



Submitted by email to
contact@bramford-twinstead.nationalgrid.com

17 March 2022

Bramford to Twinstead Reinforcement:

Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Partnership¹ response to statutory consultation Feb 2022

The AONB Partnership

This representation is made on behalf of the Dedham Vale AONB and Stour Valley Partnership. The Partnership is made up of around 20 organisations who are committed to the purposes of the AONB designation, to conserve and enhance natural beauty and to achieve similar aims of the Stour Valley project area, an area recognised and defined by the Dedham Vale AONB and Stour Valley Management Plan 2016-21.

For the avoidance of any doubt, some individual members of the Partnership are public bodies or statutory undertakers who have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.

Scope of response

This is a Dedham Vale AONB and Stour Valley Partnership response and in that regard has sought to address issues in a level of detail that all partners can support in its aspiration to conserve and enhance the natural beauty of the AONB and Stour Valley project area.

Many partners are custodians of Natural Beauty and Special Qualities indicators of the AONB and Stour Valley project area. This Partnership response should be seen as complementary to those responses, rather than the only response addressing AONB and Stour Valley project area issues.

The Dedham Vale AONB and Stour Valley Partnership response will restrict itself to making comment on the scheme where it directly impacts on its area of interest. This includes the AONB, its setting and the Stour Valley project area. It will provide some comment on wider areas of interest.

The Dedham Vale AONB and Stour Valley Partnership consider the principles of a mitigation hierarchy should be a guiding principle of the project development. Proposals should seek to avoid, minimise, mitigate and finally compensate any negative impacts.

¹ See appendix 1 for list of Partnership organisations

Where there is significant adverse impact on the Dedham Vale AONB and Stour Valley the Partnership consider that they should be compensated for. This should apply to residual impacts and those of a temporal nature that may arise during construction.

Summary of Dedham Vale AONB and Stour Valley Partnership Position:

- It notes the project as described will cause significant damage to the fabric of the nationally designated Dedham Vale AONB during construction.
- It notes that the decision to identify the preferred route corridor (one that crosses the AONB) is based on consultation from 2009 and considers that the applicant should further justify its decision with respect to the Holford Rules, Section 85 of the Countryside and Rights of Way Act 2000 and the National Policy Statement for Energy (EN-1).
- It considers there will be significant damage to the Stour Valley project area during construction and operation.
- It acknowledges the embedded mitigation contained in the current project proposals but notes the residual damage to landscape, wildlife, heritage assets that mitigation such as undergrounding will cause.
- It considers that options as presented, and alternatives, will cause significant impact to landscape and wildlife. National Grid should implement every possible means to avoid, minimise, mitigate and compensate for such damage inside and outside the AONB.
- It considers that the exact alignment will influence the magnitude of impact on some defined natural beauty characteristics such as natural heritage features and cultural heritage.
- Is disappointed that the Preliminary Environmental Information Report does not explicitly undertake an assessment of the impact of the project on the nationally designated AONB's defined natural beauty.
- It considers that compensation should be paid to the 'AONB' for operational and construction impacts and suggests the Stour Valley Environment Fund, AONB Sustainable Development Fund and resource for AONB team as a means to distribute at least part of this compensation.
- It recognises wider concerns about the projects impact, outside the nationally designated AONB and Stour Valley project area, and those concerns raised by stakeholders relating to transmission method, impacts of undergrounding and local impacts versus national need.
- It acknowledges the significant research undertaken by local communities and landowners and considers that National Grid should undertake assessment of suggestions put forward by the community and respond to questions relating to need and technology.

Understanding of the current position

The Dedham Vale AONB and Stour Valley Partnership's understanding of the proposals including the applicants 'preferred option', as communicated through:

- The National Grid document library accessed from <https://www.nationalgrid.com/uk/electricity-transmission/network-and-infrastructure/bramford-twinstead/document-library> on 31 Jan 2022
- *A presentation to the Dedham Vale AONB and Stour Valley Partnership meeting on 23 April 2021*
- *Knowledge from individual partnership members, local authority staff and interested stakeholders*

Is that the project has initially been split into seven sections:

- Section AB: Bramford Substation to Hintlesham
- Section C: Brett Valley
- Section D: Polstead
- Section E: Dedham Vale up to the AONB boundary
- Section F: Leavenheath and Assington
- Section G: Stour Valley
- Section H: GSP Substation has been added since the non-statutory consultation to aid the description of the project at this location.

