

Date: 01 December 2023  
Our ref: 458767  
Your ref: EN020002/20041359

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**BY EMAIL ONLY**

Dear Sir/Madam

**NSIP Reference Name / Code: National Grid: Bramford to Twinstead Reinforcement / EN020002  
Registration Identification Number: 20041359**

**Title: Natural England's Comments on Document 8.5.12: Technical Note on Ancient and Potential Ancient Woodland and Issue Specific Hearing 4, Action Point One (Table 5.1) of Document 8.6.3: Applicant's Response to the November Hearings Action Points (CAH1, ISH2, ISH3, ISH4).**

**Examining Authority's submission deadline 5: 1 December 2023.**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

For any further advice on this consultation please contact the case officer Emma Hurrell and copy to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Emma Hurrell, Lead Adviser, Norfolk and Suffolk Area Team



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## **1) Purpose**

- 1.1. This letter is to provide clarity on Natural England's outstanding matters in relation to impacts to Hintlesham Woods Site of Special Scientific Interest (SSSI) lowland deciduous woodland interest feature, which is an ancient woodland, as well as other ancient woodland sites including Bushy Park Wood, Butler's Wood and Waldegrave Wood, which are also County Wildlife Sites. Natural England has previously made comment in our Relevant Representations (dated 18 July 2023, our ref: 437197), Written Representations (dated 11 October 2023, our ref: 450715) and in our Statement of Common Ground (dated 30 October 2023).
- 1.2. The Applicant has provided document 8.5.12: Technical Note on Ancient and Potential Ancient Woodland (October 2023) (further referred to as the 'technical note'), which was submitted by the Applicant at deadline 3 (31 October 2023) and has been produced, "*to provide supporting information to further explain the proposed works at each location and to identify the need for any additional measures to reduce impacts on ancient or potential ancient woodland set out in Table 6.1 of the LEMP (document 7.8 (B)) in more detail.*" (p1). The Applicant also made comment on the coppiced swathe through Hintlesham Woods SSSI at Issue Specific Hearing 4 (9 November 2023), which they have provided a response to in document 8.6.3: Applicant's Response to the November Hearings Action Points (CAH1, ISH2, ISH3, ISH4). Natural England has now reviewed these documents (for the second document, specifically the response to AP1 in table 5.1) and provides the following comments.

## **2) Comments on the technical note**

- 2.1. Natural England still advise that further consideration is given to the application of the Standing Advice for ancient woodland, ancient trees and veteran trees<sup>1</sup> (further referred to as 'Standing Advice'). As stated in our Relevant Representations (which remained our position in our Written Representation), "*the standing advice is not simply a buffer to protect the roots, it is a buffer to protect the woods and their ecology as a whole. Consideration should be given to the increased exposure to external pollution sources, protection of the canopy extending beyond the boundary, light pollution, dust pollution and changes to hydrology affecting the wood*" (pp 44-45).
- 2.2. Having reviewed the technical note, it is still considered that the standing advice has not been adequately applied. More weight has been given to the Standing Advice concerning the buffer zone around the minimum area being for root protection, however, not enough consideration has been given to the preferred habitat of which the buffer zone should consist. Natural England advise the Applicant to refer to the Standing Advice 'Buffer zone recommendations,' which states, "*A buffer zone should consist of semi-natural habitats such as woodland and/or a mix of scrub, grassland, heathland and wetland. The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.*"

## **3) Hintlesham Woods SSSI**

- 3.1. It is acknowledged that the Applicant proposes a further commitment at Keeble's Grove, which is part of Hintlesham Woods SSSI, that it will, "*not be topsoil stripped in order to avoid impacts to the root protection area of this woodland.*" The soil is a key part of the woodland ecology and topsoil stripping of any ancient woodland should be consider as loss or damage. It is important to emphasise that driving vehicles within the buffer zone should also be avoided. As stated in paragraph 2.5.2 and illustrated in Fig. 2.5 of the technical note, a temporary access route will run adjacent to Keeble's Grove and it is not clear what distance this is from the woodland edge. Natural England would advise that a buffer zone, as described in the Standing Advice, should be applied to avoid compaction of the soil.

