

Submission ID: SFEC45081

Holton St Mary Parish Council wishes to make further representations about the effect on the village of National Grid's revised plans and other relevant matters.

Respectively yours,


Chairman

To The Planning Inspectorate Examiners

Holton St Mary (HSM) Parish Council (PC) would like to submit further comments on the proposals of National Grid (NG) as they relate to the Parish and environs.

Gunning Principles

First the Gunning Principles have not been followed in that NG has not presented any cost comparison evidence about the other options (Subsea, HVDC, rewiring existing pylons) Further we do not understand why NG is able to put cables under the sea between Suffolk and Kent and in Scotland but not between Norwich and Tilbury. Therefore, nobody has been able to assess whether the proposed route is cost effective, bearing in mind the value of the long-term damage to the environment, the visual effect on East Anglia and loss of habitat, farming land and the effect on communities, etc.

Mitigation

Second, HSMPC submitted a comprehensive document last November commenting on the flaws in the NG proposal a copy of which is below (Exhibit A) which includes internet addresses of relevant government policies and other information. The chief amongst these is that there has been no consultation with the PC about how their proposals, unless modified, will cause actual harm and how these will be mitigated, with one exception: the proposed re-engineering of Junction 31 on the A12 where it intersects with the B1070 road to Hadleigh including a new bell mouth and a new temporary road bypassing the houses on the northern side of the B1070.

While a new "access" road is welcomed it is still far too close to the village. The PC proposed that the road be moved much further north to track parallel to the dismantled railway line to Hadleigh that starts between Junctions 32A and 32B on the A12 near to the originally proposed Cable Sealing Compound. Besides protecting the inhabitants of HSM this would render the very intrusive bell mouth unnecessary. The existing slipways at A12 Junction 31 to HSM do not support HGV traffic as they are only 5.5 metres wide.

The Construction Compound and the Cable Sealing Compound should be moved further north where disruption from traffic and adverse effects on the Raydon airfield would be mitigated. The Sealing Compound should be moved north of Pylon JC26 to protect the airfield.

Traffic on the B1070 between Hadleigh and East Bergholt/Manningtree railway station is about 38000 per week and will grow appreciably with the recent completion of two new housing estates in East Bergholt. Given the large volume of HGVs already going to and from Notley Enterprise Park from the A12 and the expected NG HGVs there should be an independent safety appraisal of the risk to residents and travellers as the proposed new haul road in its current position will create additional risks at the junction.

Damage to Listed Properties

Third, in regard to the earthworks at and around Bacons Green and by Sandpits Lane no assessment of the damage to the six listed buildings has been made and how the residents will be supported. So far as we are aware, discussions with these residents have either not

taken place or have been perfunctory. It is noted that the Examiners visited the area on 15th October 2025. However, it appears they did not visit Sandpits Lane where listed Pintins and Tiffins houses are situated. The proposed drainage area is a County Wildlife Site and Area of Particular Importance for Biodiversity. Some of these effects would be mitigated by a different transmission option.

Lighting

No statement has been made as to how the effects of lighting at the various Compounds will be mitigated at night during the construction period **and thereafter** at the Sealing Compound. Our closeness to and visibility from the Dedham Vale National Landscape (formerly Area of Outstanding Natural Beauty-AONB) and the Government's dark skies policy have not been taken into account. Other mitigation issues during the construction period have not been presented **e.g. noise, dust, effects on wildlife, traffic etc.** In regard to traffic the recent map shows that many roads that are used by HSM residents and nearby villages will be closed with the resultant congestion and use of alternative unsuitable lanes. Moving the proposed access road further north as described above would help reduce some of that.

Operating Hours

The proposed operating hours, including weekends are unacceptable.

HVDC vs. HVAC

The use of HVAC cabling will permanently remove any possibility of restoring the landscape to the status quo ante. Trees cannot be planted, crops will have to be limited, wild life will not thrive and future disruption will be necessary after just 40 years: such a scar will be ingrained in an area of the county that runs alongside the Dedham National Landscape. We consider that even if the capital cost of other options - HVDC or Offshore- is higher the damage to East Anglia and particularly HSM should be properly considered. Long term loss of environmental amenity must carry a high price.

