

## COMMENTS to The Inspectorate.

Reference: [REDACTED]

Holton St. Mary Parish Council Response to the Examiner's requests for information (ExQ1)

as referenced by REP1-168 WE.1.13 requested on Page 71 (EN020027-002163).

### WE 1.13 [REP1-168] Response - Holton St Mary Parish Council

*Holton St Mary Parish Council comments in its WR, Holton St Mary PC [REP1-168] notes that drainage works are planned from the haul road into a stream on the west of Sandpits Lane, just to the north of Dewlands Farm. Its notes that the area is rich in wildlife habitat and that otters have been recorded in the area and that the stream proposed for the run-off is prime otter habitat. The PC note that it has not seen any documentation of the ecological impacts of this run-off; or the impacts on river health.*

*Provide an ecological impact analysis of the proposal for this area and, if there are no reasonable alternatives, propose forms of mitigation that might be employed, such as water capture and/or filtration.*

*Holton St Mary PC – Please provide evidence regarding the stream on the west of Sandpits Lane, just to the north of Dewlands Farm, and your statement that the area is rich in wildlife habitat and the stream, where the run-off is proposed, is prime otter habitat where otters have been recorded.*

## HOLTON ST MARY PC - RESPONSE

### Evidence of Stream est of Sandpits Lane – and, County Wildlife Site

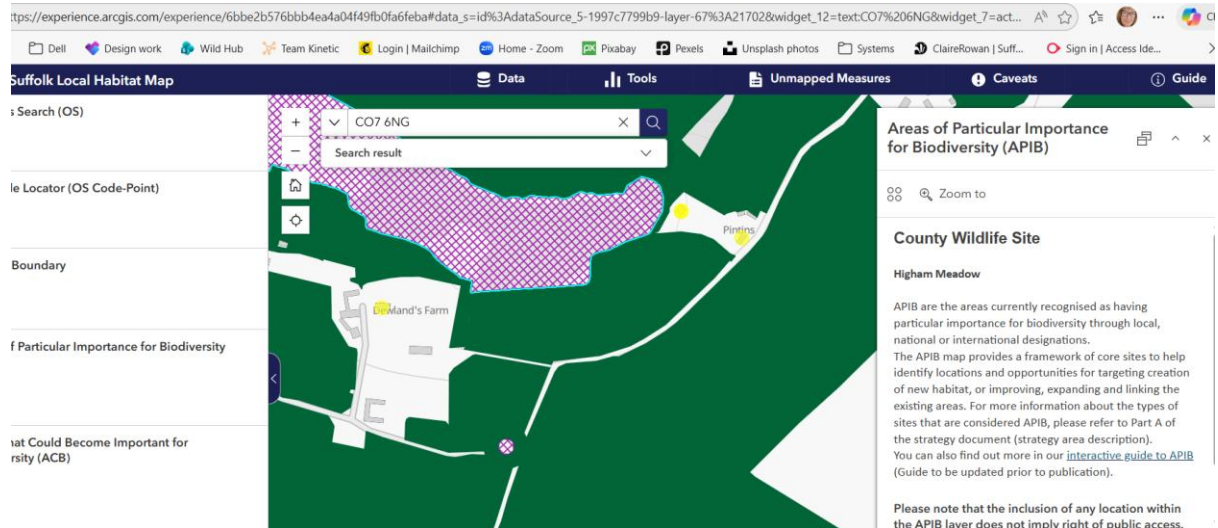
The area proposed for drainage by National Grid (between Listed Buildings: Pintins, Tiffins and Dewlands Farm on Sandpits Lane – running between the B1070 in Holton St Mary and the B1068 running from the A12 to Higham) runs along the south border of a bluebell wood and the run-off will enter the stream marked on National Grid's own map in blue (see photo NG Stream Snip below). The stream runs from the West through what is a designated County Wildlife Site and Area of Particular Importance for Biodiversity (APIB) and congregates where the drainage area ends.

As outlined in the Local Nature Recovery Strategy, The County Wildlife Site of Higham Meadow is recognised as having particular importance for biodiversity through local, national or international designations.

