



## **Bramford to Twinstead Tee Connection Project**

### **Study Area AB Preferred Alignment**

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### FIGURE 1 STUDY AREA AB PREFERRED ALIGNMENT

## **1 INTRODUCTION**

- 1.1 National Grid is currently undertaking a comprehensive pre-application consultation programme on the Bramford to Twinstead Tee Connection Project.
- 1.2 A Feedback Report<sup>1</sup> presented the results of consultation on the findings of the Connection Options Report<sup>2</sup> for the Project. The consultation ran for eight weeks from 29<sup>th</sup> May to 27<sup>th</sup> July 2012. This report set out National Grid's response to the representations made in the consultation and how representations have influenced the selection of a preferred alignment to be taken forward to detailed design.
- 1.3 The Feedback Report recommended a preferred alignment for each of the study areas with the exception of Study Area AB (Bramford/Hintlesham). In respect of Study Area AB, the Connection Options Report had identified an interim alignment running from Bramford substation to the south of the existing 400kV overhead line and passing to the north of Hintlesham Hall. The interim alignment then diverted the existing overhead line to the north and west of Hintlesham Woods while making use of the existing route through Hintlesham Woods for the new overhead line. The two lines then converged near Bushey Cooper's Farm before continuing in parallel to the west.
- 1.4 The Feedback Report concluded that further work should be undertaken to provide English Heritage, the Government's adviser on heritage issues, with the additional information it had requested in its representation on the Connection Options Report. National Grid sought specialist professional advice to address these information requirements. A decision on which alignment to take forward in Study Area AB was therefore deferred until English Heritage had had the opportunity to consider its position following receipt of this information.
- 1.5 This report summarises the information provided to English Heritage and the response from this body and Babergh District Council. It analyses the further representations from these bodies and has considered the response from its specialist

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<sup>1</sup> National Grid : Bramford to Twinstead Tee Connection – Connection Options Report – Consultation Feedback Feedback : October 2012

<sup>2</sup> National Grid : Bramford to Twinstead Tee Connection – Connection Options Report : May 2012

advisers in setting out the approach to taking forward a preferred alignment in Study Area AB. In reaching this conclusion, National Grid has also undertaken a backcheck and review of issues raised by other consultees in the May to July 2012 consultation.

## **2 HINTLESHAM HALL - REPRESENTATIONS FROM ENGLISH HERITAGE AND BABERGH DISTRICT COUNCIL**

### **Background**

- 2.1 The representation from English Heritage<sup>3</sup> concerning the findings of the Connection Options Report welcomed the proposal to underground sections of the connection in Study Areas E and G and to remove the 132kV overhead line in the Hintlesham area. However, a particular concern was the effect of the proposed interim alignment on the Grade I listed Hintlesham Hall and related listed buildings. English Heritage considered that this would have *"a significant negative cumulative impact on the setting of this exceptional group of listed buildings"*.
- 2.2 It noted that whilst the former parkland has been somewhat degraded over the years, consideration still needs to be given to whether additional change will further detract from, or can enhance the significance of the asset.
- 2.3 Following a site meeting on 30<sup>th</sup> August 2012, English Heritage stated<sup>4</sup> that *"further consideration of these impacts is justified, including a visualisation study, which we feel is practical, as the route of the line appears to be quite firmly predetermined. This assessment should, we feel also consider the option of undergrounding"*.
- 2.4 A document<sup>5</sup> was produced in response to these representations together with an additional heritage report<sup>6</sup> issued to English Heritage on 1st November 2012, which provided an assessment of the significance of the group of buildings at Hintlesham Hall, including the contribution of setting to that significance. The heritage report also provided the visualisations requested by English Heritage, together with an assessment of the magnitude of effect that the interim alignment would have on the significance of the Hall and associated buildings and their setting.

