



Chattisham and Hintlesham Parish Council Scoping Response

Summary

In its informal consultation NGET has admitted that the landscape in the vicinity of Hintlesham Parish – where the Bramford sub-station is sited - may have reached its capacity to accommodate energy infrastructure.

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

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

Landscape and visual

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

It is not clear, despite the operation of the Holford and Horlock rules, to what extent the existing baseline wire-scape, consisting of both 400kV and 132kV overhead lines, will be considered in any landscape assessment. It is likely that in some sections of the route this Project, in combination with the baseline (other proposed projects in particular Bramford to Twinstead), may create an unacceptable wires-cape. Therefore, this will need to be part of any assessment and inform the approach to mitigation.

The Scoping Report omits significant detail in and around our Parish.

No mention is made of the potential detrimental effect on businesses in this Special Landscape Area.

Notably Grade 1 Hintlesham Hall, Hintlesham Hall Golf Club & Restaurant, The Hidden Gardens and The Suffolk Escape holiday lodges.

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

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

“There is high potential for the development of a 400kV OHL within this section to give rise to significant adverse effects on local landscape character in combination with the existing NG

*and DNO assets that converge at Bramford substation. This is because **it is possible that this landscape has reached its capacity to accommodate such infrastructure.***" (our emphasis)

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

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

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

Flawed consultation means flawed scoping report

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

C & H Parish Council have suggested that Undergrounding the pylons as mitigation is considered on both the Bramford to Twinstead Upgrade and the East Anglia Green Line.

We have also stated that the East Anglia Green Line would not be required if power generated by offshore wind farms was distributed via an Offshore Grid to its point of use at Tilbury.

Neither of these options have been included by NGET in their Scoping Report.

Mr Banner stated:

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

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

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

The Bramford/Hintlesham Wirescape.

From Scoping Report Appendix A Fig 4.1 page 3

