



**Bramford to Twinstead
Targeted Consultation
Comments of Suffolk County Council**

Contents

Introduction	3
SCC Energy Infrastructure Policy.....	4
Key Issues Arising from the Targeted Consultation	5
The Exclusion of most of Bramford Substation from the Order Limits.....	5
Traffic and Transport.....	6
Previously Stated Key Issues.....	6
Need for a thorough assessment of Skills and Tourism impacts.....	6
Reinstatement of Parkland in front of Hintlesham Hall.....	6
Re-routeing of the proposed overhead lines through Hintlesham Woods	7
Cumulative Impacts at Bramford Substation	7
Cable Sealing End Compounds	8
Environmental and Biodiversity Net Gain.....	8
Mitigation.....	8
Appendix A – detailed technical comments.....	10
Background	10
SCC Archaeology	10
SCC Ecology	11
EPS Ecology.....	12
EPS Historic Environment	13
EPS Landscape	14
Changes to Order Limits Plan.....	17
Annotated Plan	18

Introduction

- 1.1 These are the comments of Suffolk County Council (SCC) in response to the targeted consultation held between the 8 September and 19 October 2022 by National Grid Electricity Transmission (NGET) upon the Bramford to Twinstead (B2T) proposals.
- 1.2 The proposed B2T scheme consists of a 29km 400kV grid reinforcement between Bramford substation in Suffolk and Twinstead Tee in Essex. This includes:
 - i) 19km of 400kV overhead line on lattice pylons, and;
 - ii) 10km of 400kV underground in two sections (Dedham Vale AONB and the Stour Valley).
- 1.3 The proposals also include the removal of:
 - i) 27km of the existing UKPN 132kV overhead line between Burstall Bridge and Twinstead Tee and;
 - ii) the removal of section of 400kV overhead line south of Twinstead Tee.
- 1.4 At the end of the reinforcement scheme in Essex the proposals include for the construction of a Grid Supply Point at Wickham St Paul, to keep UKPN supplied.
- 1.5 The scheme currently includes two route options at Hintlesham, one through Hintlesham Great Woodland, which is designated Site of Special Scientific Interest (SSSI) and one around the outside of the woodland.
- 1.6 The targeted consultation focuses on the design changes proposed following the feedback received from the statutory consultation in spring 2022. The biggest changes proposed are within the western part of the Stour Valley in Essex in the parishes of Lamarsh, Alphamstone, Twinstead, Pebmarsh and Little Maplestead. These changes comprise:
 - i) moving the route of underground cables further away from Alphamstone;
 - ii) constructing a proportion of the underground cables using trenchless construction methods, and;
 - iii) building a 3.5 km temporary haul road from Sudbury Road (A131) to the Stour Valley west cable sealing end compound to facilitate construction of the reinforcement.
- 1.7 In addition to the bigger changes in the western part of the Stour Valley a number of other smaller changes are proposed to the wider scheme. These include:
 - i) refining the draft Order Limits (the land NGET now considers it would need to build the reinforcement);
 - ii) small changes to the proposed route of underground cables and overhead lines;

- iii) adding, amending or removing construction access tracks, compounds and working areas needed to build the reinforcement;
- iv) inclusion of bellmouths and highway visibility splays to provide access to working areas;
- v) identifying locations where offsite highways works or restrictions may be required to facilitate construction;
- vi) identifying locations and land requirements for the diversion or connections to third-party assets, utilities and land drainage, and;
- vii) refining the environmental areas required for mitigation, compensation and enhancement.

1.8 In Suffolk the proposal crosses both Babergh and Mid Suffolk District Council areas and the Dedham Vale Area of Outstanding Natural Beauty (Dedham Vale AONB).

1.9 The SCC electoral divisions directly affected include the following:

- Stour Valley;
- Hadleigh;
- Samford;
- Great Cornard;
- Gipping Valley, and;
- Belstead Brook.

1.10 This representation sets out in the first section SCC's key issues, with the second part (in Appendix A) providing detailed technical comments. Appendix A explains where those technical comments have derived from the SCC's in-house staff and where they have involved input from external bodies. Plans showing proposed changes and details of the proposals are appended also.

1.11 Given the extent and nature of the matters of concern to the SCC it was not practical for them to be expressed using the format of NGET's consultation feedback form.

