



Submitted by email to  
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**10 Aug 2023**

**Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Partnership response to National Grid consultation (27 June to 21 Aug 2023) re its proposed Norwich to Tilbury project.**

**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. They seek to implement the statutory AONB Management Plan for the Dedham Vale AONB.

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 full interests and responsibilities.

Other Partnership members, including environmental Non-Government organisations and membership organisations are likely to make their own representations reflecting their purposes.

**Scope of response**

This AONB Partnership response seeks 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.

This includes the AONB, the AONB setting and it will provide some comment on wider areas of community interest. The AONB Partnership recognise the significant community and political concern about the proposals, including those relating to areas outside of the nationally designated landscape.

The AONB Partnership will comment on proposals where they impact on:

- the nationally designated landscape
- the setting of the AONB
- other topics that directly relate to the AONB designation

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

The AONB Partnership consider that proposals should:

- Conform to national and local policy
- Where there is an impact to the Dedham Vale AONB they should conform to the Dedham Vale AONB and Stour Valley Management Plan 2021-26<sup>1</sup>
- 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.

Where there is significant adverse impact (residual or temporary during construction) on the AONB the Partnership consider there should be compensation.

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<sup>1</sup> <https://www.dedhamvalestourvalley.org/wp-content/uploads/2021/12/2021-Management-Plan-Final-Online-version.pdf>

### **Summary of AONB Partnership Position:**

- The AONB Partnership recognise the importance of developing greener ways of generating electricity to help deliver aspirations for net zero.
- It recognises the aspiration to deliver 50GW of offshore wind power by 2030 and that 60% of wind energy is planned to come ashore on the east coast. This, along with new nuclear and interconnectors, will require transmission to where electricity demand is, which may require transmission through the Dedham Vale AONB.
- The AONB Partnership consider that proposed undergrounding will have negative impacts on the defined qualities of the nationally designated landscape.
- The AONB Partnership have concern on the ability of parts of AONB to deliver statutory purpose during construction of underground cabling.
- The AONB Partnership considers that Cable Sealing Ends can have a negative impact on the nationally designated landscape even where they are located outside the AONB boundary.
- The AONB Partnership consider that development outside the nationally designated landscape, such as Overhead Transmission Lines, can have a negative impact on views from the AONB.
- The AONB Partnership considers that appropriate avoidance, minimisation, mitigation and compensation measures need to be made in relation to impacts on the nationally designated landscape. This should be in addition to the embedded mitigation for undergrounding proposals that is a policy requirement.
- The AONB Partnership has concern about the cumulative impacts on the nationally designated landscape from this National Grid proposal in combination with other major projects impacting the AONB, including the Bramford to Twinstead proposals.
- The AONB Partnership consider that National Grid, as sponsor of the proposals, have a duty to address concerns from the community, local authorities and interested organisations across the Norwich to Tilbury area on the projects impacts whether they are impacting the AONB or not.

## Understanding of the current position

The AONB Partnership understanding of the proposals are from:

- Online Topic Working Groups attended by AONB staff.
- The National Grid websites (East Anglia Green and Norwich to Tilbury) and associated document libraries accessed since May 2022.
- AONB staff attendance at a drop in sessions at Holton St Mary on 17 May 2022 and Langham Community Centre 13 July 2023.
- Knowledge gained from individual partnership members, local authority staff and interested stakeholders.

It recognises the scheme as:

- A proposal to reinforce the grid between Norwich and Bramford and then on to Tilbury. It would be approximately 183 km long and made up mainly of new pylons and overhead lines with some underground cables including an underground a section through the Dedham Vale AONB and to the south of the nationally designated landscape.

Given the remit and interest the AONB Partnership, it will limit its response to:

- The geographical areas of interest, ie the AONBs and its setting.
- The reason for designation of the AONB, ie the conservation and enhancement of natural beauty, which is defined by the factors listed below:
  - Landscape quality
  - Scenic quality
  - Relative wildness
  - Relative tranquillity
  - Natural heritage features
  - Cultural heritage, including archaeology

Details of the Dedham Vale AONB defined features are available from the Alison Farmer Associates report<sup>2</sup>.

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<sup>2</sup> <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>

## Policy Framework

The AONB Partnerships consider the following policies to be key:

- **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 AONB Partnership consider that decision makers should reflect this policy and give great weight to the statutory purpose of the AONB. They consider any new lines through the AONB should go underground. Furthermore, it considers that due weight should be given to the AONBs 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, like the parameters of National Grid's Visual Impact provision and the Landscape Enhancement Initiative.

