

Suffolk County Council (20041323)

Written Submission on the proposed Examination Timetable and Procedure and Requests to be Heard

Bramford to Twinstead (EN020002)

Procedural Deadline A

22 August 2023

Table of Contents

Glossary of Acronyms.....	1
Purpose of this Submission	2
1 Comments on the Procedure for Examination	2
2 Request to be Heard Orally at the Preliminary Meeting.....	2
3 Comments on the Initial Assessment of Principal Issues	2
4 Comments on the Draft Examination Timetable	3
5 Request to Participate in Open Floor Hearing 2	4
6 Request to Participate in Issue Specific Hearing 1	4
7 Suggested Locations for ExA Site Inspections	4

Glossary of Acronyms

AONB	<i>Area of Outstanding Natural Beauty</i>
DCO	<i>Development Consent Order</i>
ExA	<i>Examining Authority</i>
ISH	<i>Issue Specific Hearing</i>
SLA	<i>Special Landscape Area</i>

“The Council” / “SCC” refers to Suffolk County Council; “The Host Authorities” refers to Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council, and Braintree District Council.

Purpose of this Submission

The purpose of this submission is to respond to the Examining Authority’s Rule 6 letter, dated 7 August 2023. It will address the Council’s comments on the procedure of the Examination, state the Council’s concerns regarding the Initial Assessment of Principal Issues, outline requests to be heard and participate in the initial hearings, and suggest locations for further site inspections.

1 Comments on the Procedure for Examination

- 1.1. The Council is content for the examination to proceed on the basis that most hearings for the Examination will be blended. Our experience of working on DCO examinations during the pandemic and since has shown that our officers and legal advisors have generally adapted well to virtual working.
- 1.2. Therefore, the Council will consider whether it is appropriate to attend hearings physically or virtually depending on their subject matter and likely scale of Council involvement, location, availability, and timetables of relevant staff. The Council will indicate which mode of attendance will be used when making a request to be heard.

2 Request to be Heard Orally at the Preliminary Meeting

- 2.1. The Council requests to be heard orally at the Preliminary Meeting.
- 2.2. The Council will attend physically and will be represented by Graham Gunby, National Infrastructure Planning Manager, Callum Etherton, Planning Officer, and Michael Bedford KC, Barrister.
- 2.3. The Council wishes to contribute to:
 - Item 3 Initial Assessment of Principal Issues
 - Item 4 Draft Examination Timetable
- 2.4. Sections 3 and 4 below address the key points the Council will wish to make.

3 Comments on the Initial Assessment of Principal Issues

- 3.1. The Council notes that Annex C of the Rule 6 letter sets out the Initial Assessment of Principal Issues.

- 3.2. The Council is concerned that this initial assessment lacks specific reference to the Dedham Vale AONB, however, the Council defers to the AONB on this issue.
- 3.3. The Council notes that in the Applicant’s Environmental Statement appendix 6.2 Assessment of effects on Designated Landscapes [APP-098], the following has been identified in paragraph 4.1.1: *“Significant adverse landscape effects during construction are predicted for the AONB and Stour Valley SLA, however only a localised part of the designation within approximately 1km of the [Limits of Deviation] would be affected. These significant effects would mainly be associated with the large scale of the construction activities associated with the 400kV underground cables compared to the smaller scale works to remove or construct pylons”*. Further detail to support this conclusion is provided in paragraph 2.5.19 of the same document [APP-098] which also notes that *“The natural beauty indicators of the AONB - notably scenic quality, relative wildness and relative tranquillity would be adversely affected.”*
- 3.4. The AONB is a higher order statutory designation and the Council, therefore, invites the ExA to expand the Initial Assessment of Principal Issues to include specific reference to impacts on the AONB in Principal Issue 10.

4 Comments on the Draft Examination Timetable

- 4.1. The Council notes that Annex D of the Rule 6 letter outlines the draft Examination Timetable.
- 4.2. The Council is largely content with the proposed timetable of the deadlines, however, warns that the short 14-day window between the publishing of the ExA’s first written questions (proposed to be published 13 October 2023) and responses requested at Deadline 3 (27 October 2023) will place extraordinary pressures on the named organisations. In the Council’s experience, it has not been uncommon to find first written questions to number in the hundreds. The Council also wishes to raise similar concerns regarding the ExA’s second written questions (proposed to be published 22 December 2023), accounting for the Christmas period this will again result in a short window before the responses requested at Deadline 7 (15 January 2024). As a means to provide a proactive

solution, the Council considers that Deadlines 3A and 7A could be created for the purposes of responding to the respective ExA's written questions one week following those proposed deadlines.

- 4.3. The Council notes that no hearings are proposed following the reserved week commencing 11 December 2023. The Council would be supportive of the reservation of dates for further hearings, potentially early in 2024, to support scheme evolution and enable the resolution of outstanding issues.