SCC Energy Infrastructure Policy

1.12 SCC adopted its Energy Infrastructure Policy in February 2021, setting out its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy is relevant for the SCC's position on the B2T proposals, and states:

"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.”¹

- 1.13 SCC will follow this approach in this Representation, and throughout the DCO process.
- 1.14 SCC continues to be willing to work with NGET through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

Key Issues Arising from the Targeted Consultation

The Exclusion of most of Bramford Substation from the Order Limits

- 1.15 The works at Bramford Substation (associated with the Bramford to Twinstead reinforcement) will broadly comprise various new busbars, shunt reactors, protection & control equipment, plus portable relay rooms/dispersed relay room, primarily within the western part of the substation. This is all standard equipment that would be expected at substations such as Bramford to connect in new overhead lines, and it is anticipated by NGET that it would be installed during 2024/25.
- 1.16 It is intended by NGET that the above works would be carried out under permitted development rights provided under The Town and Country Planning (General Permitted Development) (England) Order 2015, as opposed to being consent under the Development Consent Order. The draft Order Limits are now proposed to be revised (as shown on drawing A1/ACC/21847/001) to include only part of the existing substation.
- 1.17 However, the County Council is concerned that the disaggregation of the project may cause unnecessary legal difficulties and that in any event the full environmental implications of these works needs to be considered as part of the cumulative impacts consideration as part of the DCO application for the project as a whole. Clearly, it is a matter for NGET to take and act on its own legal advice but SCC notes that in the statutory consultation of January 2022 the whole of the Bramford substation was included in the draft Order Limits for the DCO, notwithstanding an apparent intention to rely on GPDO permitted development rights (as noted at para 4.3.2 of the PEIR), that the works to the Bramford substation are a necessary and integral part of the project, and that there is no indication that the screening requirements in Article 3(10) of the GPDO 2015 in respect of what would appear to be part of a Schedule 2 project have been satisfied. In any event, SCC considers that it is important to ensure that the full effects of the project, including the works at the Bramford substation, are assessed in the EIA of the project. SCC would therefore ask NGET to reflect further on its justification for excluding the majority of the Bramford substation works from the Order Limits.

¹ See SCC Energy and Infrastructure Policy:
<https://www.suffolk.gov.uk/assets/suffolk.gov.uk/strategic-electricity-networks/SCC-Energy-Policy-230212.pdf>

Traffic and Transport

- 1.18 SCC is concerned to ensure these impacts are fully assessed and mitigated, especially as regards construction traffic impacts on SCC's rural road network and the limited options for suitable HGV and AIL routes once the B2T route alignment has been chosen. Decommissioning/removal also needs careful consideration.

Previously Stated Key Issues

- 1.19 Although a targeted consultation, NGET have confirmed that they will consider other issues which are raised. Therefore, SCC wishes to reiterate some of the main issues raised at the Statutory Consultation Stage.

Need for a thorough assessment of Skills and Tourism impacts

- 1.20 The Council strongly objects to the suggestion that impacts upon skills and tourism can be screened out from the Environmental Impact Assessment. It is acknowledged that PINS' screening opinion accepted this. However, the Council consider this a serious omission. The Council considers that leaving these impacts unassessed in their own right and considered only to the extent that they may have cumulative effects (either intra-project or inter-projects) creates a real risk that likely significant effects will not be fully assessed. It also creates confusion for the public and other consultees if relevant information on the effects of the proposal on tourism and skills is presented in a piecemeal fashion.
- 1.21 The Council anticipates that the proposed development, given its location which is located across the Dedham Vale AONB and other rural areas of South Suffolk of importance to the tourism economy, could have significant impacts upon visitor accommodation (in the construction phase), visitor perception, and ultimately visitor numbers, both during construction and during operation, hence it is not acceptable for this impact on tourism to remain unassessed.
- 1.22 In terms of Skills the County Council is seeking for NGET to foster the local skills base in energy related industries within an area which after-all is destined to host numerous energy related infrastructure projects. However, a failure to adequately assess the likely origins of the labour force (both local and non-local), especially in the context of other energy projects with potentially overlapping construction periods, is a serious shortcoming.

Reinstatement of Parkland in front of Hintlesham Hall

- 1.23 As previously stated:

“Hintlesham Hall was historically set in an area of parkland with a tree lined avenue leading from the hall through the former parkland. The former parkland has largely been eroded and put over to agricultural use.”