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<sup>3</sup> Letter of representation : English Heritage 16<sup>th</sup> August 2012

<sup>4</sup> Letter of representation : English Heritage : 19<sup>th</sup> September 2012

<sup>5</sup> National Grid : Bramford to Twinstead Tee Connection – Hintlesham Hall – Response to English Heritage : November 2012

<sup>6</sup> H Kelly, J Edis : Bramford to Twinstead Tee connection project - Hintlesham Hall, Hintlesham, Suffolk - Additional assessment of effects of interim alignment and visualisation study for National Grid : October 2012

- 2.5 A site meeting with officers from English Heritage was held on 8<sup>th</sup> November 2012 to discuss the findings of this further assessment.
- 2.6 In its representation to the Connection Options Report, Babergh District Council proposed<sup>7</sup> that the whole of the connection should be placed underground. In respect of Hintlesham Hall, the committee report stated that :
- "The proposed overhead line would also pass to the north-west of Hintlesham Hall, a Grade 1 listed building. The setting to Hintlesham Hall has already been compromised by the existing overhead line. The environment surrounding the Hall therefore has less capacity to accommodate any further change without causing substantial harm to the setting of a designated heritage asset of the highest significance".*
- 2.7 The package of information referred to in paragraph 2.4 above was also provided to Babergh District Council as the body responsible for conservation and planning issues relating to listed buildings in the Hintlesham area and in response to the concerns it had expressed.
- 2.8 English Heritage's further representation was received on 19<sup>th</sup> December 2012 and that of Babergh District Council on 20<sup>th</sup> December 2012. The following paragraphs summarise the main issues raised by English Heritage and Babergh District Council in these responses. It draws on the more detailed analysis<sup>8</sup> which is presented in a report by National Grid's heritage consultant (available on the project website).

### **English Heritage**

- 2.9 In its further representation, English Heritage was concerned that:
- the significance of the Hall was recognised;
  - the additional heritage report takes a more limited view of the setting of the Hall than is appropriate, noting that the wider landscape in which the Hall sits is also part of its setting;
  - the additional heritage report understates the contribution the wider landscape makes to the setting of the Hall;

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<sup>7</sup> Babergh District Council Strategy Committee 12 July 2012

<sup>8</sup> H Kelly, J Edis : Hintlesham Hall assessment of effects of preferred alignment on significance of Grade I listed building : 29 January 2013

- it should be recognised that there is potential for arable land to revert to grassland which would be more in keeping with parkland character;
- the photomontages provided “downplay” the impact of the interim alignment and do not present the ‘worst case’;
- it is possible to obtain a more complete view of a pylon on the existing overhead line from the stable block archway than was shown in one photograph;
- no image was produced from the area on or near the main axis from the Hall by the A1071 where views are available of both the main elevation and the route of the new line;
- the interim alignment would result in a loss of significance through development within the setting of Hintlesham Hall.

2.10 English Heritage also referred to the policy basis for considering nationally significant developments that may impact on heritage assets and that the Overarching National Policy Statement for Energy requires: *“any harmful impact on significance to be weighed against the public benefit of development, recognising the greater the harm the greater the justification needed for any loss.”* Their representations requested that *“options for minimising the impact of the proposed development on the heritage assets should be fully explored.”*

2.11 National Grid acknowledges the significance of the Grade I listed Hintlesham Hall, which is described in the Connection Options Report and in later reports.

2.12 In accordance with the definition of setting provided in the Glossary to the National Planning Policy Framework, the additional heritage report provides a description of the area in which the Hall can be experienced. All of the heritage assessments have recognised that the wider landscape in which the Hall sits is also part of its setting. It is also accepted that the views referred to by English Heritage in its representation constitute part of the setting of the Hall and that a new overhead line would be present in these views. These factors had informed the conclusions reached in the report regarding the overall level of harm that would result from the interim alignment as development within the setting of the Hall.

2.13 The overall assessment of effect of the proposed development on the setting of Hintlesham Hall, recorded in the reports prepared by National Grid’s specialist advisers, is based on the premise that the interim alignment affects the setting of the Hall and that the setting makes a positive contribution to significance. National

Grid concurs with the view that this assessment would not materially alter if the arable fields were grassland, as they already green over at certain times of year. Furthermore, the existing overhead line and a new overhead line on the interim alignment would not hinder a change from arable land use to grassland or prohibit the restoration of parkland character.

