Planning Act 2008

Comments of Suffolk County Council

upon the

Informal pre-application consultation held between 25 March and 6 May 2021

by

National Grid Electricity Transmission

upon

Proposals to build a new 400kV electricity line between Bramford and Twinstead

Contents

Summary of response

1. The proposals

1.1 These proposals involve building a 27km (circa 17 mile) 400 kV electricity transmission line between Bramford in Suffolk and Twinstead in Essex to reinforce the national network of electrical power transmission. Of this route, potentially 19km (12 mile) would be overhead line, and approximately 8km (5 mile) underground cables.

1.2 Two sections are identified for underground cables – one in Dedham Vale Area of Outstanding Natural Beauty (AONB) and one in the Stour Valley, where an AONB extension is proposed. Cable sealing ends (four in total) would be needed to make the transition from overhead line to underground cable.

1.3 To make way for the proposed 400 kV line, approximately 25km (15 ½ mile) of UK Power Network's (UKPNs) existing 132 kV overhead electricity distribution line would be removed between Burstall Bridge in Suffolk and Twinstead in Essex. A new substation is also proposed next to Butlers Wood, on the border of Bulmer Tye and Twinstead, to keep the local network supplied when the section of 132kV line is removed.

1.4 Approximately 1km of existing 400 kV overhead line would also be removed south of Twinstead near Alphamstone.

2. The history of the proposals

2.1 Preparatory planning work started on these proposals in 2009 but were put on hold in 2013, as the reinforcement was not required at that time. Preparatory planning work has now restarted, with the intention that the upgraded infrastructure will be in place before the end of the decade. Although these proposals are, on the face of it, very similar to those discussed previously, Suffolk County Council (SCC) is taking a fresh look within the context of current national and local policies. This includes the consideration of alternatives.

3. Poorly timed public engagement

3.1 SCC acknowledges the imperative to proceed quickly to support the net-zero ambitions, but this should not be at expense of proper engagement, quality of evidence gathered and communicated, or the thorough consideration of the proposal and its impacts.

3.2 It is noted that the current round of public consultation is taking place in the midst of the local government elections, which prevents full consideration by SCC.

3.3 It also is noted that the virtual seminars employed because of Covid impact the ability of communities to participate and clashed with the pre-election period and has limited activities of elected community leaders.

4. Without prejudice

4.1 Considering the issues raised above around timing, the views expressed in this document are provided without prejudice to any future position that SCC wishes to adopt.

5. SCC Energy Infrastructure Policy

5.1 This encompasses environmental, economic, and social aspects and is set out in full in Appendix B.

5.2 Suffolk is committed to tackling climate change and adopted a policy on 23 February 2021, for energy generation and connection projects. The central tenet of the policy is to fully engage with the UK's Net Zero target, to actively engage with Government and primary stakeholders, such as Ofgem and National Grid, and to develop new systems of working, project development, and coordination to minimise detrimental impacts on the environment and communities.

5.3 The policy sets out the Council's expectation that all energy projects and their promoters will:

- Maximise benefits to Suffolk's economy and supply chains, employment opportunities, skills, and training provision; and
- Minimise and mitigate negative impacts on the environment and communities of Suffolk.
- Be responsible corporate entities, interested in achieving positive outcomes, and that:

  "If the harm of a proposal is not properly and robustly addressed, the Council will not support the scheme, notwithstanding its national significance or its contribution to decarbonisation."

5.4 In agreeing to this policy, the Cabinet members raised important issues which are relevant to the Bramford to Twinstead powerline project. These include the cumulative impacts of the many projects that the Council is likely to host in coming years and creating an adequate highways infrastructure to accommodate this growth; the potential cost to agriculture, leisure, and tourism as well as economic benefits; the continued transmission of electricity overland via pylons and powerlines, and the opportunities for offshore transmission. The Council has a strong preference for the prioritisation of offshore coordination.

6. Archaeology

6.1 In reviewing work carried out by the applicant during 2009-13 to support route selection a number of potential issues have been identified:

- it is not clear whether this information has been re-assessed recently;
- Schedule Monuments have been omitted from the maps, and;
- it is not clear if undesignated heritage assets have been taken into account.

6.2 Field evaluation should be carried out before the submission of the DCO application.

7. Ecology

7.1 SCC, like other public authorities in England, has a duty to conserve biodiversity. General comments are as follows:

- account should be taken of the Biodiversity Motion passed by SCC's Full Council in December 2020;

- the Suffolk Biodiversity Information Service holds vital information and should be contacted;
- surveys must be carried out within accepted guidelines;
- the ecological mitigation hierarchy of avoid, mitigate, compensate, enhance should be employed, and

7.2 If necessary, the DCO provides further ecological validation mechanisms alongside any discharge of requirements such as details relating to construction methods and drainage for example. Specific areas of concern raised prior to the 2013 hiatus remain:

- potential impacts on watercourses;
- potential impacts on groundwater flows;
- potential impacts on ecological connectivity;
- potential impacts on the robustness of existing habitats, and
- extent and mechanisms for mitigation and compensation and enhancement.

7.3 Mitigation should include:

- formulation of a Construction Environmental Management Plan (CEMP);
- disturbance of the narrowest swathe of land.

7.4 Compensation and enhancement should include:

- an Environmental Improvement Fund for tree planting etc. and;
- biodiversity net gain.

8. Floods

8.1 It is likely that the new substation at Butlers Wood will require sufficient sustainable drainage infrastructure that will need to be accommodated within the local environment, although this located outside of Suffolk.

8.2 Experience suggests with other DCO projects within Suffolk indicates, however, that drainage needs to be carefully considered along the cable routes. In particular, enough space needs to be left to accommodate drainage during construction.

8.3 Detailed consideration will need to be given along the cable routes to in particular the interaction with watercourses.

9. Highways

9.1 Although not primarily a transport scheme, recent experience with other DCOs suggests that a considerable amount of effort will be required to accommodate all of the undoubted transport-related issues that will arise. This is likely to include:

- sophisticated traffic modelling;
- abnormal indivisible loads;
- access management plan;
- wheel cleaning facilities;

- road improvements;
- mitigation for other highway users;
- air quality modelling and monitoring;
- avoidance of significant highways constraints where possible;
- construction traffic management plan;
- worker travel plan;
- lorry tracking systems;
- impacts arising along diversionary routes;
- legal agreements to cover highways improvement works and monitoring, and;
- temporary haul routes.