5 Request to Participate in Open Floor Hearing 2

- 5.1. The Council requests to participate in Open Floor Hearing 2, on the evening of Wednesday 13 September 2023.
- 5.2. The Council will attend virtually. A virtual log-in is requested for Richard Rout, Deputy Leader and Cabinet Member for Finance and Environment [REDACTED], and Graham Gunby, National Infrastructure Planning Manager [REDACTED]. Councillor Richard Rout will speak at the Open Floor Hearing, with Graham Gunby attending without intention to speak.

6 Request to Participate in Issue Specific Hearing 1

- 6.1. The Council requests to be heard / participate in ISH1 on the scope and details of the Proposed Development, including construction activities, and the principles of the Applicant's draft Development Consent Order (dDCO).
- 6.2. The Council will attend physically and virtually. In-person, the Council will be represented by Graham Gunby, National Infrastructure Planning Manager, Michael Bedford KC, Barrister, and Emyr Thomas, Solicitor. A virtual log-in is requested for Callum Etherton, Planning Officer [REDACTED]

7 Suggested Locations for ExA Site Inspections

- 7.1. As much of the linear route consists of rural roads, the Council considers that accompanied site inspections with large groups of people will require landowner access to ensure safety whilst inspecting the locations.

- 7.2. The Council recommends that all unaccompanied / accompanied site inspections should include views of the Bramford Substation, the Cable Sealing End Compounds, and Hintlesham Hall. Particularly, these are essential locations for the public to perceive the impacts of the project on the landscape.
- 7.3. Site visits should also include other locations across the overground route that may reflect where there are concerns raised by other consultees. Namely, locations between the Dedham Vale AONB and the Stour Valley, and other sensitive locations including the Brett Valley, East Anglian School of Art, and the Box Valley.

Suggested by the Highways Authority

- 7.4. Access Routes (see attached plans in Annex A).
- 7.5. A1071 in terms of road safety Hintlesham Bends and the section between Hintlesham and Beagle Roundabout, specifically the pinch point between Burstall Bridge and Pigeon Lane.
- 7.6. Routes from the A12 to the cable corridor (A143 county boundary to Assington), B1508 (Bures to Sudbury particularly through Bures), B1070 (Holton to Hadleigh including Benton Street) noting the geometry, road width, vegetation, proximity of buildings and non-standard slip road access onto the A12.
- 7.7. Local routes along cable corridor with regard to the geometry, width, proximity of buildings, NMU facilities, and vegetation. To include Stone Street (between Boxford and Leavenheath) and the permanent accesses to Cable Sealing End Compounds (Polstead, Levington, Assington).
- 7.8. Abnormal Indivisible Load Routes from Ipswich Wet Dock (east) or West Bank to Bramford Substation via either Sproughton or Claydon noting structures at A137 Wherstead Road (Ostridge Creek), B1113 Rail and River Gipping Bridge, Great Blakenham and the water main adjacent to A1214 Tesco's, Pinewood.
- 7.9. All the above locations can be safely seen from a vehicle. The Local Highway Authority can provide an engineer to accompany the ExA if requested.

Suggested by the Public Rights of Way Team

7.10. w-289/030/0 – Hadleigh Public Footpath No. 30 (south west of Hadleigh Railway walk). The route forms part of a circular route from the railway walk to Benton Street. No diversion route is proposed.



Figure 1 – Hadleigh Public Footpath No. 30, w-289/030/0. © Crown copyright and database rights 2023 Ordnance Survey 100023395