Given the remit and interest Dedham Vale AONB and Stour Valley Partnership it will limit its response to:

- The geographical areas of interest, ie the AONB and Stour Valley project area and the associated settings.
- The reason for designation of the AONB, ie the conservation and enhancement of natural beauty, which is defined as factors relating to:
 - Landscape quality
 - Scenic quality
 - Relative wildness
 - Relative tranquillity
 - Natural heritage features
 - Cultural heritage. Including archaeology

Details of the AONB defined features are available from the Alison Farmer Associates report² and the Dedham Vale AONB and Stour Valley Management Plan 2021-26³.

² <https://www.dedhamvalestourvalley.org/wp-content/uploads/2021/04/Natural-Beauty-and-Special-Qualities-and-Perceived-and-Anticipated-Risks-Final-Report-July-2016-1.pdf>

³ <https://www.dedhamvalestourvalley.org/managing/management-plan/>

Similarly, the defined qualities of the Stour Valley project area are defined in a Valued Landscapes Assessment, also by Alison Farmer Associates⁴

Policy Framework

The Dedham Vale AONB and Stour Valley Partnership considers the following policies to be key in developing proposals such as the Bramford to Twinstead proposals:

- **National Policy Statement for Energy (EN-1)**

That states in relation to development proposals in nationally designated landscapes (para 5.9.9):

National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.

The Dedham Vale AONB and Stour Valley Partnership consider that decision makers should reflect this policy and give great weight to the statutory purpose of the AONB. It considers any new lines through the AONB should go underground. Furthermore, it considers that due weight should be given to the AONB statutory purpose when siting any infrastructure associated with taking transmission routes underground (Cable Sealing Ends) and where the transmission route is visible from the AONB, similar to the parameters of National Grid's Visual Impact provision and the Landscape Enhancement Initiative.

The Dedham Vale AONB and Stour Valley Partnership note that the current (as at 1 Feb 2022) review of National Policy Statements make the following statement in the draft EN-5⁵

Whilst pylon-supported overhead conductors should be the strong starting presumption for new electricity lines generally, this situation is reversed in National Parks and Areas of Outstanding Natural Beauty. In these areas, the strong starting presumption will be that new lines should be undergrounded, unless the harm of doing so outweighs the landscape and visual benefit. We expect this change to bring welcome clarity to communities and stakeholders, and to streamline the consultation process for infrastructure crossing these important landscapes.

⁴ <https://www.dedhamvalestourvalley.org/wp-content/uploads/2021/04/Final-Report-Stour-Valley-Project-Area-Valued-Landscapes-Assessment.pdf>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015302/nps-consultation-document.pdf

The Dedham Vale AONB and Stour Valley Partnership consider the impact of undergrounding the transmission route through the AONB would lead to less harm than if an overhead line were to form part of the project. It considers undergrounding should include measures to minimise damage to the defined AONB qualities such as natural heritage features and cultural heritage. This should include the treatment of hedgerows, in 2009 National Grid had agreed a process to remove hedgerows, keep them safe while construction took place and return them at the end of construction. The Partnership considers this approach should be adopted should the project be consented. Where loss is unavoidable, losses should be kept to an absolute minimum and mitigated in advance by the planting of equivalent compensatory hedgerow habitat. A similar approach should be adopted for other important habitats, including impacts relating to woodland, scrub and species rich grassland.

- **National Policy Statement for Electricity Networks Infrastructure (EN-5)**
That states in relation to undergrounding (para 1.7.5):

the range of factors to be taken into account means that decisions on undergrounding are best taken within a more flexible policy framework using case by case evaluation.

The Dedham Vale AONB and Stour Valley Partnership note that the applicant proposed undergrounding in the AONB and part of Stour Valley project area before the project was paused in 2012. It considers there has not been any material change to alter that decision, indeed further evidence has emerged of part of the Stour Valley project area meeting the criteria for AONB status.

- **The Holford Rules**

The Dedham Vale AONB and Stour Valley Partnership recognise these rules apply to decisions relating to new overhead lines. It considers that the Stour Valley project area should be recognised as having the highest amenity value (as the area has been subject to a management plan from 2000, recognised as a valued landscape and parts of which meet AONB criteria according to external consultant opinion) and therefore Holford Rules 1 and 2 apply:

Rule 1: Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence.