- 2.14 The photomontages were prepared at the request of English Heritage and the images on which they were based were taken after some autumn leaf fall. By the time of the English Heritage site visit with National Grid, further leaf fall had occurred and the vegetation offered the lowest level of screening that would be possible. In any event, the assessment on which the additional heritage report was based included consideration of a 'worst case' of visibility with no leaf cover. In both the report and English Heritage's analysis, it is acknowledged that there would be views of the interim alignment from within the setting of the Hall, from the important vista at the front of the Hall and in views to and including the Hall.
- 2.15 It is accepted that there is a view of an existing pylon from the stable block archway. However, the photomontages prepared at English Heritage's request specifically relate to the effects of an additional overhead line, rather than the effects of the existing overhead line which can be readily seen on site.
- 2.16 The view from the field east of the A1071 and west of the Hall is not one which is generally available and the most appropriate publicly accessible location would be from the side of the A1071 which would be dangerous for pedestrians. This location was visited at the time of total leaf fall and National Grid and its consultants did not consider that it was necessary to provide a further photomontage to make an assessment.
- 2.17 National Grid, its consultants and English Heritage agree that the development would result in a loss of significance. English Heritage considers that the line would erode the landscape character of the setting of the Hall and that the harm has been underplayed. It does not specify what level of harm it considers the interim alignment to have in relation to Hintlesham Hall, but does not suggest that it would be substantial.
- 2.18 It is accepted that the interim alignment would harm the wider landscape which forms part of the Hall's setting. However, viewed from the Hall, the new overhead line would have relatively low magnitude of effects on the wider landscape beyond that identified as its former parkland. The effects of distance would mean that a relatively small part of the wider landscape setting would change and only a small



part of any view would change. In the wider landscape, this level of change would be balanced to some extent by the removal of the existing 132kV line in the landscape to the south-east of the Hall. Overall, National Grid accepts the view of its consultants that the harm that would be caused to the setting of Hintlesham Hall by a new overhead line on the interim alignment is "moderate" and less than substantial.

- 2.19 The National Policy Statement for Energy<sup>9</sup> (EN-1) and National Policy Statement for Electricity Networks Infrastructure<sup>10</sup> (EN-5), make it clear that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be (EN-1, 5.8.13). It is agreed in this case that Hintlesham Hall and associated listed buildings are of the highest significance, in which case substantial harm to or loss of, should be wholly exceptional (EN-1, 5.8.14). Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of the development (EN1, 5.8.15) – a point recognised by English Heritage. When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should weigh any negative effects against the wider benefits of the application (EN-1, 5.8.17).
- 2.20 As noted above, English Heritage has not stated that the interim alignment will cause substantial harm to the significance of Hintlesham Hall. National Grid accepts that it is necessary to weigh the acknowledged harm to the setting of Hintlesham Hall against the wider benefits of the scheme.
- 2.21 EN-5 advises that *"where there are serious concerns about the potential adverse... visual effects of a proposed overhead line, the Secretary of State will have to balance these against other relevant factors, including the need for the proposed infrastructure"*, also that *"the Secretary of State should only refuse consent for overhead line proposals in favour of an underground... alternative if it is satisfied that the benefits ... will clearly outweigh any extra economic... and environmental impacts."*

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<sup>9</sup> Department for Energy and Climate Change : Overarching National Policy Statement for Energy : July 2011

<sup>10</sup> Department for Energy and Climate Change : National Policy Statement for Electricity Networks Infrastructure : July 2011

- 2.22 The English Heritage response notes National Grid’s assessment of the additional cost of a partial underground solution which would avoid effects on the setting of Hintlesham Hall. However, English Heritage has not sought to conclude whether its own assessment of the degree of harm to the setting of Hintlesham Hall would justify incurring these additional costs and the consequential ecological and archaeological effects. The additional capital cost of £57m associated with a partial underground solution in Study Area AB compares to a capital cost for the preferred alignment of the whole of the Bramford to Twinstead Tee Connection, described in the Connection Options Report, of £207.7m. Nor has English Heritage sought to comment on the other options discussed in the document referred to in paragraph 2.4, the implementation of which would also have adverse effects on the settings of heritage assets.
- 2.23 In the context of EN-1 and EN-5, National Grid has to form an opinion on the appropriate balance to be taken between the effect of an overhead line on the setting of an important heritage asset and other factors. While it recognises that English Heritage considers that the magnitude of effect would be greater than that predicted by its own assessment, it does not consider that there is sufficient evidence to conclude that this should outweigh the adverse effects associated with other options.