10. Landscape

10.1 Initial comments are as follows:

- The location of the Cable Sealing Ends will be landscape driven although there will need to manage and reflect interactions with Ecology; Highways including Public Rights of Way (PROW), Floods, archaeology/ heritage, and public health factors around Electro Magnetic Fields;
- Pylon design - there is no benefit in a mixed approach - that is, the adoption of the new pylon design for the new line in close proximity to a line using the traditional design. This would add additional project costs which could be better spent elsewhere;
- Hintlesham routing and alignment must have regard to the position of Historic England;
- All cables in or visible from the Stour valley, not just affecting the AONB (or where they would otherwise significantly detrimentally affect the Stour Valley) should be undergrounded;
- **Substantial new evidence has been collated since 2013, that supports the contention that the Stour Valley east of Sudbury is of particular significance and sensitivity (see Appendix C);**
- The Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Partnership have produced their own, separate, submission, and;
- The Dedham Vale Society have received a letter from the Department for Environment, Food & Rural Affairs stating that National Grid should be fully receptive to evidence in support of undergrounding the transmission section in the Stour Valley. The following is an extract from the letter

> "In presenting its final options in the formal statutory consultation planned for the autumn, and subsequently in the application for a Development Consent Order, I will expect National Grid, in compliance with the duties … (and being fully receptive to advice and evidence from all interested parties, not least The Dedham Vale Society, The Colne Stour Countryside Association and their local partners and supporters) to provide comprehensive evidence to support the case for undergrounding the transmission section in the Stour Valley."[1]

11. Property

11.1 No comments were received at the time of writing.

12. Public health

12.1 The impacts of the proposed development upon the health of local communities must be taken into account. This includes the choice of transmission line route, Electric and Magnetic Fields, construction, and operational impacts. There might also be indirect impacts on rates of physical activity arising from fewer people accessing the countryside without suitable alternatives.

13. PROW

13.1 Impacts particularly during construction must be adequately mitigated. There has been increased use of the PROW network since the original assessments were undertaken. Enhancements to the network may be needed to offset impacts.

14. DCO Requirements

14.1 SCC believes that it should be the discharging authority in respect of requirements where it has a statutory function including highways, PROW, floods, and archaeology.

15. Community benefit

15.1 SCC notes the lack of proposals in this regard. The applicants should propose a package of funding along the lines of other similar proposals to compensate for the undoubted detrimental impacts that will arise from this development upon the local area. The Government's Energy White Paper *Powering our Net Zero Future* specifically recognised the impact of connecting off-shore wind to the national distribution network (page 80). National Grid should consider how its own corporate priorities and aims need to be reflected in delivering this project.

1 https://dedhamvalesociety.org.uk/uploaded_pdf/Response%20to%20Robert%20Erith%20regards%20National%20Grid%20power%20line%20and%20Dedham%20Vale%20AONB%20and%20the%20Stour%20Valley.pdf

Appendix A - Full copy of SCC responses

1. SCC Energy infrastructure policy

1.1 In accordance with Suffolk County Council's Energy Infrastructure Policy, adopted by Cabinet on 23rd February 2021[2]

1.2 The Council recognises that Suffolk has specific natural and geographic advantages which make it very attractive for locating low carbon energy projects and the consequent connection infrastructure.

1.3 The Council seeks to influence the provision of new energy infrastructure to ensure that the benefits for Suffolk's communities are maximized, whilst minimising the adverse impacts on them, specifically to;

- maximise the benefits of economic growth, skills, and STEM (Science Technology Engineering and Maths) educational inspiration, from energy generation and connection projects, in order to ensure the post Covid-19 economic recovery, and long-term economic growth of the area.
- ensure that such schemes fully and appropriately consider the character, function, and sensitivity of the natural and historic environment and landscape of the county.
- manage the impact of low carbon projects on the environment and our communities, arising not only from the construction and operation of a project alone but from the in-combination and cumulative effects of overlapping and consecutive projects.

1.4 Furthermore, the policy sets out that;

1.5 Promoters of energy projects should be responsible corporate entities, interested in achieving positive outcomes, and should have a willingness to deliver social and environmental objectives, not only to mitigate and offset the adverse impacts of their projects but also to integrate their projects into the community.

1.6 For example, the policy states that the Council will expect projects, and their promoters, to deliver appropriate community benefit schemes in addition to the necessary compensation and mitigation, including schemes that support the decarbonisation of heat and transport, reduce energy poverty, and improve the climate adaptive resilience of both the natural environment and communities.

1.7 However, "If the harm of a proposal is not properly and robustly addressed, the Council will not support the scheme, notwithstanding its national significance or its contribution to decarbonisation."

1.8 The Council acknowledges that the applicant in this instance is, a responsible, and regulated, corporate entity, indeed the Council's own policy set out in Appendix B, cites National Grid in respect of its Responsible Business Charter[3] Furthermore, the Council notes the commitment to Building a Net Zero

[2] https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(23-02-2021),%20The%20Cabinet

[3] https://www.nationalgrid.com/document/134426/download

Workforce[4] and how this aligns with its objectives for economic recovery, and likewise, that Grid for Good[5] aligns with its objectives for inclusive growth.

1.9 Therefore, subject to the effective resolution of the adverse impacts of construction and operation of the project and the anticipated cumulative impacts, it may be possible to deliver this Net Zero project, whilst protecting our environment and communities. In order to achieve this mitigation must be effective and robust, fully responding to the sensitivities of Suffolk's environment and communities.

2. Essex Place Services (EPS) Archaeology

2.1 Please find below the archaeological comments regarding the Bramford to Twinstead Project Development Options Report (document BT-JAC-020631-550-001).

2.2 The document summarises the work that was undertaken in 2009-13, although it is unclear whether the original data that was used to identify the preferred option has been reassessed some 10 years later.

2.3 The document indicates that the setting of a number of Scheduled Monuments will be impacted by the proposed route. Unfortunately, although Listed buildings of grade I and II* designation are shown on the included maps the scheduled monuments are omitted. The document has identified that archaeology has been considered in assessing the potential undergrounding options in a number of locations and identifies that this can both have an adverse impact on archaeology and can be very expensive. It is unclear from the document whether the remainder of the undesignated heritage assets either in the form of below-ground archaeology or grade II listed buildings have been taken into consideration in the route corridor assessment.

2.4 As has been shown on other underground cable routes constructed in the County, although these may preserve the visible above-ground cultural heritage they have a significant and irreversible impact on below-ground deposits. As discussed previously in 2012-13 it will be important for the applicant to undertake appropriate archaeological assessment including updating the desk-based assessment and undertaking field evaluation to fully understand the archaeological implications for the scheme. This is especially the case for the underground sections and cable sealing end compounds as they will have the most significant impacts to below ground heritage assets. This work should be undertaken prior to the submission of the DCO application so that it contains an informed assessment of the archaeological impact of the scheme. This will also facilitate the production of an appropriately detailed mitigation strategy that can be defined and agreed upon with all parties as part of the SoCG.