Exhibit A

Holton St Mary Parish Council's submission to the Planning Inspectorate regarding National Grid's Norwich to Tilbury Great Grid Upgrade Targeted Consultation

Background

Following consultations with residents of Holton St Mary over the past two years, Holton St Mary Parish Council wishes to stress that it is clear that National Grid's consultation has been flawed in that no alternatives were offered to the current proposal.

Please note that Holton St Mary Parish Council is in full agreement with its neighbouring Parish, that of Raydon Parish Council. The two councils together represent circa 400 properties directly affected by the proposals.

At no time were we offered the chance to comment on the option of an undersea cabling solution or HVDC cabling, despite requests from local parish councils, town councils, district councils, county councils and MPs from all parties. We believe this to be contrary to

Gunning Principles for Public Consultation, which stipulates our right to comment on other options. National Grid's decision to pursue and consult on one single option creates the basis for a flawed consultation at best, and, possibly, unlawful.

Alternatives

Whilst Holton St Mary is in full agreement that greener electricity supplies are required and they accept the need to take electricity generated in the North Sea to London, they cannot endorse the solution currently suggested by National Grid and request that an integrated off-shore grid or HVDC options are seriously considered. If they were to be offered now, they would save significant costs in battling against residents so grossly affected by the proposals as residents would be more likely to be amenable to such a considered and viable alternative, which would both cause far less devastation in East Anglia and reduce the cumulative effects of current NSIP proposals in Suffolk.

For reference, regarding an integrated off-shore grid, which would provide a long-term sustainable infrastructure for electricity supply to the country and allow for further growth in the future, without having to bring the electricity supply network through the whole of East Anglia. National Grid never provided the residents of Holton St Mary with the opportunity to review this option despite it being a viable one for the UK (Viability of off-shore, see their website: <https://www.nationalgrid.com/the-great-grid-upgrade/sea-link>).

Second, and perhaps even more compelling given recent findings published in last year's East Anglia Network Study Report by National Grid ESO (nationalgrideso.com/document/304496/download), is the option of using Underground High-Voltage Direct Current (HVDC) cables. This is currently the standard method prevalent in Europe. National Grid ESO's findings demonstrate that an HVDC solution is preferable to a pylon solution if built before 2034. The parishioners of Holton St Mary would likely respond positively to a revised proposal for an HVDC underground cable solution from Norwich to Tilbury and are disappointed that this very practical and financially beneficial option has not been offered for consultation. HVDC would not require the 120m swathe currently proposed for the undergrounding of the AC cables through the village, nor the revisit in 40 years' time.

Third, there appears to have been scant if any discussion of the opportunity to upgrade the existing pylon network through the installation of new types of cable. TS Conductor technology enables existing pylon structures to carry between 2 and 3 times the capacity of existing AC lines and is compatible with existing pylon structures, rendering the construction of new pylons unnecessary.

Holton St Mary Parish Council repeat that not to consult on these three options impact the integrity of the Norwich to Tilbury route consultation. The damage caused by the current proposal far outweighs any of the 'green' benefits of the wind-generated electricity supply. An HVDC option would cause far less devastation in a rural area!

Harms and mitigation

If the project is to proceed based on the current proposals, Holton St Mary Parish Council urge Inspectors to consider the following impacts on the village and its residents:

Harms & Mitigations - Holton St Mary, Suffolk

Long hours of operation

National Grid's proposal suggests working 7 days a week 7am-7pm (8am-5pm at weekends). The haul road runs very close to the village and will occasion regular road closures and heavy vehicular traffic, disruption to the lives of residents, noise, light pollution and dust. The proposal is already causing stress and distress

Vital Mitigation: shorter working hours, weekdays only (or at worst Saturday mornings and weekdays only).