### **Babergh District Council**

- 2.24 In its further representation, Babergh District Council:
- does not accept that the harm to Hintlesham Hall caused by an overhead line on the interim alignment would be less than substantial “*within the meaning provided by the National Policy Statement for Energy (EN-1)*”;
  - considers that the setting of the Hall is more complex than is suggested in the additional heritage report;
  - considers that to make a distinction between the better preserved parts of the setting, and those which are not, as a means of justifying the proposal is disingenuous and fails to deal with the matter holistically.
- 2.25 Neither EN-1, nor the National Planning Policy Framework<sup>11</sup>, provides any definition of substantial harm and the reference to EN-1 in that regard is unclear. English Heritage

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<sup>11</sup> Department for Communities and Local Government : National Planning Policy Framework : March 2012

has not suggested that the harm caused by an overhead line on the interim alignment is substantial, nor has Babergh District Council provided an alternative assessment to explain why it considers that the harm is substantial.

- 2.26 Babergh District Council does not set out any information to support its assertion that the setting of the Hall is more complex than is suggested in the additional heritage report.
- 2.27 As is set out above in response to the representation of English Heritage, it is agreed that the development is within the setting of the Hall, and the assessment undertaken in the additional heritage report is based on this position. The method used in assessing the effect of the interim alignment on the setting of Hintlesham Hall is based on the policy provided in EN-1, which in paragraph 5.8.8 directs that *“the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance.”*
- 2.28 It is therefore fully in accordance with current historic environment policy and best practice guidance to provide a description of the setting of a heritage asset, and the contribution made by setting to significance, mindful that not all elements of that setting will necessarily make a positive contribution to its significance. Further, the additional heritage report treats the setting, including the less well preserved parts of it, as making a positive contribution to the significance of the Hall while also recognising that there is a difference in character between parts of that setting.

### **Conclusion on the effects of the interim alignment on the setting of Hintlesham Hall**

- 2.29 There is agreement between National Grid’s consultants, Babergh District Council and English Heritage that:
- an overhead line on the interim alignment affects the setting of Hintlesham Hall, a Grade I listed building, and associated Grade II\* and Grade II listed buildings, and that the shared setting of these assets contributes to the significance of the buildings;
  - an overhead line on the interim alignment would harm the setting of Hintlesham Hall and lead to a loss of significance through development within the setting of the Hall.

2.30 English Heritage considers the harm would be greater than 'moderate' but does not suggest that it is substantial in the context of EN-1. Babergh District Council disagrees that the harm is less than substantial, but does not set out an alternative assessment to that in the additional heritage report.

2.31 English Heritage's guidance on the setting of heritage assets provides a method of assessment for determining the effect of development on the setting of heritage assets that includes:

*"The second stage of any analysis is to assess whether the setting of a heritage asset makes a contribution to its significance and the extent of that contribution. In other words to determine 'what matters and why?' in terms of the setting and its appreciation".*

2.32 National Grid is satisfied that the additional heritage report provides an assessment in accordance with that method. Having taken into account the representations of English Heritage and Babergh District Council, National Grid considers that, although there will be change within the setting of the Hall and that the change will be harmful to the setting of the Hall and therefore result in a loss of significance, it is not so harmful as to lead to an inability to appreciate or understand the Hall or its relationship to its setting. National Grid accepts that the acknowledged harm to the setting of Hintlesham Hall must be weighed against the wider benefits of the proposed development. It will engage further with English Heritage and other parties to develop mitigation measures to reduce the potential effects on the setting of the hall.