3. SCC Ecology

Preliminary:

3.1 Any proposal before SCC must seek to deliver real improvements in habitat and management to secure enhancements for biodiversity. This is a critical tenet of SCC Policy and should be recognised as such.

[4] https://www.nationalgrid.com/stories/journey-to-net-zero/net-zero-energy-workforce

[5] https://www.nationalgrid.com/responsibility/community/grid-for-good

Generally:

3.2 Until such time as more detailed mapping showing the route (including access roads, compounds, methods for, e.g., crossing watercourse and so on) is available, comments must be general and over-arching.

3.3 Once specific details are available, we must reserve the right to alter, amend and add to any comments made herein.

Data and Surveys:

3.4 SCC will expect the Applicant to undertake the fullest possible searches for information and we strongly recommend that Suffolk Biodiversity Information Service is contacted (not just at the outset but from time to time throughout the life of the project as new data is added frequently).

3.5 We expect all ecological survey work to be carried out by suitably trained and qualified personnel and refer to the latest guidance and best practice throughout (we would particularly draw the Applicant's attention to CIEEM guidance in this respect). It shouldn't be necessary to say that surveys should be carried out at suitable times of the year for the target species and habitats of interest and that a Zone of Influence (agreed with the relevant ecological stakeholders) should also be surveyed.

Mitigation Hierarchy:

3.6 The Ecological Mitigation Hierarchy of Avoid – Mitigate – Compensate – Enhance should be employed.

3.7 Avoidance: Strenuous efforts must be made in planning any project or development to avoid loss or damage to any ecological feature. These features are valuable in so many ways, not least in the ecosystem services that they offer.

3.8 Mitigation: If removal or cutting back of any feature is the only option available, then harm must be mitigated by undertaking the appropriate surveys for, e.g., breeding birds, bat roosts or other essential bat habitats, floral interest, and so on. Surveys must meet the appropriate guidelines for best practice (see, e.g., CIEEM website) and be carried out by suitably qualified and experienced personnel.

3.9 The application must explain how mitigation will address the likely impacts of the proposal and identify key timing issues to protect the biodiversity that may constrain the development. Mitigation proposals must be robust and likely to be effective.

3.10 It is expected that detailed mitigation proposals will be secured through appropriate planning conditions e.g. a Construction Ecological Management Plan (CEMP) and the long-term management secured by way of a Landscape and Ecological Management Plan (LEMP).

3.11 Compensation: The loss of any natural feature must be compensated for. This means that, for example, if there is no alternative to removal of a mature tree, at least three appropriate (suitable species and provenance) trees must be planted elsewhere, as close as possible to the removed feature, two such trees for an immature specimen and one-for-one for saplings.

3.12 Enhancement: It is an SCC requirement that all projects and developments deliver Biodiversity Net Gain. The site must be surveyed to establish a baseline and a Landscape Plan provided showing how Biodiversity Net Gain will be

achieved. Such a plan must also show full details of monitoring and maintenance (including replacement where necessary).

3.13 By following the mitigation hierarchy set out above, it is to be hoped that developments will be delivered in the most sustainable way possible, always seeking to deliver the maximum gain for our wildlife and habitats as they are so vital to our health and wellbeing and an essential tool in tackling the declared climate emergency.

3.14 Some specific points:

3.15 Referring to the proposals of nearly ten years ago, we can recall concern over a number of specific areas:

- Potential impacts on watercourses.
- Potential impacts on groundwater flows.
- Potential impacts on ecological connectivity.
- Potential impacts on the robustness of existing habitats.

3.16 In addition, the disturbance caused by access to the construction route, the haul road, and associated features may well include noise, light, dust, air quality, and similar environmental factors. SCC Ecology Team will expect to see all of these features assessed in the light of the potential receptor species and habitats.

3.17 As an example, the siting of sealing end compounds cannot be dictated by civil engineering requirements alone. These features are likely to cause considerable, negative impacts, and sensitive siting, informed by detailed ecological advice, will be required.

Mitigation:

3.18 As mentioned above, once there is a clear understanding of the actual route and there has been sufficient ecological survey effort, A Construction Ecological Management Plan (CEMP) or similar document will be anticipated. It is expected that ecological stakeholders will be fully consulted, and their relevant comments and requirements included in such a plan.

3.19 A key ecological principle will be an undertaking by the Applicant to employ the narrowest practical swathe of vegetation clearance and consequent disturbance and destruction through Suffolk's countryside in order to deliver the power line. This is likely to be scrutinised very closely indeed by the ecological stakeholders.

Compensation and Enhancement:

3.20 SCC will expect the Applicants to present the fullest understanding of how habitats under threat from the proposal function, not just under the cable route but within a Zone of Influence to be agreed with ecological stakeholders. This will inform how compensatory habitat will be delivered.

3.21 In 2012, SCC asked for an Environmental Improvement Fund to plant, e.g., community woodlands, general tree planting, and wildlife habitat enhancement. Since the adoption in December 2020 by SCC of a Biodiversity Motion, a measurable enhancement to habitats will be required. This may include hedgerow reinforcement, watercourse restoration, enhancing and expanding management of existing woodlands, and so on. More details on this point can be offered once the route is clear. SCC will be particularly concerned to see the re-

establishment of ecological connectivity as an underlying tenet of delivering enhancement in line with the Lawton Principles of “more, bigger, better and joined up”.

Biodiversity Net Gain:

3.22 Although NSIPs currently have an exemption form providing this, the situation is highly likely to be corrected when the Environment Bill gains Royal Assent. SCC will certainly expect this to be addressed.

Conclusion:

3.23 The SCC Ecology Team will be keen to work closely with the Applicant to assist in delivering all of the above and will support measures that result in the conservation of biodiversity.

4. SCC Economic Development

4.1 The Bramford to Twinstead connection project is one of four projects proposed by the promoter in Suffolk, for delivery between 2028-2030.

4.2 Local partners, including the Council and the New Anglia Local Enterprise Partnership, share a high-level ambition to ensure energy infrastructure development actively supports a sustainable regional and national supply chain, with the direct benefit of increased employment, education, and training, that these projects bring to Suffolk, Norfolk, and Essex.