This is the link to the Local Nature Recovery Strategy - Suffolk map:

[https://experience.arcgis.com/experience/6bbe2b576bbb4ea4a04f49fb0fa6feba#data\\_s=id%3AdataSource\\_5-1997c7799b9-layer-67%3A21702&widget\\_7=active\\_datasource\\_id:dataSource\\_5,center:605342.4443751641%2C236390.88037862128%2C27700,scale:9683.742836355028,level:13.92504576,rotation:2.327619908064877,viewpoint:%7B%22rotation%22%3A2.327619908064877%2C%22scale%2](https://experience.arcgis.com/experience/6bbe2b576bbb4ea4a04f49fb0fa6feba#data_s=id%3AdataSource_5-1997c7799b9-layer-67%3A21702&widget_7=active_datasource_id:dataSource_5,center:605342.4443751641%2C236390.88037862128%2C27700,scale:9683.742836355028,level:13.92504576,rotation:2.327619908064877,viewpoint:%7B%22rotation%22%3A2.327619908064877%2C%22scale%2)

[https://experience.arcgis.com/experience/6bbe2b576bbb4ea4a04f49fb0fa6feba#data\\_s=id%3AdataSource\\_5-1997c7799b9-layer-67%3A21702&widget\\_12=text:CO7%206NG&widget\\_7=act...](https://experience.arcgis.com/experience/6bbe2b576bbb4ea4a04f49fb0fa6feba#data_s=id%3AdataSource_5-1997c7799b9-layer-67%3A21702&widget_12=text:CO7%206NG&widget_7=act...)  
(enter CO7 6NG)(see Snip below)



### Details of the **Local Nature Recovery Strategy for Suffolk:**

<https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/local-nature-recovery-strategy>

**BELOW – 2 x Snips from SBIS showing stream and 1 x National Grid map showing stream running into drainage destination, which is an area of increasingly wet woodland.**

Attached a **photo** of the area taken last year in April/May. Note the abundance of bluebells in the wood to the north of the drainage area and the inclination of the land into a ditch where water from the surrounding fields, road and upstream water source congregates. National Grid's proposed drainage outlet (again, NG Stream **photo** showing the presence of the stream) will also drain into this area and into the bluebell wood.

### **PHOTOGRAPHS**

See also:

- 1) Photos of water-filled ditch/stream at the end of the bluebell wood area taken with back to bluebells looking West down the footpath.
- 2) Photo of pond, with bullrushes, behind Tiffins (photo taken from footpath looking East showing Tiffins in the background).
- 3) Photo for context from road looking (West) down into the bluebell wood (taken March 2026 - bluebells not yet flowering)

The drainage area and the road (Sandpits Lane) are much higher than the stream/ditch/pond below the bluebell wood, so all drainage water will run down into the existing pond and water-filled ditch/stream. Sandpits Lane is itself lower than the field to the East and National Grid's main undergrounding swathe. Run off will be considerable into

the drainage area, bluebell wood, stream and pond. Full feasibility survey should be conducted for viability of this location for drainage.