- 1.24 The proposed mitigation is as follows:

“Mitigation planting could include planting thin strips of land adjacent to the driveway and strengthening planting around the pond to the north. In addition, enhancement planting along the historical avenue could help

improve and enhance the parkland outside of the house to reflect the original design intent.”

- 1.25 Whilst the Council welcomes NGET’s recognition of the need for mitigation to offset the impacts of the adjacent new 400kV overhead line and 50m high pylons on Hintlesham Hall and its Parklands, we are disappointed with such modest proposals which fall short of previously discussed levels of reinstatement of the Parkland between the house and the A1071.

Re-routing of the proposed overhead lines through Hintlesham Woods

- 1.26 NGET have proposed alternative routes either to the west of Hintlesham Woods or parallel to the existing 400kV overhead powerlines through the woodland.
- 1.27 The option of a parallel line through the woodland would involve the coppicing a wider band of the woodland than is currently required for the existing line. Pylons would not need to be placed within the woodland itself, by the use of slightly taller towers so that the requisite clearance can be achieved, but there would still be an impact in respect of the woodland which is a designated Site of Special Scientific Interest (SSSI).
- 1.28 The benefits of the through the woodland option would be the avoidance of the need to suspend the transmission of power down the existing line during the swapping of those lines between the existing and new pylons to the west (which would be limited to periods of planned outages and so extend the construction period) and the likely avoidance of the bird nesting season for works. Importantly, it would also reduce the number of residential properties that would be affected by the proposals in comparison to the option of an alternative route to the west of Hintlesham Woods.
- 1.29 However, the Council reserves its judgement at the present time until more detailed information is available in respect of ecological mitigation.

Cumulative Impacts at Bramford Substation

- 1.30 The substation provides a means of connection for multiple energy projects including from within the local area and from much further afield. The B2T proposals must seek to minimise the impact upon local residents and environment as a whole. Proposals must take into account cumulative impacts from the other projects both in respect of construction and operation.
- 1.31 The Council also considers that a full wirescape design review in the Bramford area is now essential, involving both this B2T project, East Anglia Green, as well as the UKPN 132kV network in this area. This is necessary to identify further options for mitigation and infrastructure reduction, to minimise adverse impacts on the host communities. The Council recognises, and expects, that this will require effective collaboration between NGET, UKPN, and Ofgem.
- 1.32 As at this stage it is impossible to consider these cumulative impacts, the Council has to reserve its judgement at this stage.

Cable Sealing End Compounds

- 1.33 The Council acknowledges that, in their proposals for the siting of the Sealing End Compounds, NGET have sought to address the impact of visibility off the Sealing In Compounds from the AONB or the Stour Valley, so that although there would be some visibility from these areas there would potentially not be a significant detrimental impact.
- 1.34 Reference is made to the use of Full Tension Gantries which the Council welcomes in principle as they would offer less of an impact than a more traditional pylon type arrangement. Further mitigation including some limited additional undergrounding if the Cable Sealing End Compounds need moving might be required.
- 1.35 However, the Council reserves its judgement at the present time until more detailed information is available.

Environmental and Biodiversity Net Gain

- 1.36 The Council welcomes that NGET endorse the principle of Environmental and Biodiversity Net Gain, with environmental net gain being the concept of ensuring that infrastructure developers leave the environment in a measurably better state compared to the pre-development baseline, and Biodiversity net gain a narrower measurement that refers only to habitats and is a requirement for achieving environmental net gain.
- 1.37 The Council notes that NGET's proposals are relying on works within the order limits to achieve environmental and biodiversity net gain, which could be self-limiting in its impacts. Much of this effort would concentrated around the Cable End Sealing In Compounds.
- 1.38 The Council therefore reserves its judgement of the specific proposals at the present time until more detailed information is available.