Temporary Construction Access Road north of Holton St Mary

We are grateful that National Grid took on board our comments regarding the unsuitability of the B1070 to construction traffic and proposed an alternative temporary access road. However, this new Temporary Access Road is situated very close to the back of the houses north of the B1070 and to residents living at the Four Sisters junction with the A12/B1070. The residents have communicated how stressed they are about this move as they will not only need to endure the ongoing noise, vibration, pollution and disturbance of the B1070 and A12 roads on their doorsteps, but in addition, have new disruption, noise, dust and disturbance from the Temporary Access Road.

Being constructed of Type 1 stone, the Temporary Access Road will mean that residents are faced with long days of noise and dust from unbound surface of this access road in addition to the disruption they already experience from the A12 and B1070. (*note long hours of operation above – noise/lighting below*)

According to NG figures, the proposals will see traffic volumes of 327 vehicles per 12-hour day, 189 of which would be HGVs travelling along the temporary access road. This would equate to at least one HGV every four minutes during the 'peak build' year.

This disturbance from the temporary access road would be in addition to the circa 38,000 traffic movements per week, with which the residents of Holton St Mary are already contending.

Holton St Mary believes this will cause unreasonable noise and disturbance, plus unsafe noise/dust levels for its residents.

Bellmouth on A12

In addition, a new bellmouth to the east of Holton St Mary, is proposed near the junction with the slip road to the A12, in order for HGVs and construction traffic to enter the new temporary access road. The location of the new bellmouth is far too close to the A12 slip road/junction, which is already the subject of an investigation by Suffolk Highways in conjunction with Suffolk Police due to the number of accidents recorded here. Adding a further 327 vehicles per day including HGVs to the hundreds of usual traffic movements will render this section of the B1070 unsafe and impassable.

Mitigation: Alternative temporary access route - dismantled railway line

We draw inspectors' attention to the dismantled railway line running from the A12 at the Capel St Mary slip road between Junctions 32A and 32B. A route parallel to and on the north side of the dismantled railway line between the A12 and the proposed Cable Sealing End Compound could be used as the alternative access route and cause disruption to far fewer properties. (Maps are available).

Although the Dismantled Railway Line itself is a local nature reserve (with bat roosts etc) and cannot be disrupted, the field margins to the north of it would provide a practical location for an alternative access road to your Haul Road. It would lead directly to the proposed Cable Sealing End Compound at Wenham and provide a practical solution for vehicles.

Siting the access road and routing the heavy traffic further north (north of Capel parallel with the old railway line) would also provide large vehicles with a far better and wider access route off the A12. Construction traffic wishing to return south could then easily do so at the Bentley roundabout. In addition, there is also plenty of room to site the proposed A12 construction compound there too.

Mitigation: Planting/landscaping. If no changes as above – mitigation in terms of planting to create baffles for the noise/dust/light for residents.

Full Risk Assessments Required

If the current proposal remains, full risk assessments showing in detail the mitigation NG will take to protect drivers, pedestrians, cyclists and horse riders using the B1070 Four Sisters junction. Full reports on the noise and dust impacts on Holton St Mary residents are also needed from NG.

Safety:

Safety must be a priority. Holton St Mary is within two miles of the local schools in East Bergholt, therefore school children are expected to walk or cycle to school along the B1070 passing the junction with the hall road and the bellmouth proposed. The excessive additional traffic and disruption to the footpath, would make it lethal for children or parents to walk or cycle to school; and for any residents for that matter.

Please note that for residents of Holton St Mary and Raydon, the B1070 is the only route to the nearest Doctors surgery, chemist, local shops and post office in East Bergholt. It is also transited by all the traffic from the A12 travelling to Notley Enterprise Park, Raydon and other villages to the town of Hadleigh. We haven't received satisfactory traffic assessment studies for this junction and the bellmouth.

At this end of Holton St Mary, NG also propose lengthening the North bound entry slip onto the A12. Please note that this two-way slip road from the A12 Northbound to the B1070 is only 5.5M wide and, as National Highways are aware, this is sub-standard as it does not allow two HGVs to pass without mounting the kerb. NG propose that eight metres is required for a Haul Road, so, it is not possible that the current 5.5m two-way A12 slip road is sufficient to accommodate NG's construction traffic.