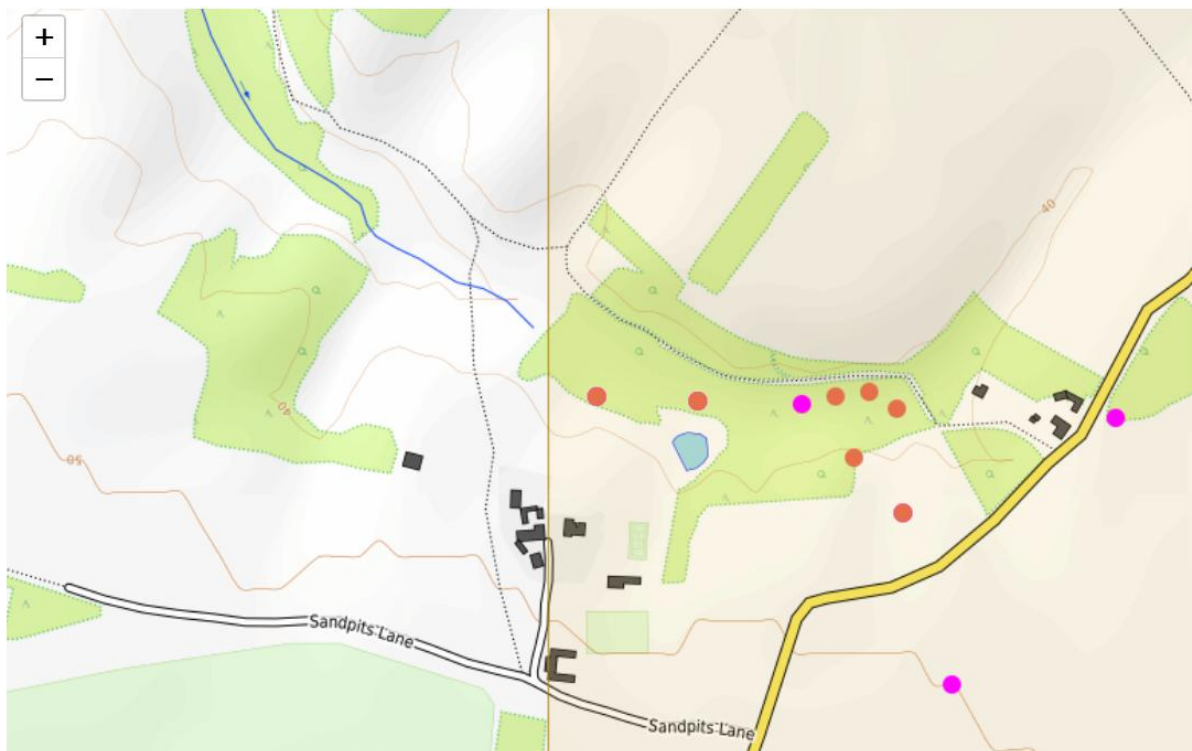


suffolkbis.org.uk/record/nbn-atlas-records

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National Grid's map showing the proposed run-off/drainage channel in pink and the Stream in blue.



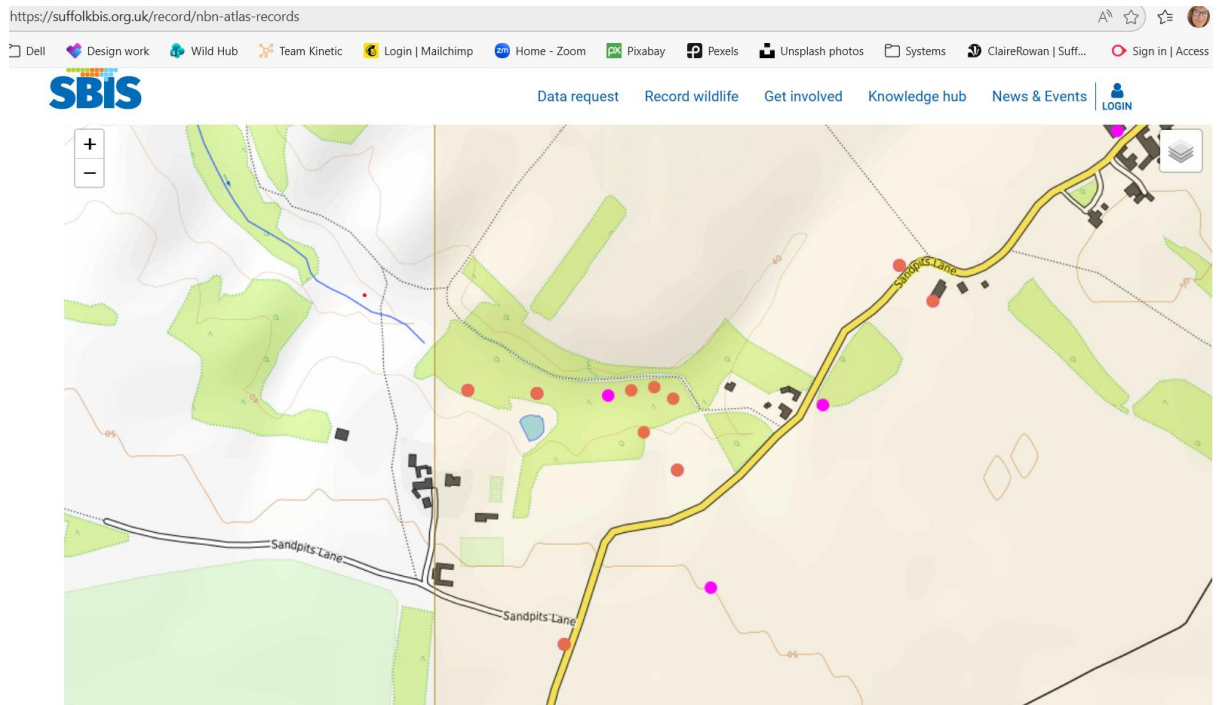
#### **EVIDENCE PRESENCE OF WILDLIFE**

##### **Flora & Fauna recorded:**

**Photograph** showing bluebell wood area (entitled 'drainage destination'). The wood is completely covered in bluebells. Photo, taken last year, from footpath facing South-East, back up towards the road and border with Dewlands Farm paddock.

Bluebells are an Ancient Woodland Indicator Species and are protected under the Wildlife & Countryside Act (1981)

Using **Suffolk Biodiversity Information Service** map and enter: CO7 6NG  
([suffolkbis.org.uk/record/nbn-atlas-records](http://suffolkbis.org.uk/record/nbn-atlas-records))(see **2 x Snips** below)



suffolkbis.org.uk/record/nbn-atlas-records

SBIS

Data request Record wildlife Get involved Knowledge hub News & Events

ALL_SPECIES	641
<b>Animals</b>	304
Amphibians	0
Arthropods	198
Crustaceans	0
Insects	198
Myriapods	0
SpidersAndAllies	0
<b>Birds</b>	72
Fishes	0
Mammals	12
Molluscs	19
Reptiles	1
Worms	0
<b>Bacteria</b>	0
<b>Chromista</b>	0
<b>Fungi</b>	41
<b>Plants</b>	296
Algae	0
Bryophytes	42
ClubmossesAndFirmosses	0
FernsAndAllies	4
FloweringPlants	247