Mitigation

- 1.39 The project proposals will have permanent residual impacts on the local landscape and sense of place. Residual adverse impacts that cannot be dealt with within the project red line, should therefore be addressed through a s106 agreement, and if required, relevant landowners should be party to that agreement, to ensure delivery of necessary mitigation strategies, based on the approach used in National Grid's Landscape Enhancement Initiative.
- 1.40 The Council would normally anticipate, in addition to a s106 mitigation strategy, funding by the project promoter, outside consideration in the planning balance, of a community benefit scheme. However, it is understood by the Council, that as a business regulated by Ofgem, National Grid's community benefits are included as part of the current RIIO2 settlement 2021 – 2026, and delivered through National Grid's corporate Community Grant Programme. Notwithstanding this scheme, the Council considers that an additional community benefit scheme for this project, (in combination with other NGET transmission projects in Suffolk), should be provided, specifically to alleviate fuel poverty and support energy efficiency, in communities hosting new transmission infrastructure. It is recognised that such a scheme would be likely

to require the agreement of the regulator. However, we believe that such a scheme would be fair and reasonable, and consistent with both national and local policies and priorities.

Appendix A – detailed technical comments

Background

2.1 Suffolk County Council (SCC) has been liaising with Babergh & Mid Suffolk District Councils, Essex County Council and Braintree District Council, as well as the Dedham Vale Area of Outstanding Beauty Project in gathering the technical information below.

2.2 As part of this activity Essex Place Services (EPS) have been instructed to provide a response to ecology, landscape and built heritage aspects. Where EPS contributions have been provided this has been identified and SCC endorses the EPS contributions on these matters.

SCC Archaeology

- 2.3 The archaeological evaluation trenching within the area of undergrounding within the Dedham Vale as currently stopped for the remainder of the year, looking to start up the remainder of the archaeological evaluation trenches in the new year. The Outline Written Scheme of Investigation has been submitted to SCC Archaeological Service for review, and they will get the comments out for this shortly.
- 2.4 There are changes to the Order Limit Plan (OLP) to the west of the Stour Valley, which include moving the route of underground cables further away from Alphamstone and the building a 3.5km temporary haul road from Sudbury Road (A131) to the Stour Valley west cable sealing end compound to facilitate construction of the reinforcement. This will have impacts on below ground heritage assets, however, Essex Place Services will be able to comment more appropriately on this.
- 2.5 Of the major changes to the OLP in Suffolk, is the proposed trenchless crossing within the Stour Valley, though the crossing may have lower impact on the near surface buried heritage assets there are concerns regarding the impacts on any palaeoenvironmental remains that may exist, particularly around and within the river Stour. Geoarchaeological and palaeoenvironmental investigations undertaken in 2013 identified that there is peat deposition in the Stour Valley. As a result, it should be considered necessary to undertake further palaeoenvironmental assessment in the area of the trenchless crossing, comprising of targeted borehole survey, undertaken by geoarchaeological and palaeoenvironmental specialists, with provision for radiocarbon dating to inform any future mitigation strategy for the trenchless crossing.
- 2.6 There are two options for the proposed overhead route near Hintlesham, both of the options are in an area of archaeological potential, recorded on the county Historic Environment Record, the options are:
- 2.7 Option 1 – Which would utilise already existing overhead power line. Option 1 would be preferable from an archaeological perspective as the proposal would use pre-existing pylon locations. However, archaeological assessment may be

a requirement on access routes for construction traffic and would be required should pylon locations change.

- 2.8 Option 2 – Would have more of an impact on buried heritage assets as new pylons would need to be constructed. When locations for pylons are chosen the location would need to be subject to trenched archaeological evaluation, to determine the archaeological potential, followed by mitigation as appropriate, based on the results of the archaeological evaluation. There should be scope to re-locate pylons should significant heritage assets be identified that would require preservation in situ.

SCC Ecology

Information submitted:

- 2.9 The SCC Ecology Team would like to see the results of an ecological walkover survey of the proposed haul road route. This should include an assessment of the impacts on farmland bird species such as Yellowhammer, Bullfinch and Skylark (all listed as Priority Species for Suffolk) which could potentially be impacted by the habitat loss and severance that will result from the construction of the road. This assessment should also look at the potential impacts of any potential potent habitat severance (hedgerow loss/fragmentation) on foraging and commuting bats.

Likely ecological effects:

- 2.10 The SCC Ecology Team would like to know how this temporary loss of habitat connectivity (from the proposed haul road construction) will be mitigated for during works – in respect of the potential impacts on foraging/commuting bats and nesting birds. It is essential a mitigation/compensation strategy is produced and the SCC Ecology Team are keen to view this document as and when it becomes available.

