PROGRESS POWER’S APPLICATION FOR DCO
GAS-FIRED POWER STATION & INFRASTRUCTURE
AT EYE & YAXLEY, SUFFOLK
PINS REF. EN010060

DEADLINE 5 SUBMISSION BY
EYE AIRFIELD PARISHES WORKING GROUP
17 November 2014
Responding to the Examining Authority’s Q1.2:

Please would English Heritage, Suffolk County Council, Mid Suffolk District Council and, if they wish, other interested parties comment specifically on the assessment of the impact of the proposed development on the setting of heritage assets as set out in the Environmental Statement and the additional review provided as Appendix B to the applicant’s response to SCC and MSDC local impact report. ([http://infrastructure.planningportal.gov.uk/document/2746616](http://infrastructure.planningportal.gov.uk/document/2746616)). Please include comment on the appropriateness of the methodology and the adequacy of the information used. If further information is considered necessary please specify what is required.

Scrutiny of the Applicant’s revised assessment of the impact of the development on designated heritage assets has been carried out by the Suffolk Preservation Society (SPS) and, we understand, by Conservation Officers of Mid Suffolk District Council. Members of the Group have seen the former prior to submission but not the latter.

We can do little more than fully endorse the SPS’s conclusions. It seems clear that the impact of the development will cause a significant level of harm to the setting of many heritage assets, both designated and undesignated. It is also clear that our national electricity supply must be sustained and that the proposed plant is designed to make a contribution towards achieving that.

There is therefore the ‘harm vs benefit’ balance to be weighed. Is the intermittent benefit from a peaking plant that will be operated for only 15% of the time worth the continuous and permanent harm that will be caused to an area that has one of the highest densities of built heritage in the country? The point would be more arguable if the harm was unavoidable – but it isn’t. This is by no means the only place where such a facility could be situated. It might be a convenient place for the Applicant in a business sense but the price for that is the lasting inconvenience and disbenefits that will have to be endured by not only the people who live in the locality but also by many who visit it.

The applicant has so far not been called upon to demonstrate that the harm is unavoidable and in our view should be required to do so by presenting a sequential evaluation of a range of alternative sites before the Examination progresses much further.
Responding to the Examining Authority’s Q1.3:

Please would English Heritage, Suffolk County Council, Mid Suffolk District Council, the Eye Airfield Parishes Working Group and, if they wish, other interested parties comment on the Eye to Yaxley field systems report provided as Appendix D to the applicant’s response to SCC and MSDC local impact report. (Link as in Q1.2 above).

see:

Annex 1 – The proposed gas-fired power station and associated infrastructure at Eye and Yaxley, Suffolk: the historic significance of the landscape, by Tom Williamson, Professor of Landscape History, University of East Anglia

Annex 2 – A Statement on the Yaxley Field Boundaries and a Review of the Chadwick Report, by Dr Helen Geake

There is nothing that the Group can add to the academic appraisals already made by SCC’s Dr Jess Tipper, the Applicant’s consultant Dr Adrian Chadwick of the University of Leicester, the Prehistoric Society and now Dr Helen Geake of the British Museum and Professor Tom Williamson. All we can do is endorse the majority conclusion that this very valuable heritage asset would be substantially harmed by the development. The enjoyment and understanding of the past, particularly as experienced from the ancient Judas and Leys Lanes, would be severely diminished. There is little that can be done to mitigate that loss.
Responding to the Examining Authority’s Q2.9:

Please will the **Eye Airfield Parishes Working Group** comment on the revised landscape mitigation strategy and revised planting strategy submitted as part of the SoCG with SCC and MSDC on 4 September 2014.


see also:

Annex 3 – *Some comments on the* Interim Landscape Mitigation Strategy Version 2, October 2014, by Christine Fisher BSc DipLA(Edin.) CMLI

Annex 4 – *Some comments on the* Interim Landscape Mitigation Strategy Version 2, October 2014, by Dr Paul Read

Although the ExA’s request for comment related to the revised *Landscape Mitigation Strategy* submitted on 4 September, the Applicant has very helpfully made available to the Group the latest iteration of that document. This has evolved as a result of the more recent discussions with SCC and will, we understand, form part of the Applicant’s Deadline 5 submissions. The following comments therefore relate to this latest version and the numbering below is that of the paragraphs in that version, which is *Interim Landscape Mitigation Strategy Version 2, revision D, 4-Nov-14*. Unfortunately, it was not possible to refer these comments back to the applicant in time for possible incorporation into the Deadline 5 version.