Rule 2: Avoid smaller areas of high amenity value, or scientific interests by deviation; provided this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction.

- **The Electricity Act (1989)**

Requires National Grid, when formulating proposals for new lines and other works, to:

have regard to the desirability of preserving natural beauty, of conserving flora, fauna, and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and shall do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

The Dedham Vale AONB and Stour Valley Partnership notes that the desirability of conserving ‘natural beauty’ is not confined to the nationally designated landscape, the Dedham Vale AONB but should include other areas such as the Stour Valley.

The Dedham Vale AONB and Stour Valley Partnership consider that the applicant should conserve the natural beauty of the nationally designated AONB and the Stour Valley project area. This should include paying due regard to sites, ecological, geological, architectural, historic and archaeological features during planning and constructional phases of the project.

- **The Countryside and Rights of Way Act (2000)**

Section 85 of the Countryside and Rights of Way Act (2000) notes:

General duty of public bodies etc.

(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.

(2) The following are relevant authorities for the purposes of this section—

(a) any Minister of the Crown,

(b) any public body,

(c) any statutory undertaker,

(d) any person holding public office.

National Grid Electricity Transmission (National Grid) are recognised as a statutory undertaker and are therefore subject to Section 85 responsibilities as outlined in the Countryside and Rights of Way Act 2000.

The Dedham Vale AONB and Stour Valley Partnership consider that the applicant is required to pay regard to the purpose of the AONB when developing its proposals. Furthermore, the applicant should provide evidence demonstrating how the Duty of Regard has been met.

- **National Planning Policy Framework**

The application for the Bramford to Twinstead project will be determined by the Planning Inspectorate but it is worth noting what the National Planning Policy Framework (para 177), which should be a material consideration in Development Consent Order process, has to say on development impacting on nationally designated landscapes and their setting:

When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

The Dedham Vale AONB and Stour Valley Partnership recognise that the applicant has considered options that have no detrimental impact on the AONB but have chosen to give as their preferred option a proposal that will negatively impact the AONB:

- During construction for AONB designation characteristics including:
 - Natural heritage features
 - Cultural heritage
 - Relative tranquillity

Due to operations such as trenching

- During operation for AONB designation characteristics including:
 - Landscape quality
 - Scenic quality
 - Relative wildness
 - Relative tranquillity

Due to significant development in the setting of the AONB

By having a preferred route through the AONB which will damage the defined natural beauty, the project would cause harm to features such as wildlife habitats that deliver the statutory AONB purpose.

It considers that if the applicant secures approval for its preferred option it should compensate for damage caused to the nationally significant landscape given other options are available that would not impact the AONB and deliver project purpose.

The application for the Bramford to Twinstead project will be determined by the Planning Inspectorate but it is worth noting what paragraph 176 of the National Planning Policy Framework has to say about development within the setting of nationally designated landscapes/

that where poorly located or designed, development within the settings of AONBs can do significant harm.

Paragraph 176 states:

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their

setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

The Dedham Vale AONB and Stour Valley Partnership consider that the applicant should reduce to as near to zero as possible any negative impacts on the AONB and impacts associated with the setting of the AONB. Furthermore, it should seek to avoid any negative impacts on the 'valued landscape' that is the Stour Valley project area.

- **The Dedham Vale AONB and Stour Valley Management Plan 2021-26⁶**
The AONB Management Plan is a statutory document and should be given significant weight in decision making.

The Statement of Significance relating to the AONB in this management plan includes:

The area remains mostly free on incongruous development and large scale industrial developments

The Countryside section includes the following objectives:

- *Land use management decisions pay regard to the purpose of the AONB, to conserve and enhance its natural beauty*
- *Decision makers consider the purposes of the AONB when working on development proposals*
- *The natural features, of the AONB and Stour Valley project area, including its wildlife, are conserved and enhanced*

The vision statement for the Stour Valley project area says:

The Stour Valley project area is a cherished landscape by both residents and visitors. It has agriculture and wildlife at its core and everyone appreciates its scenic quality and beauty. The area is treasured and decisions impacting its landscape quality recognise its status as a valued landscape.

The Dedham Vale AONB and Stour Valley Partnership consider that the applicant should give great weight to the objectives of the management plan.

