medieval archaeology.
- 2.13. Pylon RG115 appears to be in close proximity to PROW Bridleway W-267/014/0. The report does not mention/address/mitigate the relocation to potentially impact on the PROW.

### *Suffolk 3*

- 2.14. In brief, SCC understands that the proposal at this location is to move a line of pylons near Cay Hill to the west of the location proposed at statutory consultation, between pylons RG136 and RG142 (previously at statutory consultation RG135 to RG141).
- 2.15. SCC welcomes the proposed changes, in principle, as they would remove the alignment further from some residential properties and lessen the effects on some views in this area.
- 2.16. SCC also welcomes the reduction in tree loss and avoidance of the area of "perceived" ecological interest.
- 2.17. Based on currently available information there are no major changes for archaeology based upon the information within the HER.
- 2.18. PROWs appear to be used as access roads (near to Wicks Farm W-392/060/0) and the Middy Railway promoted route at red house farm Footpath W-

392/045/0 & Cotton Boat W-203/056/0. This will require mitigation to ensure that safe use by all users. This should be outlined and safety adequately addressed in a PROW management plan.

#### *Suffolk 4*

- 2.19. In brief, SCC understands that the proposal at this location is for a new construction compound nearby pylon RG173 (previously at statutory consultation RG172).
- 2.20. SCC notes that provided that the compound is set back sufficiently from any existing vegetation and that existing vegetation is appropriately protected, and provided that the vehicles using the access road would not require additional vegetation removal, the additional construction compound is acceptable in landscape terms.
- 2.21. SCC concurs with the statement that “there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”
- 2.22. Based on currently available information there are no major changes for archaeology based upon the information within the HER.
- 2.23. There are no changes to PROW.
- 2.24. Whilst the construction compound is described as temporary, it is suggested there could be Public Health impacts deriving from the positioning and use of this additional compound that have not been considered in the PEIR.

#### *Suffolk 5*

- 2.25. In brief, SCC understands that the proposal at this location is to reposition the route for 132kV underground cables near Offton.
- 2.26. SCC welcomes the proposed change, in principle, as it would reduce impacts on agricultural activity and avoid fields otherwise unaffected by works.
- 2.27. The potential for fewer effects on ecological features is also welcome.
- 2.28. The undergrounding of the UKPN 132kV cable would be in closer proximity to the medieval Grade I listed St Mary’s Church (OFF 005). The Historic Environment section should acknowledge the potential to encounter as yet unknown archaeological heritage assets and that the works involved with undergrounding the 132kV line will damage or destroy archaeological heritage assets.
- 2.29. There are no changes to PROW.

### *Suffolk 6*

- 2.30. In brief, SCC understands that the proposal at this location is to reposition the underground cable alignment near Raydon.
- 2.31. SCC welcomes the proposed change to the cable route, in principle, as it would lessen the impact on agricultural activity by reducing the number of fields affected by construction.
- 2.32. However, it must be ensured that surveys have previously covered or will cover any new field boundaries and the proposed new bellmouth, facing impacts during these works and that they have been/will be comprehensively assessed with regard to potential impacts on important habitats and species associated with these features e.g. arable margins and hedgerows. Otherwise, SCC concur with the assertion that there will be no change in effects.
- 2.33. SCCAS welcome the acknowledgement of the proposal affecting as yet unknown archaeology.
- 2.34. There are no changes to PROW.

## **3 Conclusion**

- 3.1. Overall, with the notable exception of the Waveney Valley, SCC welcomes the proposed changes subject to in many cases further assessment and mitigation being carried out.

## Annex

### Full Comments from Technical Specialists

#### 4 Archaeological Service (SCCAS)

- 4.1. In our role as Archaeological Advisors, SCCAS will only discuss archaeological heritage assets, any advice on built heritage and landscapes should be sought from the relevant advisors; Babergh and Mid Suffolk District Councils' (BMSDC) Heritage officers, Historic England and the SCC Landscape Team.
- 4.2. The results of the targeted pre-submission archaeological evaluation are still being gathered in the field, and as a result, SCCAS are unable to comment fully on the impacts of the proposed changes made for this targeted consultation. Our advice, therefore, is based upon information held in the county Historic Environment Record and our advice may change once further information is made available.
- 4.3. The geophysical survey and trial trenching are being undertaken within 'high priority' sections of the route as defined by Grid and Arcadis, with priority being attributed to the construction impact of the scheme. SCCAS have not agreed to the priority designation based upon construction impacts and have advised that priority should also be given to areas of high archaeological potential. Areas of high archaeological potential have the possibility to form a constraint upon the development should significant archaeology of be identified, which can lead to unexpected project delays and higher costs.
- 4.4. Buried archaeology will undoubtedly be found across the scheme, and while it is useful for a targeted approach to understand the impacts of the development upon archaeology, it provides no information on the areas where archaeological potential has not yet been determined, and the developer should be aware of the risks this approach brings.
- 4.5. The full scheme will need to be subject to archaeological evaluation, the results of which will inform on the mitigation requirements for archaeology. However, this will not be fully completed prior to the submission of the Environmental Impact Assessment (EIA), therefore the requirements for archaeological mitigation cannot be understood for examination. Further archaeological evaluation will be required to be secured for post consent, and appropriate time and budget must be provided to allow for full archaeological evaluation of the scheme which will inform on the archaeological mitigation to be undertaken ahead of the commencement of development.



- 4.6. On other NSIP's within Suffolk, such as East Anglia 1 and Sizewell, most of the areas identified to move forward into the mitigation phases of work were identified by trenched archaeological evaluation.

#### *Suffolk 1*

- 4.7. This section of the route is within an area of very high archaeological potential as indicated by information held in the Historic Environment Record (HER). The proposed overhead route Construction laydown area, Overhead compound (RG main) and undergrounding of the 132kV line is in close proximity to the site of the Chapel of St John, a medieval chapel mentioned in The Domesday Book (PAL 003), and in close proximity to artefact scatters indicative of a Roman and Saxon inhumation and cremation cemetery (WTM 050).
- 4.8. Further archaeology recorded on the HER within close proximity to the scheme:
- a. BUR 010: post medieval tile kiln
  - b. BUR 012: Medieval moat
  - c. BUR 013: Cropmark of a ringditch, probable prehistoric funerary monument
  - d. SUF 009: Projected line of a possible Roman road it must be noted that Pylon RG101 on top of the (SUF 009)
  - e. TDE 008: substantial spread of burnt flint, indicative of a Bronze Age burnt mound
  - f. PAL 022: Saxon Gold disc pendant
- 4.9. Trandeston Marsh visible on the 1783 Hodskinsons Map of Suffolk, which has the potential to contain important palaeoenvironmental and other organic archaeological remains.
- 4.10. Because of the high archaeological potential of this area SCCAS would recommend pre-determination archaeological evaluation, comprising geophysical survey and trenched archaeological evaluation, of both the compounds and undergrounding of the 132kV in this area as this has the potential to impact delivery of the overall scheme.
- 4.11. There also needs to be appropriate provision for hydrological, geoarchaeological and palaeoenvironmental assessment of the undergrounding of the 132kV line.

*Suffolk 2*

- 4.12. Based on currently available information there are no major changes for archaeology based upon the information within the HER.
- 4.13. However, the movement of pylons RG116, RG117 and RG118 places the pylons in closer proximity to archaeological heritage assets recorded in the county HER which are indicative of early medieval and medieval activity. These heritage assets comprise:
- a. GSG 013: Saxon artefact scatter
  - b. GSG 005: the proposed site of Swatshall or Swattisfield Hall, which includes the earthwork remains of an infilled moated enclosure, undated cropmarks, and indications of possible kiln sites
  - c. GSG 053: Saxon Brooch, buckle and coin along with a post-medieval ring
- 4.14. The proposed changes have the potential to increase the probability of encountering as yet unknown early medieval and medieval archaeology.
- 4.15. Table 1.2.3 the Historic Environment section should acknowledge the potential to encounter as yet unknown archaeological heritage assets.