1.1.4 It is hoped that the finalisation of the Landscape Mitigation Strategy, detailed landscape design and long term management proposals will not only allow the involvement of MSDC but also the Eye Airfield Parishes Working Group as a conduit through which to take advantage of the local knowledge and expertise that is available.

1.1.5 We have serious concerns regarding the deliverability of off-site mitigation by means of an s106 agreement. To some extent this will depend on the sum of money set aside for this component of the s106, which is unknown to us at this time. It is hoped that the revised s106 requested by the Examining Authority for Deadline 5 will contain this information.

4.2.3 The sentence in this paragraph: ‘The sensitivity of this landscape is high.’ should be a guiding principle in decision making for all elements of this aspect of the proposal and especially for the detailed design of on- and off-site mitigation.
6.2.1 3rd bullet point: We would like to see the word ‘considered’ replaced by ‘used’ to add some certainty to what can be expected in terms of visual continuity until the screening is effective.

6.2.1 7th bullet point: We question the need to utilise the southern end of the site in this way. The land take is excessive and in our view unjustifiable. The provision of wildlife habitat within it is laudable but the argument can be made that the site is more valuable locally for development with a reasonably high employment potential. If the land remains a part of the power generation plant site, a planting belt far deeper than 20 metres could be accommodated that would provide for more effective layered screening and habitat provision.

6.2.1 8th bullet point: We would like to see the words ‘where available’ removed. It is essential that locally sourced plants are used. At 6.2.7, 6th bullet point, the use of UK provenance and grown nursery stock carries no such condition.

6.2.7 1st bullet point: The proposed structure planting does not ‘enclose’ the ECC. The planting on two-thirds of the west side is limited to a hedge, the height of which is unlikely to be allowed to exceed that of the perimeter fence. Screening from important viewpoints to the west, including the Mellis conservation area, is therefore under-provided.

6.2.7 2nd bullet point: Can it be confirmed that the security fence here will be, in its ‘aesthetic design and colour’, the same as the one around the power generation plant, namely ‘a weldmesh fence, colour black, dark green or similar’? Other National Grid installations of this type have galvanised steel palisade security fencing.

6.2.7 7th bullet point: Until more detailed plans are available we remain concerned that disposing of excavated material by creating raised sections of ground (bunds) may not contribute positively to the landscape mitigation. We are pleased to note in 7.3.1, however, that mounding will be constructed in accordance with DEFRA guidance.

6.2.9 We question whether the necessary layering can be achieved satisfactorily within a planting width of only 10 metres, to which it would be reduced if the GIS variant were to be used.

8.2.1 For a comment on the plant species list see Annex 4 in which Dr Paul Read of the Suffolk Traditional Orchard Group and the Suffolk Biodiversity Partnership gives additional information on our behalf on landscape mitigation and species selection. A few comments on species selection by Landscape Architect Christine Fisher, who wrote the report that accompanied our 4 September written representation, are given in Annex 3. Much of the detail in these annexes may well be more relevant to the later stage when design detail is being considered. We note that the earlier tables giving proportions of the various species to be used in structured and hedgerow
planting are no longer included in the Strategy. It may therefore be no longer necessary to say so, but it is hoped that there will not be the former preponderance of Hawthorn (*Crataegus monogyna*) in the hedges at the expense of the more locally prevalent Field Maple (*Acer campestre*), Dogwood (*Cornus sanguinea*) and Blackthorn (*Prunis spinosa*).

8.3.3 Christine Fisher comments that where plants can be protected by deer/rabbit-proof fencing there is no need to restrict them with further guards.

8.4.2 She is of the opinion that six herbicide applications in a seven-month period is excessive and probably unnecessary. She writes: ‘I have planted miles of hedges in the countryside and never used any weed killer. Mulch with old straw in a thick layer.’