Conclusion/Recommendations:

- 2.11 The SCC Ecology Team are keen to hear how the proposed loss of trees, hedges and vegetation resulting from the construction of the haul road will be compensated for. Will there be further areas identified within the order limits for biodiversity enhancements to compensate for the habitat loss and severance resulting from the haul road construction.
- 2.12 It is essential that the mitigation hierarchy protocol is followed, to protect and enhance biodiversity.

- 2.13 We fully expect any proposed development to be compliant with all relevant legislation and to result in a Biodiversity Net Gain as stated in Section 15 of the National Planning Policy Framework (HM Government, February 2019).
- 2.14 Please send all species survey results to the Suffolk Biological Information Service (SBIS).

EPS Ecology

Proposed Changes

- 2.15 As the proposed change to the route of underground cables (Section G) between Moat Lane and the Stour Valley West cable sealing end compound uses a trenchless construction method, we have no ecological comments as this does not affect Alphasstone Meadows

Local Wildlife Site, the watercourse in the valley floor and bordering woodland and scrub habitats.

- 2.16 We note that the amended route would avoid the need to excavate a trench through the two

Local Wildlife Sites at Moat Farm/ Burnt House Marsh and Alphasstone Complex.

- 2.17 The proposed construction haul road and its crossings with minor roads lies mainly within arable land and generally uses existing gaps in hedgerows to cross field boundaries. There is no information relating to likely impacts on hedgerows and watercourses which cannot be avoided and were not previously affected by the project.

Likely Significant Effects During Construction

- 2.18 We consider that there is the potential for short-term significant effects on ecological features particularly hedgerows. We note that the temporary haul road lies within arable fields and generally existing gaps in hedgerows have been used to cross field boundaries.
- 2.19 We welcome that ecological surveys are ongoing and will be covering the areas of the new cable alignment and haul road. Whilst these surveys may confirm the results of previous surveys undertaken within the Stour Valley, we await the results to be presented within the Environmental Statement submitted with the application for development consent and will review the detailed mitigation plans for protected and Priority species to ensure they are appropriate and deliverable during the construction phase.
- 2.20 We note that the consultation seeks feedback on the route proposed not the principle and there is no detail provided on embedded mitigation measures such as night time provision of Heras fencing with camouflage netting where hedgerows would be severed to reduce impacts of temporary habitat loss and habitat fragmentation e.g. commuting/foraging bats including Barbastelles.

Likely Significant Effects During Operation

- 2.21 The Consultation report states that there will be no likely significant effects identified for biodiversity associated with underground cables during operation. We agree that the new proposed cable alignment and new haul road would not alter this conclusion. However non-significant impacts e.g. fragmentation of hedgerow habitat, which will require mitigation and compensation for protected and Priority species during operation to re-instate the habitats of the temporary construction haul route to be delivered under implementation of the LEMP under a Requirement of the DCO.

Further information

- 2.22 We await further information on the temporary construction haul road before providing comments to be included in any Statement of Common Ground.

EPS Historic Environment

- 2.23 Proposed Changes Designated heritage assets were identified within the original PEI document submitted as part of the previous consultation in Spring 2022. As part of this consultation, Appendix A has been presented as additional preliminary environmental information.
- 2.25 Appendix A identifies that the proposed new cable alignment will be located further from the listed buildings in Aphasstone village, which will be positive. However, with this, the cabling will thus be closer to Ansell's Farm (list entry number: 1166093) and Moorcot (list entry number: 1122874), both of which are Grade II listed.
- 2.26 The temporary haul road will reduce pressure on the existing road network but will be located within
- 2.27 500m metres of two Grade II listed buildings: Charity Cottage (list entry number: 1123272) and Collins Farmhouse (list entry number: 1122820) and in close proximity to further Grade II listed buildings at Dagworth Manor (list entry number: 1338099) and Gallants Farmhouse (list entry number: 1123026). As part of this consultation two options are still proposed for Hintlesham Woods, with the renewed overhead cabling either replicating the existing route or extending north and west, outside the woods. A section of land immediately south of the hall has been added to the draft order limits, as shown on page 24 of the applicant's explanatory Consultation Summary Document.