⁶ <https://www.dedhamvalestourvalley.org/managing/management-plan/>

The Dedham Vale AONB and Stour Valley Partnership make the following comment and requests relating to elements of the proposals:

Impact on the AONB

- **Statutory purpose**

- During Operation

- The Dedham Vale AONB and Stour Valley Partnership consider that there will be some impacts on the statutory purpose of the AONB during operation. It notes that National Grid has identified short term significant effects from the overhead line on landscape designations. Furthermore, there is a recognition of Long term significant effects on views from the effects of the overhead power lines and compound sealing ends (Table 16.2 Preliminary Environmental Information Report, Vol 1 Jan 2022). It notes that the new overhead power line will be visible from the AONB.

The Dedham Vale AONB and Stour Valley Partnership considers that further justification of the assessment that overhead lines would not have a significant impact on landscape designations, such as the AONB, given that the new overhead line outside the AONB will be visible from within the nationally designated landscape.
It considers that any residual impact should be compensated for.

- During Construction

- The Dedham Vale AONB and Stour Valley Partnership agree with the assessment in Table 16.1 of the Preliminary Environmental Information Report, Vol 1 Jan 2022 that notes there will be short term significant effects on landscape designations such as the AONB. It further notes that parts of the AONB will not be able to deliver its statutory function during construction.

The Dedham Vale AONB and Stour Valley Partnership considers that the detailed project design should seek to avoid and minimise **impacts and compensate for the impacts caused by the delivery of the proposals during construction.**

- **Natural Beauty characteristics**

- During Operation

- The Dedham Vale AONB and Stour Valley Partnership consider that the information contained in the Preliminary Environmental Information Report, Vol 1 Jan 2022 has not undertaken an assessment of impacts, during operation, of the defined AONB natural beauty characteristics. It considers that an assessment against the broader 'landscape designations' does not demonstrate the statutory obligation to pay regard to the AONB.

The Dedham Vale AONB and Stour Valley Partnership considers that the applicant **should provide an assessment of the proposals on the defined characteristics of the AONB** during operation to include those relating to: Landscape quality, Scenic quality, Relative wildness, Relative tranquillity, Natural heritage features, Cultural heritage.

During Construction

The Dedham Vale AONB and Stour Valley Partnership consider that the information contained in the Preliminary Environmental Information Report, Vol 1 Jan 2022 has not undertaken an assessment of impacts, during operation, of the defined AONB natural beauty characteristics. It considers that an assessment against the broader 'landscape designations' does not demonstrate the statutory obligation to pay regard to the AONB.

The Dedham Vale AONB and Stour Valley Partnership recognise the benefits of undergrounding but note that there are potential negative impacts on defined AONB qualities, including wildlife, wildlife habitat and archaeology.

The Dedham Vale AONB and Stour Valley Partnership considers that the applicant **should provide an assessment of the proposals on the defined characteristics of the AONB** during construction to include those relating to: Landscape quality, Scenic quality, Relative wildness, Relative tranquillity, Natural heritage features, Cultural heritage.

It further considers that the proposals should be developed to minimise impacts on wildlife, wildlife habitat and archaeology.

- **Setting**

During Operation

The Dedham Vale AONB and Stour Valley Partnership recognise that the project as described includes land for landscape planting and embedded design features to mitigate the visual impacts of the Cable Sealing Ends. However, it considers that an assessment against the broader 'landscape designations' and non-designated historic landscapes does not demonstrate the statutory obligation to pay regard to the AONB.

The Dedham Vale AONB and Stour Valley Partnership considers that the applicant **should provide an assessment of the proposed development within the setting of the AONB on the nationally designated landscape** and not just more general assessment on landscape designations or non-designated historic landscapes

During Construction

The Dedham Vale AONB and Stour Valley Partnership recognise that the project as described notes that part of the Stour Valley is in the setting of the AONB and has similar landscape qualities to the Dedham Vale [AONB]. Para 3.3.5 Preliminary Environmental Information Report, Vol 1 Jan 2022

The Dedham Vale AONB and Stour Valley Partnership considers that the applicant **should provide an assessment of the proposed development that is in the setting of the AONB** to include those factors identified in the defined natural beauty and special qualities of the part of the Stour Valley between Bures and Sudbury.

- **Alignment with policy: National, Local, Management Plan**
During Operation and During Construction

National

The Dedham Vale AONB and Stour Valley Partnership recognise that National Grid considers that the revised National Policy Statements will be published before project decisions are presented within any application and this is welcomed, particularly policy relating nationally designated landscapes. It further welcomes the recognition of National Grid in relation of the requirement to adhere to the National Planning Policy Framework in relation to AONBs, recognition of the Holford Rules and Horlock Rules.