8.4.3 … and she goes on to say: ‘Also they do not need fertiliser as it is good agricultural land and these are 'native' plants. Fertiliser will encourage rank weed growth round the base, swamp[ing] native plants (but these are going to be killed off by the herbicide anyway!).’
Annex 1

The proposed gas-fired power station and associated infrastructure at Eye and Yaxley, Suffolk: the historic significance of the landscape.

by Tom Williamson, Professor of Landscape History, University of East Anglia (for the Eye Airfield Parishes Working Group)

Introduction

The character and antiquity of the field boundaries in the area around Yaxley in north Suffolk are matters of some importance in assessing whether the construction of a gas-fired power station on the nearby Eye Airfield and associated infrastructure at to the north of the village (centred at NGR TM 1323 7510) should be permitted. The idea that the essential structure of the landscape in this area originated in the late prehistoric period was first proposed in the late 1980s (Williamson 1986 and 1988), as part of more general discussions of apparently ‘planned’ field patterns on the East Anglian boulder clays. This work was in itself an extension of research originally undertaken in the late 1970s and early 1980s by Warwick Rodwell and Paul Drury, into the antiquity of field patterns in the anciently-enclosed county of Essex. These had formerly been thought to be largely unplanned and organic in character, and entirely of medieval or later in date. Rodwell and Drury noted, however, that in some districts fields shared a common orientation across extensive areas, significantly larger than the parishes or manors of the Middle Ages, implying that they had been laid out in an organised manner in some earlier period, probably the Roman or later Iron Age. More importantly, they noted that in a number of places in the same county, most notably at Little Waltham, early Roman military roads appear to slice through the field pattern in a way analogous to a railway line or bypass, leaving awkward corners, in such a manner as to suggest that the fields were earlier, and thus of prehistoric date.¹

‘Co-axial’ field systems

Over the following decades these ideas were developed further by a number of archaeologists and landscape historians, with many noting the resemblance of such potentially early field patterns to organised landscapes of accepted prehistoric date known from aerial photographs, excavation, or surviving as earthworks or tumbled walls in areas of marginal land, especially on Dartmoor. In particular, many displayed what is often described as a ‘co-axial’ form: that is, they have a dominant ‘grain’, with axes running for a longer

distance in one direction than another, so that they resemble in plan rather wavy and irregular brickwork. Field patterns of this type, of suggested prehistoric origin, have now been identified in parts of Norfolk and Suffolk; in western and in south eastern Cambridgeshire; on the dipslope of the Chiltern Hills in Hertfordshire; on the London clay uplands in the south east of that county; and in the Arrow valley of Shropshire, around Hergest and Lyonshall. Such landscapes are now, moreover, recognised as a distinct type in many of the county-based ‘Historic landscape Categorisation’ projects funded by English Heritage. Some examples, although by no means all, appear to be dated by their relationship with Roman military roads, which seem to crash through them in the manner just described. More generally, their antiquity is confirmed by the fact that they generally extend over several parishes and townships, the boundaries of which join, leave, and rejoin their principal axes in such a manner as to suggest that their basic framework at least was in place by the late Saxon period, when these units first came into existence. Yaxley is a particularly good example of a landscape of this type, with co-axial boundaries orientated roughly north-south extending over an area of some 20 square kilometres, and with individual fields to the south of the village apparently bisected by the Roman road from Caister by Norwich to Coddenham (the ‘Pye Road’) (Figures 1 and 2).

It must be emphasised that many of these field patterns have been analysed principally on the basis of map evidence: agricultural intensification and field amalgamation in the immediate post-war period has ensured that most examples, especially in the arable eastern counties, have been badly damaged (or even rendered completely unrecognisable) by the large scale removal of their constituent boundaries. The area around Yaxley is of particular importance because a significant number of hedged boundaries survive in the local landscape and, while those defining fields to the south of the village (clearly bisected by the Roman road) have in part been removed, the overall co-axial arrangement of land division is still generally apparent. The landscape has been damaged: but enough remains to

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7 See, for example, L. Dyson-Bruce, S. Bryant, and I. Thompson, *Historic Landscape Character: county report for Hertfordshire* (Hertford, 2006).
provide a good and immediate visual impression of the potential antiquity of the local countryside.

