

COMMENT ON LIRs with respect to Hintlesham and Ramsey Woods and surrounds

Whilst the various councils have put strong arguments around certain aspects of the proposed lines, and indeed touched on the local issues here, I am surprised by the lack of voice and relatively lightweight approach to the area around Hintlesham woods, by nearly all 'official' parties. Ramsey Wood, which would end up ringed by pylons and lines, is an even older and rarer wood, and is hardly mentioned. This 'overlooking' was also referred to in consultation submissions by me and others (see note at end). "Hintlesham" itself is referred to rarely, and with no apparent special submission.

The fact of a new proposed stretch of 3k-4km of line is completely ignored in the LIR summary, stating simply: "The proposed route of the new 400kV for much of its route follows that of an existing 132kV overhead line". In any case the nearest 132kV line to us (and 'our' closest route) is nearly 3km away. These are much smaller pylons in any case.

I do not believe this is because of the area's significance or the impact on it. This cannot be the case. The area is of equivalent stature to other parts of the line that are being afforded extra protection and even undergrounding. Further, the woods and surrounds are special and rare in their own right, ecologically and visually. The impact will be massive.

As I have stated in other submissions the ecological and environmental surveys in the area, put forward as supporting evidence by the Applicant, have been highly selective, even sporadic, with tenuous concluding arguments.

As owner of the ancient Hintlesham Woods, the RSPB - one of the largest and most significant landowners affected - has in my view been disappointingly quiet on this issue, despite having also advocated undergrounding as an alternative. As custodian of all it contains and of the impact it has on the wider area around, it surely must realise that impact is huge and widespread. As a member and very long-standing volunteer I support and actively work towards its aims. I broadly understand its position and how / where it needs to comment on the impact.

However, I feel the decision and oft-cited 'reasoning' to adopt Option 1 (the new lines to the north and west of Ramsey woods) is not at all the "least worst" in terms of impact. There are strong arguments that it is in fact *at least as bad*, if not much worse¹. In their celebration of not affecting a very small amount of woodland area² at the expense of so much else (as well as more cost and extra effort to National Grid), the various environmental bodies, including the charity that owns the woods, seem to be content to overlook or underplay or, shockingly, argue for the alternative impact. The LIR summary itself notes that but fails to mention let alone assess the impact of the alternative, The impact will be on a huge area of woodland itself, including nesting sites of rare species, while the environment does not stop at the borders of hedgerows, woodland or legal boundaries.

This has left the surrounds of Hintlesham Woods, and site or Ramsey Wood itself, hugely under-represented in terms of detailing and demonstrating the impact. In my original submission I asked

¹ The total length of near 'impact' by Option 1 on the woodland and the surrounding area would be 8 times that proposed as Option 2

² The area to be over-sailed by Option 2 would ('only') be around 1% of the total area of the woods, ~0.8ha.

the Planning Inspectorate to take into account the fact that there are some 'small', fairly lone voices trying to speak for the area. As residents, we care deeply about all aspects of the area: environment, visual, amenity etc. These should carry weight even if they don't have the backup of surveys and full-time teams. I am not just talking about me. National Grid should know this very well from its consultations over 13 years.

We have attempted to put the case as best we can – from detailing wildlife and potential impacts to inviting surveys and proper consideration of our land, including commentary on where things are not assessed or should have been. I made various representations, over many years, with evidence, to National Grid of the potential **huge environmental impact on so far unspoilt areas**.³

On top of this, the new additional lines would amplify the visual disturbance along the A1071, bisecting two wonderful SSSI wildlife reserves and near a third, between which much wildlife travels.

Quite rightly, a lot of weight has been placed locally on the visual aspects around historical/cultural sites such as Hintlesham Hall and Benton End. But what is more historical than the medieval woodland landscape and one that arguably has not changed since Roman times, that runs between the two? More than the various 15th/16th and other 17th Century houses and sites on along its route?

Indeed, the reports talk of the need for protecting areas that were previously Hintlesham Hall estate, but that also included the Hintlesham Woods, so the same arguments should apply there too. And what if you decided to walk between the two, as many people do? A new pylon line for 4km, which would run over much of the existing footpaths. Or if you drive along the A1071 between Hadleigh and Hintlesham - as many tourists as well as locals will do - and in time the councillors and politicians and environmental bodies who wrote these reports - the lines will be visible, even dominant, from at least an extra 3km of this road.

