

1. Objection to the Scheme

Earl Stonham Parish Council OBJECTS STRONGLY to the current National Grid proposals for overhead power lines on 50m high pylons cutting through the most open and beautiful parts of our parish. Suffolk is renowned for its big skies, yet these views would be lost forever as a line of pylons would stride across our parish – and as the landscape through which the pylons would cross is relatively level, they would be visible for many miles around.

The whole route from Norwich to Tilbury cuts through 183km of stunning countryside and would have an immense impact on the landscape and those who work or live in it, or use it for recreation/health reasons. Many areas of course (e.g. Dedham Vale) are a major attraction for tourists and nature lovers and, within our own parish, there are several certificated locations for caravans as well as Shepherd Huts for hire.

Whilst we recognise the need to transition to Green Energy, we do not believe that this should be at a cost to our landscape, heritage, environment or those who live, work and visit our parish. We already have a second major infrastructure project, a solar farm development (Willow Solar Farm) which is to be located on highly productive, drought-resistant agricultural land in the fields immediately adjacent to the proposed pylon route. This is currently going through local planning processes.

We believe that consultation has been and remains inadequate and valid alternatives with less negative impacts have not been adequately presented and considered. The ESO Report suggests that the energy requirements within Norfolk, Suffolk and Essex are very low and this new power line is not required to meet current and future local needs.

Rather the main purpose of the pylons is to provide additional capacity for London and the South, and we believe these needs can better be met through alternatives which have been presented and assessed in the ESO East Anglia Network Study. Option 8 - Onshore HVDC and Option 1 – Predominantly Offshore; both options have a superior environmental ranking to Option 3 (onshore pylons), rank equally in deliverability and operability, and have superior ranking in community sentiment. In fact, all but one of the 9 alternative options studied are superior to National Grid's Option 3.

We also point out that National Grid are rolling out a new T-pylon design for the Hinkley Connection Project. These pylons are smaller (35m), sleeker with a single pole and T-shaped cross arms and hold the overhead power lines suspended from two diamond-shaped 'earrings'. Although more steel is used in these pylons, the base of a lattice pylon uses around three times the area and uses 1.5 times the amount of concrete, leaving less land available for farming. The operational life of a T-pylon is around the same as a traditional lattice pylon at about 70-80 years.

Section 3 of the TEP report to National Grid (September 2017) in relation to the proposed use of T-pylons to carry the power from Hinkley Point makes abundantly clear that T-pylons are visually much more appropriate and acceptable in a relatively flat landscape where pylons are silhouetted against the sky rather than hills and/or trees; the N2T route is almost entirely in such an open, flat landscape, with sky (East Anglia's famed 'Big Skies') as the principal backdrop.

2. Harm caused by the project

Built Heritage

Earl Stonham residents are passionate about safeguarding their precious heritage assets. The community views with dismay the harm likely to be caused by these unsightly pylons. The siting of the proposed pylons so close to Earl Stonham is bound to have a huge effect on the setting of these assets. Some listed buildings would be further affected should the Solar Farm Planning Application be granted.

There are 45 listed Grade 1 and Grade 2 buildings within Earl Stonham dating back as far as the 14th Century. The Grade 1 listed Church of St. Mary the Virgin is the oldest surviving building in Earl Stonham. The closest listed buildings to the proposed pylon route are Spall's (Sporles) Farmhouse (2), Yewtree Farmhouse (2), The Elms Farmhouse (2), Hicks Farmhouse (2), Roydon Hall (2*), Upper Lonsdales Farmhouse (2), Fen House (2) and Fen Farmhouse (2).

Grade 1 and 2 listed buildings were often built with no or limited foundations and may be impacted by construction activity, including pile driving, as well as the volume of construction traffic required to deliver materials to site.