4.3 Preliminary discussions indicate that National Grid recognise the significant opportunities that this project and the further East Coast projects, for connection by 2030 represent. The Council is keen to ensure, through mutual benefit and collaboration, the socio-economic opportunity of these is maximised. Therefore, these projects should be approached as a single meta-project and not solely on a piecemeal basis.

4.4 Suffolk has natural geographic advantages, which mean it will play a huge part in achieving the UK’s ambition to reach Net-Zero. This project is a direct consequence of the increase in low carbon generation capacity. Therefore, the cumulative opportunity and negative impacts (such as adverse impacts in the visitor economy, churn, and negative displacement in local employment) of all this development must be at the forefront of National Grid’s thinking, as further details of these projects are developed.

4.5 In line with National Grid’s own findings, in their publication Building a Net Zero Workforce, ensuring a workforce with the right skills, is available at the right time, and a capable supply chain is not only paramount to ensuring the successful delivery of Net Zero ambitions, but also crucial to ensuring Suffolk can maximise all of the positive impacts of this project, whilst mitigating any negative impacts.

4.6 The Council looks forward to working with National Grid and to understand how they can enrich and enhance measures in place that are already working to deliver legacy employment, education and skills benefit alongside growth and investment in a sustainable local supply chain.

4.7 Account must be taken of the potentially detrimental impacts of the proposed development upon the tourism and hospitality sectors. Funding will be sought to offset such impacts.

5. SCC Emergency Planning

5.1 There are no issues, implications, or comments that we would wish to include in the response.

6. SCC Floods

6.1 We'd need to know the following wherever the overheads go below ground in the vicinity of any watercourse or impact on existing drainage.

6.2 Has laying cables below the bed of the watercourse been considered, if so, they will need to be at least 1m below the existing bed depth

6.3 How many watercourse crossings culverts are required, both temporary and permanent and where they are, as Land Drainage Act Consent will be required

6.4 Need a schedule of grid reference, type of crossing, pipe dia, culvert length, etc.

6.5 Other than that, the substation is proposed to be in Essex so, the main SW drainage issues will be around that.

7. SCC Highways

7.1 This note forms the comments raised with regards to highways and transportation matters relating to the March 2021 'Project Development Options Report' (PDOR). Whilst the PDOR provides information on the high-level emerging proposals for the scheme, most notably routeing of the cables, limited information is provided on highway and transport matters, which is understandable at this stage of development.

7.2 On this basis, Suffolk County Council, as highway authority for the majority of the length of the scheme, are providing comments on information and details that we would encourage to be provided as part of future submissions, which would help in our ability to comment and to address relevant concerns. Comments should be considered with regard to those locations where Essex County Council is the relevant highway authority.

Construction Programme

7.3 Information should be provided on the expected programme for construction, including the length of construction activities. It should be made clear where any conclusions regarding impacts are based on the length of construction activities and their 'temporary' nature. This would include preparatory work such as utility diversions if applicable.

Access Arrangements

7.4 The highway authority will need to understand the proposed access arrangements for constructing the cable corridor, any temporary construction compounds or site offices, and preparatory work such as archaeological or ground investigations. This includes the understanding of visibility and vehicle swept paths in order to provide safe turning movements in/out of each access. This may require relevant speed surveys to understand visibility requirements or potential temporary speed limit changes to reduce impacts on hedgerows etc.

7.5 Details of the connection of the access tracks will need to be provided to show that they are safe to use, with the need for an adequate length of the access road that is of a suitable width to allow two vehicles to pass safely and that this is not obstructed by gates preventing vehicles leaving the public highway. The access

roads will need to be designed to prevent the trafficking of mud and debris or the flow of water onto the public highway.

Freight Traffic

7.6 Evidence should be provided setting out the following:

- Consideration was given to transporting freight traffic by rail.
- The peak number of HGV movements (including movements to/from each access and along each link).
- The average number of HGV movements to the site (including movements to/from each access and along each link).
- The profile for the requirements for the transportation of construction materials over the duration of the project.
- Operational HGV traffic.
- Routeing of HGV traffic.
- The proposals that are in place to limit the impact of HGV movements on the local highway network such as restricting working hours.
- Origin/destination of HGV movements.
- The peak number of LGV movements.
- The average number of LGV movements.
- Numbers of anticipated abnormal loads and abnormal indivisible loads.
- Routeing of anticipated abnormal loads and abnormal indivisible loads.
- Workforce Traffic

7.7 Evidence should be provided outlining the:

- Peak number of workforce and vehicle movements.
- Average workforce numbers and vehicle movements.
- The profile of workforce numbers and vehicle movements for the construction activities.
- Origin of the workforce.
- Staff shift patterns, including evidence where appropriate, especially where this affects the assessment of traffic impacts.
- The measures that will be used to reduce single-occupancy vehicle trips to the construction site, including monitoring and enforcement.
- The level of and management of on-site car parking and potential monitoring of fly parking.

Management and Controls

7.8 Relevant controls, monitoring, and enforcement measures will need to be put in place to ensure that all HGV movements do not exceed those assessed within the relevant Development Consent Order submission and supporting documents such as the Transport Assessment and Environmental Statement. This will need to include the ability to monitor HGV numbers and routeing to/from each site

access through an appropriate delivery management system, such as through the use of GPS.

7.9 The submission should include relevant management documents in the form of:

- Construction Traffic Management Plan: to set out the details, limits, and methods, for controlling and monitoring freight traffic to/from the site.
- Construction Worker Travel Plan: to set out the details, limits, and methods, for controlling and monitoring workforce numbers and traffic to/from the site.
- An Access Management Plan: to set out details of the proposed access arrangements.

7.10 The highway authority will not accept any transport impact assessment that does not rely on relevant controls, monitoring, and enforcement e.g. any assumptions that underpin the worst-case assessment need to be monitored and controlled in order for it to be ensured it is a worst-case.

Constraints

7.11 The transportation network surrounding the site is rural in nature, with all roads single carriageway and at points narrow with limited opportunities for passing slow-moving vehicles.

7.12 Whilst this list is not aimed to be exhaustive; the below represent a number of locations within Suffolk where potential constraints may exist:

A12

7.13 The majority of junctions of local roads with the A12 Trunk Road south of Ipswich are not compliant with modern designs generally having shorter than desirable on and off slips. Examples include the B1070 at Holton St Mary, B1068 east of Higham, and B1029 at Stratford St Mary.