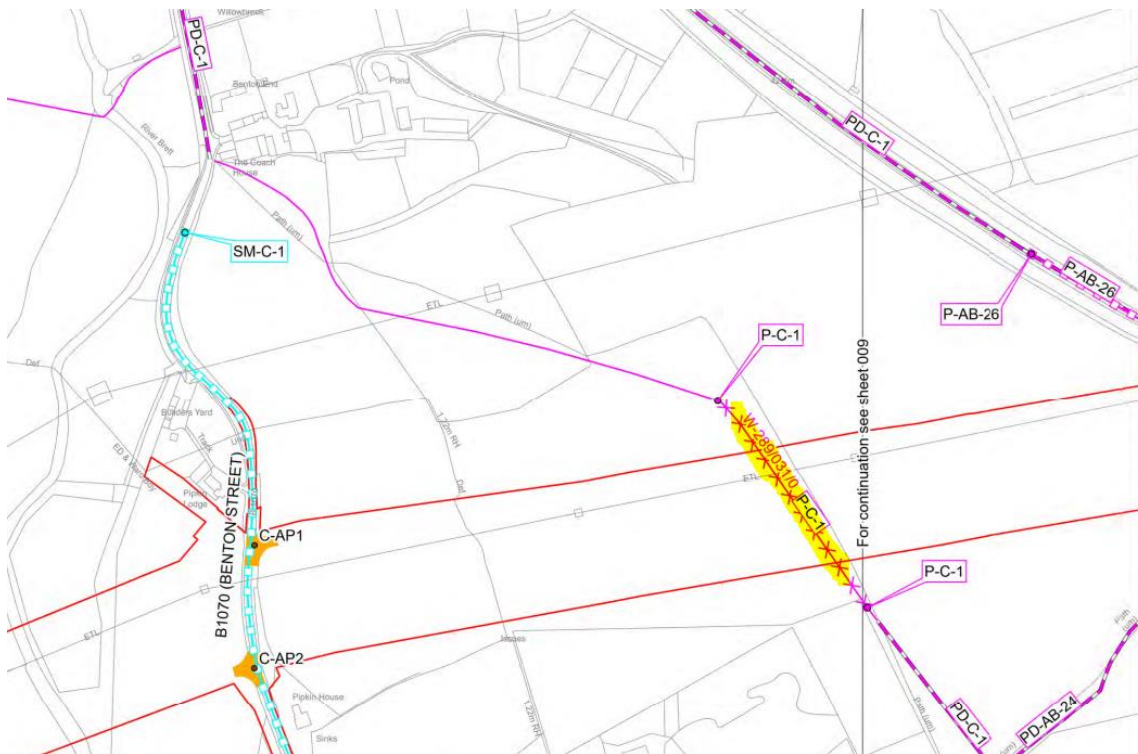


Figure 2 – Extract from Sheet 10 of Access, Rights of Way and Public Rights of Navigation Plans [APP-012]. © Crown copyright and database rights 2023 Ordnance Survey 100023395

7.11. South of Pond Hall Road / west of Clay Hill, Chattisham. Series of routes in close proximity with no diversions proposed.

- a. w-185/042/0 – Chattisham Public Footpath No. 41
- b. w-185/044/0 – Chattisham Public Footpath No. 41
- c. w-185/045/0 – Chattisham Public Footpath No. 41

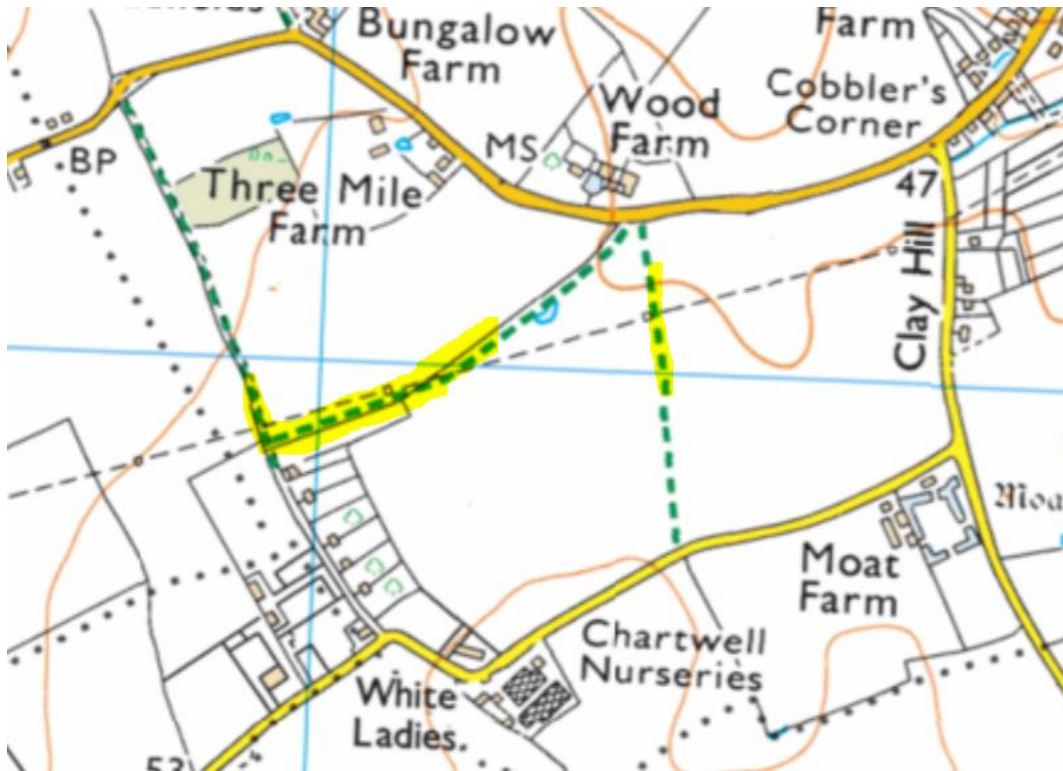


Figure 3 – Series of Public Rights of Way south of Pond Hall Road / west of Clay Hill, Chattisham. © Crown copyright and database rights 2023 Ordnance Survey 100023395

