

From: [Julie Howe](#)
To: [BramfordtoTwinstead](#)
Subject: EN020002: Bramford to Twinstead Reinforcement Examining Authority's First Written Questions (ExQ1) (13 October 2023) Response from Suffolk Preservation Society (SPS) Interested party number: 20041317 Reference HE1.8.9
Date: 31 October 2023 10:33:35
Attachments: [REDACTED]

**EN020002: Bramford to Twinstead Reinforcement Examining Authority's First Written Questions (ExQ1) (13 October 2023)
Response from Suffolk Preservation Society (SPS) Interested party number: 20041317**

Good morning

Please find attached SPS comments in response to the questions raised as requested by the examining authority.

Many thanks

Julie

Julie Howe
Office Manager
Suffolk Preservation Society
Little Hall
Market Place
Lavenham
Sudbury CO10 9QZ
Tel: [REDACTED]
Email: sps@suffolksociety.org
Hours: Monday – Friday 9.30 – 1.30
www.suffolksociety.org

Have we helped? Please consider membership or a donation. We are a small charity working across Suffolk to protect the landscape and heritage of the county. We depend on membership and donations to be able to continue this work. Please see our website for more information <https://www.suffolksociety.org/donate/>
<https://www.suffolksociety.org/become-a-member/>

Suffolk Preservation Society is a Charitable Incorporated Organisation No. 1154806

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient you must not use, disseminate, forward, print, or copy this e-mail or any information contained in it. If you have received this email in error please notify sps@suffolksociety.org



Please consider the environment before printing this e-mail or its attachments

BramfordtoTwinstead@planninginspectorate.gov.uk

EN020002: Bramford to Twinstead Reinforcement Examining Authority's First Written Questions (ExQ1) (13 October 2023)

Response from Suffolk Preservation Society (SPS) Interested party number: 20041317

Reference HE1.8.9

A number of parties have raised issues in relation to effects on the Grade I listed Hintlesham Hall and the associated listed buildings. The Applicant's proposals here are said to be based on the micro-siting of towers agreed with Historic England prior to the project being put on hold in 2013, but the proposed Limits of Deviation proposed would allow pylons to vary from the indicative agreed positions.

Do you consider this approach acceptable in the area within the setting of Hintlesham Hall?

SPS Response: The Suffolk Preservation Society is happy that the applicant has, and continues to, work closely with Historic England regarding the micro-siting of the pylon towers which are to be located within the setting of Hintlesham Hall and Park. This is vital in order to ameliorate the impact of the transmission infrastructure on these highly graded heritage assets. However, we are concerned that the final siting of the pylons cannot be confirmed due to the limits of deviation (LoD) which equates to approx. 110m in width, and consider that the assessment of heritage impact is therefore unreliable. We call for a tighter LoD, and the detailed locations of the pylons to be agreed between the applicant and Historic England prior to consent being given.

Are there any implications in relation to avoidable harm to Hintlesham Hall?

SPS Response: Careful micro-siting of the pylon towers will reduce the degree of visual harm that the new line of pylons will have in concert with those existing in the landscape. The cumulative visual appearance of the resulting wirescape must be taken into account from the most sensitive viewpoints. This will vary depending on how the existing and additional pylons are viewed together. The LoD may result in alterations to the siting of the pylons at a later date which has the potential to cause greater visual impact within the setting of these highly graded heritage assets.

Can you confirm if there is a specific area, component or extent of the proposed Limits of Deviation that is of concern, and any harm you consider could arise.

SPS Response: The area that causes SPS the greatest concern is between the designated heritage assets and the existing 400kV power line 310m to the north of Hintlesham Hall. This area has been converted from parkland to arable land and contains the existing 400kV overhead line. Nevertheless, through its open character to the woodland on its northern boundary the area contributes to the appreciation and understanding of Hintlesham Hall in its original more extensive parkland setting.

Should any changes or deviation be restricted to those agreed by the relevant local planning authority and Historic England?

SPS Response: Yes.

Paragraph 8.11.6 of the ES [APP-076] addresses the sensitivity testing that was carried out in relation to pylon locations and alignment and concludes that, 'the pylons could be located anywhere within the parameters of the LoD (including the vertical LoD) without resulting in significant effects to heritage assets.'

Do you agree with this conclusion?

SPS Response: SPS disagrees with this conclusion. Whilst the setting of the heritage assets is already compromised due to the presence of transmission infrastructure 310m away, introducing a new 400kV overhead line and pylons in closer proximity to Hintlesham Hall and ancillary buildings will impact the experience of these assets. The degree of impact will vary according to the proximity of the new infrastructure and alignment of existing and new pylons.

Given the LoD, SPS does not consider that the worst-case scenario for the impact of the new pylons and wirescape on Hintlesham Hall and Park has been demonstrated and we strongly suggest that the worst-case scenario is illustrated within the submission to fully understand the impact of the proposals.

Reference HE1.8.10

Noting that nearby locations and slightly different angles of view might introduce one or more of the proposed new pylons into the visualisation in addition to the new overhead lines, is the location of viewpoint HV01 [APP-063] reasonably representative of the full range of potential impacts on the listed buildings at the Hintlesham Hall estate, including their setting?

SPS Response: SPS considers that the viewpoint HV01 and visualisation 05 does not adequately illustrate the potential impact of the proposals. A single viewpoint is not representative of the full range of potential impacts on the setting of the heritage assets. Receptors which include those visiting the hotel and golf club are not fixed in one viewing position and will have a kinetic experience taking in a series of views of the new transmission infrastructure from a number of viewpoints when moving around the heritage assets.

At viewpoint HV01 there is a sparse hedgerow/ tree line between receptors and the direction of view of the current and proposed transmission lines. A site visit demonstrates that the existing infrastructure is highly prominent within the landscape in this area and that the visualisation from HV01 understates this impact. The proposed overhead line would run parallel to the existing overhead line, at least 85m away, and therefore closer to this viewpoint.

Moving in either direction from HV01, along the access tracks to the north of the Hall and around stable buildings, affords even clearer views through to the application site area due to the varying degrees of planted screening. For this reason, SPS has asked for more details as well as a greater degree of planted mitigation including the reinstatement of an avenue of trees along the access track from the A1071.

On this basis, is the assessment set out in the Hintlesham Hall Assessment [APP-128] a reasonable worst case?

SPS Response: Given the LoD, SPS does not consider that the worst-case scenario for the impact of the new pylons and wirescape on Hintlesham Hall and Park has been demonstrated.

Assessments within the report are carried out according to the proposed pylon line being located centrally within the LoD (para 4.2.1). Para 4.2.4 however, states that the line could be anywhere between 35m and 135m closer than the existing line to the grade II* listed stable buildings (and para. 3.3.2 states that the new line needs to be located at least 85m away from existing infrastructure).

If the new 400kV overhead line is closer to the Hall and its ancillary buildings, or the pylon location changes within the LoD, the degree of impact on the setting of Hintlesham Hall and its ancillary buildings will change. The assessment does not evaluate the worst-case scenario, simply stating that this change in impact will be marginal (para 4.4.2).

The setting of a heritage asset is not restricted to intervisibility and includes how an asset is experienced (Historic England Good Practice Advice Note 3 The Setting of Heritage Assets 2017). In addition to the visual impact, the introduction of additional intrusive electricity infrastructure into the setting of the hotel will impact the experience of those visiting and enjoying the setting of these highly graded assets.