*Suffolk 3*

- 4.16. Based on currently available information there are no major changes for archaeology based upon the information within the HER.
- 4.17. Table 1.2.3 the Historic Environment section should acknowledge the potential to encounter as yet unknown archaeological heritage assets.

*Suffolk 4*

- 4.18. Based on currently available information there are no major changes for archaeology based upon the information within the HER.
- 4.19. Table 1.2.3 the Historic Environment section should acknowledge the potential to encounter as yet unknown archaeological heritage assets.

*Suffolk 5*

- 4.20. The undergrounding of the UKPN 132kV cable would be in closer proximity to the medieval Grade I listed St Mary's Church (OFF 005). The Historic Environment section should acknowledge the potential to encounter as yet unknown archaeological heritage assets and that the works involved with undergrounding the 132kV line will damage or destroy archaeological heritage assets.

- 4.21. Additionally, undergrounding of the 132kV has the potential to cause changes to groundwater levels, which could lead to the de-watering of important archaeology, such as preserved organic remains, peat deposits and organic silt deposits which may exist. There should be provision to assess these impacts.
- 4.22. Comments on setting and impacts of the construction works (e.g. vibration, dust etc.) upon St Mary's Church should be sought from Historic England and the Babergh and Mid Suffolk District Councils' Heritage officer.

### *Suffolk 6*

- 4.23. SCCAS welcome the acknowledgement of the proposal affecting as yet unknown archaeology.
- 4.24. If the changes for this section are adopted, the changes should be included within the pre-submission archaeological evaluation written scheme of investigation.

### *General comments*

- 4.25. The provided maps do not show the full proposed route of the 132kV undergrounding. Therefore, consideration must be given to the impacts of the removal and undergrounding of the 132kV line. The works associated with the undergrounding of the 132kV cables, will have considerable impacts upon archaeological heritage assets.
- 4.26. The provided maps do not show the full extent of the temporary haul road or pylon working areas across the entire route within Suffolk, which will have considerable impacts upon archaeological heritage assets.
- 4.27. SCCAS have not been provided with mapping for any ecological mitigation beyond the order limits. As these areas may also require archaeological evaluation and mitigation. The archaeological impacts of these ecological compensation schemes can be very large.

## **5 Ecology**

- 5.1. Without detailed survey data having been made available at the time of writing, and with c.15% of the N2T route having not been surveyed for its baseline biodiversity and ecological value (nor have these sections been identified to SCC Ecology on a bespoke plan), and as discussed in previous meetings, SCC Ecology cannot precisely assess the validity of any of the proposed alterations.

- 5.2. SCC Ecology request provision of primary data from field survey and desk study to assist and confirm our responses to the consultations within this document and forthcoming in future iterations and subjects.
- 5.3. SCC Ecology also would like clear information regarding where un-surveyed sections of the scheme are located and the rationale as to how ecological assessment has been undertaken and why specific values have been applied to them.
- 5.4. Therefore, comments below should be caveated in this regard and SCC Ecology reserve the right to alter our view and requirements for further information, based on information and data not yet provided.

#### *Suffolk 1*

*“The proposed change increases the amount of underground cabling. While the majority of the proposed additional underground cabling goes through arable land, the alignment does pass through Thrandeston Marsh Local Wildlife Site designated for its wet grassland habitat. This would require additional mitigation measures to reduce any likely effects. The proposed change crosses additional well-defined field boundaries with mature planting bands (including hedgerows and woodland bands) therefore would have a greater effect on these features (which are not designated features).*

*However, with appropriate mitigation measures, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”*

- 5.5. The status of the additional “well-defined field boundaries”, would require detailed assessment with regard to biodiversity value and against the Hedgerow Regulations 1997, where appropriate and mitigated accordingly.
- 5.6. The proposed changes are likely to cause greater ecological impact than the previous scheme design, particularly due to the impacts at Thrandeston Marsh CWS. It is noted that the CWS is not only designated for its wet grassland but a range of associated habitats and its connections via hedgerows to the wider landscape. All features of interest at the CWS should be assessed with regard to impacts upon them and mitigated appropriately.

#### *Suffolk 2*

*“There would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”*

- 5.7. SCC Ecology welcome the alteration of line which would reduce potential impacts on veteran trees. Otherwise, the Council concurs with the assertion that there will be no change in effects.

### Suffolk 3

*“There would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”*

- 5.8. SCC Ecology welcome the reduction in tree loss and avoidance of the area of “perceived” ecological interest.
- 5.9. In regard to:
- “use field edges to route diversions for lower voltage electricity lines to reduce potential effects on an area of perceived ecological interest
  - use field edges or existing tracks for temporary and permanent works access where practicable.
  - To accommodate this proposed change, we are also proposing to reposition the haul road and the bellmouths.”
- 5.10. It must be ensured that surveys have previously covered or will cover these areas and impacts on “field edges” and other locations described above, have been/will be comprehensively assessed with regard to potential impacts on important habitats and species associated with these features e.g. arable margins and hedgerows.

### Suffolk 4

*“There would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”*

- 5.11. SCC Ecology concur with this assertion and await the updated baseline information, as indicated in the Environmental Implications of Change - Suffolk 4 document, if these changes are carried forward.

### Suffolk 5

*“The proposed change would reduce the width of underground cabling which would be likely to have less effects on ecological features and lower fragmentation effects when compared to the design presented at statutory consultation. There would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”*

- 5.12. Fewer effects on ecological features are welcome.
- 5.13. It must be ensured that surveys have previously covered or will cover any new “field boundaries” facing impacts during these works and that they have been/will be comprehensively assessed with regard to potential impacts on

important habitats and species associated with these features e.g. arable margins and hedgerows. Otherwise, SCC Ecology concur with the assertion that there will be no change in effects.

#### *Suffolk 6*

*“There would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”*

- 5.14. It must be ensured that surveys have previously covered or will cover any new field boundaries and the proposed new bellmouth, facing impacts during these works and that they have been/will be comprehensively assessed with regard to potential impacts on important habitats and species associated with these features e.g. arable margins and hedgerows. Otherwise, SCC Ecology concur with the assertion that there will be no change in effects.

## **6 Economic Development**

- 6.1. In our role as the economic development department, SCC acknowledges that the revisions as presented are reasonable, with minimal isolated economic impact, either positive or negative. The adjustments largely respond to community feedback, aiming to reduce disruption to residential properties, agricultural activities, and transport routes.
- 6.2. Key changes include repositioning underground and overhead cable alignments to lessen impacts on farmland, water pipelines, and residential properties. Additionally, construction access routes have been altered to minimise traffic disruptions in villages such as Holton St Mary and Needham Market. The shift of pylon locations near Cay Hill and Gislingham further reduces impacts on local properties and ecological areas. Importantly, the undergrounding of sections of the existing 132kV line in locations such as Palgrave and Offton represents a minor but positive improvement in terms of visual amenity and potential benefits for tourism and local businesses.
- 6.3. While these changes do not materially alter the economic outlook of the project, the reduction in visual pollution through undergrounding and better alignment of pylons may contribute to preserving local character, which could have indirect benefits for tourism and the rural economy. Suffolk County Council recognises these refinements as constructive but does not anticipate major economic gains or setbacks arising from them. SCC Economic Development are mindful of the potential for disruption to the economy during the undergrounding process however.

- 6.4. The council views these modifications as refinements rather than significant shifts in the project's scope or economic footprint. However, our economic concerns highlighted in previous consultation responses remain unaddressed. The proposals do not address some of the significant challenges around cumulative impact on construction works or the collective socio-economic impact of the programme as a whole or the impact of the trenches within the River Stour that are proposed. Whilst the consultation documents reference the potential environmental implications of each proposed change, there is no reference to socio-economic, health & wellbeing, transport or other impacts that could also be affected.