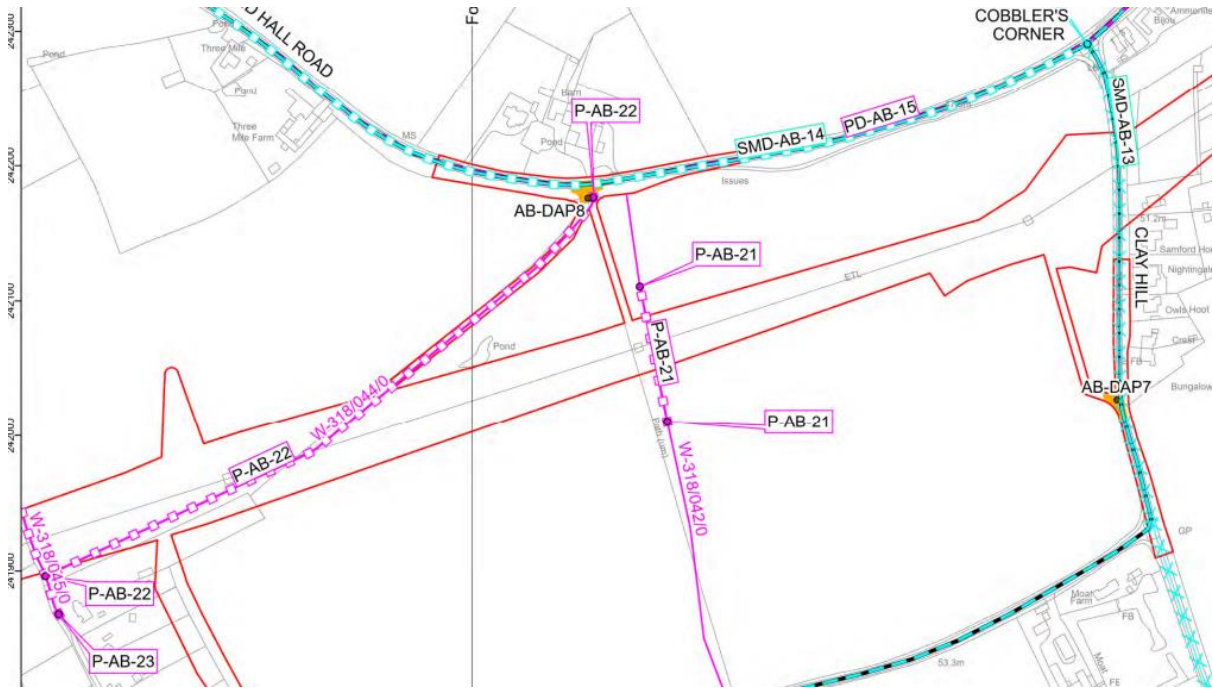


Figure 4 – Extract from Sheet 7 of Access, Rights of Way and Public Rights of Navigation Plans [APP-012]. © Crown copyright and database rights 2023 Ordnance Survey 100023395

7.12. Dorking Tye House, Bures St Mary. Key access link north of Bures Green, no diversion proposed.

- a. W-113/001/0 Assington Restricted Byway No. 1
- b. W-171/002/X Bures St Mary Restricted Byway No. 2, continuing as W-171/002/0 Bures St Mary Public Footpath No. 2



Figure 5 – Public Rights of Way by Dorking Tye House, Bures St Mary. © Crown copyright and database rights 2023 Ordnance Survey 100023395



Figure 6 – Extract from Sheet 19 of Access, Rights of Way and Public Rights of Navigation Plans [APP-012]. © Crown copyright and database rights 2023 Ordnance Survey 100023395

Suggested by the Natural Environment Team

- 7.13. Isolde Cutting, Senior Landscape Officer [REDACTED] would welcome attending any accompanied site inspections.
- 7.14. View from Tye Lane from the top half of The Channel (VP AB2.11, AB19, AB2.17, AB2.18), facing southeast towards Bramford, to perceive the impacts of the new pylons connecting into Bramford Substation on the landscape.
- 7.15. Public Right of Way to the north-western edge of Burstall, around the Walnut Tree Farm (VP AB03, AB2.11, AB2.18, AB2.19). Burstall will experience significant cumulative effects if the Norwich to Tilbury application comes forward as anticipated, with regard to Bramford to Twinstead mitigative planting would be beneficial.
- 7.16. From Hintlesham Hall and the grounds of the Hall to the north, looking back to Bramford (VP AB20, AB21, HV01, AB08, AB09, AB10, AB11, AB2.27, AB04, AB18, AB23a, AB24, view north from A1071, west of Hintlesham Hall).

- 7.17. Around the Benton End Farmhouse and Overbury Hall at Hadleigh / Brett Valley (VP C01). This location can be viewed safely from a vehicle, the area has large cultural associations with Suffolk artists alongside the heritage of these Listed Buildings. This location should be perceived to appreciate the landscape in general.
- 7.18. View of the Dedham Vale East Cable Sealing End compound from Polstead Heath (VP D02, D04). Observations should include proximity to Polstead Heath and the siting of the compound in the fields.
- 7.19. The location where undergrounding corridor crosses the Box Valley (VP E06 in the valley, E007 overlooking the AONB), this location should provide an appreciation of the nature of the valley and its sensitivity.
- 7.20. View of Stour Valley East Cable Sealing End Compound from Leavenheath.
- 7.21. Footpath to the north of the water tower, south of VP F2.14, and viewpoints of the Assington Neighbourhood Plan Protected Views (6, 12, 13, 15, 16) (VP F2.14, F20, F10). The Council advises that this location requires additional mitigation, specifically the vegetation along the footpath could be strengthened to filter the views.
- 7.22. View of the Stour Valley East Cable Sealing End Compound at Workhouse Green (VP G01).
- 7.23. Views of the Stour Valley, along Bures Road (B1508) at bus layby on Spouts Lane and Corner Twinstead Road / Moat Lane (588010, 236455 roughly) where St Edmund Way passes. Due to its high elevation, this location provides a good view into the valley and an appreciation of the overall Scheme and surrounding landscape.
- 7.24. View of the Stour Valley West Cable Sealing End Compound at Alphemstone (VP G07). The Council believes there is an omission on Photomontages 34A and 34B [APP-065], displaying VP G07 in Year 1 and Year 15, no mitigative planting is shown in Year 15 whereas [APP-106] notes that Year 15 will include mitigation. The Council will make this clear in subsequent submissions, however; this location should be viewed with an understanding of the impacts without mitigation to appreciate the need.