### **3 OTHER ISSUES AND REPRESENTATIONS - STUDY AREA AB**

3.1 In addition to the issues raised in relation to the potential effects of the connection on Hintlesham Hall, the Feedback Report considered the merits of alternative alignments (overhead and underground) referred to in representations received. The Connection Options Report had assessed the following options :

- Overhead lines
  - Corridor 2A (North)
  - Corridor 2A (South)
  - Corridor 2B (North)
  - Corridor 2B (South) – the interim alignment
- Underground cables
  - Corridor 2 optimal route

3.2 Representations had commented on these options and also suggested that further options should be considered, including :

- Underground cables
  - Corridor 2A
  - Corridor 2A partial
  - Corridor 2B partial

3.3 The Feedback Report sets out the representations and National Grid's response to them. The Corridor 2B partial underground option is discussed in the November 2012 report referred to in paragraph 2.4.

3.4 The alternative alignments noted above would all result in a lesser effect on the setting of Hintlesham Hall:

- the larger pylons required for a 400kV overhead line in Corridor 2A would be visible from the front of Hintlesham Hall, looking south and west, although the distance of separation and filtering of views by intervening mature trees would lessen the magnitude of effect;

- a northern alignment in Corridor 2B would avoid the extent of Hintlesham Park and would have less effect than the interim alignment on views from the Golf Course and driveway approach to the Hall. However, it would make very little difference to views from the front of the Hall, which would see the upper half of new pylons around the northern edge of the Ramsey Woods (over 2km distant) with either a northern or southern alignment in Corridor 2B;
- an underground cable connection running through the whole of the Bramford/Hintlesham study area in either Corridor 2A or Corridor 2B would not result in any long term effects on the setting of Hintlesham Hall;
- a partial underground cable option on Corridor 2B would avoid the effects on the setting of Hintlesham Hall associated with the interim alignment. There would, however, be some effects on the parkland due to the removal of hedgerows and trees in order to accommodate the cable alignment. The eastern sealing end compound may also be visible from within the former parkland.

3.5 However, the adverse environmental/socio-economic effects and the variations in capital and lifetime costs associated with the alternatives need to be taken into account in seeking to identify a preferred option.

3.6 Adopting a more northerly overhead alignment in Corridor 2B would result in an overhead line passing much closer to several residential properties than would be the case with the interim alignment and would have a negative effect on the setting of several Grade II listed buildings, including Norman's Farm, Park Farm and Burstallhill Cottages. Park Farm itself would have overhead lines to either side of it, with little intervening vegetation. It would also affect a wider swathe of the landscape than the interim alignment and would have an adverse effect on the visual amenity of residential properties to the north of the existing 400kV overhead line, including some in Burstallhill and in the vicinity of Park Farm. A variation to this alternative, also suggested in a representation, would have a greater effect on the setting of the listed Canes Farm than the interim alignment.

3.7 The landscape and visual effects of Corridor 2A overhead alignment option would be greater than those associated with the interim alignment as they would introduce an overhead line to an area east of Burstall where there are no overhead lines at present. The interim alignment would permit the removal of a 4km section of the 132kV overhead line which would provide a benefit in views from residential property on the southern edge of Hintlesham/Duke Street and in Chattisham and on the setting of a number of listed buildings. A Corridor 2A alignment would also affect views from a

greater number of properties than the interim alignment and would extend the landscape effects of 400kV overhead lines over a wider area.

- 3.8 There is little to choose between the overhead line options on ecological grounds. The effects of alternative alignments on local economic activity would be less than those of the interim alignment, though the numbers of businesses affected would be low in each case. The cost differentials are such that they should not, on their own, be a determining factor in choosing between the overhead line options.
- 3.9 National Grid concludes that overall the environmental effects of the overhead line alternatives would be greater than those associated with the interim alignment.
- 3.10 It is recognised that the fully underground options would deliver landscape and visual benefits. However, the Connection Options Report notes that avoiding the moderate adverse effects of an overhead line on a landscape which carries no national designation, and on local views, could only be achieved at a significant additional cost. The capital cost of putting the connection underground through the whole of the study area would be at least £153m greater than that of the interim alignment and the lifetime costs would be at least £130m greater.
- 3.11 The National Policy Statement for Electricity Networks Infrastructure (EN-5) requires National Grid to consider whether *'the benefits from the non-overhead line alternative (underground cables) will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable'*. Even taking account of the wider benefits which would accrue to the heritage interests, the landscape and local views by placing this part of the connection underground, National Grid considered that the considerable additional cost, which would ultimately be met by electricity consumers, could not be justified.
- 3.12 While not as expensive as a fully underground solution, a partial underground option in Corridor 2B would still incur considerable cost. The option would involve incurring capital costs approximately £57m greater than those of the interim alignment and lifetime costs £37m greater. While the option would avoid the negative effects of the interim alignment on the setting of Hintlesham Hall and Grade II listed Park Farm, College Farm and Old Hall House, the sealing end compounds would affect the settings of other Grade II listed buildings and would be visible in views from Hintlesham Park.
- 3.13 Consideration had also been given to a partial underground solution in Corridor 2A, involving underground cables running between Bramford and Burstall Bridge. While this would avoid effects on the setting of Hintlesham Hall, it would incur capital costs approximately £50m greater than those of the interim alignment. The disbenefits