The council believes that proposing the A12/B1070 junction as a major conduit for significant numbers of large construction lorries is completely unsuitable. Not only would it be unfeasible (even impossible) for two large vehicles to pass at this junction (as above), but it would also be difficult (even impossible) to widen the junction as there are properties on either side of the road - Four Sisters Cottage on one side and Gateway Cottage on the other side. Siting the A12 Construction Compound at that junction will only increase the intensity of heavy traffic and potentially cause major delays, even accidents.

Action: If alternatives are not found (moving the junction proposals and alternative temporary access road further north - as above), detailed safety and feasibility studies for the plans at this junction are required.

Construction Compound (JC-CC02) north of B1070

The Construction Compound was moved from within the boundary of the Old Raydon Airfield/Notley Enterprise Park where there is some existing infrastructure and screening to the Acacia Road/B1070 junction further South, closer to the Dedham Vale National Landscape and at a very high point in the countryside, therefore visible for miles. It means the Construction Compound is far closer to properties in both Holton St Mary and Raydon: Rectory Gardens/Greengage Close/Pipers Went in Raydon and houses in Bacons Green and listed building, Mayfields in Holton St Mary.

Damage: increased disruption, lighting/noise and dust issues for all these properties.

Mitigation: Return the Construction Compound/workers compound/Materials lay down area further north to the Old Raydon Airfield/Notley Enterprise Park. Or, as per our previous comments regarding the Cable Sealing End Compound and the Construction Compound, we propose that be moved further north to align with a new Temporary Access Road running north of the Dismantled Railway Line.

Cable sealing compound and Raydon Wings Airfield

The proposals do not provide sufficient safe room for landing fixed-wing aircraft, which generally approach from the north of the runway before turning to face the prevailing South Westerly wind in order to land safely on Runway 27. They impact the operations of an emergency General Aviation Airstrip and pose a risk to any light aircraft in distress wishing to make an emergency landing.

As this is one of only a few airfields along the East of England, such safety considerations must be taken into account.

Mitigation: Cable Sealing in Compound moved further north, as least as far north as Pylon JC26 to allow for safe operation of Raydon Wings Airfield. The undergrounding cable route/haul road should also avoid all runways within this operating, emergency airfield. We suggest that it be moved further north to Pylon JC26 at least in order to allow for a safe, clear approach to Raydon Wings Airfield from all directions. We highlight that this

move would tie-in well with a new access route (above) north of the dismantled railway line and also affect fewer properties.

Listed Buildings

Holton St Mary is home to 14 of the 370,000 grade two listed buildings nationally (<https://historicengland.org.uk/listing/what-is-designation/listed-buildings/#3cb5a350>).

These special buildings, their architecture, historic importance and their setting are protected. The current undergrounding proposal through the West of Holton St Mary directly impacts Dewlands Farmhouse; Holton Place; Lark Hall; Mayfields; Pintins and Tiffins; while the Highway Construction Laydown area and current proposal for a temporary access road in the East of the village is likely to impact the Four Sisters Farmhouse and Barn.

Damage: Most damage will be sustained by Lark Hall, Pintins and Tiffins, which will be completely enveloped by the Haul Road. Their setting of native hedgerows and trees will be destroyed by current plans and will never be able to recover in any reasonable time frame while the lives of the residents will be impacted beyond what can be considered reasonable.

The haul road, with its ensuing noise pollution, vibration, dust and light pollution will be within feet of each of the properties and not acceptable. Please look carefully at how close the digging will take place to these valuable Listed assets.

Mitigation: HVDC or off-shore alternatives; shifting the route away from these listed buildings.

Action: Risk Assessments/mitigation plans from NG.

If the proposals do go ahead - how does NG intend to support the residents of these buildings for the duration. What compensation will NG offer for damage to the foundations and integrity of the buildings?

We note also that the AC proposal envisages a return in 40 years design life to remove and relay the cables with the recurrence of the same disruption for a following generation or two.