- 7.25. View from A131 at Wickham St Paul where the A131 passes Butler’s Wood Grid Supply Point Substation (VP G18), facing east, viewing existing pylons. If this location is effectively screened then the Council does not anticipate adverse impacts, however, the Council notes that mounding is proposed in this location.

Annex A – Access Route Plans

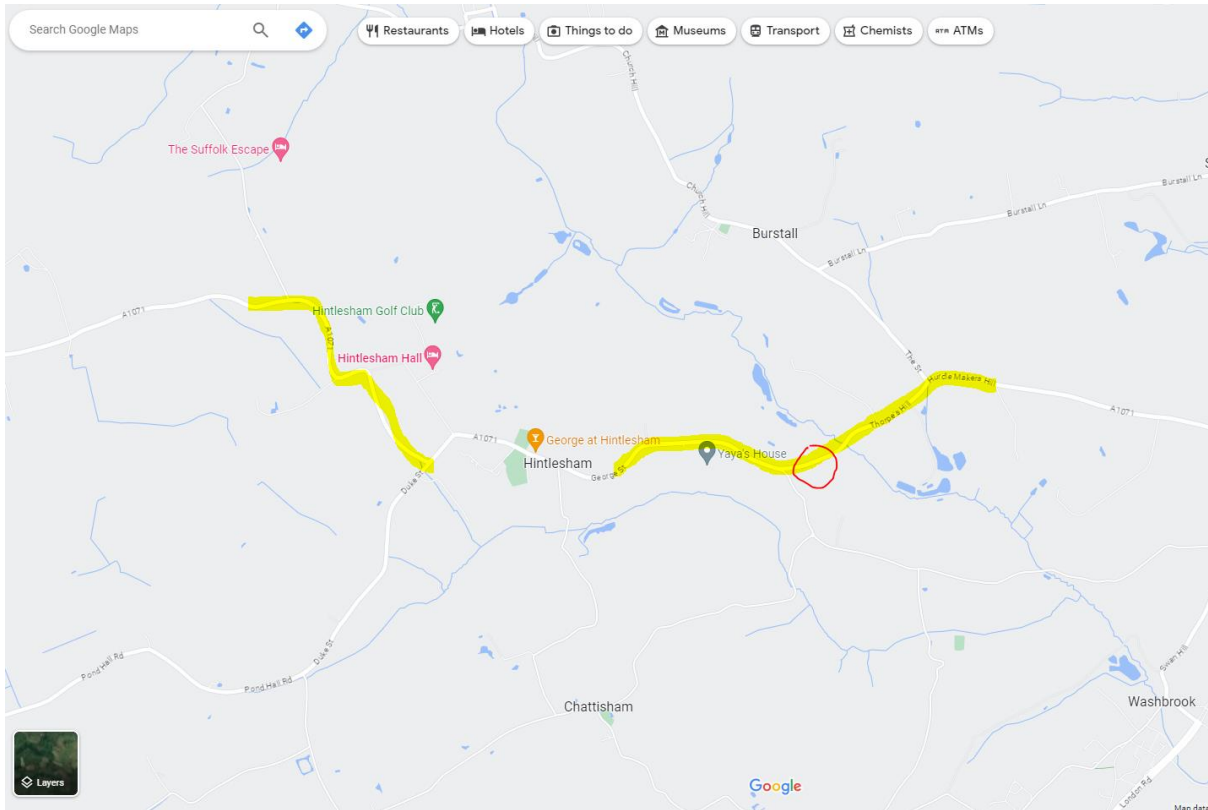


Figure A1 – A1071 east and west of Hintlesham in terms of road geometry and road safety. The area marked in red in terms of width for HGVs to pass.