The AONB Partnership note the consultation on National Policy Statements closed on 23 June 2023 and that the draft EN-5<sup>3</sup> (National Policy Statement for electricity networks) includes:

*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.*

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<sup>3</sup><https://www.gov.uk/government/consultations/planning-for-new-energy-infrastructure-revisions-to-national-policy-statements>

The AONB Partnership consider the impact of undergrounding the transmission route through the AONB would lead to less harm to the defined AONB characteristic of landscape quality than if an overhead line were to form part of the project. However, this approach has the potential to harm other defined characteristics of the AONB including scenic quality, natural heritage features and cultural heritage.

It considers undergrounding should include measures to minimise damage to any defined AONB qualities that would suffer negative impacts. This should include the treatment of hedgerows and other wildlife habitats and seek to route the corridor through arable and pastureland.

The Partnership considers this approach should be adopted should the project be consented. The ecological mitigation hierarchy principles (avoid, mitigate and compensate as a last resort) should be applied Where loss is unavoidable, losses should be kept to an absolute minimum and mitigated in advance. The scheme should seek to achieve a Biodiversity Net Gain of at least 10% for all habitats using DEFRA's Biodiversity Metric and following CIEEM's good practice principles.

- **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 AONB Partnership note that the applicant has proposed undergrounding in the AONB and part of the corridor to the south of the nationally designated landscape. This is supported in as far as it goes but re-emphasises that undergrounding can have a negative impact of some defined characteristics of the AONB and will have a significant impact during construction.

- **The draft National Policy Statement EN-5 on Electricity Networks Infrastructure**  
States:

*2.11.13 Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, Broads, or Area of Outstanding Natural Beauty). In these areas, and where harm to the landscape cannot feasibly be avoided by mitigation or re-routing, the strong starting presumption will be that the developer should underground the relevant Section of the*

*line. Note however that undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes is not outweighed by its corresponding landscape and/or visual benefits.*

*2.11.14 Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may nonetheless recommend undergrounding the relevant segments of the line. In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring undergrounding, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding option against:*

- i) the adverse implications of the overhead line proposal*
- ii) the cost and feasibility of re-routing the relevant line section*
- iii) the cost and feasibility of the reconfiguration, rationalisation, and/or undergrounding of proximate existing or proposed electricity*

The AONB Partnership note that the applicant has proposed undergrounding in the AONB and part of the corridor to the south of the nationally designated landscape. This is supported in as far as it goes but re-emphasises that undergrounding can have a negative impact of some defined characteristics of the AONB and will have a significant impact during construction.

- **The Holford Rules**

The AONB Partnerships recognise these rules apply to decisions relating to new overhead lines, that include:

*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 AONB Partnerships notes that the desirability of conserving 'natural beauty' is not confined to nationally designated landscapes.

The AONB Partnership consider that the applicant should conserve the natural beauty of the nationally designated AONB, its setting and other areas of high value landscape and nature conservation land. 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 AONB 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 East Anglia Green 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 AONB Partnership recognise that the applicant has considered different route corridors through the Dedham Vale AONB. However, there will be inevitable negative impacts from the undergrounding process. When developing detailed proposals, including for Cable Sealing Ends and development in the setting the project proposer should seek to ensure that any detrimental impact on the AONB and its setting is kept to a minimum.

- 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 will cause harm to features such as wildlife habitats that help 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 have less impact on the AONB and deliver the scheme purpose.

**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 AONB Partnership consider that the applicant should reduce to as near to zero as possible any negative impacts on the AONB and its setting.

- **The Dedham Vale AONB and Stour Valley Management Plan 2021-26<sup>4</sup>**  
The AONB Management Plan is a statutory document and a material planning consideration which 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*

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

**The AONB Partnership make the following comment and requests relating to elements of the proposals:**

### **Impacts on the Dedham Vale AONB**

The AONB Partnership considers that the proposals as presented will cause significant impact on the Dedham Vale AONB and its ability to deliver its statutory purpose during the construction phase.

Proposals to underground cables in the nationally designated landscape will have a negative impact on the defined natural beauty characteristics, ie those used to designate an AONB, during construction including:

- Landscape quality
- Scenic quality
- Relative wildness
- Relative tranquillity
- Natural heritage features
- Cultural heritage

It recognises that during the operation phase impacts on the AONB are unlikely to be significant.

The AONB Partnership considers that these potential impacts should be assessed against the defined natural beauty and special qualities indicators as described in Natural Beauty and Special Qualities document of July 2016<sup>1</sup>. This will enable those engaging in future consultations and those determining any future application of the impacts on the AONB from the proposals.

While recognising the proposals contained in this consultation give a detailed alignment of new infrastructure, any further evidence coming to light, from the community, National Grid's survey and assessment or interested organisations should be acted upon to refine the alignment to minimise impacts on the AONB and its defined natural beauty indicators.

Impacts during the construction phase should be compensated for.