Archaeology

We are not aware that National Grid have or will be undertaking site surveys prior to commencing construction although is a normal requirement for building sites. Without such surveys there is clearly a significant risk that sites of local and national interest remain undiscovered or at risk of damage/destruction from construction. The Suffolk Heritage Explorer provides details of Suffolk's rich archaeological heritage. The followings finds, historic buildings and location, relatively close to the pylon route have been identified within Earl Stonham:

- The current route of the A1120 runs along the site of Wicks Green, dating back to Medieval times (1066 to 1539) and shown on a parish map of 1587 and Hodskinson's Map of 1783.
- Early Medieval scatter, C13-C14 pottery scatter found in field adjacent to Perfect Perennials Nursey and north of Bell's Lane (A1120)

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- Cropmarks of possible Bronze Age Barrows east of Sporles Farm. Circular cropmarks were identified on aerial photography. These are of uniform size of c.24m and could potentially represent round barrows of possible Bronze Age date.
- Roman Features 43AD to 409 AD and Roman artefact scatter C1 & C2. Features including a ditch and a small pit and finds - pottery (mainly C1 and C2), Samian, amphora, a few tile fragments, coins (?Hadrian and ? an Antoninianus?) - identified after topsoil stripped for sewage pipe. Partial sectioning of the features done by contractor.
- Bay's Farm, Earl Stonham. 19th century farmstead and farmhouse. Regular courtyard multi-yard plan formed by working agricultural buildings. The farmhouse is set away from the yard. Total change to the farmstead layout. Located within a hamlet.

Environment, Habitat and Species

Any loss of well-established trees, hedgerows and field margins during construction would impact on local wildlife, causing significant habitat loss. Even if replaced like for like it would take years to regrow to maturity, and the loss of habitat would be detrimental to all wildlife in the area.

There would be loss of Spinney Wood, behind Bay's Farm. There are also Tree Preservation Orders on land belonging to Stowupland Hall between the A1120 (adjacent to the proposed pylon construction and set down site) and Creting Lane.

A range of wildlife would be potentially impacted. There are several ponds known to have newts (including Great Crested Newts) living in them, and otters have been seen locally. There also badger setts in and around the area which use the hedgerows as navigation markers to their feeding areas; any hedgerow removal would have an impact on the bats. The pylon route is on the flight path of migratory birds and there are established bat colonies in the area. Deer also roam across the local landscape.

Landscape Heritage

The pylons would have a significant impact on our landscape, classified as 'Ancient Countryside' by the late Professor Oliver Rackham. We have already referred to the loss of Suffolk's famed Big Skies, with the destruction of views across open landscapes and the view across to the Gipping Valley would be lost forever. The pylons would be visible for many miles around.

Highly productive farming land would be lost to productive use during construction of the pylons with an ongoing impact from pylon sites and ongoing

maintenance. It is likely that construction would lead to ground compaction and therefore increase the risk of flooding in those areas.

There are many footpaths and public rights of way crisscrossing land along the pylon route. It is inevitable that the construction phase would impact on these, perhaps necessitating closure for weeks or months at a time, resulting in reduced access to our open countryside. Many of these footpaths form part of circular routes, which if closed, would limit access as there may be no alternative route. This may also impact on physical and mental health through reduced access for walking and to the countryside.

Proximity to Houses and Businesses

The Pylon Route crosses the A1120, near several houses and businesses. Property values would be adversely affected for those houses and businesses close to the pylon route and it is likely to impact more widely on property values across the Parish.

Earl Stonham is a rural area with most housing centred in small hamlets. Most of the open countryside is given over to crop cultivation. The impact on farming would be high during the construction phase with a loss of land available for cultivation. While this may be lower once works are completed, inevitably the pylon sites and the need for ongoing access would still reduce the amount of land available for cultivation. Such ongoing, invidious losses are significant given that the UK is not self-sufficient in food production, importing about 40% of the food it requires from outside the UK. A local plant nursery would be significantly impacted as it lies only about 250m from the pylon route.

There is likely to be some impact on tourism affecting those businesses operating Certificated Locations, shepherds huts or bed and breakfast/Air BnB accommodation.

Road Infrastructure

Residents and businesses are seriously concerned about likely disruption either to their businesses or for residents who live alongside the A1120 and all the other local roads.

The A1120 is the main route through the Parish running from the A140 to the A14. It is a designated lorry route and a diversion route for the A140 and A14 if they are closed. The A1120 already suffers from high levels of excess speed through the 30mph section through Forward Green. It is likely that residents living alongside the A1120 would experience increased noise and disruption and higher volumes of traffic during the construction phase leading to higher levels of wear and tear

to the surface of the road. The proposed staging area adjacent to the A1120 to its junction with Saxham Street would emerge on to a national speed limit of 60mph.

