

11 October 2023

Interested party number: 20041317

BRAMFORD TO TWINSTEAD - WRITTEN REPRESENTATION

1. Introduction

The Suffolk Preservation Society (the SPS) is a non-political, independent, self-funding charity that was established in 1929. Its charitable objects are to “promote the conservation, protection and improvement of Suffolk’s physical and natural environment for the public benefit by ensuring any change is undertaken sympathetically and to the highest level of design and sustainability possible”. The Society is a member of the Suffolk Coast and Heaths AONB Partnership and also represents the CPRE, The Countryside Charity in Suffolk.

2. Summary

SPS acknowledges the imperative for the transition to a low carbon economy, the urgent need to provide renewable energy at pace and that grid infrastructure updates will be required to successfully deliver Net Zero targets. Nevertheless, in supporting the Nation’s current and future energy requirements, Suffolk is disproportionately affected in terms of the combined environmental impact of onshore infrastructure including substations, cable and new pylons routes. SPS considers that if harm cannot be avoided, it should be fully mitigated and, where this is not possible comprehensive, compensation must be made available.

With regards to the Bramford to Twinstead transmission upgrade, our primary concern is that the proposals do not go far enough to mitigate the impact of the proposals on the setting of grade I listed Hintlesham Hall and its grade II* listed ancillary buildings. More could be done to mitigate the visual impact of the proposed new infrastructure through enhanced planting. Current proposals which, at most, aim to filter views through limited hedgerow planting are inadequate and larger scale planting should be delivered.

3. Impact on Hintlesham Hall

3.1 Significance of Hintlesham Hall

Grade I Hintlesham Hall was built out of red brick in the late 1570s by Thomas Timperley on an E-plan. The building’s original appearance can be best appreciated on the south and east fronts. Significant alterations were made in 1686 by Thomas’s descendant, Henry Timperley. These included the creation of a first-floor drawing room with a plaster ceiling described by Pevsner as being ‘among the best of the late C17 anywhere in East Anglia’.

The house was further remodelled in 1720 and from 1724 by father and son Richard and Richard Powys who gave it sash windows, a rusticated ground floor (originally with an open arcade), and converted the old Elizabethan hall into a double-height Saloon. The Hall is the only Grade I listed building in Hintlesham.

An 18th century red brick service range with pedimented façade is attached to its north side, from which further ancillary buildings including the brewhouse, coach house, and the stable block, extend north westwards. These are mainly 17th century in date, but include a 16th century timber frame and 18th century extensions. All are listed Grade II*. Further west lies the site of the historic kitchen garden, now converted to use as the golf club car park, which retains its fine red brick walls.

Hintlesham Hall and its ancillary buildings are surrounded by former parkland set out in the 16th century. This undesignated landscape is now degraded and is in part converted to arable and in part in use as a golf course. It nevertheless provides an important setting for the heritage assets, free from development, and is included in the Historic Environment Record for Suffolk. There are expansive views out of the site towards the north west, west and south west in particular.

3.2 Historic Mapping:

The park is shown on Hodskinson's map of Suffolk, 1783, on which the principal north/south driveway and secondary east/west driveway can be seen clearly. The east/west driveway is shown with a formal avenue of trees planted along it.

The first edition 25" to 1 mile Ordnance Survey map (surveyed 1881) shows looser tree planting in the vicinity of the east/west driveway, scattered parkland planting surrounding the Hall on all sides, and a belt of trees ('Square Pastures') to the west and north west of the Hall delineating the boundary between the parkland and the farmed landscape beyond. This tree belt is still largely intact, but a broken tree line survives only on the north side of the east/west driveway today.

Historically the view to and from the principal front was framed by an avenue of trees across the parkland and a long vista between Hintlesham Great and Hintlesham Little Woods, as shown on the OS 6" map (surveyed 1881 to 1884). The principal front of the Hall is still a significant feature in the landscape when viewed from the Hadleigh to Ipswich Road which lies to the south west.



Hintlesham Hall's parkland setting and woodland belts. Ordnance survey 25" to 1 mile, 1st edition, surveyed 1881 (reproduced with the permission of the National Library of Scotland).



Hintlesham Hall's long avenue and vista. Ordnance survey 6" to 1 mile, 1st edition, surveyed 1881-4 (reproduced with the permission of the National Library of Scotland).

3.3 The proposed development

The proposed power lines will principally affect views from the historic core of the site towards the north west and round to the west. The tree belt historically known as Square Pastures is located to the north of the existing and proposed pylons, and will therefore not soften the landscape impact of the pylons when viewed from the vicinity of the Hall. Views south west from the principal front of the Hall are less affected as existing tree belts and areas of woodland obscure all but the tops of the pylons in the far distance.