associated with an overhead line running west from Burstall Bridge in Corridor 2A, notably its prominence from the southern edge of Hintlesham (including Duke Street) and from Chattisham and effects on the settings of listed buildings in that area, would also accrue.

- 3.14 Effects on buried archaeology and wildlife habitats would also weigh against underground options.
- 3.15 National Grid considers that the benefits of a partial underground cable option would be outweighed by other factors and that such an option should not be taken forward.
- 3.16 National Grid has further explored options for minimising the impact of the proposed development on the heritage assets as requested by English Heritage. In concluding that the interim alignment should be taken forward, National Grid has considered :
- whether the representations from English Heritage and Babergh District Council relating to the effect on the setting of Hintlesham Hall have added further weight to the argument against the interim alignment;
  - whether representations from other parties, including the local community, have introduced new information which would justify adopting a different alignment.
- 3.17 As noted in the previous chapter, the representations of English Heritage and Babergh District Council have not presented information that changes National Grid's position on the effects of the interim on the setting of Hintlesham Hall. Even if, as English Heritage suggest, the effect on the setting of Hintlesham Hall would be greater than assessed in the Connection Options Report, it is not sufficient to alter National Grid's view that the balance lies in favour of the interim alignment. In particular, the adverse effects of the alternatives and the increased costs do not justify either an overhead alternative on another alignment or the additional costs of undergrounding. No views have been expressed by English Heritage or Babergh District Council on the merits or otherwise of alternative alignments, other than the latter's position that it would prefer an entirely underground solution.
- 3.18 Local concerns about the potential effect of the interim alignment on particular properties are recognised. As noted in the Feedback Report, many of these effects had already been considered in the Connection Options Report and no new effects were identified which would materially affect the selection of preferred alignment. The detailed design of the alignment will specifically address effects upon properties, including all those where concern about potential effects have been expressed. These



receptors will be referenced in the Environmental Statement which will accompany the application for Development Consent