Pollution - Dewlands Farm and revised drainage plans

Drainage works are planned from the Haul Road into a stream on the West of Sandpits Lane just to the North of Dewlands Farm and to the South of a footpath (just south of listed building Tiffins).

This area is rich in wildlife habitat and we have not seen any documentation of the ecological impacts of this run-off; or the impacts on river health.

NB Otters have been recorded in this area and the stream proposed for the run-off is prime otter habitat. Otters are Protected in the UK under the Wildlife and Countryside Act, 1981; are a Priority Species under the UK Post-2010 Biodiversity Framework.

European Protected Species under Annex IV of the European Habitats Directive. Listed as Near Threatened on the global IUCN Red List of Threatened Species.

(<https://www.wildlifetrusts.org/wildlife-explorer/mammals/european-otter>).

Mitigation: if it has to go here – other means of water capture prior to drainage into a nature water course; filtration.

Required: ecological impact analysis of proposal

Water pipe along Sandpits Lane

A water pipe runs along Sandpits Lane from Larks Hall/Laits Barn to Pintins and Tiffins, which will be crossed by the proposed Haul Road.

Required Assurance that residents will not lose their water supply.

Environmental Cost

NG is promoting this as a 'green project' but does not appear to have calculated the impact to the environment or carbon footprint into its consultation and we are interested to know what mitigation steps will be taken for the loss of habitat, hedgerows & valuable roadside verges, badger setts and oak trees, in particular.

Along the [REDACTED], we have recorded five established native hedgerows and 15 established oak trees; plus at least [REDACTED] and the presence of otters.

Badgers and their setts (tunnels & chambers where they live) are protected by law.

<https://www.gov.uk/guidance/badgers-protection-surveys-and-licences>

Oak trees support over 2,300 species of wildlife

(<https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/oak-tree-wildlife/>)

The native hedgerows proposed for destruction support wildlife by providing shelter, food and wildlife corridors for a wide number of different species. They also clean our air, capture carbon and reduce flooding (<https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/habitats/hedgerows/>)

Please also note that the proposed undergrounding route is home to plentiful numbers of Red Listed Skylarks (<https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/bird-a-z/skylark/>); as well as yellowhammers (Priority species:

<https://www.wildlifetrusts.org/wildlife-explorer/birds/finches-and-buntings/yellowhammer#:~:text=Protected%20in%20the%20UK%20under,UK%20Post%2D2010%20Biodiversity%20Framework.>); bat species

(<https://www.bats.org.uk/advice/bats-and-the-law>) and bluebells, snowdrops, red & white campion, among other wildflowers which are protected by law from being dug up (note that bluebells are slow-growing and it takes five years for seeds to develop into a bulb)

<https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/plants/wild-flowers/bluebell/#:~:text=The%20bluebell%20is%20protected%20under,from%20their%2>

[Oland%20to%20sell.](#)). And, as above Otters. Once disrupted, it is unlikely that such species would return.

NG plans contravene the Government's 25 Year Environment Plan and to achieving Net Zero by 2050 (<https://www.gov.uk/government/publications/nature-for-people-climate-and-wildlife/nature-for-people-climate-and-wildlife>). It says 'Over the past 50 years, much of the UK's wildlife-rich habitat has been lost or degraded, and many of our once common species are in long-term decline' – NG's 'short-term' plans cut right through the Government's Plan and propose to destroy precious habitat. This current proposal negates the benefits of offshore wind electricity generation in the long term.

Action – Onus is on National Grid to provide 10% Biodiversity Net Gain from the project. This is over and above making good the losses. **Needed:** Detailed evidence of how NG plans to mitigate for the loss of habitat, reduce flooding, maintain air quality and carbon capture? How it plans to protect wildlife and provide wildlife corridors for any poor creatures left standing. How will it provide 10% Biodiversity Net Gain over and above the losses?

Mitigation: Replanting – although a woefully inadequate legacy (native hedgerows take decades, oaks centuries, to become truly valuable). Translocation of protected species. Creation of/investment in new habitat for wildlife in and around Holton St Mary – in agreement with affected farmers?