## **7 Floods & Drainage (Lead Local Flood Authority (LLFA))**

- 7.1. The LLFA is content that the proposed development will not increase flood risk for the permanent works within Suffolk, as the proposal is for cabling either below or above ground.
- 7.2. For any temporary works, a Construction Surface Water Management Plan (CSWMP) is to be submitted and approved prior commencement on the proposed development. The CSWMP shall be prepared in conjunction with the LLFA requirements.
- 7.3. Land Drainage Act 1991 (as amended by the Flood and Water Management Act) consents for works (permanent or temporary) on any ordinary watercourse crossings, which fall under our jurisdiction, will need to be consented. This process shall fall outside of the DCO.
- 7.4. Where cables are to be laid below a watercourse, then they shall be laid at least 1m below the bed level and suitably protected and locations marked.

## **8 Highways & Transport**

- 8.1. The highway authority will require more details, specifically of the changes in the highway accesses or crossing points to make a full informed response.

### *Suffolk 1a*

- 8.2. It is noted that the construction access is to be repositioned. No comment can be made based on the information presented in this consultation.

### *Suffolk 2*

- 8.3. It is noted that the proposed permanent access location will be relocated and that the crossings over Burgate Road and Major Road will also be moved. Further details such as scaled plans would be needed for the authority to

provide a response although the visibility from the crossing and into the compound at Major Lane should be checked to ensure it is acceptable for traffic passing through the rail bridge.

### *Suffolk 3*

- 8.4. The relocation of the haul road crossing to the west on the unnamed road to Elden Lanes Farm places it closer to the sharp bend but more detail such as scaled plans would be needed to allow the authority to comment further.
- 8.5. Moving the bellmouth on Lamberts Lane appears to place it close to the sharp bend when Wible Lane joins but more detail such as scaled plans would be needed to allow the authority to comment further.

### *Suffolk 4*

- 8.6. Hill House Lane from immediately south of Barn Field Drive is a private road albeit it is a public footpath. The extended order limits do not appear to extend to the adopted highway limits. The highway authority would seek assurances that the safety of PROW users is not compromised. It is noted that there is a residential development under construction adjacent to Hill House Lane which may require consideration in the environmental assessment.

### *Suffolk 5*

- 8.7. The highway authority has no comments on the routing other than access via Bildeston Road or Holly Road is problematic due to their narrow width and the latter being susceptible to flooding (being a ford).

### *Suffolk 6*

- 8.8. From a highway perspective, SCC welcomes the proposal of a temporary haul road to remove construction traffic from passing through Holton St Mary. However, SCC would seek reassurance that the order limits are sufficient to provide a safe access to the B1070 and that space for drainage of the haul road has been considered.
- 8.9. SCC would seek clarity regarding the additional area adjacent to the A12/B1070. Is this a construction compound or does it allow for improvements to the slip road onto the A12?

## **9 Landscape**

### *Waveney Valley Alternative*

- 9.1. The clear preference of all four local authorities and NGET was for undergrounding of this proposed pylon line through the Waveney Valley, in



accordance with Paragraph 2.11.6 of [NPS EN-5](#). This position was founded on NGETs own findings, and the findings of Alison Farmer Associates, set out in [SCC's 19 April 2024 press release](#), and as set out in the formal responses from the local authorities to National Grid, regarding this project.

- 9.2. However, for technical reasons, NGET have not been able to move forward with a scheme of undergrounding. Therefore, they will, in the view of SCC officers, need to mitigate and offset the impacts of the scheme through the Waveney valley, given that it meets, in principle, the criteria of [NPS EN-5](#) paragraph 2.11.6.
- 9.3. There are established mitigation routes that SCC officers consider can be applied, by NGET and Ofgem, in this instance:
  - a. **Landscape Enhancement** – the precedent for this is set by the [Landscape Enhancement Initiative](#), which is a part of the [Visual Impact Provision](#) for the removal and or mitigation of High Voltage Overhead Lines in AONBs and National Parks. The VIP Scheme is designed to identify and fund the undergrounding of High Voltage lines in designated landscapes. However, if such undergrounding not possible provision is made within the scheme for landscape enhancement to offset the adverse impact caused by the retention of overhead lines.
  - b. **Low voltage undergrounding** – undergrounding of the low voltage network to enhance landscape and public amenity is an established programme in National Parks and AONBs, which is funded by Ofgem. See for example the [Suffolk & Essex Coast & Heaths National Landscape Low Voltage Undergrounding](#).
- 9.4. SCC officers consider that a scheme of landscape enhancement, based on these established approaches, should be used to offset (at least partially) the residual adverse impacts of the overhead lines that are now confirmed as being proposed for the Waveney Valley. Based on initial discussions, today it is likely that such a scheme of enhancement will be complimentary to the [WaLOR project](#).

#### *Suffolk 1*

- 9.5. SCC Landscape welcomes, in principle, the additional undergrounding of the 132kV powerline, and the closer alignment of the proposed 400kV line with the route alignment of the former 132kV line, as this would reduce over-sailing of the park at St John's House, make residential properties around The Grange and Spring Cottages less hemmed in by powerlines west and east, and would reduce adverse effects on a Brook Farm airstrip.

- 9.6. SCC Landscape considers that the undergrounding of the 132kV line should have explored further to PK40 (near Elm Vale Farm), in particular as the Waveney Valley Alternative remains no longer viable.
- 9.7. The additional loss in vegetation, resulting from the new alignment crossing a more intricate landscape with a denser network of treed hedge lines and wooded areas, as well as the relocation of bellmouths, access points and hauls roads is however of concern and would need to be fully assessed and mitigated. The loss of additional veteran tree should be avoided.
- 9.8. Where the proposed undergrounded section of the 132kV line ends at Red Cottages, it would need to be carefully considered where the change from underground to overhead is made. SCC (Landscape) considers that it would be preferable to have overhead lines across the A143 to avoid roadside vegetation loss.
- 9.9. The new location for the temporary construction compound should not result in additional vegetation losses.
- 9.10. SCC Landscape considers that not all the changes in this area have been sufficiently explained, for example the assumed haul road (without hatch) west of the relocated construction compound, and what looks like additional undergrounding around RG92-RG93.

### *Suffolk 2*

- 9.11. SCC Landscape welcomes the proposed changes, in principle, as they would put the 400kV line at a greater distance from some parts of Gislegham.
- 9.12. It would have been preferable, if the changes could have gone further, as previously requested by SCC, to avoid the vegetation at Green Lane altogether and to avoid crossing Burgate Road twice.
- 9.13. Continued undergrounding of the UKPN line to PKF14 would have reduced the concentration of energy infrastructure at Burgate Road.
- 9.14. It is unclear what the resulting adverse impacts and effects would be following the relocation of the bellmouth on Burgate Road 110m to the south. This could conflict with the nearby wooded area on the eastern side and affect the property adjacent to the west. SCC considers that the loss of any mature roadside trees should be avoided.
- 9.15. It is welcome that the access between Major Lane/Thornham Road and Coldham Lane has been removed from the proposals and relocated 200m east, although the exact location is unclear. SCC reiterates that this should be in a location which is less densely vegetated.

- 9.16. It is further unclear from where the construction compound north of Thornham Road was relocated. It does appear to be located too close to the railway line resulting in the risk of unnecessary loss of vegetation along the railway line, which SCC Landscape would not consider acceptable.
- 9.17. SCC Landscape welcomes the new routing of the haul road east of the railway line, as it lessens the disturbance of agricultural land and makes use of existing tracks through vegetated areas.

### *Suffolk 3*

- 9.18. SCC Landscape welcomes the proposed changes, in principle, as they would remove the alignment further from some residential properties and lessen the effects on some views in this area.
- 9.19. The closer alignment of haul roads is welcome, in principle, but care would need to be taken that they are at a safe distance from existing vegetation and would not incur any additional vegetation losses.
- 9.20. It is not fully clear what impacts and effects the relocation of the bellmouth at Lamberts Lane will have on vegetation losses. SCC considers that this would need to be fully assessed.
- 9.21. It would be important to ensure that the wooded area to the west of the line (between RG137 and RG138, new alignment) is at a sufficient distance to the line as not be adversely affected.
- 9.22. At RG142 (new alignment) additional vegetation loss is likely to occur, which would need to be fully assessed.