A1071

- Access to the A1071 requires the use of the A14 junction 55 ‘Copdock’, the A1214 / Scrivener Drive roundabout, and the A1214 / A071 signal junction, all of which have capacity constraints.
- The Wolsey Grange Planning Permission (B/15/00993) is a Two-Phase mixed-use development and includes works at a number of junctions with a brief summary provided below.
- A1071 / B1113 /Swan Hill roundabout enhancement
- A1071 / Poplar Lane Traffic signal control junction
- A1071 / A1214 traffic and signal traffic control enhancement
- A1214 / Site access (new traffic signal control access)
- A1214 / Scrivener Drive / Tesco Roundabout junction

7.14 The carriageway narrows at Burstall Bridge approximately 1km east of Hintlesham restricting two-way vehicle movement for large vehicles.

7.15 The community of Hintlesham includes properties on either side of the road and includes a school and a signalised crossing facility.

7.16 There are a number of tight bends, particularly to the immediate west of Hintlesham.

7.17 Being an evolved road many of the minor junctions connecting to the A1071 do not meet current design criteria, such as for visibility.

7.18 Parts of the A1071 have or have had a history of collisions resulting in injuries. Areas of concern have been Burstall to Hintlesham, the bends southwest of Hintlesham, and the A1071 / A134 junction, although the frequency and location of road collisions fluctuate.

7.19 A1071 / A134 junction has a capacity constraint.

7.20 There are a number of properties on the A1071 at Boxford.

A134

7.21 The A134 creates severance between a small number of properties to the west of the A134 at Nayland.

7.22 The A134 passes through the community of Newton where there are either narrow or an absence of footways and causes severance through Newton.

7.23 The A134 forms the outer arterial route for Sudbury, this is a built-up area and includes the presence of high numbers of vulnerable road users and associated crossing facilities.

7.24 Being an evolved road section of the A134 and particularly minor junctions are not designed to modern standards.

A131

7.25 A131 passes through Sudbury, including Sudbury high street, which is a built-up area with large numbers of vulnerable road user movements, there is on-street parking, numerous turning locations, properties in close proximity to the highway, and a pinch-point at A131 Cross Street to the north of the bridge over the River Stour restricting two-way traffic flow.

7.26 The A131 / B1508 / Newton Road roundabout junction has a capacity constraint.

B1068

7.27 The B1068 / Brick Kiln Hill junction has a road collision history.

7.28 The minor road between the B1068 and A1071 Boxford passes through Stone Street where the carriageway is narrow and forward visibility reduced due to the built environment. Even limited numbers of light vehicles meeting head-to-head create delays and there is a record of damage to buildings by vehicles.

7.29 There is an 18-tonne with an exemptions weight limit on the B1068 from the junction with the A134 to past Stoke by Nayland.

7.30 The B1068 passes through the community of Stoke by Nayland. There are properties on either side of the community with limited and often no footway provision (particularly on the southern footway).

7.31 Although subject to a 20mph speed limit the B1068 and joining minor roads are narrow, often single lane and forward visibility can be poor. Damage to historic buildings with frontages directly onto the carriageway has been recorded on a number of occasions.

7.32 Between Stoke by Nayland and Thorrington Street, there are narrow canyon sections where vehicles cannot pass easily.

7.33 There are a small number of properties on either side and with direct access to the B1068 at Thorington Street.

7.34 The B1068 passes through the community of Higham which has properties on either side of the road, and either an absence of or narrow footways throughout.

7.35 The carriageway narrows through Higham limiting two-way traffic flow, and there are a number of properties with frontages directly onto the carriageway.

B1070

7.36 There are restrictions, with exemptions, on the B1070 for HGVs over 7.5 tonnes into Layham and through Hadleigh.

7.37 There are properties on either side of the B1070 and narrow or even an absence of footway provision through Holton St Mary, with a small number of properties that access directly onto the B1070 to the north of the community.

7.38 The B1070 passes through the community of Raydon. There are properties on either side of the community with limited and sometimes no footway provision. There are a number of properties with frontages onto the B1070.

7.39 The B1070 passes through the community of Upper Layham. There are properties on either side of the community with limited and sometimes no footway provision.

7.40 The B1070 passes through Hadleigh, which is a built-up urban environment with on-street parking, pinch-points, crossing facilities, numerous turning points, and at points narrow footways. There are a number of properties with frontages onto the B1070. Benton Street, in particular, is a constrained environment with a history of complaints regarding vehicles mounting footways, noncompliance with the weight limit, delays, and damage to listed buildings.

Assessment of Impacts

7.41 It is recognised that establishing a baseline for existing traffic movements is not possible during pandemic conditions, that it could be a significant period of time post-pandemic before traffic patterns return to ‘normal’ and that ‘normal’ might be very different to pre-pandemic conditions. Historic traffic flows may be able to be used to inform a baseline; assuming that relevant assessment has been undertaken looking at general traffic trends since those surveys were undertaken. We would look for the best available information to be used to determine traffic baselines.

7.42 Any locations where traffic impacts are scoped out should be agreed upon with the relevant highway authority.

7.43 The categorisation of the sensitivity of links should be agreed upon with the relevant highway authority. This should include a plan showing the showing the links identified for the assessment and the sensitivity of these links. Clearly, as indicated in the descriptions above, there are a number of highly sensitive locations in the immediate area.

7.44 When assessing environmental impacts related to vulnerable road users; consideration should be given to:

- The public perception of the transport network, especially, but not limited to, when regarding impacts on severance.

- The existing baseline use for HGVs, light vehicles, and vulnerable road users.
- The existing baseline facilities (e.g. presence and width of footways).
- The in-combination effects of numerous impacts – especially with regards to noise, vibration, air quality, and rights of way.

7.45 If impacts on vulnerable road users are dismissed based on that they are predicted to occur outside of an hour when vulnerable road users would be utilising the road network; then impacts need to be understood during those hours when vulnerable road users would be utilising the road network.

7.46 Locations where small changes in traffic flows would result in a different categorisation of impact, which subsequently presents a risk to the conclusions of the assessment.

7.47 Comments are provided below regarding some specific areas.

Severance

7.48 The existing levels of severance on each link should be determined so that a baseline level of severance can be presented.

7.49 All areas where a 10% change in traffic flows occur should be identified and those areas that require further assessment on this basis should be agreed upon with the highway authority.

7.50 Consideration needs to be given to how severance is assessed within DMRB document LA112. For clarity, the changes between traffic flows that result in a low, medium and high impact are not agreed, as they are coarse and are assumed figures rather than having been tested.