**The antiquity of the Yaxley landscape.**

It must be emphasised that in none of the studies alluded to above has it been claimed that the modern field pattern represents a fossilised and unchanged prehistoric field system: the implied criticism made by Chadwick on p.3 of his report is a little unfair on this point. All those involved in such approaches acknowledge that the landscapes in question have undergone centuries of piecemeal alteration and change, with boundaries being added and taken away, and furlongs inserted and then enclosed – but in such a manner that, for the most part, the overall structure of the original pattern has been maintained. Landscapes have histories, not ‘dates’, and this applies to Yaxley as much as to any other area. It should also be noted (as Dr Chadwick observes) that these ideas and approaches have not been universally accepted and have, indeed, come in for some robust criticism. But I would emphasise here that no-one involved in this particular case doubts that some at least of the roads and boundaries in the area affected by the proposed development are of prehistoric origin.

Indeed, in a useful discussion of the evidence, Dr Chadwick himself argues (p.15) that of the eighteen boundaries which he lists as likely to be affected by the proposed development, five (his FB 1-5) are potentially prehistoric, while a further seven (6-12) may represent prehistoric elements. Only in six cases (FB 13-18) is a relatively recent origin ‘more likely’. In other words, it is accepted by Dr Chadwick that two thirds of the boundaries are potentially of prehistoric date. The Precautionary Principle should, I suggest, be applied here: if even the report submitted by the developers suggests that the clear majority of boundaries in the area could be elements of a very ancient landscape, then we should proceed with considerable caution.

**Sites, features and landscapes**

Dr Chadwick argues that the destruction of such potentially ancient features is acceptable, and possibly beneficial, because it would produce useful archaeological evidence about the date and origins of the features destroyed (pp.12-14), something that strikes me as a distinctly odd argument. The boundaries themselves, in spite of their potential antiquity, he considers to be of medium or low conservation importance, and there are ‘no boundaries of High or Very High Significance’ within the area (p.14). I find this a slightly old-fashioned approach, in archaeological terms. Over the last few decades English Heritage has, especially though its Historic Landscape Characterisation programme, emphasised the conservation importance of entire landscapes, rather than just of the individual elements and sites within them. It is true that this has not, to date, been reflected in conservation legislation: tracts of ‘ordinary countryside’ have not as yet been scheduled or ‘listed’ in the way that individual sites, monuments and buildings have been, on the basis of their historical importance. This
does not mean, however, that we should treat landscapes merely as a collection of parts, individually assessed and valued, as in Dr Chadwick’s approach.

Even if a significant proportion of the field boundaries in question are of relatively recent date this does not reduce the significance of the overall landscape around Yaxley. Here I need to emphasise again that nobody has ever argued that the Yaxley landscapes represents an arrangement of boundaries which has survived, unaltered, since the Iron Age. Over a period of over two thousand years some elements have been added and others taken away, so that many represent later modifications of the original field system (although even these will be of some antiquity - most will be of medieval date and most predate the eighteenth century). The fact that the landscape is thus a palimpsest does not reduce its significance; the precise date of individual elements does not affect the meaning of the whole. This is one of the few places in England where a Roman military road, probably laid out in the first century, visibly slices through the fieldscape like a modern bypass or railway line. This is not only an ancient landscape, but a place where antiquity can be shown, and appreciated, with an immediacy impossible to convey in books, words, or images; it embodies in striking visual form both the antiquity and the continuity of the English rural landscape. This impression will be irreparably damaged by the intrusion of a major new industrial development.

The idea that sections of or elements in important historic landscapes can be removed, damaged or radically altered so long as they are archaeologically investigated during destruction, as Dr Chadwick suggests, is problematic. So also is the notion that because such a landscape has been added to and altered, its value is diminished. We would not, for example, easily accept that a power generation facility could be intruded into a landscape designed by Capability Brown, even if many of his original trees had been lost and new ones planted; nor would we accept that sections of such a landscape could be destroyed, provided that they had been carefully recorded. The landscape under consideration here is arguably of similar historic importance. Indeed, although not subject to any conservation designation, this is arguably a landscape of national importance which will be substantially harmed by the proposed development. Development should and could be located elsewhere: destruction of this particular piece of countryside is unnecessary.

**Conclusion**

There is agreement on all sides of this dispute that a majority of the field boundaries in the area where the substation is to be placed are potentially of prehistoric origin; and that the overall structure of the landscape in the locality had developed by the start of the Roman period. The argument of the developers appears to be that the proposed development should nevertheless be permitted:

(i) Because we are unable at present to establish with any certainty which precise boundaries are ancient and which are more recent.
(ii) Because destruction of a significant proportion of the field system will help throw light on its origins.