Likely Effects

- 2.28 It is concluded that the modified cable route will affect different heritage assets than those identified in the PEI statement, however the affect will be relatively similar. Further clarification should be provided regarding which heritage assets this conclusion is applicable to, however, assuming that the same methodology has been applied as per the first document, I believe that this reasoning is likely to be sound.

- 2.29 As stated in my previous response, due consideration should also be given to potential indirect effects upon these buildings during the works, caused by vibrations, noise or other construction related activities. Further description of the effects of construction, including disturbance to these buildings' setting, should be provided as part of the mitigation strategy. This is particularly relevant in relation to the proposed temporary haul road.
- 2.30 The additional PEI has concluded that the proposed changes will not result in any further or greater effects than those found in the original PEI. The document has also not identified any change to the scope set out within the Scoping Report. I agree with these statements; whilst the assets affected may have changed, the overall impact on the significance of designated heritage assets is not higher than the previously submitted proposals.
- 2.31 At this stage, it remains unclear how the landscape around Hintlesham Hall will be affected. There is an opportunity to greatly enhance the listed building's setting, including reinstating part of its former parkland. It is unclear if the inclusion of an additional corridor to the south of the hall within the draft order development limits as an 'environmental area' includes provision for such a change, nor how the addition of temporary access roads and a bellmouth within the setting of the hall will affect its significance. It is hoped that National Grid engage with the local authorities regarding this element, particularly as I am aware that a previous scheme proposed additional planting and screening within the hotel's setting, mitigating some of the visual effect of the proposed upgrades to the power lines immediately to the north of the listed buildings.

Further Information

- 2.32 The potential for non-designated built heritage assets to be affected by the works remains high. Within the next stages of the scheme, a thorough survey must be undertaken to identify any non-designated buildings of heritage interest which will be affected by the scheme, through a change to their setting. I understand that no demolition of existing structures or buildings will occur as part of the proposed network upgrade, however this should be clarified, particularly in the areas where the cabling will be routed underground.
- 2.33 As I have stated in my previous responses, the details provided are insufficient to fully comprehend how any changes to the existing cable corridor (eg. an increase in height to existing pylons) will affect the setting of the listed buildings identified as susceptible to impact, nor have sufficient visualisations been produced which highlight how the replacement of existing pylons with larger variants would affect the setting of heritage assets or the historic landscape. It is expected that these will be provided as part of the further consultation phases.

EPS Landscape

- 2.34 As the Consultation specifies, the main changes proposed are within the western part of the Stour Valley. This includes:
- moving the route of underground cables further away from Althamstone

- constructing a proportion of the underground cables using trenchless construction methods
- building a 3.5 km temporary haul road from Sudbury Road (A131) to the Stour Valley west cable sealing end compound.

2.35 The above changes fall outside of the Babergh and Mid Suffolk area however we note that there are minor changes to the draft order limits outside the changes described above, including new temporary access routes.

2.36 There is the potential for short-term significant effects on landscape character during the construction phase from the presence of construction activities associated with the proposed new cable alignment and the new temporary haul road, and vegetation removal within the landscape. These landscape effects would be of a similar scale to those presented in the original PEI Report.

2.37 There is also potential for short-term significant effects on views from a smaller number (but potentially different) receptors during the construction phase, compared to the original PEIR because of the new temporary haul roads. We would advise that viewpoint locations are reviewed to ensure all impacts on community visual amenity have been taken into consideration. Though temporary, the length of time the roads may be in-situ could extend across years and therefore should still be considered.

Other recommendations

2.38 The landscape response to cumulative impacts at and around the Bramford Sub-station needs to be carefully considered. Currently there is a number of live and upcoming applications and DCO's in and around the Bramford area of an industrial character, that will have a detrimental impact on the landscape and Bramford as a settlement. The principal objective for all parties is to compensate for the landscape impact of the development by providing a long-term legacy of landscape compensation. Collectively National Grid along with other developers should be exploring mitigation measures and enhancements within the wider landscape. This could include but is not limited to reinforcement of historic field boundaries, restoring and planting hedgerows and increasing the stock of hedgerow trees are important measures to consider on site.

2.39 The proposed new cable alignment lies within the Stour Valley Project Area, as did the previous alignment. This has already been identified as having a particular value and plays an important role in the setting of the Dedham Vale AONB that is distinct from its local Special Landscape Area designation. As such, we would expect the ES to include sensitivity testing against the Stour Valley Project Area as a landscape designation.