Local

The Dedham Vale AONB and Stour Valley Partnership recognise that National Grid have considered local planning policies in the development of the Preliminary Environmental Impact Report.

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid **should consider and adhere to local planning policy** when developing the detail in any application related to the project.

Management Plan

The Preliminary Environmental Information Report makes reference to a consultation draft of the Dedham Vale AONB and Stour Valley Management Plan 2021-2026 and the fact that this is a statutory document. National Grid also recognise that this plan contains elements relating to a recognised area know as the Stour Valley project area.

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid as a statutory **undertaker should develop its proposals so that they conform to the adopted statutory AONB Management Plan** and consider the elements of the plan that relate to the Stour Valley project area.

- **Preferred route: AONB impacts vs corridors 3 and 4**
During Operation and During Construction

The Dedham Vale AONB and Stour Valley Partnership recognise that if corridors 3 or 4 had been taken forward the impacts on the nationally designated landscape would have been less. It recognises that the proposals

as they stand have embedded mitigation within them, undergrounding through the AONB, but this is a policy requirement.

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid should **compensate for the damage caused by the preferred option as other options that would have avoided damage to the nationally designated landscape have not been selected.** It recognises the value of the embedded mitigation, undergrounding, but considers there are other damaging elements associated with the preferred option including, loss of land to deliver AONB purpose during construction, long term impacts of the upgrading of the 132kV line to a 400kV line visible from the AONB and impacts from cable sealing ends.

Impact on the Stour Valley project area

Treatment of the Stour Valley project area

The Dedham Vale AONB and Stour Valley Partnership consider that the Stour Valley project area should be considered to be a high value landscape. The area has been subject to an agreed management plan for over 20 years and has received public funding to deliver countryside management, funding from the National Lottery Fund (now National Lottery Heritage Fund) to deliver landscape enhancement works, grants from other public and private sector sources to deliver environmental enhancement work.

Parts of the Stour Valley project area have been identified as meeting AONB criteria by AONB consultants (Alison Farmer Associates, *Special Qualities of the Dedham Vale AONB Evaluation of Area Between Bures and Sudbury*⁷) and the Dedham Vale AONB and Stour Valley Partnership consider that National Grid should take a precautionary approach when developing proposals that will impact this area.

The draft National Policy Statement for electricity networks infrastructure (EN-5) at paragraph 2.11.20 says:

*The Secretary of State should also have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be inverted to favour undergrounding. **Away from these protected landscapes, and where there is a high potential for widespread and significant landscape and/or visual impacts, the Secretary of State should also consider whether undergrounding may be appropriate, now on a case-by-case basis, weighing the considerations outlined above.***

⁷ <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>

[Our emphasis and considerations above include: *rationalisation, reconfiguration, or undergrounding*]

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid should **deliver on its commitment to underground part of the route in the Stour Valley project area and consider further sections to underground** where the balance of impacts would be lessened by further undergrounding eg setting of heritage assets, to protect wildlife habitat and enhance landscape quality.

Commentary on aspiration for boundary review

The Dedham Vale AONB and Stour Valley Partnership have a long held aspiration for a boundary extension to the west of its current boundary. The minutes of the Partnership meeting of 10 Nov 2009 record this aspiration (copy of minutes available on request) and a subsequent letter was sent to Natural England expressing its desire for a boundary review. The Stour Valley project area has been subject to a Local Authority agreed management plan for around 25 years.

In 2014 the AONB Joint Advisory Committee commissioned expert opinion, Alison Farmer Consultants, whose interpretation of the brief included:

The aim of the study has been to review, update and gather evidence on the special qualities of an evaluation area to determine its suitability for designation as AONB using Natural England's Guidance. The evaluation area was initially defined in the brief and lies within the Dedham Vale Special Project Area between the existing AONB boundary and Sudbury⁸

Contained within the conclusions of this report is the following:

The 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 track of land associated with the Dedham Vale AONB to the east.

In its response to the Designated Landscapes Review, sometimes known as the Glover Review⁹, the Government said the following on 15 January 2022:

*Our vision for protected landscapes is:
A coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy. Protected landscapes will support thriving local communities and economies, improve our public health and*

⁸ Special Qualities of the Dedham Vale AONB Evaluation of Area Between Bures and Sudbury, available from AONB team

⁹ <https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response/landscapes-review-national-parks-and-aonbs-government-response>

wellbeing, drive forward nature recovery, and build our resilience to climate change.