### *Suffolk 4*

- 9.23. Provided that this compound is set back sufficiently from any existing vegetation and that existing vegetation is appropriately protected, and provided that the loads using the access road would not require additional vegetation removal, the additional construction compound is acceptable in landscape terms. SCC expects that the existing trees along the access route (in particular those of Little Newton Wood and Great Newton Wood, but also single trees along the route) would be circumvented and appropriately protected and that any space requirements would be accommodated on the southern, arable side of the track.

### *Suffolk 5*

- 9.24. SCC Landscape welcomes the proposed change, in principle, as it would reduce impacts on agricultural activity and avoid fields otherwise unaffected by works.
- 9.25. SCC disagrees with the statement that any visual effect would be temporary, as trees would not be able to be replanted within the cable corridor, which would lead to a permanent visual change.
- 9.26. The provided maps do not show the full length of the cable route corridor for the undergrounding of the 132kV power line. It is therefore not possible to provide comments for most of the route. SCC considers that vegetation losses should be avoided and reduced as far as possible, even if this would require slightly more land take.

### *Suffolk 6*

- 9.27. SCC Landscape welcomes the proposed change to the cable route, in principle, as it would lessen the impact on agricultural activity by reducing the number of fields affected by construction. The additional loss in vegetation would need to be fully assessed, however.
- 9.28. From a landscape perspective more difficult to support is the proposed change for an additional haul road to bypass Holton St Mary. The location of the proposed bell mouth appears to cut through a patch of mature vegetation, which is not acceptable. SCC Landscape considers that, if this haul road is required, it would need to be micro-sited to avoid any mature hedgerow trees and Important Hedgerows, and that this must take priority over avoiding arable land in this instance, as the latter would be more easily reinstated.
- 9.29. It is noted that the construction compound at Piper's Went has increased in size and that this has also increased the DCO limits. This change has not been explained.

### *Unresolved change requests at other locations*

- 9.30. SCC notes that a number of other issues remain unresolved and have not been addressed in the Targeted Consultation. These include:
  - a. Design review around RG123/RG124 regarding risks and opportunities around the poplar plantation in this area.
  - b. Realignment through Gipping Valley, around Creting Hall, RG160-RG167.

- c. Comprehensive scheme of undergrounding south of Stowmarket Road, around Badley Hall and Church, Holyoak Farm and Combs.
- d. Opportunities to reduce cumulative harm around Bramford substation through undergrounding and comprehensive landscape master planning.
- e. Design review in the area between Bamford and the Dedham Vale National Landscape (undergrounding options).
- f. Additional undergrounding from JC026 to mitigate aviation impacts at Raydon Airfield with additional benefits for the setting of listed buildings at Wenham Grange and Vauxhall.
- g. Consideration for HDD drilling in the Stour Valley, around Glebe Farm, Springfield Farm and at crossing of Black Brook.

## 10 Public Rights of Way (PROW)

- 10.1. All previous responses from Public Rights of Way to the Norwich to Tilbury Consultations are still valid. In addition, comments for the Targeted Consultation dated January 2025.

### *Suffolk 1*

- 10.2. No separate PROW Category is listed on the document, as requested in previous responses.
- 10.3. No change to PROW, no comment to make on this specific change.

### *Suffolk 2*

- 10.4. No separate PROW Category is listed on the document, as requested in previous responses.
- 10.5. Pylon RG115 appears to be in close proximity to PROW Bridleway W-267/014/0. The report does not mention/address/mitigate the relocation to potentially impact on the PROW.

### *Suffolk 3*

- 10.6. No separate PROW Category is listed on the document, as requested in previous responses.
- 10.7. PROWs appear to be used as access roads (near to Wicks Farm W-392/060/0) and the Middy Railway promoted route at red house farm Footpath W-392/045/0 & Cotton Boat W-203/056/0. This will require mitigation to ensure

that safe use by all users. This should be outlined and safety adequately addressed in a PROW management plan.

- 10.8. Pylon RG141, W-392/041/0 Footpath appears to be in close proximity to PROW. The report does not mention/address/mitigate the relocation to potentially impact on the PROW.

#### *Suffolk 4*

- 10.9. No separate PROW Category is listed on the document, as requested in previous responses.
- 10.10. No change to PROW, no comment to make on this specific change.

#### *Suffolk 5*

- 10.11. No separate PROW Category is listed on the document, as requested in previous responses.
- 10.12. No change to PROW, no comment to make on this specific change.

#### *Suffolk 6*

- 10.13. No separate PROW Category is listed on the document, as requested in previous responses.
- 10.14. No change to PROW, no comment to make on this specific change.

#### *Summary*

- 10.15. It is still requested that PROW is scoped in its own section or a subsection or within in the transport section and not fragmented across a number of disciplines and should include all PROW routes within, passing through or immediately adjacent to the order limits.
- 10.16. SCC has a strong preference to keep PROW open by implementing suitable safe operating procedures. Permissive routes will need to be secured by requirements or other suitable methods to avoid removal and, wherever possible, should not be of lower amenity than the PROW being replaced.
- 10.17. Where public rights of way are stopped up and no alternatives are provided, compensation is sought by the council to ensure that continued access for circular routes is maintained.
- 10.18. Public rights of way improvements in the area are required to facilitate and encourage active travel and support the delivery of the aims and objectives of the green access strategy.

## 11 Public Health

### *Suffolk 1*

- 11.1. Proposed position of RG95 appears to be in close proximity with a structure. This notwithstanding, the Health and Wellbeing row of the Environmental Topic table has the following wording: *The proposed change would locate the alignment closer to a number of health and wellbeing receptors, including residential properties, but further from others. There would be no change to the type or significance of health and wellbeing effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.* Recognising at least part of the alignment within the proposed change will be closer to residential properties, SCC suggests that there could be reasonably be an increased risk of Public Health impacts to the localised community including examples of stress and anxiety of EMF concerns, increased noise.

### *Suffolk 4*

- 11.2. SCC Public Health notes the addition of a temporary 132 KV construction compound near RG173 and that the Environmental Implications of Change (EIC) does not include a table analysis for the change detailing the Environmental Topics, comments and observations. The EIC concludes that this proposed change would not materially change the conclusions that were reported within the PEIR. Whilst the construction compound is described as temporary, it is suggested there could be Public Health impacts deriving from the positioning and use of this additional compound that have not been considered in the PEIR.