Destruction of farmland

Holton St Mary and Raydon are surrounded by prime agricultural land. Local farmers have fed back to us that the land directly within the Haul Road Swathe is unlikely to be viable after NG's work. What calculations have been incorporated into NG plans for this?

Mitigation: If it is not possible for farmers to cultivate the land effectively once completed, what compensation will be offered them? Can they be financially supported for the long term to create wildlife corridors or similar valuable alternative habitats on unusable land? We suggest that long-term Wilding options on unusable arable land would help mitigate the native hedgerow and oak tree loss detailed above. This does not, however, compensate the country as a whole for the loss of prime agricultural production in East Anglia as a result of NG's AC proposal.

Access for the duration

So many vital roads will be closed for the duration of the project that access in and out of Holton St Mary will become a nightmare. Traffic travelling East/West along the B1070, including commercial operations at Notley Enterprise Park will be heavily impacted – diverting along unsuitable country lanes causing traffic chaos and congestion around the village; and further destruction of valuable roadside verges. Journeys for residents to and from the schools, doctors or shops in East Bergholt will be severely impacted. Traffic transiting the A12 when it is blocked will be diverted through unsuitable country lanes, which include designated Quiet Lanes.

NB the number of houses effected: Holton St Mary – 109; East Bergholt - 1,481; Layham - 277; Raydon – 280; Wenham – 81; Shelley – 26; Hadleigh – 4,264: a total of 6,518 properties; plus, all the businesses in Hadleigh and those along the route and at the Notley Enterprise Park. Traffic congestion and speeding is already an issue between the A12 and Hadleigh, to push this traffic along smaller lanes will have a devastating effect on residents.

Holton St Mary is on the Suffolk Cycle Route, which is used by hundreds of cyclists annually for tournaments and for hundreds of hobby cyclists during weekends and holidays.

What mitigation will you put in place to ensure their safety and for this loss of amenity?

Mitigation/Action required: Robust measures to prevent unsuitable detours taking place. Investment in speeding enforcement in Holton St Mary and surrounding villages. Measures to prevent erosion and destruction of the surfaces of small country roads? If destroyed, what repair contingencies have been built into the NG costings?

At least two weeks' notice for residents of planned road closures to allow for alternative personal plans to be made. (With a clear and well-resourced enforcing/responsible body for enforcement?)

What is NG planning to do to protect villagers and the surrounding road networks? It will not be sufficient to merely control traffic at the location of your works. There will need to be an active traffic management plan for light vehicles around the area, as otherwise vehicles will be unlikely not to use HGV diversion routes and will attempt to use narrow lanes as rat runs.

Mitigation – NG to be financially accountable to invest in restoring road networks and roadside verges destroyed during construction

Access on footpaths

The area around Holton St Mary and Raydon is blessed with a network of ancient footpaths (Holton St Mary has ten footpaths recorded in the village), tracks, and bridleways. There are a further two footpaths crossing the airfield at Raydon. (There would be less impact with HVDC.)

Mitigation: reinstatement of footpaths to a high standard after construction.

Light pollution

Holton St Mary is a mile from the National Landscape of the Dedham Vale and is home to over 100 residents, who enjoy the amenity of dark skies.

The haul road and accompanying construction & cabling compounds will cause untold light pollution, especially given the proposed working hours.

Mitigation: Haul road and temporary access roads, compounds etc to be lit by detector lighting only NOT floodlit! Environmentally-more-friendly, Dark sky-approved lighting to be used throughout.

Ref: <https://darksky.org/what-we-do/darksky-approved/>

Government Guidance on Light Pollution: <https://www.gov.uk/guidance/light-pollution>

Mitigation: Baffles/light barrier vegetation planted. Landscaping to obscure the visual, sound and lighting impacts of the construction swathe/compounds etc.

Cumulative effects

All of the above impacts will have such a negative impact on residents, we wonder what NG is proposing in terms of compensation for loss of amenity, habitat, dark skies, peace and the noise, vibration, dust and pollution planned?