On the issue of current Government aspirations for nature recovery, to protect 30% of UK by 2030, get to net zero by 2050 and enhancing physical and public health designated landscapes, such as AONBs, can play an important part. More and increased designated landscapes can help meet this aspiration and Government has commented on the boundary review process, in its response to the Designated Landscapes Review report, in the following way:

...It will enable a more collaborative process to designate new National Parks and AONBs

The Parliamentary Under Secretary of State, Lord Benyon, recently commented on what his predecessor, Lord Gardiner, had to say about the Bramford to Twinstead proposals and the aspiration for boundary review:¹⁰

Thank you for directly bringing to my attention the concerns raised with my predecessor about the National Grid's plans to construct a 400kV powerline from Bramford to Twinstead and the current consultation exercise, which now includes proposals for overground cables through the Stour Valley. I have reviewed and fully support the assurances provided by my predecessor in his detailed reply to you of 4 May, notably that we would expect the National Grid to present within its final options in the formal statutory consultation planned for the autumn, and subsequently in the application for a Development Consent Order, comprehensive evidence to support a case for undergrounding the transmission section in the Stour Valley. I will also re-iterate that, notwithstanding Natural England's (NE) future decisions about the potential extension of the AONB, there is a clear legislative and policy requirement for National Grid to give proper weight to the role and importance of the Stour Valley in the design and delivery of this scheme.

Natural England are in the process of producing a new strategy and visionary map for 'England in the 21st Century' that will be reflecting the spirit of the 'Hobhouse Map' which led to the establishment of the first National Parks 70 years ago. It has said it will work with stakeholders and communities to identify conservation needs across England, including any remaining places suitable for future National Park or AONB designation.

¹⁰ Correspondence from Lord Benyon to Robert Erith TD DL, president of the Dedham Vale Society
18 June 2021

The Dedham Vale AONB and Stour Valley Partnership welcomes National Grid proposals to underground part of the new line in the Stour Valley project area. It considers that the case has been made to underground. However, it is concerned that the proposals as they are currently presented could have significant negative impact on the Stour Valley project area and that a precautionary approach should be adopted to protect:

- the setting of the AONB,
- the recognised natural beauty of the Stour Valley project area, including its natural heritage.

It recognises that no formal Natural England process has started to assess the suitability of part of the Stour Valley project area being designated but:

- AONB consultants have concluded part of the area does meet the designation threshold,
- Current minister with responsibility for AONBs has indicated that he would wish to see proper weight given to the Stour Valley project area,
- there is a Government agenda for more and larger designated landscapes to meet its aspirations for nature recovery and addressing climate change.

While Natural England is unlikely to comment on impacts on a currently undesignated landscape other Statutory Authorities have previously indicated their support for an extension to the Dedham Vale AONB in this area.

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid should revise its proposals by increasing the length of cables put underground, but should be mindful of avoiding sensitive ecological areas when designing this element.

Natural Beauty and Special Qualities defined characteristics

The Stour Valley project area shares many characteristics with the nationally designated AONB. The area recognised as being in the setting of the AONB and that which, in the opinion of the AONB Partnership's consultants, meets the AONB criteria should be given great weight when developing proposals.

The Dedham Vale AONB and Stour Valley Partnership consider that the project **should be designed to avoid and minimise impacts on the features ascribed to the Stour Valley project area.** It considers that the mitigation hierarchy should be applied and that any residual impacts should be compensated for.

Alignment with local policy and management plan

The Stour Valley project area is subject to Local Plan policy and been subject of an agreed management plan.

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid **should consider and adhere to Local Plan policy and the management plan** when developing the detail in any application related to the project.

Compensation and Mitigation

Undergrounding compensation for AONB for construction impacts

As discussed above, the Dedham Vale AONB and Stour Valley Partnership acknowledge the embedded mitigation of undergrounding new cables in the AONB but note the impact on the AONB, including part of the AONB not being able to deliver statutory purpose during construction. It further notes the potential for negative impacts on wildlife habitat, natural heritage features being a defined AONB quality, during construction and operation of underground cables.