## 4 CONCLUSIONS AND NEXT STEPS

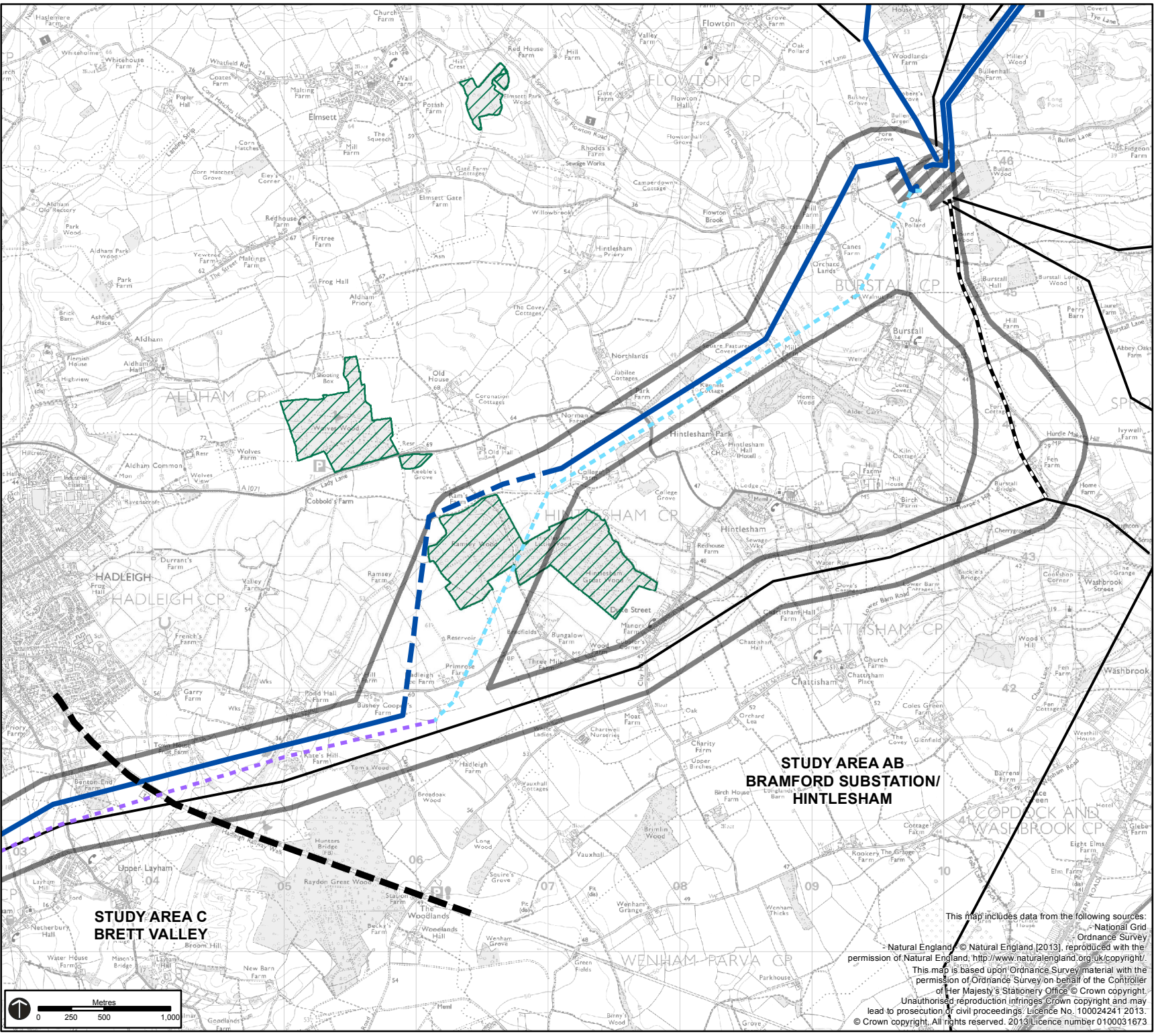
- 4.1 Throughout the early engagement process with local communities and the Stage 1 and Stage 2 consultations, National Grid has been aware of the high level of interest in the effects of its proposals on the area between Bramford and Hintlesham (Study Area AB). The published interim alignment showed an overhead connection passing along Corridor 2B to the north of Hintlesham.
- 4.2 Following the publication of the Connection Options Report, representations were received, which are reported in the Feedback Report, together with National Grid's responses to them. A particular issue raised by both prescribed bodies and members of the local community was the effects of the interim alignment on the setting of the Grade I listed Hintlesham Hall. The Feedback Report concluded that a decision on the preferred alignment to be adopted in Study Area AB could not be made until English Heritage had had the opportunity to consider the findings of additional assessment work which it had requested.
- 4.3 National Grid agrees with consultees that an overhead line on the interim alignment would affect the setting of Hintlesham Hall, the national importance of which is reflected in its designation.
- 4.4 The Overarching National Policy Statement for Energy (EN-1) states that *"any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh loss or harm."*
- 4.5 English Heritage has not suggested that the interim alignment would result in substantial harm to the setting of Hintlesham Hall. There would be no direct effect on the designated heritage asset itself. On that basis there would be no justification for the IPC's successor body to refuse consent for the interim alignment on the basis of effects on Hintlesham Hall and its setting. The public benefit of the development would be substantial as it would provide the necessary additional capacity on the electricity transmission network to allow new electricity generators to connect, including the proposed Sizewell C nuclear power station and a number of offshore wind farms.
- 4.6 Babergh District Council does not accept that the harm to Hintlesham Hall caused by an overhead line on the interim alignment would be less than substantial *"within meaning*

*provided by the National Policy Statement for Energy (EN-1)*". However, it has not provided any assessment to justify this conclusion.