It is inevitable that construction would require some restrictions to manage traffic on the A1120 and other roads within the parish. This may be in the form of road closures, speed restrictions (we hope) and diversions. Diversions would need to be monitored and enforced to avoid creating rat-runs on unsuitable (often single-track) local roads. Access by construction traffic to the northern end of the pylon route, west of Leylands Farm, would need to be from the A140, given the 7.5t weight limit along Saxham Street, and the total unsuitability of Blacksmith's Lane (a single-track road with virtually no passing places) as a short-cut for HGVs approaching on the A1120.

NB In relation to the proposed solar farm adjacent to the proposed power line, Suffolk Highways have stipulated that the site must not be accessed from Blacksmith's Lane by HGVs, because of the unsuitability of the road for large vehicles. The same rationale and precedent must apply to NG HGVs.

Breaches of the Holford Rules

We believe there are several breaches to the guidelines on overhead line routing, first formulated in 1959 by Sir William late Lord Holford, a part-time member of the CEGB. They are known as the Holford Rules and are still in use by National Grid.

Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees. The proposed route sites 50m pylons in the middle of open, flat countryside which would be clearly visible for miles around and ruin the views of our big skies.

Rule 5: Prefer moderately open valleys with woods where the apparent height of towers would be reduced, and views of the line would be broken by trees. This is clearly not the case as already detailed in 4 above.

3. Consultation

We believe the consultation process has been flawed from the outset. National Grid ruled out several alternative options to the current proposal prior to the consultation process commencing, thus denying us the opportunity to help shape the consultation. It is not a true consultation if there is only one option to consider!

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Consultation meetings have all been timed to take place during the working day, denying working people the opportunity to express their views. We appreciate that there were some online webinars, but these were limited in scope. There has been 1 venue local to Earl Stonham – Needham Market which ran from 1pm to 6pm. The general feeling was that the webinar and in-person events were disorganised, that those representing NG were not open to discussion, not all questions were answered as a result and some of those that were answered were not necessarily accurate in their response. There has also been a conflict between responses given in webinars and at in-person event

National Grid has failed to give residents any faith in the process resulting in a loss of trust and confidence in National Grid and its employees. Most have been left with the impression that residents views will be ignored and that we are being presented with a 'fait accompli', with a deal reached behind closed doors.

In view of this we believe that National Grid's approach needs to be strategic and long-term given the number of projects under development by NG. Go back to the drawing board to bring all options into play. Cost calculations need to include whole costs not just construction costs - include impact on community and wider environmental costs. Offshore route and all other options should be brought back into play.

In any event, any decision on N2T is premature pending the outcome of the OCSS (Offshore Coordination Support Scheme) investigating a coordinated design for offshore energy transmission, especially in the light of the Hiorns Smart Energy Network report's conclusion that the need for additional capacity is likely to be closer to 2035 than 2030. NG's insistence on a 2030 completion date does not chime with current thinking.

4. Mitigation

Whilst having made very clear our disapproval of NG's consultation processes to date, including this one, and of the proposed scheme, if the N2T project gains approval, we seek the following mitigations:

The current proposal envisages 50m tall lattice pylons on an 11m² concrete base which, in total, take up a large area of valuable productive land, and which (in NG's own research) are inappropriate in 'Big Skies', and relatively flat countryside. We request NG to use the new T-pylons which would cause less harm and have a lower impact on the environment.

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The removal of trees, hedgerows and field margins should be avoided other than as a last resort with any replacement on a 4 to 1 basis to speed up recovery.

National Grid must make and adhere to strict traffic controls to reduce the impact of construction traffic on the A1120 and all the other local roads. These must include measures to control traffic entering the staging area alongside the A1120 and the Debenham Road (Saxham Street to the A140, the installation of Speed Indicator Devices in 30mph restricted areas and improved signage and road markings to deter speeding. We would also require National Grid to reinstate the A1120 and other affected roads following the completion of construction.

There should be realistic compensation for losses for householders and businesses directly affected by the pylons

Mark Gillett
Chair, Earl Stonham Parish Council

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