The Dedham Vale AONB and Stour Valley Partnership considers that **appropriate compensation should be made available for impacts caused during construction.**

Cable Sealing End impacts on AONB

Cable Sealing Ends have the potential to impact on the nationally designated AONB.

The Dedham Vale AONB and Stour Valley Partnership **considers that National Grid should undertake an assessment of impacts on the AONB**, not just the wider landscape designations, and provide appropriate compensation for any residual impacts caused by cable sealing ends.

New line impacts on AONB and Stour Valley project area

The new sections of overhead lines will be visible from parts of the nationally designated landscapes and the Stour Valley project area that will damage the defined landscape and scenic qualities.

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid **should undertake an assessment of impacts on the AONB**, not just the wider landscape designations, and provide appropriate compensation for any residual impacts caused by negative impacts on views from the AONB and Stour Valley project area.

Use of Stour Valley Environment Fund, the Dedham Vale AONB Sustainable Development Fund and AONB team to deliver compensation

The Dedham Vale AONB and Stour Valley Partnership would wish to draw the attention of applicant to the Stour Valley Environment Fund. The Stour Valley Environment Fund is a grant scheme hosted at the Essex Community Foundation that operates into the Suffolk part of the Stour Valley project area with the purpose to support charities and voluntary groups working to enhance the environment in the Stour Valley¹¹.

It further wishes to bring National Grid's attention to the Dedham Vale AONB Sustainable Development Fund¹². This is a grant programme held by the AONB team, in its host authority Suffolk County Council account, that distributes grants for projects that benefit the environmental, economic and social wellbeing of the AONB. Grants are decided by a panel including the AONB chair and representatives of the environmental, community and business interests.

It also notes that the AONB team is the only organisation that works exclusively to deliver AONB purpose and that consideration for additional resources be made available to the AONB team to support the delivery of compensation projects relating to AONB purpose.

The Dedham Vale AONB and Stour Valley Partnership considers that if National Grid wish to compensate for any impacts on the AONB it **should consider making a contribution to the Stour Valley Environment Fund and Dedham Vale AONB Sustainable Development Fund.**

Other areas

Cable routes and corridors

In addition to comments made above relating to the preferred route having a negative impact on the nationally designated landscape that would not have arisen if corridors 3 or 4 were to be taken forward the Dedham Vale AONB and Stour Valley Partnership wishes to make the following points:

- i) Community view
The Dedham Vale AONB and Stour Valley Partnership are aware of considerable work undertaken by local communities to identify alternative routes that they consider would cause less environmental harm than the proposers preferred route option.

The Dedham Vale AONB and Stour Valley Partnership considers that National Grid should **assess ideas put forward by community interest groups and parish councils** and undertake a full assessment of such ideas and provide a rationale to explain any decisions relating to why National Grid decide to take forward the suggested alternatives or not take them forward.

¹¹ <https://www.dedhamvalestourvalley.org/managing/grants/stour-valley-environment-fund/>

¹² <https://www.dedhamvalestourvalley.org/managing/grants/sustainable-development-fund/>

- ii) Treatment of area around Leavenheath
The Dedham Vale AONB and Stour Valley Partnership recognise the proposals as presented include an overhead section (Section F between Leavenheath and Assington) which will require two Cable Sealing Ends between the two proposed undergrounding stretches.

The Dedham Vale AONB and Stour Valley Partnership considers significant landscape **benefits could accrue if this proposed overhead section was put underground**. Landscape benefits from the removal of an overhead line, and the avoidance of the introduction of two Cable Sealing End compounds would benefit the wider area and impacts on the AONB.

- iii) Underground cables versus overhead lines
The Dedham Vale AONB and Stour Valley Partnership recognise that undergrounding cabling has the potential for significantly larger ecological impacts due to the larger area of land that would need to be disturbed to install underground cables.

The Dedham Vale AONB and Stour Valley Partnership considers that micro cable siting and corridor selection should be based on the need to avoid important ecological areas (woodlands, species rich grassland, wetlands etc.) wherever possible. Furthermore, that any unavoidable hedgerow crossings should see the removal of hedgerows during construction and that hedgerow should be returned for the operational phase.

- iv) Hintlesham Woods
The Dedham Vale AONB and Stour Valley Partnership recognise that the proposals relating to section AB (Bramford to Hintlesham) are a considerable distance from the AONB and Stour Valley project area. However, Partnership members have raised concerns relating to the impacts on Hintlesham Woods Site of Special Scientific Interest contained within the proposals as presented.