As no assessment of the potential impacts is yet available, the AONB Partnership will comment further on the proposals and the assessment of impacts which it assumes will be contained in a Preliminary Environmental Information Report.

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

### **Cable Sealing Ends**

The AONB Partnerships consider that Cable Sealing Ends have the potential to cause significant negative impacts to the nationally designated landscape. From the information currently available it notes that the Cable Sealing Ends are located at a distance from the AONB boundary, presumably to minimise the impacts on the nationally designated landscape.

The AONB Partnership considers that potential impacts on the AONB from the Cable Sealing Ends should be assessed against the defined natural beauty and special qualities indicators as described in Natural Beauty and Special Qualities document of July 2016<sup>1</sup>. This will enable those commenting on any future consultations and those determining any application of the impact of the proposals on the AONB.

While recognising the status of the AONB, the Partnership consider that Cable Sealing Ends should be sited in locations that considers environmental, community, heritage and landscape needs of locations outside the AONB.

As no assessment of the potential impacts is yet available, the AONB Partnership will comment further on the proposals and the assessment of impacts which it assumes will be contained in a Preliminary Environmental Information Report.

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

### **Development in the setting of the Dedham Vale AONB**

The AONB Partnership recognise that part of the transmission route will be in the setting of the nationally designated landscape. It notes that the proposals include further undergrounding of cables to the south of the AONB as well as extending the undergrounding of cables that go through the AONB to outside the AONB to the proposed sites of the Cable Sealing Ends. It is assumed that this is, in part at least, to reduce any negative impacts on the AONB.

This further undergrounding is broadly welcomed, with the caveats outlined above.

The AONB Partnership consider that an assessment of the impacts on the AONB of the required Cable Sealing Ends for the undergrounding to the south of the nationally designated be undertaken.

It further considers that an assessment of the type of pylons to be used in the vicinity of the AONB be undertaken, including standard, lower height and T-Pylon to assess which would have the least impact on the AONB.

The AONB Partnership considers that potential impacts on the AONB from the development in the setting of the AONB should be assessed against the defined natural beauty and special qualities indicators as described in Natural Beauty and Special Qualities document of July 2016<sup>1</sup>. This will enable those commenting on any future consultations and those determining any application of the impact of the proposals on the AONB..

As no assessment of the potential impacts is yet available, the AONB Partnership will comment further on the proposals and the assessment of impacts which it assumes will be contained in a Preliminary Environmental Information Report.

## **Observations and requested actions on elements of the proposals that impact the Dedham Vale AONB.**

### **Cable Sealing End (Towers JC39 and JC40):**

The AONB Partnership do not currently consider there will be significant impacts on the AONB from this proposal but will reserve its position until it has seen an assessment which it anticipates will be in the Preliminary Environmental Information Report.

### **Cable Sealing End (Towers TB34 and TB35):**

The AONB Partnership do not currently consider there will be significant impacts on the AONB from this proposal but will reserve its position until it has seen an assessment which it anticipates will be in the Preliminary Environmental Information Report.

It notes that there are likely to be at least glimpsed views of the proposed overhead line running east from the Cable Sealing End (Towers TB34 and TB35) from the south of the AONB.

### **Cable Sealing End (Towers TB36 and TB37):**

The AONB Partnership do not currently consider there will be significant impacts on the AONB from this proposal but will reserve its position until it has seen an assessment which it anticipates will be in the Preliminary Environmental Information Report.

### **Underground cabling from northern boundary of AONB (Holly Bush Corner) to edge of Flood Zone 3 boundary (Near Higham Hall Farm):**

The AONB Partnership consider that:

Horizontal Directional Drilling should be employed where the alignment crosses hedgerows within this stretch.

The footpath running from Lower Street, Higham in a broadly south easterly direction to Brook Farm has been recognised as a popular walking route, see <https://www.dedhamvalestourvalley.org/wp-content/uploads/2020/12/Explore-Brett-Valley.pdf> While recognising the experience of walkers will be negatively impacted during construction it considers that the scheme proposer devise a method to ensure the route is not closed during this phase.

The Higham Road should be crossed using a Horizontal Directional Drilling technique to avoid inconvenience to local residents, businesses and visitors.

### **Underground cabling from the edge of Flood Zone 3 boundary (Near Higham Hall Farm) to the northern bank of the River Stour (both cable runs):**

The AONB Partnership consider that:

This section should be delivered by Horizontal Directional Drilling, from north of the Higham Road, due to the sensitive landscape, ecology and wildlife considerations of this section.

**Underground cabling from the northern bank of the River Stour (both cable runs) to just before where the two cable runs join back to be one:**

The AONB Partnership consider that:

This section should be delivered by Horizontal Directional Drilling under the River Stour should continue under the Stour Valley Path.