Benton End also clearly has artistic and cultural importance. But how can certain sites be judged as deserving of more protection than others, than all the rare and precious wildlife and the incredible woodland landscape. They all need protecting in the best way. The best way around the woods is undergrounding.

The closest a new pylon would come to the Hall would be around 375m. From Benton End a similar distance. I am not making light of the serious impacts here – of course these sites should be strongly protected – rather to highlight comparison to the new lines – including 6 pylons which would be only 50-100m from ancient woodland and in one case around 50m from known nightingale nesting sites as well as various other rare or protected species. And as close as 35m to a 15th C farmhouse.

Very little has been discussed about the relative merits of undergrounding compared to aerial lines, when the huge Hintlesham site is specifically to preserve aerial creatures. As I see the wildlife fly in and out of the woods past where lines would be that I am genuinely shocked by the lack of argument. And it's not only one line - there would be a multiplier effect, with the woods effectively ringed by pylons. The new lines should be nowhere near these sites.

³ See notes at end

It is also argued, including implied in the LIR itself, that the Applicant is in breach of Holford rules by not properly considering the alternatives (such as undergrounding) where there are new lines or a cumulative effect of them. (This has been pointed out many times, over many years, during consultations on this section AB).

The LIR also states that planning decisions need to “recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland” (6.48b) I would ask how this will be achieved by the plans for a new line around the exceptional Ramsey Wood.

There is only one solution if the new line has to go this route out of Bramford, and can't parallel through the woods: Undergrounding, and to include the whole section.

I also suggest, before any decision is made, and in order to be balanced and provide weight of evidence appropriate for the importance of the sites, that an independent survey of the kind done for other parts of the proposed line, be commissioned for Hintlesham and Ramsey Woods and the routes of new lines around them.

As a very minimum as part of this process I would repeat my recommendation (earlier submission) to the Planning Inspectorate to spend some time walking around the northern and western edges of Ramsey Wood in particular, and also take a view from the other side of where new pylons/lines, are proposed - I am sure landowners, including ourselves, would be happy to grant permission to do so if not already given. The site visits so far do not appear to have included these areas of 3km of completely new lines.

Available to the Inspectorate, subject to redaction

1 Notes prepared for call with National Grid 2/3/22 and exhibition 4/3/22 re environmental concerns (provided to National Grid)

Extract: “This proximity and potential dominance of our lives is also exceptional - I believe virtually unique along the whole route - as is the proposed area of the Option 1 route that would see lines run close [to the] the woods, across completely unspoilt and valuable countryside. I have requested information on this exceptional proximity. I have stated that I believe that we have been somewhat overlooked and even ignored by this process in the past. So much so that despite its proximity to the potential route, our very old property and its inhabitants are not mentioned anywhere in any of the thousands of pages of consultation reports, indeed even removed from one map. (The closest I found anywhere is in the options report: “there are a few isolated farmsteads and residential properties in farmland between...”).

2 Response to National Grid re consultation on proposed Bramford-Twinstead installations 21st March 2022

Extract: I have separately made the case here in discussions with your team, by zoom call on 2/3/22, in person at an exhibition session on 4/3/22 and again at a one-to-one appointment with members of your team on 11/3/22. I attach my notes for these. I have also recently lobbied the RSPB in the form of a meeting with local staff and the letter attached.

Extract: Surely custodians like the RSPB simply cannot entertain at all the idea of new pylons and lines being so close to and even encircling the Ramsey and Hintlesham SSSIs, which themselves are in a Special Landscape Area? And further split them permanently from its partnering SSSI at Wolves (which perhaps could be linked in any case?). It need not be a question of 'least bad' – the answer is not allowing them in the first place - and so one where everyone wins in the long term. This means challenging their need at all and arguing for the readily available alternatives; firstly, a subsea route as being proposed and discussed separately at national level and secondly, for full undergrounding of the line around Hintlesham woods (and beyond).

As far as I can tell, nearly all owners along the route around Hintlesham are in consensus on this and have made strong arguments for undergrounding – for example with Hintlesham Hall 'upstream' of us putting a good historical landscape and tourism case and immediately downstream the Hadleigh / Brett and Stour Valleys with similarly important landscape and tourism cases. Then Dedham Vale AONB, which seems to have selectively been granted special status based on its AONB designation... ... Does the RSPB consider our area, and specifically your sites, as less important than those?

The impact would be forever.