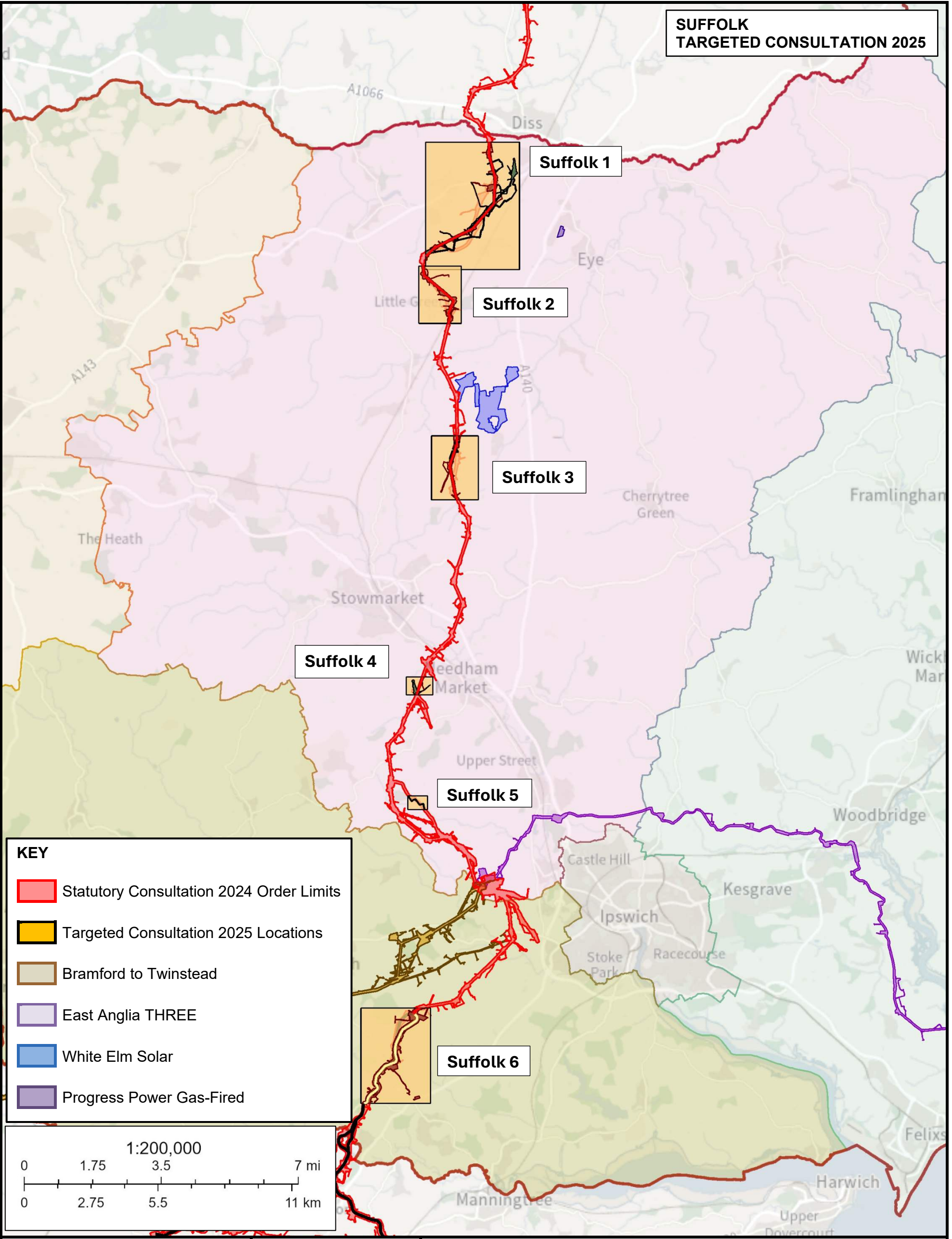
## Appendix

Map series identifying the changes from the Statutory Consultation 2024 and Targeted Consultation 2025

1. Suffolk (displaying all Targeted Consultation 2025 Locations and local NSIPs)
2. Suffolk 1
3. Suffolk 2
4. Suffolk 3
5. Suffolk 4
6. Suffolk 5
7. Suffolk 6

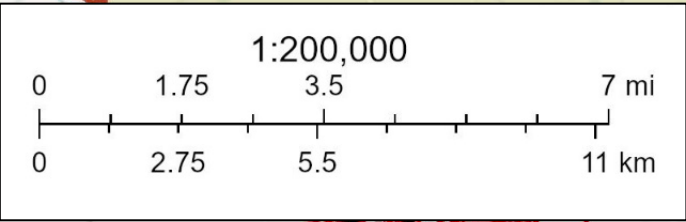


**SUFFOLK  
TARGETED CONSULTATION 2025**



**KEY**

- Statutory Consultation 2024 Order Limits
- Targeted Consultation 2025 Locations
- Bramford to Twinstead
- East Anglia THREE
- White Elm Solar
- Progress Power Gas-Fired



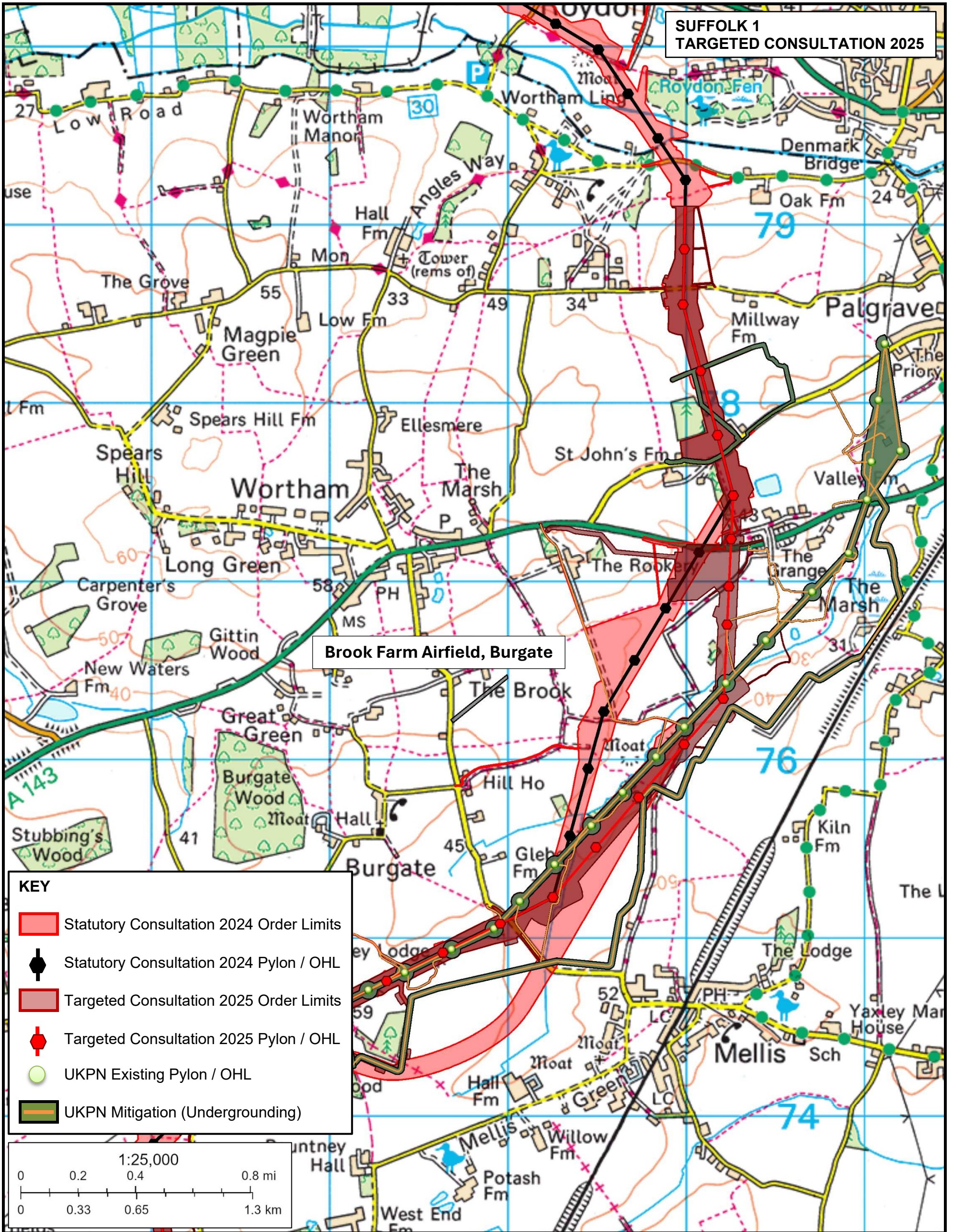
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**NORWICH TO TILBURY**

**SUFFOLK LOCATIONS  
 FOR TARGETED CONSULTATION 2025  
 COMPARED WITH STATUTORY CONSULTATION  
 2024**

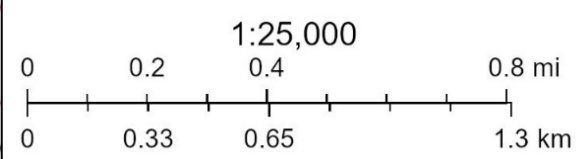
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**SUFFOLK 1  
TARGETED CONSULTATION 2025**