(iii) Because specific legislation preserving such important landscapes does not yet exist.

My own view is that the Precautionary Principle should be applied to landscapes of such potential significance; that the overall landscape, rather than the individual elements within it, is what really matters; and that the importance of the area as a visible testimony, easy to ‘read’, to the antiquity and history of the Suffolk countryside should count as a material consideration when deciding whether to grant, or to refuse, permission for this particular development. The proposed development will cause substantial harm to a highly important historical landscape which all sides in the argument agree has its origins in the late prehistoric period.

Tom Williamson

14 November 2014
Annex 2

A Statement on the Yaxley Field Boundaries and a Review of the Chadwick Report

by Dr Helen Geake (for the Eye Airfield Parishes Working Group)

Although Adrian Chadwick’s report is on the whole useful and well-researched, there are some problems and lacunae. These can be summarised as follows:

1) Inadequate assessment of significance.
2) Lack of distinction between visible field boundaries and below-ground remains.
3) A failure to consider the potential of the below-ground remains at Yaxley itself.

(1) The assessments of significance rest on unsafe assumptions. Firstly, the reasons for ascribing these particular significances to each individual field boundary are not explained; one has to infer these from his analysis of co-axial field systems nationally and regionally.

Secondly, his method of considering each individual field boundary separately is flawed. While it may be true that none of the Yaxley field boundaries in isolation is of more than Medium heritage importance, it is the field system in total that should be seen as having at least High importance. This is undoubtedly an extremely important field system regionally, nationally and possibly internationally (the international context is not explored) – its individual components should not be looked at individually.

As the regional research agenda says, we are interested in how agriculture began and developed through prehistory, and the social conditions that led to these particular ways of gaining a living. This is as true nationally as regionally, and probably internationally as well. If parts of a system – individual field boundaries - are removed without having regard for the system as a whole, the importance of the whole is destroyed. In the same way, no individual timber in a Grade I listed medieval building is of High significance, but the piecemeal removal of original features is against all conservation principles. Without considering the wider picture, a whole building can lose its heritage importance (the case of Barley Hall in York (Stewart 2011) being a specific example).

There are errors in his individual assessments of significance, also leading from considering each individual boundary in isolation. Relationships between pairs or groups of boundaries are far more valuable than the sum of their parts. A targeted programme of field research would concentrate on associated features in order to determine their relationships, and junctions of boundaries are acknowledged as being able to provide much more information than other areas. FB16 and 17 are adjacent to the Roman road and may well provide the

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8 Appendix D in The Applicant’s Response to SCC MSDC Local Impact Report, 2 October 2014
crucial evidence of the relationship of this road to the boundaries; put simply, did the road come first, or did the boundaries? Our knowledge is still too rudimentary to answer this very basic question, which is the key to the whole study, nationally as well as regionally. Therefore FB16 and 17 should have High significance in themselves, as well as being part of a system of (at least) High significance.

(2) The below-ground archaeology of already-destroyed field boundaries in the development area is barely discussed. The very early boundaries at Heathrow and Gwithian, long destroyed but discovered through excavation, are clearly important; similar features will exist at Yaxley but these are not mentioned in the report except where they are part of recently removed visible features. The report is therefore partial and ignores much of the potential significance of the Yaxley deposits.

(3) We are given a lot of detail about field systems in many parts of lowland England, but evidence as to which are still upstanding and visible is lacking. There is a huge practical and philosophical difference between field systems known only from excavation (so already destroyed and not available to see) and those that remain visible, above ground and vegetated, still part of the present-day landscape and still giving us a tangible impression of immense time depth. The difference between the two (which may add greatly to the significance of the Yaxley system) is not considered in the report.

**Why archaeologists often don’t agree about whether development is right or wrong**

Archaeologists have a conflict of interest in situations like this. On the one hand, we would like to know more about these field systems. Although they survive at ground level today in only a very few precious places, as Adrian Chadwick points out they are likely to have been far more widespread before modern agricultural intensification. We have very few hard facts about them, and they are controversial in terms of precise date.

Tom Williamson has been the most influential and convincing commentator, arguing that they are a palimpsest of boundaries that have been replaced piecemeal over time. But there are other theories, ranging from a very ancient date, to them being far more modern, and nearly everything in between. These need to be tested on the ground, and the best way is by excavation.