- 4.7 Neither English Heritage nor Babergh District Council has taken issue with National Grid's assessment of alternatives, incorporated in the November 2012 report. English Heritage notes that undergrounding has been considered and acknowledges the costs of a partial underground solution. It does not comment on whether, given its own assessment of the effects on the setting of Hintlesham Hall, such additional costs would be justified in the context of national policy as set out in EN-5. In the context of formulating the application for development consent, that judgement is left to National Grid. Babergh District Council has always been of the view that the whole of the connection should be made by underground cable but has not sought to balance the costs and benefits of such an approach.
- 4.8 National Grid has considered representations made by other parties relating to both the effects on Hintlesham Hall and on other assets in Study Area AB. It has reviewed alternative proposals and concluded that the environmental effects of overhead alternatives would be greater than those associated with the interim alignment. A partial underground cable option could be developed in Corridor 2B which would avoid effects on Hintlesham Hall and on other properties highlighted in representations. However, the additional cost (£57m) would be substantial and, taken together with adverse effects on ecology and buried archaeology, these factors would outweigh the benefits (on landscape, views, heritage and socio-economic assets associated with Hintlesham Hall) which would accrue. A partial underground cable option in Corridor 2A, between Bramford and Burstall Bridge, would avoid effects on Hintlesham Hall but would incur additional cost (£50m) and most of the disbenefits of an overhead line in Corridor 2A.
- 4.9 Given the above, National Grid considers that the interim alignment (of a southern overhead alignment in Corridor 2B) identified in the Connection Options Report should be taken forward as the Preferred Alignment. This is shown on Figure 1.
- 4.10 The next step is to commence the development of a detailed connection design, based on the Preferred Alignment, which will also be influenced by technical considerations, environmental and geo-technical surveys and discussions with affected landowners and occupiers. National Grid will work closely with English Heritage and Babergh District Council to develop the detailed design of the connection and appropriate mitigation measures. In particular it will give careful consideration to the siting of pylons and to

appropriate landscape treatments in the vicinity of Hintlesham Hall to minimise the effects of the proposed overhead line on its setting.

- 4.11 During Stage 3 of the process, the detailed connection design will be subject to environmental impact assessment (EIA) and further public consultation.
- 4.12 The project is subject to a continuous process of backcheck and review in the pre-application stages to ensure that when new information comes forward (be it related to policy, technological developments, environmental or other factors), this is communicated to the project team and it is reviewed to determine whether different conclusions should be reached in the light of the new information.
- 4.13 It is anticipated that National Grid's formal consultation on the detailed connection design and preliminary environmental information will be undertaken in Summer 2013. The proposal will then be finalised and it is anticipated that a submission will be made to the Planning Inspectorate in Winter 2013/14, seeking consent for the connection and associated development. Timescales and activities may be subject to alteration as the project progresses.



**Key**

- Preferred Route Corridor
- Study Area Boundary
- Existing Infrastructure**
- Bramford Substation National Grid Ownership
- Existing 400kV Overhead Line
- Existing 132kV Overhead Line
- Existing 132kV Underground Cable
- Overhead Alignment Options**
- Southern Alignment - Corridor 2B (using existing 400kV pylon in Hintlesham Woods)
- Southern Alignment
- New Alignment for Existing 400kV Overhead Line with Southern Alignment on Corridor 2B (north of Hintlesham Woods)
- Selected Environmental Constraints**
- Site of Special Scientific Interest

**nationalgrid**

Project: **Bramford to Twinstead Tee Connection**

Title: **Study Area AB Preferred Alignment**

Drawing No: **Figure 1**

Date: 17-02-2013      TEP Ref No: G1980.1133a

Drawn: CB	Checked: CH	Approved: CH
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