**KEY**

- Statutory Consultation 2024 Order Limits
- Statutory Consultation 2024 Pylon / OHL
- Targeted Consultation 2025 Order Limits
- Targeted Consultation 2025 Pylon / OHL
- UKPN Existing Pylon / OHL
- UKPN Mitigation (Undergrounding)



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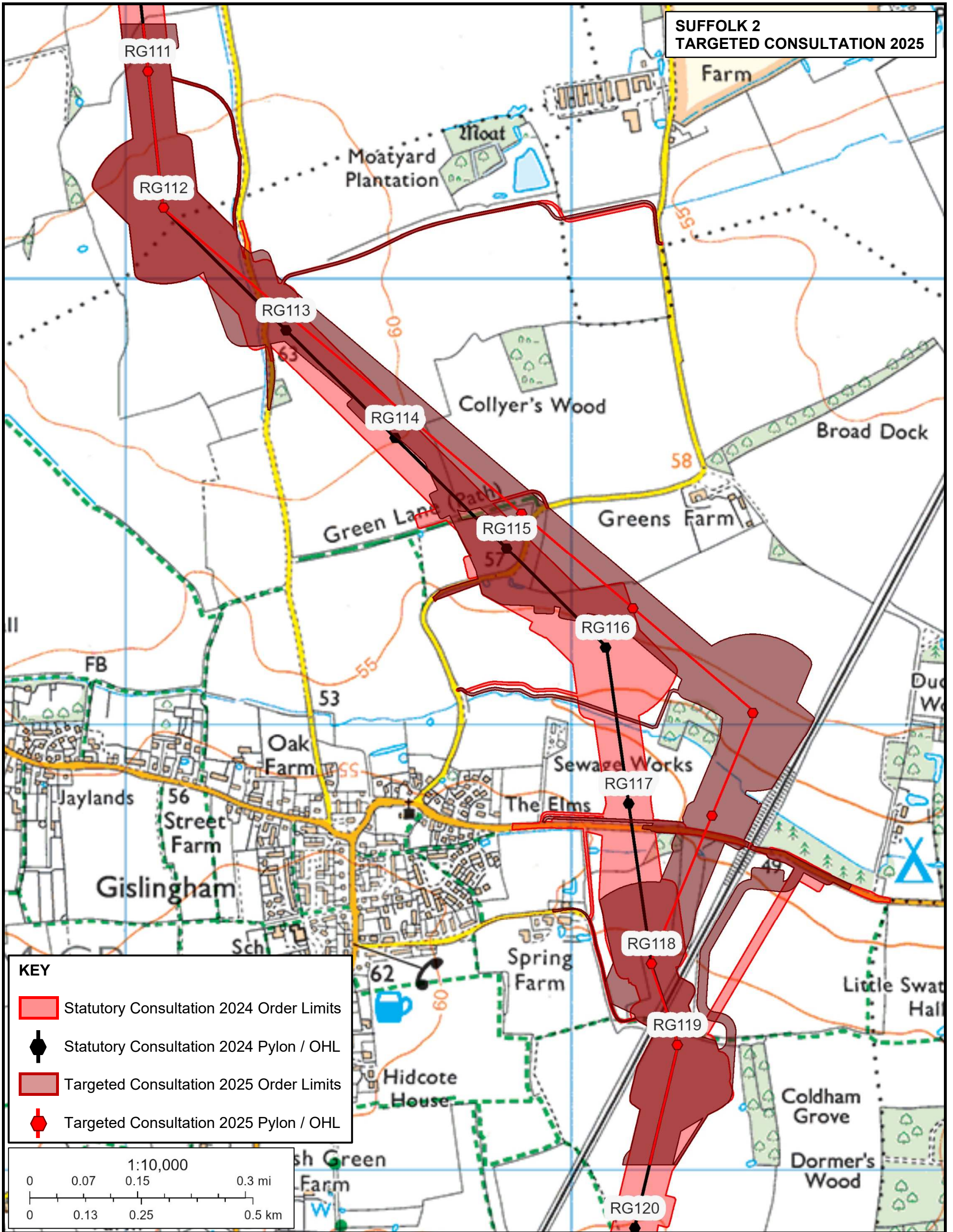
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FOR TARGETED CONSULTATION 2025  
COMPARED WITH STATUTORY CONSULTATION  
2024**

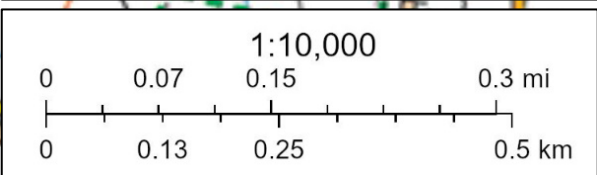
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**SUFFOLK 2  
TARGETED CONSULTATION 2025**



**KEY**

- Statutory Consultation 2024 Order Limits
- Statutory Consultation 2024 Pylon / OHL
- Targeted Consultation 2025 Order Limits
- Targeted Consultation 2025 Pylon / OHL