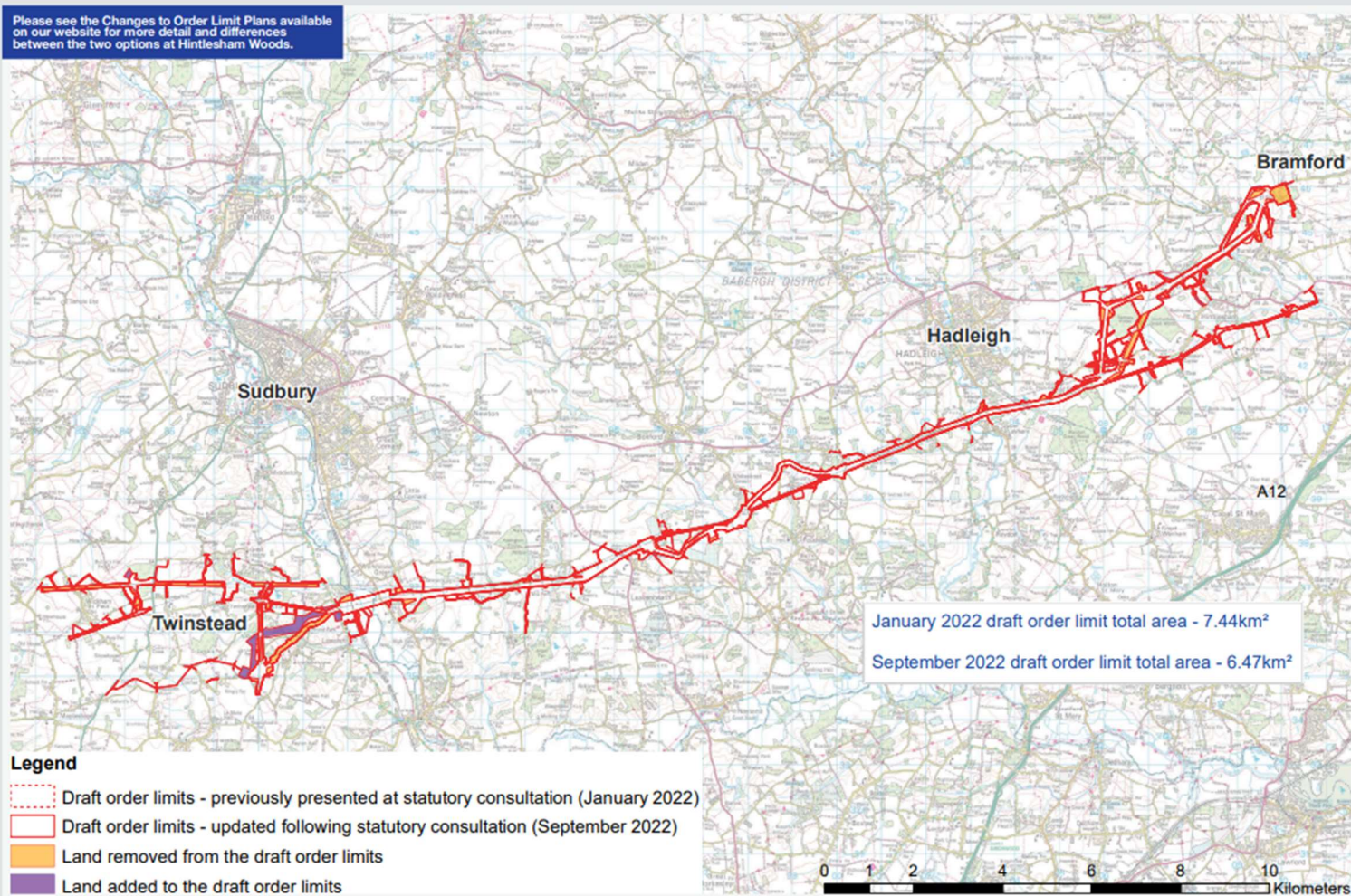
2.40 We are still awaiting details in regard to impacts on hedgerows, particular those that could be deemed 'important hedgerows' under the Hedgerows Regulations 1997 (both in terms of wildlife and landscape, as well as archaeology and history) and how this would impact effects on landscape character and designations. This information is also integral as it can go on to inform species

options for restoration planting schemes, which may need to differ given the restrictive options available above underground cables.