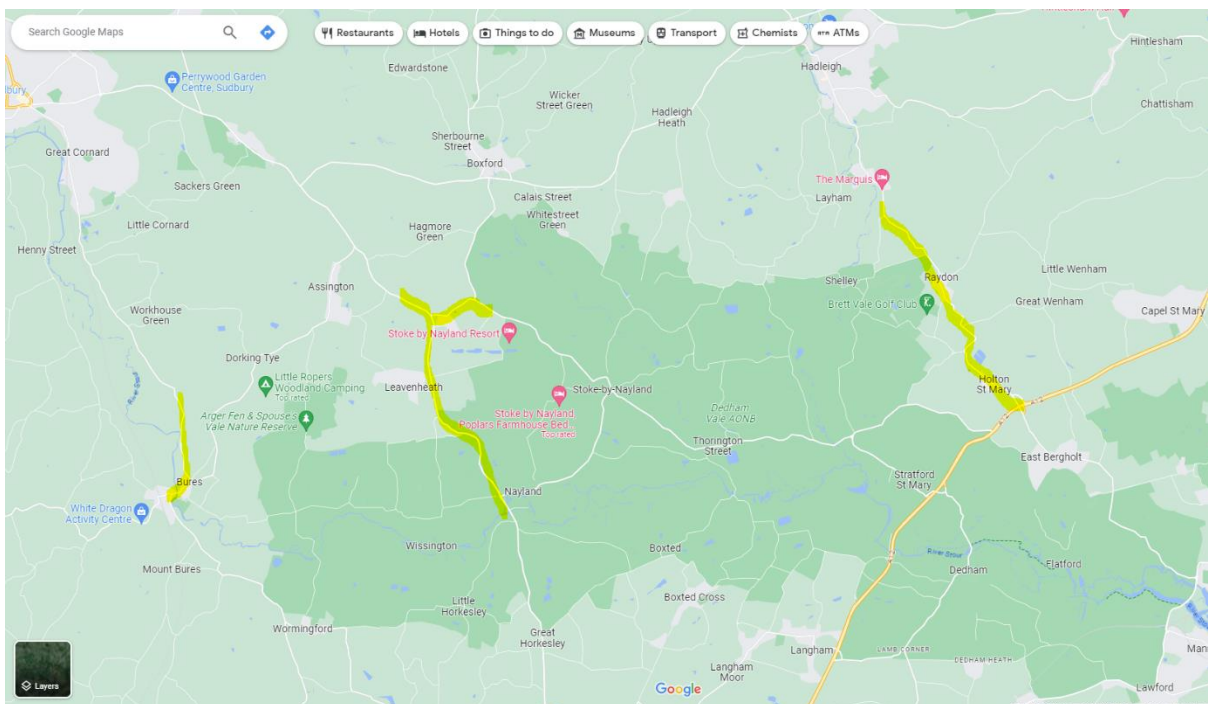


Figure A2 – Access routes from the south and east (B1508, A143 and B1).

Local Access Routes

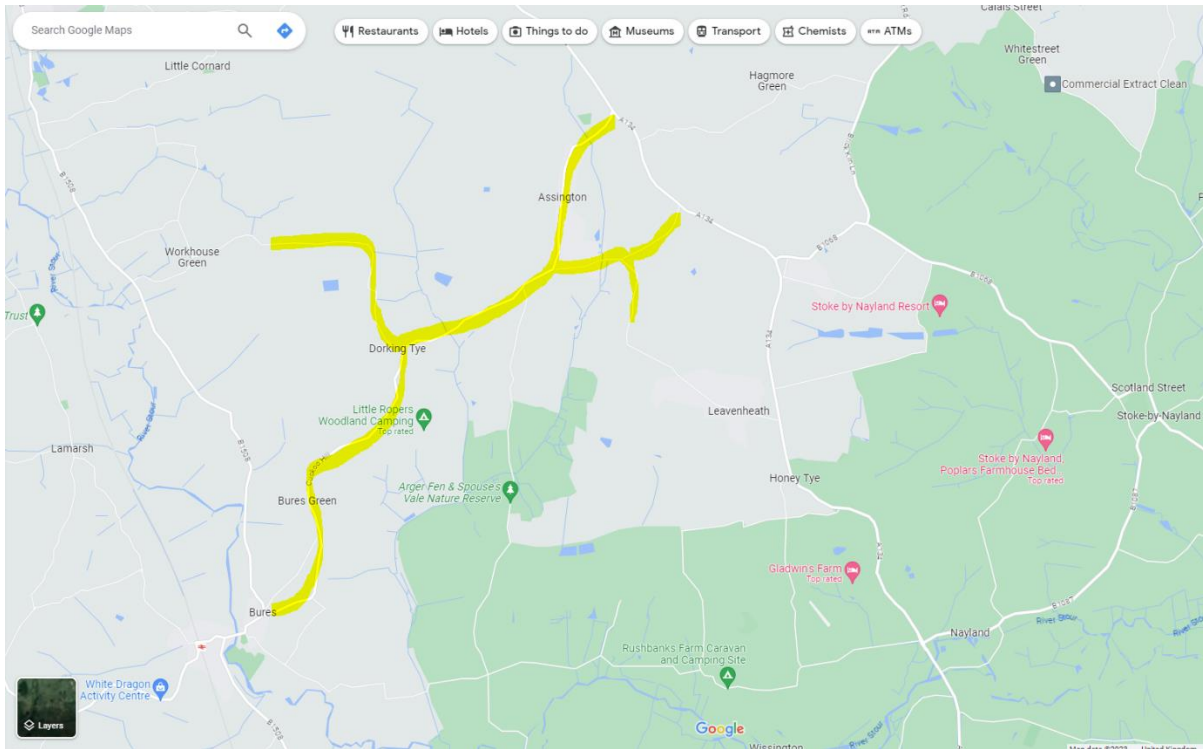


Figure A3 – Assington – Bures.