SPS acknowledges that the existing 400kV overhead line is unsympathetic to the setting of the Hall and its ancillary buildings but is concerned that the addition of a second overhead line, considerably closer to the designated assets, will have the cumulative impact of increasing the visual intrusion.

Good Practice Advice 3 (Historic England, 2017) provides guidance on cumulative change and states that *...Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting...consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.*

Chapter 6 of the Environmental Statement Landscape and Visual concludes at 6.12.8 that *The only long term significant adverse effect for landscape character has been identified in LCA 2b Hintlesham. Within this LCA, the proposed 400kV overhead line does not follow the alignment of the existing 132kV overhead line and therefore there would be an increase in overhead line infrastructure within the landscape.* Moreover, ES Appendix 8.2 – Annex A Hintlesham Hall Assessment, concludes that Hintlesham Hall and its ancillary buildings are high value heritage assets and that the project would result in a loss of heritage significance (para 5.1.5).

SPS agrees with these findings and further agrees that the proposals would not constitute substantial harm. However, the cumulative impact and potential loss of significance resulting from the introduction of an additional 400kV pylon line is not fully recognised by the applicant and we urge that additional mitigation to reduce the impact of the proposals on these important heritage assets is delivered.

3.4 Mitigation proposals

In accordance with the Historic England guidance, this project should be viewed as an opportunity to enhance the significance of the asset. We therefore call for greater compensatory mitigation measures in terms of an enhanced planting scheme which effectively filters views of the wirescape, and we consider that the current proposed planting falls some way short of this aspiration.

There is currently very little proposed in terms of mitigation planting along the entire Bramford to Twinstead project route. The only proposed additional mitigation measure in the Hintlesham area is hedgerow planting (MM06) which aims to benefit properties along the A1071 by filtering views of the new 400kV overhead line.

The applicant has not recognised any requirement for additional mitigation planting around Hintlesham Hall. It is unclear why the area identified as MM04 is described as additional planting only which is defined as landscape softening and biodiversity compensation. A

sparse row of trees and scrub already exists on this section adjacent to the drive to the house, from the corner of the A1071 up to the house and no detailed plans are provided on how the proposals will improve on this.

There is a lack of specific details as to what this will consist of in terms of the depth and height of the planting and whether it will be restricted to hedgerow gapping or whether new trees are to be incorporated. SPS would urge for a degree of reinstatement of closely-planted trees along the east/west access track, the precedent for which is shown on the historic maps of Hintlesham Hall's parkland, in order to ameliorate the view towards the pylons north west of site and to provide a heritage benefit through the reinstatement of an historic landscape feature.

More significant and detailed measures to mitigate the heritage impact at grade I listed Hintlesham Hall should be delivered. We consider that the landscaping measures currently proposed do not go far enough to mitigate the impacts of the scheme on this grade 1 designated heritage asset and continue to call for more extensive reinstatement of parkland features adjacent to the Hall.

3.5 Limits of Deviation:

SPS is concerned that the proposed Limits of Deviation (LoD) could alter the resulting landscape and visual effects and urge that the final alignment, including the micro-siting of pylon towers in sensitive locations such as close to Hintlesham Hall, is more tightly controlled.

Where pylon positions have been previously agreed with Historic England, any changes and deviation should only be made with their agreement. The applicant argues that Hintlesham Hall and its ancillary buildings would not experience any significant change in their value, irrespective of the final alignment chosen within the LoD. This is of concern as SPS considers that the alignment of the new pylon towers, in conjunction with the existing line from particularly important viewpoints within the environs of the Hall, will be key to the resulting degree of visual impact.

We consider that the placement of the pylon towers should be agreed with Historic England at this stage to enable a reliable assessment of the visual and heritage impacts of the proposals which will not change after the DCO has been granted.

3.6 Statutory duties:

National Planning Statement EN-5: Electricity Networks Infrastructure, is relevant to the provision of mitigation in order to reduce or offset the harmful impact of electricity infrastructure development. EN-5 makes specific reference to heritage and landscape in the context of factors influencing site/route selection by applicants for electricity networks NSIPs. At para. 2.2.6 it states that as well as having duties under section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), developers will be influenced by Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders 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 ... do what [they] 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. (my emphasis).

4.0 Conclusion

In the opinion of the SPS, the cumulative impact and potential loss of significance to grade I Hintlesham Hall and its ancillary buildings resulting from the introduction of an additional 400kV pylon line within its setting is not fully recognised by the applicant. Accordingly, we urge that additional mitigation, as set out above, is provided to mitigate the impact of the proposals on these important heritage assets.