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<sup>1</sup> Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (Natural England & Forestry Commission, January 2022) - Available at <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

- 3.2. With regards to Wolves Wood (also part of Hintlesham Woods SSSI), paragraph 2.4.2 states, *“Although the Order Limits lie within 15m of the wood, the only works associated with the project are the instruction of a bellmouth to access the field to the south of the A1071. The bellmouth lies to the south of the road, the road would therefore provide a buffer between the proposed works at the bellmouth and Wolves Wood.”* Natural England advise that the road doesn’t provide a buffer. The road itself means that there is already a compaction zone causing below ground impacts. It is important to note that a buffer zone following our standing advice would also prevent above ground impacts. Consideration should be given to the habitat that could be provided within the buffer zone, above ground (as detailed in paragraph 2.2. of this letter).
- 3.3. In Natural England’s Relevant Representations, we asked for clarity on the need for hand digging/vacuum excavation at Hintlesham Little Wood (part of Hintlesham Woods SSSI). Natural England welcomes the Applicant’s comments in paragraph 2.2.9. of the technical note, which states, *“no excavation works are proposed within 15m of Hintlesham Little Wood.”* Again, Natural England reiterates the need to apply the Standing Advice, with 15m being the minimum buffer zone required, dependant on other factors.

#### **4) Butlers Wood and Waldergrave Wood**

- 4.1. Information provided in Table 6.1 of the Document 7.8: Landscape and Ecological Management Plan (April 2023) implies that no impact is anticipated at Butler’s Wood and Waldergrave Wood due to their distance from works or other features. However, the technical note does not make this clear as no distance is provided from either wood to the substation and therefore it is unknown if the works will be within the minimum distance 15 metre buffer zone. Paragraph 2.11.7 states, *“Both woodlands are bordered by a ditch in excess of 1m depth therefore groundworks within 15m of ancient woodland will not cause tree root damage.”* As advised in our comments on Wolves Woods with regards to roads, the ditch does not provide a buffer and consideration should be given to above ground impacts. The placement of a substation between the two woods will result in the ecology of the wood becoming less functionally connected. Natural England advise that the Applicant review their implementation of the mitigation hierarchy for Butler’s Wood and Waldegrave Wood.
- 4.2. The technical note has made reference to pruning to maintain operational maintenance. This is still considered an impact on the trees and therefore on the woodland feature. Natural England would advise that this is given further consideration by the Applicant and to review their implementation of the mitigation hierarchy.

#### **5) Hintlesham Woods (PoAWS05)**

- 5.1. As stated in Natural England’s Relevant Representations, we welcome the Applicant’s decision to consider potential ancient woodland as ancient woodland and to implement the mitigation hierarchy in the same way. However, having reviewed the information provided on works at PoAWS05, Natural England advise that this has not been acceptably implemented. Planned works at this site include cutting a 5m gap, which includes root removal. It is Natural England’s advice that this is considered a loss or damage, and the implementation of the mitigation hierarchy should be reviewed.

#### **6) Further General Comments on the Technical Note**

- 6.1. For reference, Natural England notes that the technical note consistently refers to “designated ancient woodland.” It is advised that it is sufficient to describe it as “ancient woodland” or “ancient woodland included on the inventory”. The term “designated” can be misleading because it has no statutory designation, and hence can be confused with “designated sites” by which, we would be referring to SSSIs.

- 6.2. Natural England welcomes the relocation of the pylon line away from Tom's/Broadoak Wood. We would still advise that the Standing Advice is applied to the works to remove the existing 132kV pylons.
- 6.3. Natural England has consistently referred the Applicant to the Standing Advice to highlight that 15m from the boundary of ancient woodland should be considered a **minimum** buffer zone distance. As detailed in the standing advice, "*Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.*" Natural England advise further consideration should be given to these other factors. It is a concern that Natural England's Standing Advice including the minimum 15m buffer zone, may not have been considered sufficiently when determining the project route, as indicated by the works at the ancient woodland sites discussed above. For example, is it possible that the siting of the proposed substation located between Butlers Wood and Waldergrave Wood County Wildlife Site could have avoided works within the minimum 15m buffer zone or impacts to functional connectivity between the two woodlands?

**7) Comments on Action Point 1 of Table 5 in document 8.6.3: Applicant's Response to the November Hearings Action Points (CAH1, ISH2, ISH3, ISH4)**

- 7.1. Natural England welcomes confirmation from the Applicant in their response to Action Point 1 of Table 5.1 that the works and ongoing maintenance at Hintlesham Woods SSSI will not extend beyond the existing maintenance swathe. Natural England would welcome the addition of this commitment to the Landscape and Ecological Management Plan, including details of how it will be assured that works will not stray beyond the existing managed swathe, which was discussed with the Applicant in a meeting on 22 November 2023.