Excavation tends to be expensive, and normally these days it is paid for by development; the ‘polluter’ (i.e. whoever wants to destroy them) must pay for their excavation and recording, which is often referred to as ‘replacement by record’. So you might think that most archaeologists would welcome the development of the Yaxley power station as a rare chance to investigate these field systems.

But there’s another side to the argument. A landscape can’t be appreciated from a record. Looking at a map of a place that is not there anymore cannot have the same effect as visiting that place. Landscape archaeologists have developed a body of theory known as ‘phenomenology’, combining modern surveying methods with the experience of being in a landscape both to learn more about the past and to appreciate it more. If the landscape has
now vanished, these techniques (and others to be developed in the future) cannot be applied.

These tensions can be reconciled, however; what’s needed is a tightly constrained programme of small-scale fieldwork, excavating precise targets (both physical features and palaeo-environmental samples) that can answer key questions. Large-scale open-area excavations resulting from big developments, so useful to answer many archaeological questions, are not the right solution here.

Helen Geake

17 November 2014

Dr Geake is an Anglo-Saxon expert at the British Museum. She began her working life at Sutton Hoo, then worked for Channel 4's Time Team for many years. She has a particular interest in East Anglia's transition from Roman province to Anglo-Saxon kingdom - enigmatic years for which these field systems provide crucial evidence. Helen is a Fellow of the Society of Antiquaries, a visiting scholar at Cambridge University's McDonald Institute for Archaeological Research, and a past member of council for the Society for Medieval Archaeology. She writes regularly for the journal Medieval Archaeology and the popular magazine British Archaeology.
Annex 3

Some comments on the Interim Landscape Mitigation Strategy Version 2, October 2014

by Christine Fisher (for the Eye Airfield Parishes Working Group)

I think the mixes are a bit better than before. I am wary of just two mixes for such a large site. I would prefer each boundary of the main site to be looked at individually considering aspect, soil type, pollution and how much screening is required and how fast it needs to grow. You cannot be said to be increasing biodiversity by using two standard mixes throughout. However these matters should be addressed by MSDC when they require detailed planting plans. More significantly, if the amount of planting is still the same as before in the power station site it will be quite insignificant in the context of such large buildings and empty open spaces.

Like all poplars, Aspen (Populus tremula) is fast growing but unlike others it suckers prolifically. This might be unwelcome near any farmers’ fields. It is less typical of the south-east than other parts of the country and is more characteristic of Scotland. I find it odd that this species, and so much of it, should have been suggested for this locality. There are plenty of other poplars - White Poplar and the hybrids are useful in shelter belts if not near any drains. They can be used as nurse plants and removed when the shelter belt is established (this doesn’t seem to be part of the programme of maintenance). All poplars are short lived – for example, 60-80 years. As the life of the power station is only 25 years that won’t matter to them. In the context of developing Eye Airfield, however, and creating a development area that is not an eyesore, perhaps a longer term strategy ought to be encouraged.

Shrubby willows are good in hedges – for example, Salix caprea and S. vilmoralis – Paul Read would know better than I do what grows in the immediate locale. Also there is the good old Suffolk Hedgerow Survey to refer to.

As there is Small-leaved Lime (Tilia cordata) in the path of the Ley’s Lane/ECC access road crossing, perhaps one or two of that species could be included.

Apart from acknowledging the above small changes, the criticisms I made in my earlier report remain as before.

Christine Fisher BSc DipLA(Edin.) CMLI

17 November 2014
Annex 4

Some comments on the Interim Landscape Mitigation Strategy
Version 2, October 2014
by Dr Paul Read (for the Eye Airfield Parishes Working Group)

1. There are two issues with screening the main power station. One is screening on the proposed Progress Power site and the other is the possibility of creating off-site mitigation on adjacent land owned by Roy Humphrey. Fortuitously, the latter is the subject of a Section 106 agreement between MSDC and Mr Humphrey in 2009 that provided for the creation of extensive landscaping at the southern end of his site. To date the obligation remains undischarged. The site is adjacent to the A140 and is an ideal location for creating screening of the power generation plant, not only from the road itself but also from viewpoints to the west, including some parts of Yaxley, the extensions of Leys Lane and Judas Lane through to Thrandeston, and the Mellis conservation area. Because this site, already prescribed for landscaping, is some 400-500 metres from the power station site its contribution to screening from that direction could be immensely effective. This should be pursued by MSDC in any event but in the present context as an important element of off-site mitigation.