7.51 The methodology should assess impacts on different groups that are present (e.g. young, disabled, and elderly).

Pedestrian and Cycle Delay

7.52 The baseline level of pedestrian and cycle movement be determined.

Pedestrian and Cycle Amenity

7.53 Justification will be needed for the proposed method for assessing impacts on pedestrian and cycle amenity and how the proposed method will actually assess the relative pleasantness of any journey that is affected by the development. Consideration should also include rights of way where traffic increases may impact on routes crossing roads used by construction traffic.

Driver Delay

7.54 Impacts on driver delay should be assessed with regards to impacts associated with:

7.55 Traffic management associated with the scheme, including diversion of utility apparatus.

Highway capacity.

7.56 Increase in large numbers of slow-moving vehicles.

Fear and Intimidation

7.57 Consideration should be given to the baseline characteristics and the existing level of fear and intimidation based on existing traffic flows. LA112 could be used to do this.

Hazardous and Dangerous Loads

7.58 Further clarification is needed over the potential for and number of Abnormal Indivisible Loads that are expected to be generated by the proposed development. Including by relevant categorisation as follows:

- Category 1
- Category 2
- Category 3

Special order movements.

7.59 Once vehicle numbers and routeing are known any relevant junction capacity assessments should be agreed upon with the local highway authority.

Requirements

7.60 Where SCC is the relevant Local Highway Authority, SCC will look to protect its role to enable it to discharge its legal duties and protect itself against future liabilities. This may be through a legal agreement with the applicant, planning obligations, DCO requirements, specific clauses of the management plans within the DCO, or by the inclusion of protective provisions.

8. SCC Landscape

8.1 Initial comments are as follows:

- The location of the Cable Sealing Ends will be landscape driven although there will need to manage and reflect interactions with Ecology; Highways/PROW Floods and archaeology, heritage, and EMF issues.
- Pylon design - there is no benefit in a mixed approach - that is, the adoption of the new pylon design for the new line in close proximity to a line using the traditional design. This would add additional project costs which could be better spent elsewhere;
- The Hintlesham routing and alignment must have regard to the position of Historic England.
- All cables in the Stour valley, not just the AONB should be undergrounded.

8.2 Undergrounding

- The Council agrees with National Grid that it is essential that any new 400kV line should be put underground where it crosses, or negatively impacts, the nationally designated landscape of the Dedham Vale AONB, in order that the purposes of the designation, that is, “conserving and enhancing the natural beauty of the area”, as set out in the CROW Act 2006 s826[1], are appropriately protected.
- Likewise, the Council agrees with National Grid. that is essential that any new 400KV connection through the Stour Valley should be undergrounded,

[6] https://www.legislation.gov.uk/ukpga/2000/37/section/82

and furthermore, considers that the evidence base to support this undergrounding is significantly more robust than it was when the project was paused, in 2013.

8.3 Stour Valley evidence

- Substantial new evidence has been collated since the project pause in 2013, which supports the contention that the Stour Valley east of Sudbury is of particular significance and sensitivity this is set out in more detail in Appendix C.

9. SCC Property

9.1 No comments were received at the time of writing.

10. SCC Public Health

10.1 Priorities identified from a health and wellbeing perspective:

10.2 Efforts to minimise the impact on the natural environment will be equally beneficial to population health. Access to green space and nature is important for both physical and mental health therefore this access should be maintained throughout the duration of the work for the local population, with routes chosen that minimise the impact on the natural environment.

10.3 Comments on the specific content of the Development Options report:

10.4 Chosen routes and minimising impact: The assessment and proposed choice of routes that both minimise the impact on the natural environment and disruption to local settlements are welcome from a health and wellbeing perspective.

10.5 Given an increased emphasis placed on the value of access to green space since the start of the COVID-19 pandemic, it is essential not only for the work to minimise impact and preserve access, but to provide reassurance to the local population that this is the case.

10.6 The choice of routes (and overground/underground cabling options) around settlements should minimise the impact on the local population, including sensitive receptors in addition to the natural environment. It is good to see the mention of protected lanes and hedgerows in para. 5.4.16 and the commitment to protecting these. We also welcome the proposed use of woodland screening to minimise visual and noise impact.

10.7 Engagement with the local population: The document makes reference to engagement activities with the local population around the time of the original consultation, and we would encourage that similar engagement is undertaken over the coming months to ensure the location population are kept informed and feel they are able to comment on plans. Open consultation, transparency, and engagement are important to provide reassurance and minimise any impact on mental health relating to perceived risks.

10.8 Duration and intensity of work near population centres: It would be helpful to understand the expected duration of works taking place near the settlement and whether the proposed timings of 7am – 7pm for works will apply to all sections of the route including those near settlements. Given construction traffic would be likely to start before 7am, this may cause disruption to local residents.

10.9 Access to Public rights of way: In order to ensure the local population continues to have the opportunity for active travel and outdoor leisure it is crucial that

access to PROW is maintained and where closures are needed that alternatives are provided ahead of these closures.

10.10 Assessment should be included in respect of the potential impact of Electric and Magnetic Fields, associated with overhead and buried cables and other transmission equipment, in accordance with adopted standards.

10.11 Further detail required:

- There appears to be limited detail on the methodologies used and no mention of a Health Impact Assessment
- It would be important to see further detail on the planned works over the duration of the project e.g. expectation duration of construction for each section (and whether work on each section will be concurrent) and technical detail on expected noise emissions etc.

11. SCC PROW

11.1 My comments are as follows:

- Confirmation of accurate GIS data detailing the Public Right of Way network will be required from the County Council's Definitive Map team to ensure all routes are identified correctly.
- Clarification is required of the management of the Public Right of Way network during the construction phase. Details are required of construction access that affects the Public Rights of Way network and the potential impact on the use of the network by construction traffic.
- If closures to the Rights of Way network are essential then alternative routes should be provided. To ensure the network is available for the majority of the construction of the scheme, a phased approach to any closures should be adopted, and routes should only be closed for a minimum period when works require it.
- There is an increase in the use of the Rights of Way network since original assessments were undertaken. With an increase in use by approximately 75% over the last 14 months by the public. This has resulted in greater demand on the network with more people utilising the asset for health and well-being. Consideration needs to be given to the impact of the development on the local community and non-motorised access between settlements. Enhancements should also be sought to areas of high use, particularly close to village centres, connecting settlements and within the AONB.

12. SCC Planning Authority

12.1 In respect of cumulative impacts, attention needs to be paid to the influence of other major proposed schemes including within the Bramford substation area where a number of solar farms and grid connections are proposed. This consideration should also extend south across the Stour Valley where a recommended new project in the Network Options Assessment 2021 may run partially parallel to this proposed project, including through a Nationally Designated Landscape.

