



## **Suffolk County Council (20041323)**

Additional Evidence relating to the  
Landscape and Ecological Management Plan

## **Bramford to Twinstead (EN020002)**

Deadline 6

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## Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Orders</i>
<i>DVNLSVP</i>	<i>Dedham Vale National Landscape and Stour Valley Partnership</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ExQ</i>	<i>Examining Authority's Written Questions</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>LHA</i>	<i>Local Highway Authority</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SuDS</i>	<i>Sustainable Drainage Systems</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 provide additional evidence relating to the Landscape and Ecological Management Plan (LEMP) **[REP3-035]** and associated documents to evidence why, in their current iterations, they are not fit for purpose as control documents. Associated documents include:

- LEMP Appendix A Vegetation Retention and Removal Plan **[APP-183]**
- LEMP Appendix B Vegetation Reinstatement Plan **[REP3-036]**
- LEMP Appendix C Planting Schedules **[APP-185]**
- Arboricultural Impact Assessment **[REP1-011]**
- Important Hedgerows Assessment **[APP-115]**

This document should be read as an addition to the Host Authorities' Landscape and Ecological Management Plan Document Review **[REP5-035]**.

# 1 Additional Evidence relating to the Landscape and Ecological Management Plan and associated documents

- 1.1 The information provided on the Vegetation Retention and Removal Plan, Vegetation Reinstatement Plan, and Arboricultural Impact Assessment Tree Constraints Plan is not consistent, and therefore not reliable, between the various documents. Examples include:
- 1.1.a H-AB-054 (shown on Vegetation Reinstatement Plan, Sheet 01 and Sheet 02, label on Sheet 01) is listed in the Important Hedgerows Assessment as Important (number of woody species unknown), is shown to be completely removed on the Vegetation Retention and Removal Plan, but on the Reinstatement Plan, it is shown as partly replanted with 'H1 Hedgerow mix planting' and partly as 'Existing retained hedgerow or line of trees'. In the immediate vicinity of Hedge H-AB-054 are several other hedges, to which the same applies, however, they do not appear to have been identified, i.e. there are labels neither on the Vegetation Retention and Removal Plan nor the Vegetation Reinstatement Plan.
  - 1.1.b Both the Vegetation Retention and Removal Plan and the Vegetation Reinstatement Plan show a tree (Sheet 02, near H-AB-048) as requiring pruning and then being allowed to regrow naturally. This tree is not shown in Figure 1 Results of Arboriculture Survey (Sheet 1).
  - 1.1.c Nearby on Figure 1 Results of Arboriculture Survey (Sheet 1) is G1025, a group shown as Category U. It extends across the south-eastern corridor and further along the river up unto the north-western corridor. (It is not listed in Table A2 – Tree Group Data, also see comments below). It does not extend across the north-western corridor. However, the Vegetation Retention and Removal Plan shows 'Woodland/group of trees to be pruned' in that north-western corridor. The Vegetation Reinstatement Plan shows this group as 'Existing retained woodland'. As there is no definition of 'pruning' and what this might entail, the landscape and visual effects are difficult to understand.
  - 1.1.d The woodland/group in the south-eastern corridor is identified as wf1 (blue label EM-AB08 on Vegetation Retention and Removal Plan, Sheet 02). As the Arboricultural Survey identified this as Category U, it would be expected that this woodland would benefit from positive

management. Instead, the Vegetation Reinstatement Plan shows the majority of it as 'Existing retained woodland' (where pruning would have taken place) with a small strip in the middle earmarked for 'Proposed natural regeneration of woodland' (of coppiced areas). The LEMP contains no detailed prescriptions of how this natural regeneration will be achieved, except a reference to guidance from Flora Locale (2022), and a paragraph on soil management that would be counter-productive (paragraphs LEMP 8.4.10 -8.4.12).