**Underground cabling from just before where the two cable runs join back to be one to under the Essex Way (adjacent to The Coombs) to southern boundary of the AONB:**

The AONB Partnership consider that:

This section should be delivered by Horizontal Directional Drilling under the footpath that runs from the Essex Way to the village of Stratford St Mary as this provides an important social (popular walking route) and economic link (access to facilities for those walking the Essex Way).

The Horizontal Directional Drilling should continue under The Coombs, due to the sensitive landscape, ecology and wildlife (including bats) considerations. This method should be continued to beyond the southern AONB boundary to avoid negative impact on the setting of Langham Hall and associated rural business activity.

**Underground cabling from the A12 to Birchwood Road:**

The AONB Partnership consider that:

Horizontal Directional Drilling should be employed where the alignment crosses hedgerows within this stretch.

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

### **Community Concerns**

The AONB Partnership is aware of significant community concerns and questions about the proposed project.

The AONB Partnership calls on National Grid to continue to respond to concerns raised by communities relating to the proposals and process.

### **Impacts on tourism, farming and business**

The AONB Partnership consider that the scheme could have a negative impact on the tourism industry, farming and business during the construction phase.

Tourism in the Dedham Vale AONB is often based on the natural beauty of the AONB. The tourism was worth over £68,000,000 and supported nearly 1,500 jobs in 2019.

Farming operations are likely to be impacted by the construction of underground cabling.

Businesses are likely to be impacted due to operations required to underground transmission cables.

The AONB Partnership considers that the scheme's proposer, National Grid, seek to avoid, minimise, mitigate and compensate impacts on the tourism industry, farming and business in the AONB.



## Mitigation and Compensation

The AONB Partnership recognise the embedded mitigation in the project to underground the line through the Dedham Vale AONB but note that this is a policy requirement. It further recognises the additional undergrounding outside the AONB, to Cable Sealing Ends and the additional stretch to the south of the AONB.

The scheme as proposed will cause significant impacts on the Dedham Vale AONB during the construction phase as outlined in the paragraphs above.

The AONB Partnership consider that impacts arising from the construction phase should be compensated for. These impacts during the construction:

- Impacts on AONB defined natural beauty indicators and in particular:
  - Landscape quality
  - Scenic quality
  - Relative wildness
  - Relative tranquillity
  - Natural heritage features
  - Cultural heritage

It is noted that:

- Hazel Dormice are a Flagship Species of the AONB. Therefore, suitable mitigation and compensation for the species is essential, as is ensuring that the scheme delivers additional enhancement for Hazel Dormice (as part of the mitigation hierarchy). Of particular concern for mitigation and compensation are:
  - Direct impacts on individual Hazel Dormice
  - Temporary loss of habitat
    - Of noted concern is the loss of sections of hedgerow where underground cable routes dissect hedgerow habitat. This can cause:
      - Direct impacts on individual Hazel Dormice
      - Habitat Fragmentation in the short and medium term
      - Loss of foraging habitat
      - Temporary loss of connectivity during construction and prior to the establishment of compensation
      - Compensation hedgerow planting is limited to species suitable to plant over underground cables as opposed to species of known benefits to Hazel Dormice

Continues over

- Bats
  - Hedgerow removal could reduce habitat connectivity for bats
    - This is notable for species which especially utilise hedgerows for dispersal, including Barbastelle – with Barbastelle records occurring within 100m of the underground route near the River Stour and within the wider landscape
    - Medium term solution prior to the replacement hedgerow maturing to provide suitable connectivity.
    - Mitigation and compensation (and enhancement) for hazel dormice will also be beneficial for bats – significant overlap with dormice likely a priority over bats

The AONB Partnership consider that any residual impacts on the AONB from the proposals should be compensated for and may include:

- Natural heritage (no significant planting above underground cables, impacts on any sites important for nature
- Any impacts on the AONB due to development of Cable Sealing Ends
- Any impacts on the AONB from new overhead lines, eg views from the AONB

### **Cumulative impacts on the Dedham Vale AONB**

The AONB Partnerships have concern about the impacts of this proposal in combination with the National Grid Bramford to Twinstead project<sup>5</sup> and the Anglian Water Bury St Edmunds to Colchester pipeline project<sup>6</sup>. These three projects, if consented, would see trenching across the east of the AONB, the west of the AONB and through the centre of the AONB.

The AONB Partnerships calls on National Grid to assess the cumulative impacts of its projects on the AONB and its defined natural beauty qualities as referenced elsewhere in this response

**The AONB Partnerships 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 AONB Partnership.

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<sup>5</sup> <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/bramford-twinstead>

<sup>6</sup> <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/new-water-pipelines/bury-st-edmunds-to-colchester/>

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

Babergh District Council\*  
Braintree District Council  
Campaign for Protection of Rural England (Essex)  
Colchester City 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