Appendix B - SCC Energy Infrastructure Policy

Suffolk County Council's Energy Infrastructure Policy

Scope and purpose of the policy

Suffolk has specific natural and geographic advantages which make it very attractive for locating offshore wind and interconnection projects. Suffolk has established industries, nuclear, offshore gas logistics, and agri-tech, as well as climatic conditions, which make it attractive for specific low carbon technologies, especially new nuclear, solar power, hydrogen production, and anaerobic digestion.

The delivery of Net Zero[7] in the UK by 2050 is expected to require a pipeline of generation and connection projects in Suffolk. Therefore, significant changes for the economy, environment, and communities of Suffolk can be expected as a result.

The purpose of this policy is to outline how, in principle, the Council will engage and influence other parties to ensure adverse impacts to our communities are understood and addressed by future decisions.

The Role of Suffolk County Council

The County Council tends not to be the decision-maker. It is not the decision-maker for Nationally Significant Infrastructure Projects (NSIP), or other energy projects consented under the Electricity Act 1989. Unless connected to minerals or waste use, or the County Council's own development, energy projects would be determined by district or borough councils under the Town Country Planning Act 1990. The County Council is, however, a key statutory consultee, and its view carries significant weight with the Examining Authority, (ExA) and by extension, the Secretary of State (SoS). Particularly because it has responsibility for a wide range of interlocking issues across the whole county, which affects decision making, having a key role in representing, developing, and supporting, its local communities, and protecting their environment.

The County Council is also a significant landowner and is committed to delivering policies, projects, and working practices that will contribute to the Council achieving the ambition of net zero emissions for its own operations by 2030.[8]

The need for the Policy

a) To demonstrably recognise that, given Suffolk's locational and other advantages, low carbon and renewable energy, which has been promoted nationally[9] and internationally as a key strand of a post-pandemic economic

[7] The Climate Change Act 2008 (2050 Target Amendment) Order 2019 http://www.legislation.gov.uk/uksi/2019/1056/contents/made
[8] Climate Emergency PDP Cabinet Report Agenda Item 8 14th July 2020
[9] PM: A New Deal for Britain https://www.gov.uk/government/news/pm-a-new-deal-for-britain

recovery, has the potential to be a key plank of Suffolk's post Covid-19 economic recovery.

b) To give the Council the best opportunity to influence the provision of new energy infrastructure to ensure that the benefits for Suffolk's communities are maximized whilst minimising the adverse impacts on them.
c) To seek to maximise the benefits of economic growth, skills, and STEM (Science Technology Engineering and Maths) educational inspiration, from energy generation and connection projects, are fully realised for the communities of Suffolk, to support the post Covid-19 economic recovery and long-term economic growth of the area.
d) To provide other local authorities, energy developers, Government, and the public with a clear understanding of the position of the Council in relation to low carbon energy projects, and the policy and process that will guide the Council's response to specific proposals.
e) To ensure that such schemes fully and appropriately consider the character, function, and sensitivity of the natural and historic environment and landscape of the county.
f) To manage the impact of low carbon projects on the environment and our communities, arising not only from the construction and operation of a project alone but from the in-combination and cumulative effects of overlapping and consecutive projects.

Relationships to the Council's strategic priorities

The Council is collaborating with partners, including the New Anglia Local Economic Partnership and Public Sector Leaders across Suffolk, to work towards making the County of Suffolk carbon neutral by 2030 as set out in the declared **Climate Emergency**[10]

The expansion of renewable/ low carbon energy offers significant opportunities to drive the Council's priority to support **Inclusive Growth**, which it recognises as a key priority[11] to unlock potential and improve people's quality of life. The active delivery of net zero by the Council will support opportunities for employment and training providing more highly skilled jobs with increased wage and productivity levels for our communities whilst safeguarding Suffolk's natural and historic environment by contributing to **climate change adaptation**. This will help maximise the benefits our environment provides to our economic growth, health, and wellbeing for now and future generations.

The Council recognises the requirement to develop the **skills needed for future growth** as a signatory to the New Anglia Local Economic Partnership Youth Pledge[12]. We will support employers to train people in the skills their sectors need, continue our ambitious Apprenticeships Suffolk programme, and work with employers to create more start-up businesses.

[10] Council proposes unprecedented environmental plans in response to climate emergency https://www.suffolk.gov.uk/council-and-democracy/council-news/show/council-proposes-unprecedented-environmental-plans-in-response-to-climate-emergency
[11] Suffolk County Council Priorities 2017-21 https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Suffolk-County-Council-Priorities.pdf
[12] New Anglia youth pledge https://newanglia.co.uk/youth-pledge/

However, whilst delivering these policy priorities, the Council will as set out in **Suffolk's Nature Strategy**[13] and in **Our priorities 2017- 21**[5] **"***Continue to champion the protection and enhancement of Suffolk's natural and historic environment and our adaptation to climate change, to ensure we maximise the benefits our environment will deliver, to our economic growth and health and wellbeing for now and future generations."*

The Role of project promoters

The promoters of energy projects should be responsible corporate entities interested in achieving positive outcomes. National Grid, for example, has published a Responsible Business Charter[14] that includes designing assets to avoid waste. There is likely to be a high degree of alignment between corporate objectives and the achievement of benefits beyond those that are needed to mitigate the impact of the project. Just as there is an expectation that Suffolk County Council justifies why infrastructure improvements, environmental or other conditions are necessary to mitigate the impact, promoters should demonstrate from the outset how they are addressing benefits that align with community needs as well as their own corporate priorities.

Promoters should be seeking to deliver inclusive growth through working with partners, such as Suffolk County Council, to identify and deliver additional social value. National toolkits, frameworks, and individual case studies, such as those available through the Social Value Portal[15], could assist with this process and the measurement of outcomes. A skills programme, for example, could be achieving a reduction in long-distance commuting, supporting other businesses as well as reducing health inequalities.

If a promoter does not have a clear set of corporate responsibilities, then the willingness to deliver social and environmental objectives, including those necessary to mitigate impact will be a critical matter to resolve. The willingness of the promoter to work with authorities, not just on the mitigation of the direct impacts, but also the integration of their projects into the community, should be an element that promoters look to address during the early stages of consultation.

Promoters should therefore approach communities with a clear rationale of delivering on a range of objectives as part of their project. There might not be a perfect alignment between the priorities the promoters outline and those of Suffolk County Council or even the communities. However, by exploring the full extent of potential partnerships at an early stage, promoters will significantly reduce the risk of managing potentially competing demands and any resultant obligations will be full and active commitments, clearly supported by both the promoter and the other parties.