- 1.1.e Several trees and groups (all Category C) around Burstall Bridge, as shown in Figure 1 Results of Arboriculture Survey (Sheet 2) are not shown on the Vegetation Retention and Removal Plan (Sheet 04) (G1054, G1057, G1060, G1062, T8 and T11).
- 1.1.f G1088 (Category B) is shown in Figure 1 Results of Arboriculture Survey (Sheet 2), but not on Vegetation Retention and Removal Plan (Sheet 05), although Table A2 - Tree Group Data does earmark it for retention.
- 1.1.g EM-P09 (blue label) on Vegetation Retention and Removal Plan (Sheet 05) indicates wet woodland (w1d) to be retained; it does not show the full extent of the woodland, which can be seen in Figure 1 Results of Arboriculture Survey (Sheet 2), as G1089 (Category C).
- 1.1.h In the Brett Valley (Vegetation Retention and Removal Plan (Sheet 10) vegetation is shown on either side of Layham Road, where it falls within the DCO boundary. The eastern hedge (H-C-03) consists predominantly of hawthorn, interspersed with the occasional field maple, dogwood and sloe (1 No. observed). West of Layham Road is a line of young trees on an embankment, which include oak, lime, ash. These trees are identified on the Vegetation Retention and Removal Plan (some for coppicing), but not in the Arboricultural Survey. A mature oak tree further south (outside the DCO area) is also present along this road.
- 1.2 The Arboricultural Impact Assessment is incomplete and inconsistent within itself (i.e. the Tree Constraints Plan is not consistent with the Tree Survey Schedule (i.e. some trees and groups shown on the plan are not listed in the schedule)).
  - 1.2.a T1, T3, G1004, G1007, G1003, G1006, etc. are not listed in the Tree survey Schedule but are shown on the Vegetation Retention and Removal Plan (G1003 and G1006 being H-AB-059)
  - 1.2.b It appears that Table A1 – Tree Data and Table A2 - Tree Group Data only list Categories A and B, but not C and D. No rationale for

this could be found. Paragraph 1.2.1 states: *The purpose of this AIA is to identify the trees which may be affected by the project, and to provide information on their locations, quantity, and quality. The information on tree constraints has informed the design development process.*

- 1.2.c Paragraph 2.2.6 states: *An arboricultural survey has been undertaken of all qualifying tree and group features but with limited data collection of low and very low-quality features.*
- 1.2.d It is therefore not clear, why the identified 371 Category C trees, 630 Category C Groups, 23 Category U trees and 27 Category U Groups (see Table 3.1 – Summary of Arboricultural Features) are not listed at all in Table A1 – Tree data and Table A2 - Tree Group Data.
- 1.2.e G1023 at Rose Cottage, Church Hill, Burstall, consists if a hedgerow with four to five mature oaks, which are specimen trees and should not be classed as a group. Not all trees/ not all of the hedge in this location have been assessed, despite the DCO boundary exting further south. The Vegetation Retention and Removal Plan indicates coppicing and pruning in this area. This would result in detrimental effects of the oaks. There is a further mature oak just south of the DCO boundary.
- 1.3 The Arboricultural Impact Assessment does not include a Tree Protection Plan, showing Root Protection Areas (RPAs) and Tree Protection Fencing and no Arboricultural Method Statement. It is therefore a Preliminary Arboricultural Impact Assessment. The scale of the Figure 1 Results of Arboriculture Survey of 1:10,000 would be too coarse to show these and it is not clear why Figure 1 Results of Arboriculture Survey is not presented at the same scale as the Appendices A and B of the LEMP at 1:2,500.
- 1.4 The Vegetation Reinstatement Plan has an inaccuracy in the key (regarding hedgerow planting).
  - 1.4.a Key: the difference between H1 Hedgerow mix planting (purple) and H1 Hedgerow planting (green) is unclear and does not correspond with the Appendix C Planting Schedules); the second (green) entry may be surplus.
  - 1.4.b The colour coding for various hedges and for 'Natural regrowth of pruned trees' vs 'T1 Individual tree planting' is very difficult to decipher.
  - 1.4.c Important hedgerows are not made visible in the plan. The Important Hedgerows Assessment has to be consulted.