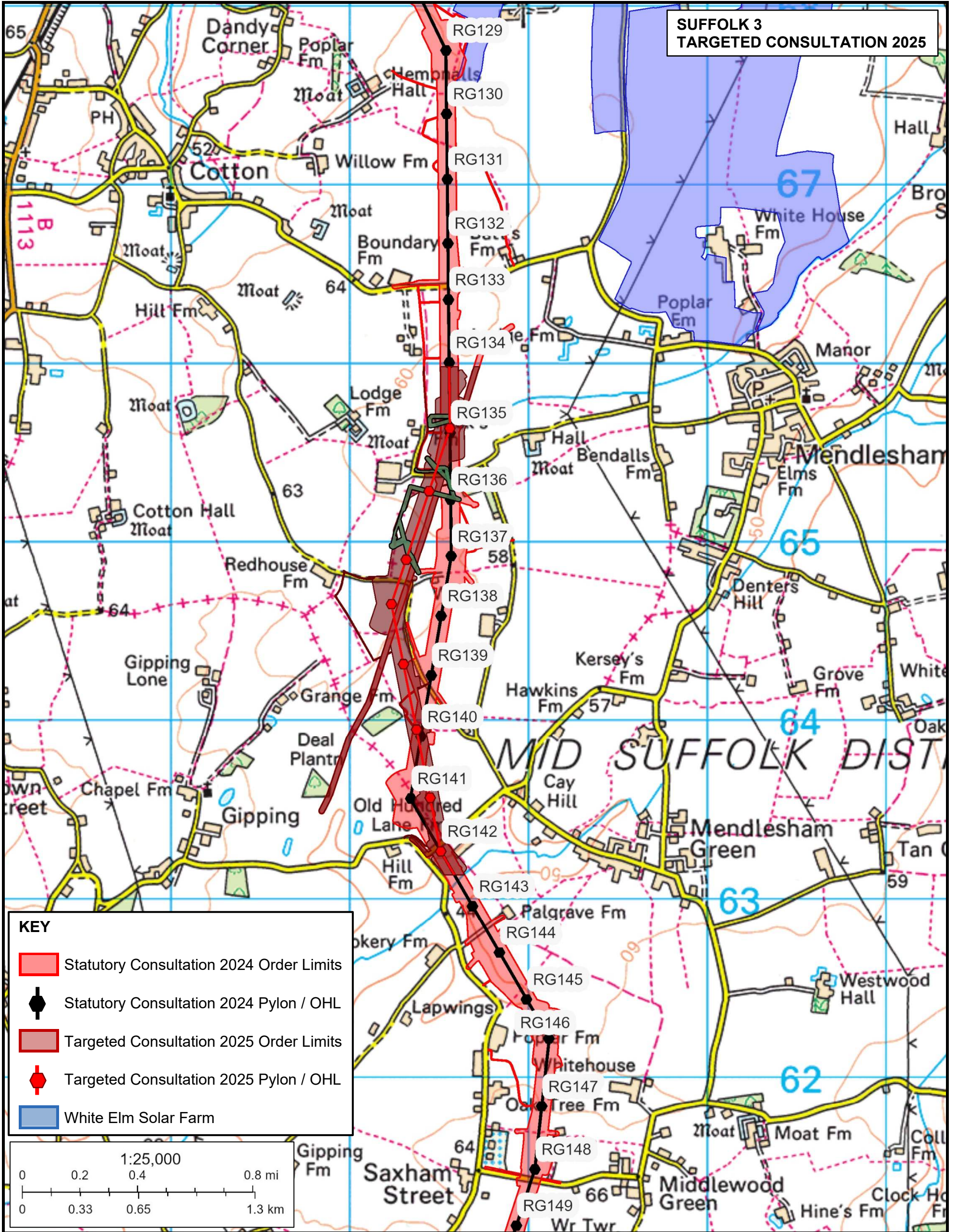


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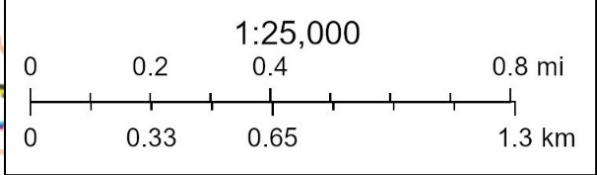
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FOR TARGETED CONSULTATION 2025  
COMPARED WITH STATUTORY CONSULTATION  
2024**

**SUFFOLK 3  
TARGETED CONSULTATION 2025**



**KEY**

- Statutory Consultation 2024 Order Limits
- Statutory Consultation 2024 Pylon / OHL
- Targeted Consultation 2025 Order Limits
- Targeted Consultation 2025 Pylon / OHL
- White Elm Solar Farm



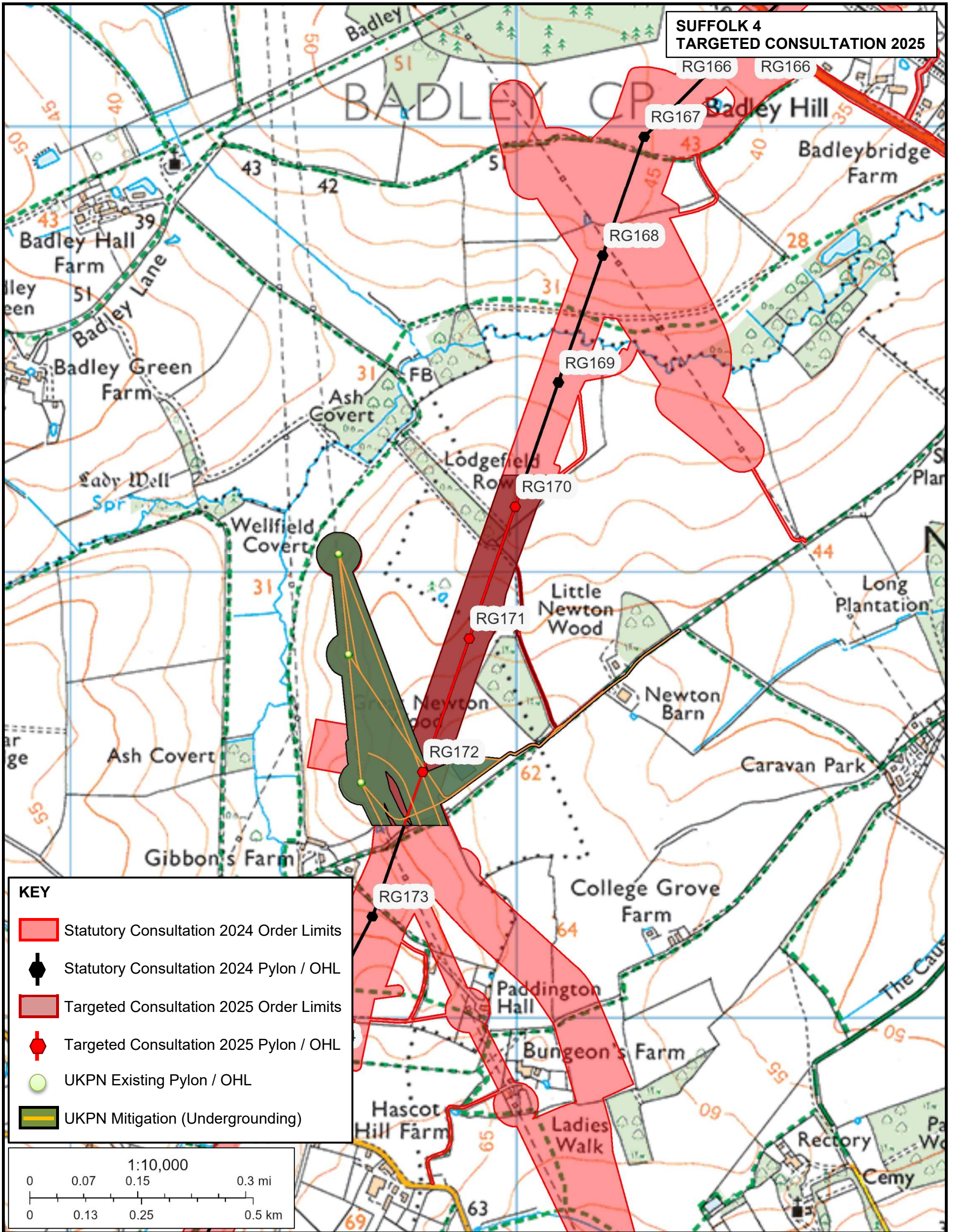
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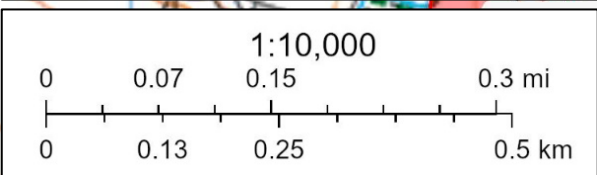
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FOR TARGETED CONSULTATION 2025  
COMPARED WITH STATUTORY CONSULTATION  
2024**

**SUFFOLK 4  
TARGETED CONSULTATION 2025**



**KEY**


- Statutory Consultation 2024 Order Limits
- Statutory Consultation 2024 Pylon / OHL
- Targeted Consultation 2025 Order Limits
- Targeted Consultation 2025 Pylon / OHL
- UKPN Existing Pylon / OHL
- UKPN Mitigation (Undergrounding)