[13] Suffolk's Nature Strategy https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf

[14] National Grid Responsible Business Charter 2020 https://www.nationalgrid.com/document/134426/download

[15] Social value Portal https://socialvalueportal.com/

Policy

Priority setting

The County Council will identify its initial strategic priorities in relation to individual energy infrastructure projects coming forward, to help inform the development of those projects, and give clarity to developers, communities, and other parties. Those priorities will be kept under review as proposals are clarified and refined, or new information becomes available.

The County Council will review the effectiveness of its engagement in a project, against these priorities. And it will evaluate the balance of harm and benefit, against these priorities, as the project progresses through the consenting process.

Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero Carbon for the UK. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for.

Energy skills and growth

The Council will continue working actively with the energy sector - (developers, owners or operators and associated supply chains), Government, Local Enterprise Partnerships, and regulators, to facilitate the delivery of the policy, that seeks to ensure the use of best available techniques, to maximise the development of energy skills, employment, and educational inspiration in Suffolk. The objective being to create a relevantly skilled talent pool that can take advantage of the opportunities presented by a succession of energy generation and connection projects.

The Council expects those individual promoters will contribute to the delivery of these goals in Suffolk and look to align the achievement of local priorities with their own, going beyond the minimum measures necessary to mitigate the clearly defined impacts of their project. This process should result in measurable outcomes that, for example, deliver social value.

The Council will continue to review and, where necessary, improve local structures and governance to support the development of energy skills, business growth, employment, and educational inspiration, to ensure that the necessary and appropriate business support, skills, and workforce are available so that employment opportunities provided by projects are secured locally.

The Council expects to have comprehensive and effective engagement with developers and their supply chain partners to maximise the local business opportunity, skills inspiration, and employment benefits. Wherever appropriate, the Council and developers should promote synergies between projects that enhance these benefits, deliver growth, and attract inward investment.

Local decarbonisation and climate change adaptation

The Council will expect projects to deliver appropriate community benefit schemes in addition to the necessary compensation and mitigation, including schemes that support the decarbonisation of heat and transport, reduce energy poverty, and improve the climate adaptive resilience of both the natural environment and communities.

Relationship with the environment

Project promoters should recognise from the outset, that the large scale of many energy proposals means that they will conflict with the character and the sensitives of Suffolk's natural and historic environment, which underpins key economic sectors in Suffolk and is central to the sense of place of our communities.

The harm to the environment and communities will arise both from the construction and operation of the promoter's project itself and from its combination and cumulative effects with overlapping and consecutive projects. The Council will expect promoters to develop a demonstrable understanding of the wider development environment for their project, and to work with the Council and other promoters to manage and mitigate these impacts.

The Council will expect project promoters to minimise and mitigate any impacts. Where there is residual harm that cannot be mitigated, this must be appropriately compensated for. If the harm of a proposal is not properly and robustly addressed, the Council will not support the scheme, notwithstanding its national significance or its contribution to decarbonisation.

Developers' engagement with communities

The Council will expect developers and the wider sector to work with community leaders and partners to minimise and manage the impacts of both the individual project's construction and operation, and its cumulative and in combination effects with other concurrent and successive projects. The outcome of this engagement should be to ensure that wider community benefits, as well as the economic and social benefits of energy developments, are realised for the people of Suffolk.

Net Zero infrastructure in Suffolk

The Council recognises that Suffolk will play a very significant role in delivering the UK's Net Zero target. The Council wishes to ensure that Suffolk can fulfil this role, both to support the national and local response to the Climate Emergency, and to maximise opportunities for new and existing businesses and technologies in Suffolk. Whilst recognising the importance of projects to deliver Net Zero, the Council considers it is essential that projects do not lead to the avoidable, unmitigated, or uncompensated detriment to the communities and environment of Suffolk, and its existing businesses.

The Council recognises that the infrastructure required to deliver the UK Net Zero target will result in a significant change in some locations affected. It will work with developers, partners, and communities, to try to secure proposals that avoid, mitigate, and, if necessary, compensate for these changes, for Suffolk's people and environment.

Appendix C – New landscape evidence

The emerging evidence base for the character, significance, and special qualities of the Stour Valley, between the Dedham Vale AONB and Sudbury.

Substantial new evidence has been collated since the project pause in 2013, that supports the contention that the Stour Valley east of Sudbury is of particular significance and sensitivity. A brief guide to this material is provided here. The Council expects to engage with National Grid, and their consultants, on these matters in detail, as the project continues to develop.

In 2016 a detailed landscape review and evaluation of an area stretching from Wormingford to Sudbury was undertaken, and this study identified a potential candidate area for the extension of the Dedham Vale AONB.

The Special Qualities of this potential candidate area were identified and set out in accordance with Natural England Guidance[16] in, *Special Qualities of the Dedham Vale AONB Evaluation of Area Between Bures and Sudbury[17] (Alison Farmer Associates 2016).*

The conclusion of this report states that:

"detailed evaluation contained within this report concludes that there is a weight of evidence that part of the evaluation area meets the natural beauty criterion, forming a wider tract of land associated with the Dedham Vale AONB to the east. The evaluation work set out here relies on up-to-date information and is in accordance with Natural England Guidance on assessing landscapes for designation."

Subsequently, in March 2020, Alison Farmer Associates also completed a *Valued Landscape Assessment[18]* for the entire Stour Valley Project Area, using as the principal character baseline, the *Dedham Vale and Stour Valley Managing a Masterpiece Landscape Assessment[19]* (SCC 2013), that encompasses the whole of the AONB and Stour Valley Project Area, which is itself a refinement and extension of the Suffolk LCA[20] (SCC 2008/2011/2019).

[16] Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England - https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb/supporting_documents/Guidance%20for%20assessing%20landscapes%20for%20designation%20as%20National%20Park%20or%20AONB%20in%20England.pdf

[17] https://www.dedhamvalestourvalley.org/wp-content/uploads/2021/04/Special-Qualities-of-the-Dedham-Vale-AONB-Evaluation-of-Area-Between-Bures-and-Sudbury-Final-Report-July-2016.pdf

[18] https://www.dedhamvalestourvalley.org/wp-content/uploads/2021/04/Final-Report-Stour-Valley-Project-Area-Valued-Landscapes-Assessment.pdf

[19] https://suffolklandscape.org.uk/wp-content/uploads/2020/09/Core_Document_MaM_LandscapeCharacterStudy.pdf

[20] https://suffolklandscape.org.uk/map/