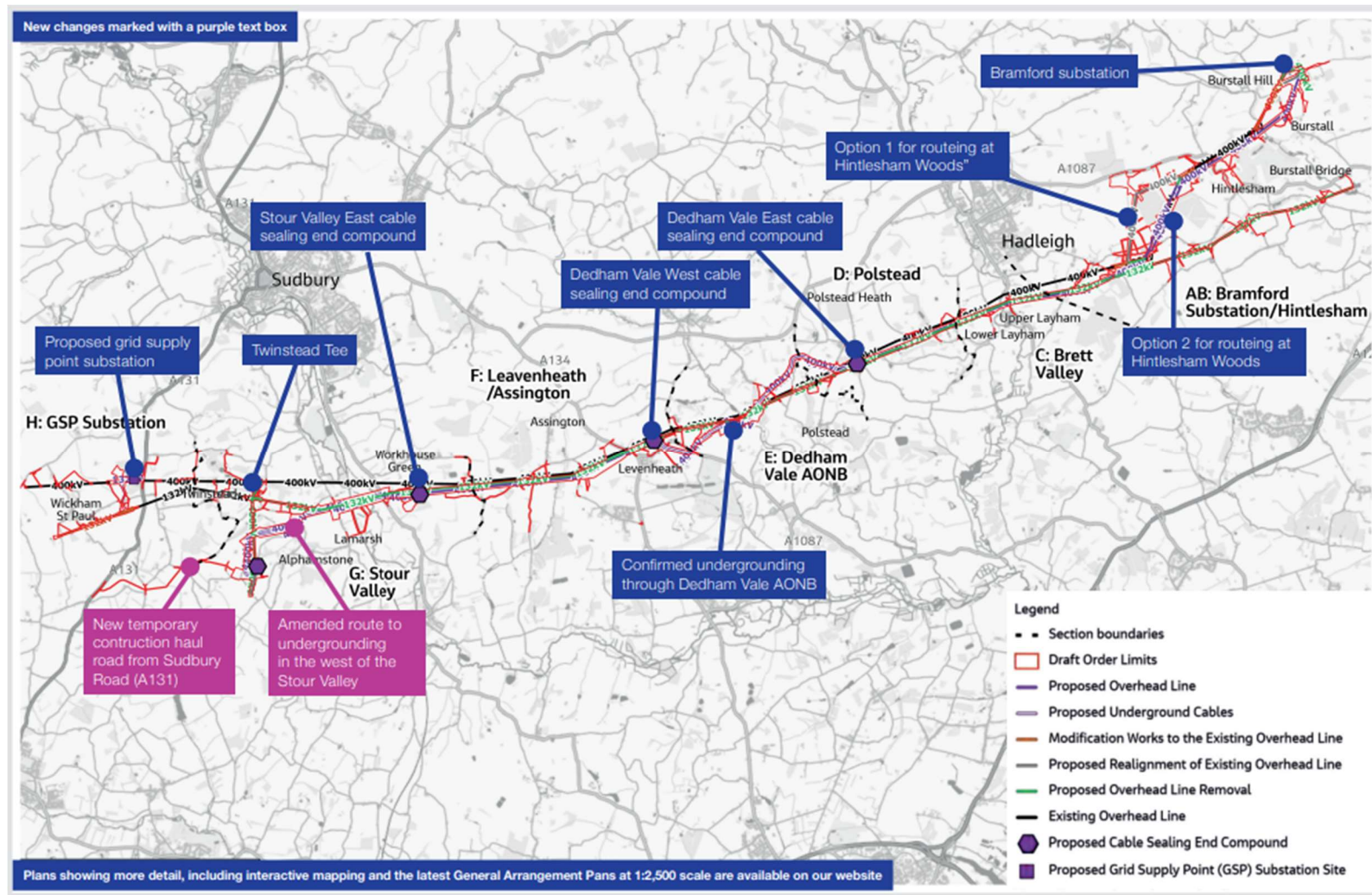
Changes to Order Limits Plan

Revisions to the draft Order Limits

Please see the Changes to Order Limit Plans available on our website for more detail and differences between the two options at Hintlesham Woods.



Annotated Plan



Crown copyright and database rights 2022 Ordnance Survey 100023395