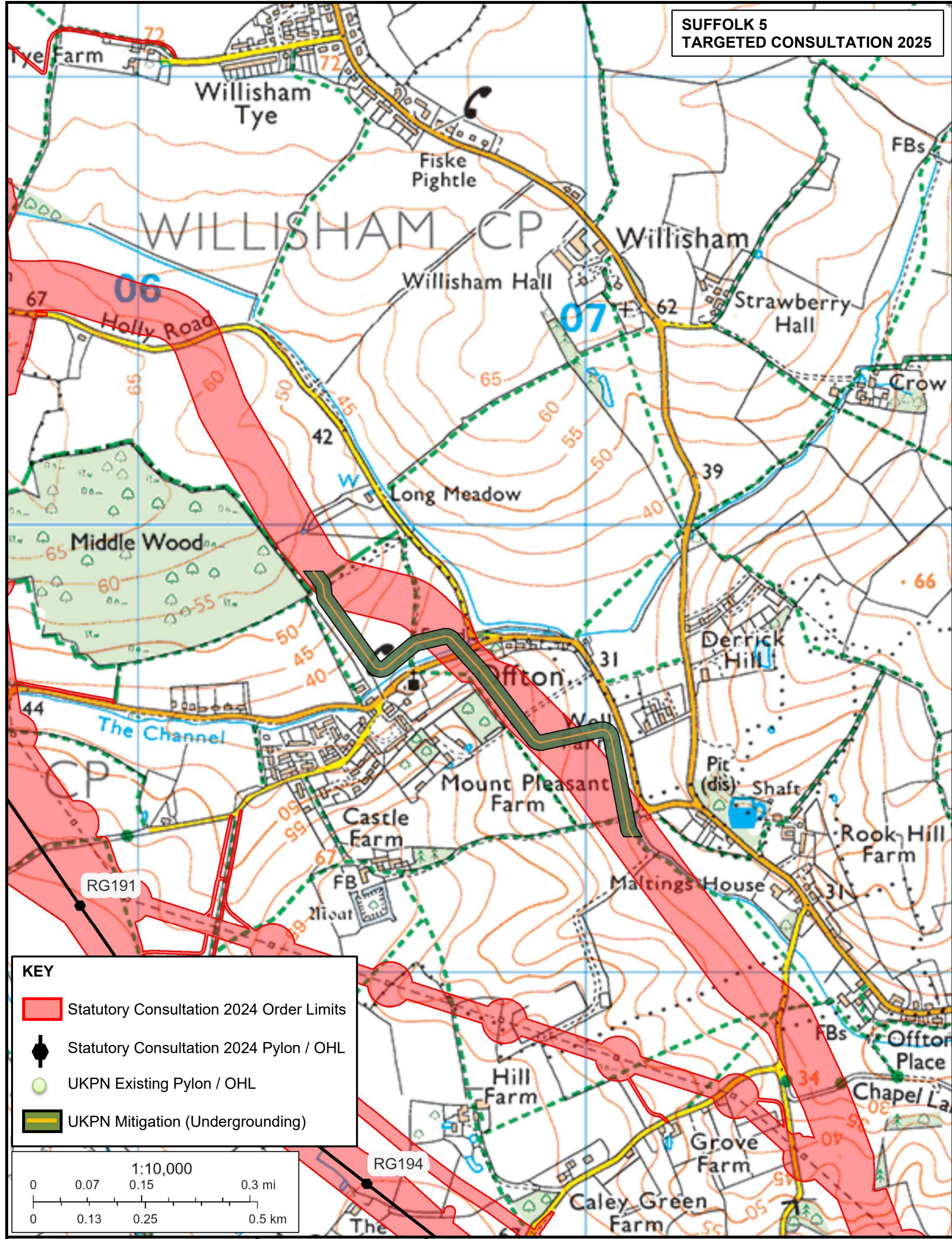


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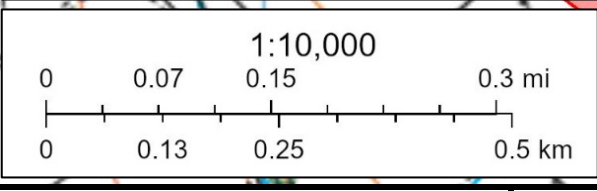
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 FOR TARGETED CONSULTATION 2025  
 COMPARED WITH STATUTORY CONSULTATION  
 2024**





**KEY**

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- Statutory Consultation 2024 Pylon / OHL
- UKPN Existing Pylon / OHL
- UKPN Mitigation (Undergrounding)

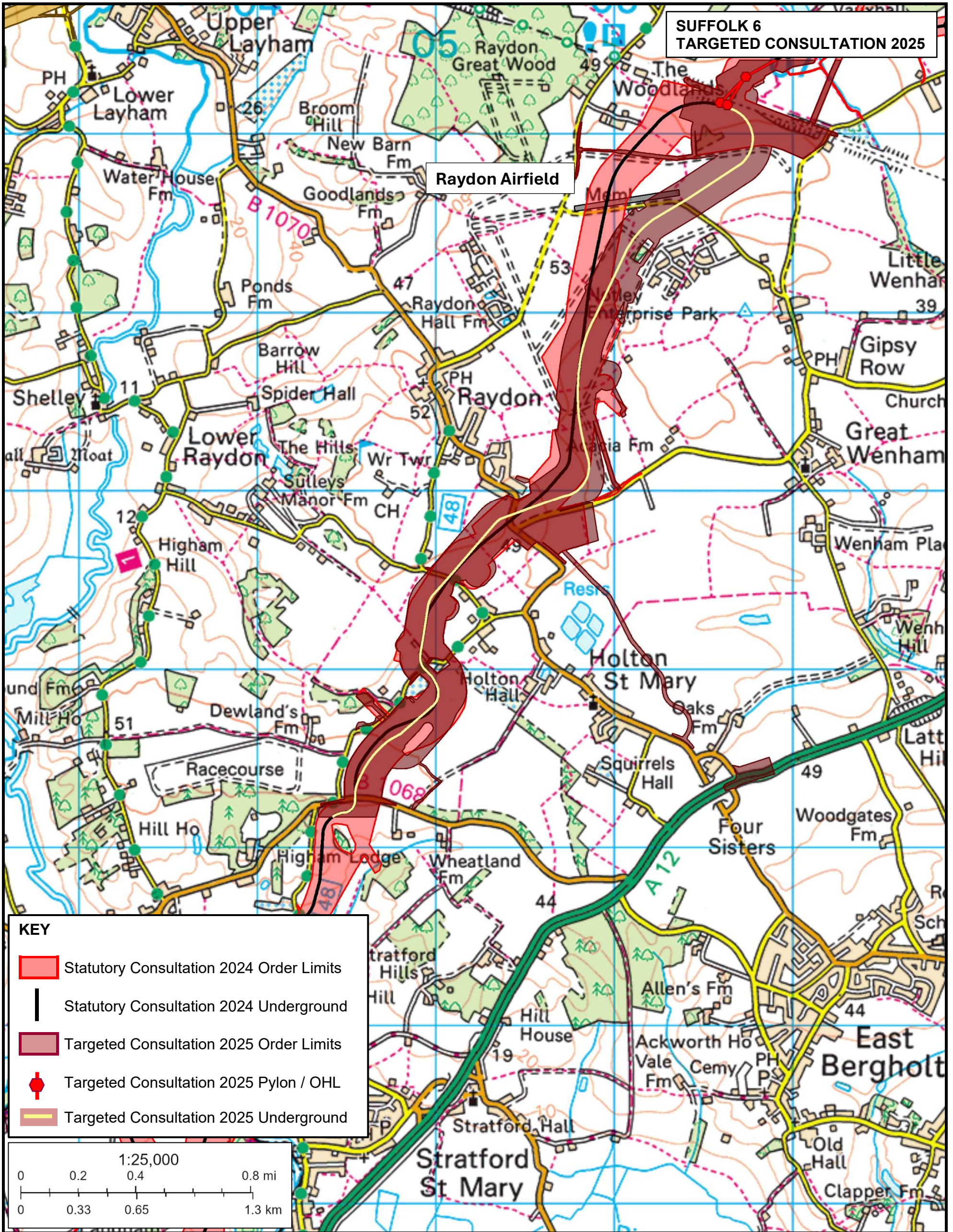


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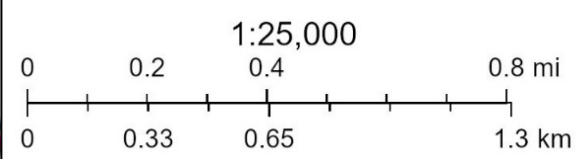
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 FOR TARGETED CONSULTATION 2025  
 COMPARED WITH STATUTORY CONSULTATION  
 2024**

**SUFFOLK 6  
TARGETED CONSULTATION 2025**



**KEY**

- Statutory Consultation 2024 Order Limits
- Statutory Consultation 2024 Underground
- Targeted Consultation 2025 Order Limits
- Targeted Consultation 2025 Pylon / OHL
- Targeted Consultation 2025 Underground





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**NORWICH TO TILBURY**

**SUFFOLK LOCATION REFERENCE 6  
FOR TARGETED CONSULTATION 2025  
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2024**



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