- 1.4.d At the Dedham Vale East CSE compound, hedges H-D-06 and H-D-07 (both ‘important’ under the 1997 Hedgerow Regulations) are earmarked for reinforcement. It is not clear from the plan whether this is to be planted within the existing hedges or if an additional hedge would be planted on the field side of the existing hedges. Further, this reinforcement, although welcome in principle, may not be possible to achieve, if the access to CSE compound is to be maintained permanently in the location currently shown. There is concern that, if the access is retained in the currently proposed location, a substantial length of hedge would be lost to visibility splays.
- 1.5 The LEMP does not provide comprehensive definitions, actions and prescriptions. Likewise, the plans do not clearly indicate where relevant information can be found within the LEMP or other relevant documents. Examples include:
- 1.5.a Definitions
- 1.5.a.1 It is not explained in the LEMP what MM stands for;
- 1.5.a.2 The terms ‘pruning’ and ‘coppicing’, and the differences between them are not explained neither for trees nor for hedges, which could be quite different. At what point does a pruned tree become a pollard or a coppiced tree?
- 1.5.b Actions and prescriptions
- 1.5.b.1 EM-AB08 (blue label on Vegetation retention and Removal plan, Sheet 02) states: No root removal along the temporary access route would be undertaken through w1f - Lowland mixed deciduous woodland (Priority Habitat) (Polygon ID HL\_262), located within Section AB: Bramford Substation/Hintlesham, from approximate X, Y 608910, 244710 to 608851, 244685.
- 1.5.b.2 The LEMP lists this same information in its table Table 6.4 – Embedded Measures Relevant to the LEMP without expanding on how this will be achieved or providing a link where such information can be found. There is no expansion in the LEMP on ‘w1f – Lowland mixed deciduous woodland (Priority Habitat)’.
- 1.5.b.3 The same is true for EM-P09 (blue label on Vegetation retention and Removal plan, Sheet 05)
- 1.5.b.4 There is no prescription in LEMP for MM09, a mitigation area to the north of Hintlesham Woods.

- 1.5.b.5 MM01 is not referenced in LEMP.
- 1.5.b.6 No difference in management is provided for Important Hedgerows.
- 1.5.c The labels on the Vegetation Reinstatement Plan do not contain any references to where further information and instructions can be found in the LEMP.
- 1.6 Information with regards to Important Hedgerows gets lost from the Vegetation Retention and Removal Plan when these hedges are affected by the works (as this information is overlaid); no distinction is then made between Important and non-important hedgerows; information must be retrieved from the Important Hedgerows Assessment. The current version of the LEMP contains no specific actions for the protection or reinstatement of Important Hedges.
  - 1.6.a Example: Sheet 1, H-AB-018 (important hedge), and H-AB-064 (non-important hedge) are both shown as 'Hedgerow/Line of trees to be pruned.
- 1.7 Even where hedges are identified as important, information about the species contained within the hedge are not available for many hedges, yet Hedge mix H1 is considered appropriate to be specified for reinstatement.
  - 1.7.a Example: H-AB-058: The table in the Important Hedgerows Assessment does not provide the species occurring in this hedge or how many different species do occur; however, it is assumed that Hedgerow Mix H1 will be suitable for reinstatement in this location.
  - 1.7.b It is considered that the hedgerow mix needs to be fine-tuned to individual locations, as the composition of the hedges throughout the DCO area varies considerably and an out of place hedge mix could result in a long-term visual reminder of the works carried out.
- 1.8 Opportunities for additional mitigation are being missed.
  - 1.8.a For example, along PRow w-174/011/0, between Churchill, Burstall, and H-AB071 (Sheet 02 Vegetation Retention and Removal Plan), the hedge should be extended to the road to afford additional visual mitigation for views towards Bramford substation.
  - 1.8.b At Hintlesham Golf Club the existing hedge at LOT-AB-14 (Sheet 03 Vegetation Retention and Removal Plan) should be strengthened and gapped up and then be continued south-eastwards on the eastern side of the exiting track to connect to the woodland.
- 1.9 In summary, SCC (Landscape) considers that the LEMP in its current form is

incomplete and inconsistent, which makes it unreliable. The information that the LEMP should provide an easy-to-follow format to enable easy reference on-site during implementation. This is not the case as several documents (not all part of the LEMP) have to be consulted to obtain relevant information.

- 1.10 The conclusion is that the LEMP in its current format is not fit for the purpose of serving as a final control document.