



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

18 October 2022

Bramford to Twinstead Reinforcement:

Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley staff team response on behalf of the AONB Partnership¹ to targeted consultation Sept 2022

The AONB staff team

The AONB staff team is funded by DEFRA and local authorities to provide an AONB service to the Dedham Vale AONB and Stour Valley project area. It acts as a facilitator and secretariat for the AONB Partnership.

For the avoidance of any doubt, this response has been submitted by the AONB staff team with only informal consultation with individual AONB Partnership members and represents the views of the staff team. The staff team was unable to develop a full Partnership response due to competing priorities.

The AONB Partnership

The AONB 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 2021-26².

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

Scope of response

This is a Dedham Vale AONB and Stour Valley staff team response and in that regard has sought to address issues to represent the statutory purpose of the AONB and management plan objectives of the Stour Valley.

The Dedham Vale AONB and Stour Valley staff team 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

² <https://www.dedhamvalestourvalley.org/managing/management-plan/>

Where there is significant adverse impact on the Dedham Vale AONB and Stour Valley project area the staff team consider that they should be compensated for. One mechanism for this could be the Stour Valley Environment Fund³. This should apply to residual impacts and those of a temporal nature that may arise during construction.

The AONB staff team will not be providing any comment on changes to the proposals at Hintlesham.

Summary of Dedham Vale AONB and Stour Valley staff team comments:

- The AONB staff team will limit itself to comments relating to the impacts on the Dedham Vale AONB and its associated Stour Valley project area.
- The AONB staff team welcomes the proposed to modify the underground section in the Stour Valley project area and partial trenchless crossing that will reduce impacts to vegetation and wildlife.
- It considers that the proposals outlined in the targeted consultation documentation may have some unintended impacts on the AONB and Stour Valley project area and these should be identified, assessed and any necessary mitigation and compensations should be made.

³ <https://www.dedhamvalestourvalley.org/managing/grants/stour-valley-environment-fund/>

Understanding of the current position

The Dedham Vale AONB and Stour Valley staff team's understanding of the revised proposals have been garnered from:

- The National Grid document library accessed from <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/bramford-twinstead/document-library>
- Knowledge from individual partnership members, local authority staff and interested stakeholders.
- Information provided by National Grid staff and consultants during meetings.

The AONB staff team understand that the targeted consultation includes changes to the Essex side of the Stour Valley and includes:

- Moving the route of underground cables further away from Alphamstone.
- 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.

The changes to the proposals relate in part to an area of the Stour Valley that is subject to a management plan, The Dedham Vale AONB and Stour Valley Management Plan 2021-26⁴ that has been endorsed by constituent local authorities and AONB partners.

AONB staff team comments

The proposed new cable alignment is welcomed as it appears to have fewer negative impacts on the Stour Valley project area during construction and operation.

The revised proposals appear to lessen the impact on two Local Wildlife Sites at Moat Farm/ Burnt House Marsh and Alphamstone complex.

The new cable alignment appears to have no significant changes to the landscape and scenic qualities of the AONB and Stour Valley project area.

The AONB staff team consider that there is likely to be temporary impacts on the Stour Valley project area from the necessary compounds required during construction.

The AONB staff team considers that any impacts arising from the proposed changes on the original scheme's mitigation, or any existing trees and hedgerows should be

⁴ <https://www.dedhamvalestourvalley.org/managing/management-plan/>

assessed. This should include any impacts on the Stour Valley project area and any lessening of mitigation for the proposed Cable Sealing End compounds.

The staff team notes that a temporary construction haul road will go no further east than the Stour Valley west cable sealing end compound. It considers that an assessment of this proposal on the defined tranquillity of the AONB, such as noise and light impacts, be made. It considers that the haul road may have a negative impact on wildlife that moves into and through the AONB and Stour Valley and that appropriate measures to mitigate this impact should be made.

The AONB staff team seek clarity if any of the proposed full tension gantries at three of the cable sealing end compounds would have any changes to impacts on the AONB or associated Stour Valley project area.

The AONB staff team note that the Stour Valley project area forms part of the setting of the nationally designated Dedham Vale AONB. As such it considers that any proposals impacting the Stour Valley project area could have impacts on the AONB and that they should be avoided, mitigated or compensated for.

Yours sincerely

Simon Amstutz
AONB Manager
simon.amstutz@suffolk.gov.uk

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