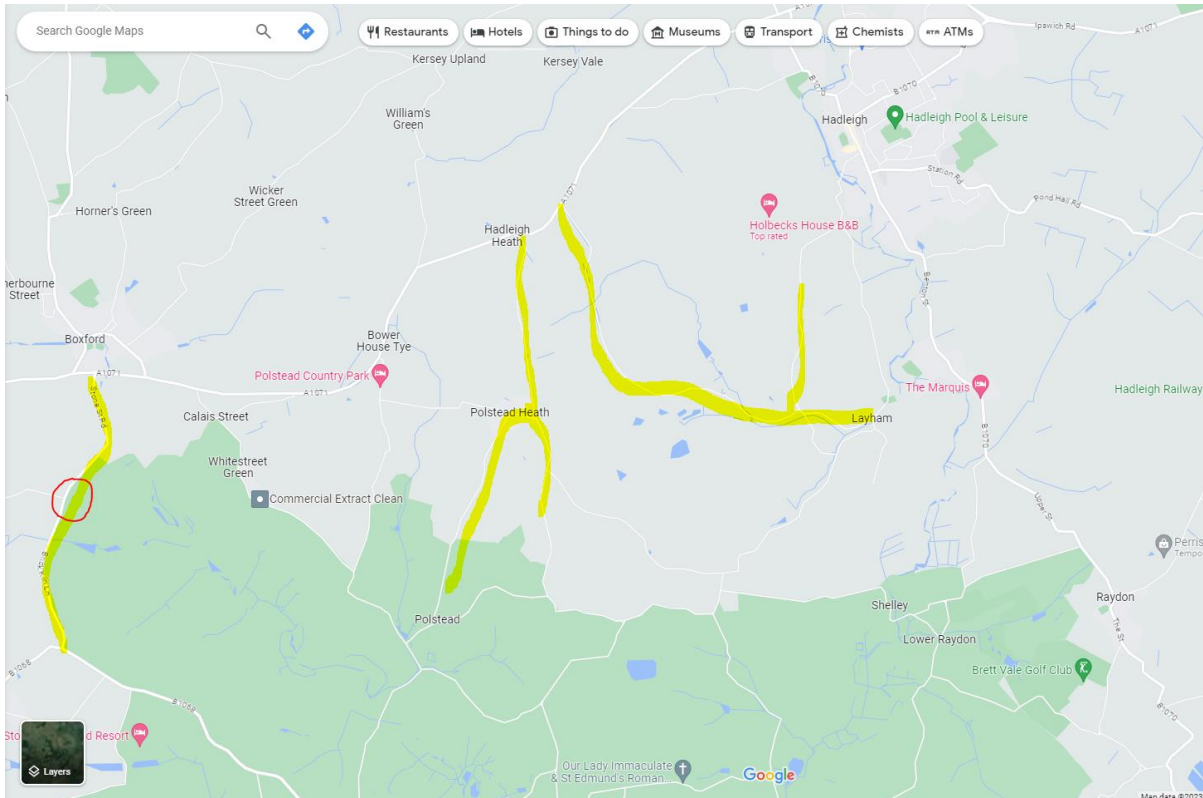


Figure A4 – Polstead – Boxford (including Stone Street circled in red).