The Dedham Vale AONB and Stour Valley Partnership considers that the proposer should seek to minimise negative environmental impacts in this area and consider the concerns raised by interested groups who have an interest in this section.

- v) Route alignment and nature recovery
The preferred route alignment corridor through the Dedham Vale AONB passes through or close to several County Wildlife Sites, Ancient Woodlands, and other priority habitats, as well as an area identified by Natural England as 'Restorable Habitat'. These represent some of the most important areas for wildlife and nature recovery within the AONB

landscape and impacts on these sites, habitats and the species they support, as well as the AONB's nature recovery aspirations, should receive special consideration by National Grid in the route selection and design, including mitigation and compensation measures.

The Dedham Vale AONB and Stour Valley Partnership considers that special consideration should be given **to minimise, mitigate and compensate** for any residual impacts **on the AONB's most important** ecological features, designated sites, and nature recovery areas.

The River Box is an important ecological and landscape feature in the Dedham Vale AONB. Records of eels and brown trout indicate its importance for these species that have undergone significant historic declines due to the modification and deterioration of England's rivers and streams.

The Dedham Vale AONB and Stour Valley Partnership note that an **open cut method is proposed for crossing the River Box** with the undergrounded cables. It should be ensured that this approach **will not have an increased adverse impact on the River Box, or the protected aquatic species it supports**, compared with employing horizontal directional drilling, as is proposed for crossing the River Stour further to the west, outside the current boundary of the AONB.

Concerns beyond the Dedham Vale AONB and Stour Valley project area

The Dedham Vale AONB and Stour Valley Partnership are aware of several concerns raised by other organisations and individuals. These include wildlife concerns at Hintlesham Wood and the impacts of the proposed substation between Butler's Wood and Waldgrave Wood.

The Dedham Vale AONB and Stour Valley Partnership would **seek reassurance that National Grid take these concerns seriously** and act upon concerns raised by individuals and organisations.

Public enjoyment of Dedham Vale AONB and Stour Valley project area

The Dedham Vale AONB and Stour Valley Partnership acknowledge that recreation is not a statutory purpose of the AONB designation but nevertheless consider public access, understanding and enjoyment to the nationally designated landscape, and associated Stour Valley project area important. The tourism industry is an important economic driver in the area and the impacts of the project could have a negative impact on this industry, that in 2019, was worth over £68M pa and supporting 1,490 jobs in the Dedham Vale AONB and over £49M pa and supporting 1,283 jobs in the Stour Valley project area.

The Dedham Vale AONB and Stour Valley Partnership would seek **reassurance that National Grid will seek to avoid and minimise any negative impacts on public enjoyment of the AONB and Stour Valley** from the project and compensate any businesses negatively impacted.

Note on technology

The Dedham Vale AONB and Stour Valley Partnership is aware of some work undertaken locally about potential alternative methods of electricity transmission.

The Dedham Vale AONB and Stour Valley Partnership is not technically competent to comment on such work it considers that National Grid **should consider such opportunities and discuss** their reasoning for chosen technologies with those suggesting alternatives.

Note on need

The Dedham Vale AONB and Stour Valley Partnership notes that the majority of beneficiaries of this project would not be from the AONB and Stour Valley project area but these areas will be negatively impacted by the project.

The Dedham Vale AONB and Stour Valley Partnership would expect National Grid to minimise impacts on the area receiving negative impacts of the project and **to compensate for temporary and residual impacts felt by the AONB and Stour Valley project area.**

The Dedham Vale AONB and Stour Valley Partnership ask that National Grid respond to the points raised in this response and in particular the points made in shaded boxes.

For and on behalf of the Dedham Vale AONB and Stour Valley Partnership

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Appendix 1:
Dedham Vale AONB and Stour Valley Partnership member organisations

Babergh Mid Suffolk District Council*
Braintree District Council
Campaign for Protection of Rural England (Essex)
Colchester Borough Council*
Colne Stour Countryside Association
Country Land and Business Association
Dedham Vale Society
Environment Agency
Essex and Suffolk Rivers Trust
Essex County Council*
Essex Wildlife Trust
National Farmers' Union
National Trust
Natural England
RSPB
Stour Valley Farmer Cluster
Suffolk County Council*
Suffolk Preservation Society
Tendring District Council*
West Suffolk District Council

* AONB Authorities