2. Leaving the Humphrey Section 106 issue aside, screening the power station might best be done, in my opinion, with a two stage/layer approach: trees that grow fast and act as nurse trees for a final screening of slower denser trees. But I am not sure how much depth of land is available to achieve that. I have seen several attempts at this, some which weren’t very successful. The best screening effect was in France with Lombardy Poplars (not sure which clone or even species - there are several) for the nurse trees and a mix of Holly and pines to follow. I think the pines were Corsican which have low branches. I saw it after 10 years and the poplars were already 15m at least and the pines 5m +, and the Holly barely noticeable. There were also a few birch, I think nigra, that softened the appearance in summer. On an industrial site the issue of native or not seems to me to be of less relevance.

3. If the substation is built in Yaxley mitigation by screening will be essential. Enlarging the hedges up, but also out, could be valuable in helping to maintain a field structure in the landscape away from the actual site. And added trees close to the switchgear would be valuable. That leaves screening away from the site if it was ever possible – and the best way would be by increasing height and width of the existing hedges round adjacent fields. I know the response will be 'they aren’t ours and how do you ensure it happens'. One day that will be the technique our law will have to permit (as it does in the USA).

4. I have great reservations about specifying Alder (Alnus glutinosa). Contractors just seem to plant the first, cheapest or most available alder from their Dutch supplier. This is bound to be Grey (incana) or Italian (cordata), both more expensive than glutinosa here in the UK, but cheaper in Holland. However A. glutinosa does surprisingly well in dry
situations – at Aspall’s orchards near Debenham they have ancient, 15m-high, close-planted *glutinosa* hedges on steep, well drained slopes on clay, as windbreaks. Of course they do need to be managed.

5. In Europe all sorts of non-natives have been used as replacements for Ash. Small-leaved Lime is being proposed round here, and it’s a good one in terms of similar distant visual appearance. Close up, surprisingly, it is Rowan that is always mistaken for Ash, as is the rare Wild/True Service (*Sorbus domestica*). When old, *S. domestica* no longer looks ash-like but they are at least as big. Also round here Chequer Tree, (*S. terminalis*), also called Wild Service, is occasionally wild. It doesn’t normally grow as big and wide, but is at least as high. *Sorbus* are as least as fast-growing as Ash.

6. Pear, *Pyrus communis*, in all its forms and subspecies I think is an ideal tall tree; they can reach 20m in 25/30 years if they retain their leader throughout. My suggestion would not necessarily be cultivated clonal grafts. Wild pear seedlings from reliable stocks are available, for example a seedling version of the old German perry pear clone called Kirchensaller, which is being used in the UK as a traditional pear rootstock, would be suitable. Alternatively there are several seedling feral populations that would be reliable and do much the same.

7. I really like the idea, and sight, of apples maintained as standards in hedges, but it is very rare except on motorway embankments. Seedling apples are very variable and so unreliable in final form. M25 as a grafted rootstock would be reliable but the clonal graft needs to be a selected triploid in order to produce a sound long-lived trunk; and a proportion of triploids are not typical of clones like Bramley Seedling or Blenheim Orange, so careful choice and specification is needed (and needs to be adhered to!). Also at £7 for a 2m, 15-month-old, budded, bare root tree they are not expensive.

8. The true Damsons (*Prunus insititia*) are not the only plums species but do make some of the largest plum trees and their flowering can be spectacular. They are best as grafted or budded clonal forms too, but also may not reach their full potential on some rootstocks. You can overcome this by planting them with the soil level 30cm above the graft union; then the damson cultivar scion roots. The original rootstock usually then breaks out into a mass of suckers but that in itself may not be problem for a screening tree. Incidentally beware Damsons that aren’t damson and are just plums called Damson in their cultivar name – Merryweather’s Damson is a *Prunus domestica* plum, producing small purple plums. Go for Shropshire Prune or Aylesbury Prune (yes, they are genuine damsons!) on a St Julien A rootstock and also about £7.

Paul Read  
*Suffolk Traditional Orchard Group*  
*Suffolk Biodiversity Partnership*  

17 November 2014