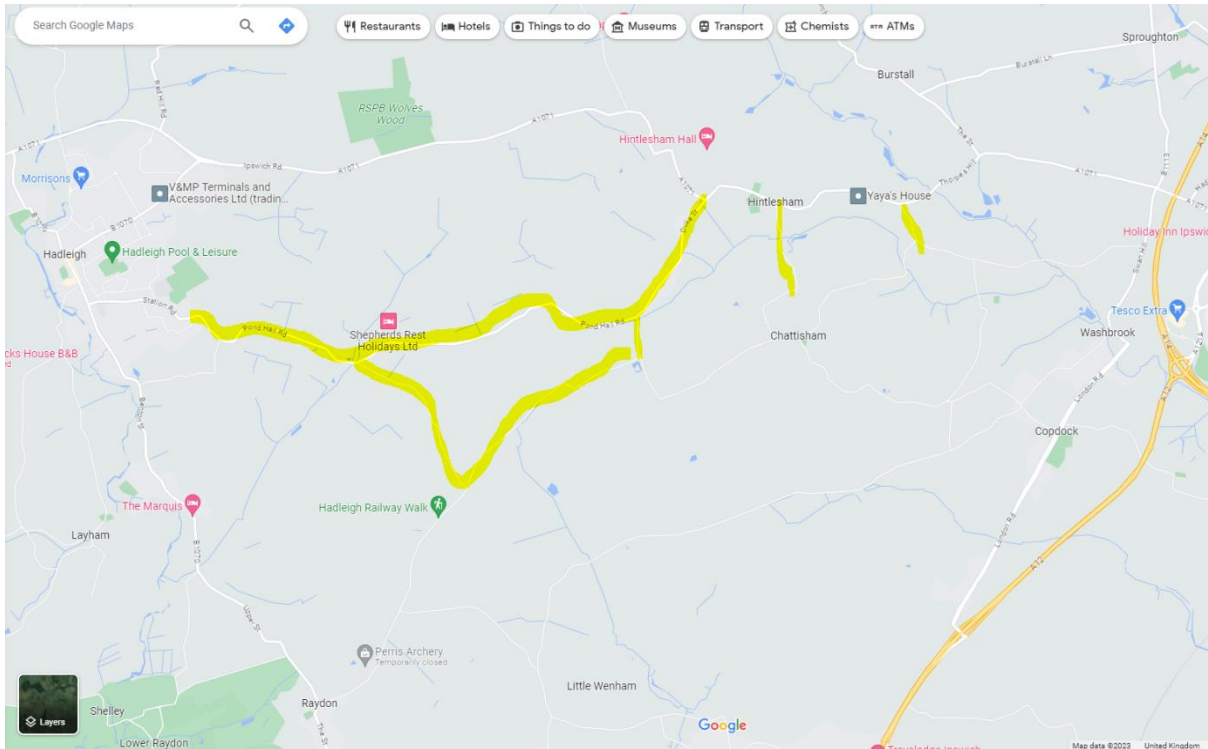


Figure A5 – Hadleigh – Chattisham – Hintlesham.

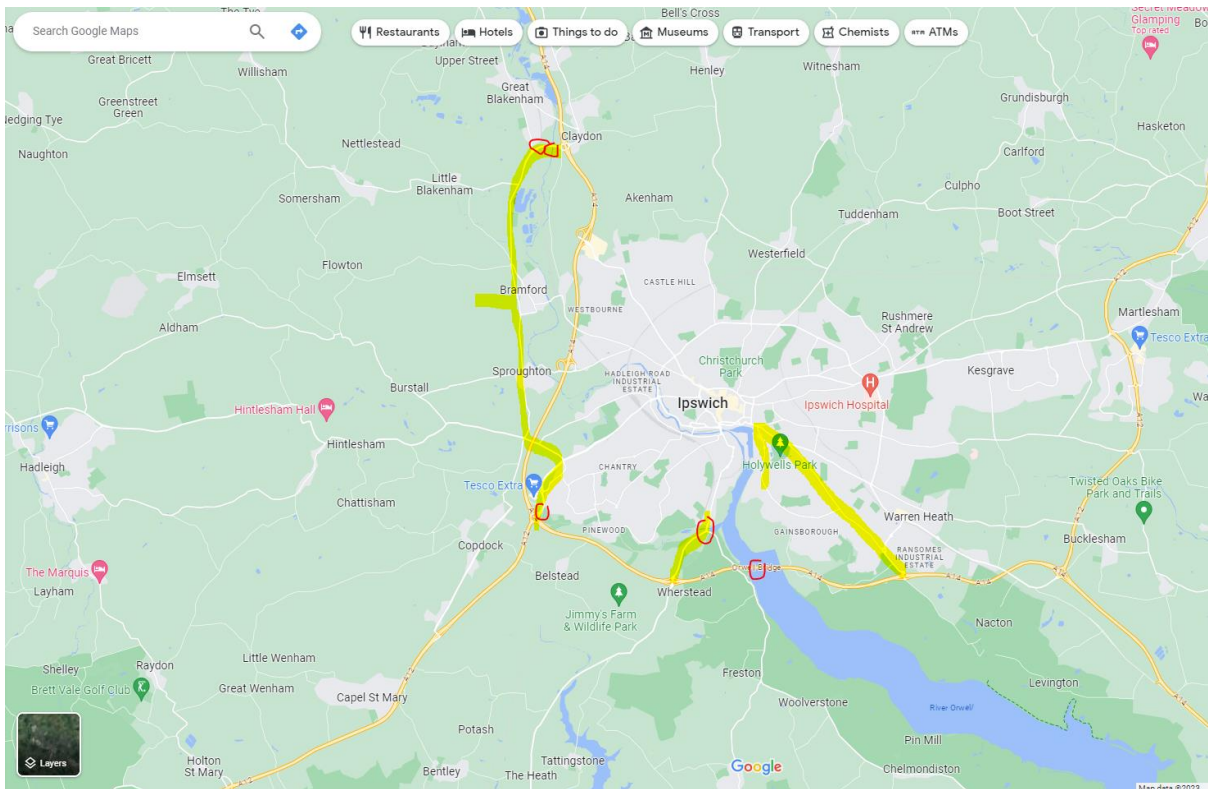


Figure A6 – Abnormal Indivisible Load Routes to Bramford Substation (structures of concern highlighted in red).