Leaflet | powered by NBN | OpenStreetMap | CartoDB

The drainage area is within the Dedham Vale National Landscape and there are lots of otters present along the Stour and the Dedham Vale area. Work has been going on in the area for the past 20 years to boost the otter population:  
[news.bbc.co.uk/1/hi/england/suffolk/4635242.stm](https://www.bbc.com/news/uk-england-suffolk-4635242)

A dead Otter was found in Holton St Mary about four years ago, but I cannot find evidence for this – photos were published at the time. Otters will happily travel up to 10 miles when hunting and will visit the stream & pond shown in photographs and in the wet area of County Wildlife Site of Higham Meadow.

I also attach a list of bat species recorded at CO7 6NJ last Autumn. This is a very important area for wildlife.

Parish Councillors have also personally recorded (phone video – can be supplied) several nightingales singing along the footpath.

## FLOODING

### WE Water environment: flood risk, hydrology and drainage

Worth noting is that this section of Sandpits Lane already floods with just moderately heavy rainfall, so additional water burden in this area will have an enormous detrimental cumulative impact on both wildlife and public amenity (making the footpath impassible), not to mention highways (Sandpits Lane will become impassible as it is sometimes already after heavy rainfall).

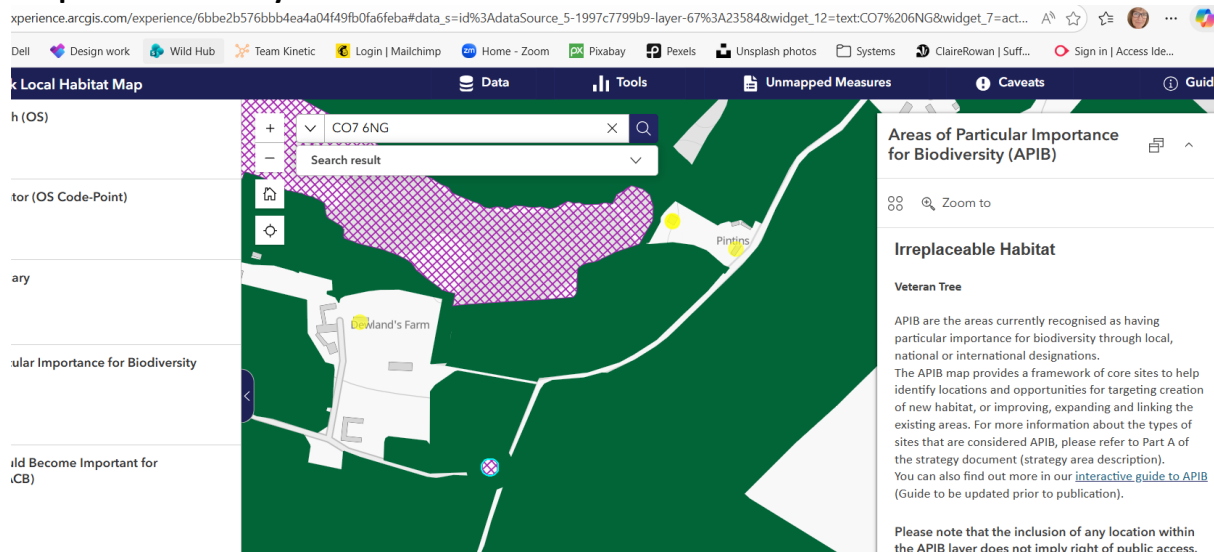
See - **Photo of road**, taken facing South from the top of the bluebell wood, showing flood evidence (potholes and run off) exactly where NG propose to run the drainage channel.

If drainage is to go ahead – serious mitigation will be required to prevent the road flooding, to prevent destruction of the bluebells if wood becomes waterlogged and excessive flooding/pollution of the stream/ditch & pond, and flooding of the footpath.

## IRREPLACEABLE HABITAT

**NB – separately, but in the same wildlife area:**

### Irreplaceable tree by Dewlands Farm.



National Grid should please be required to give wide berth of these tree roots when digging the undergrounding swathe generally and the drainage channel -

<https://www.woodlandtrust.org.uk/blog/2021/04/root-protection-areas/>

Perhaps the swathe could be moved further to the East at that point and drainage channel taken out to the East?

Certainly, any run-off/drainage should be subject to filtering and reduced in some way to protect all of this beautiful fragile habitat?

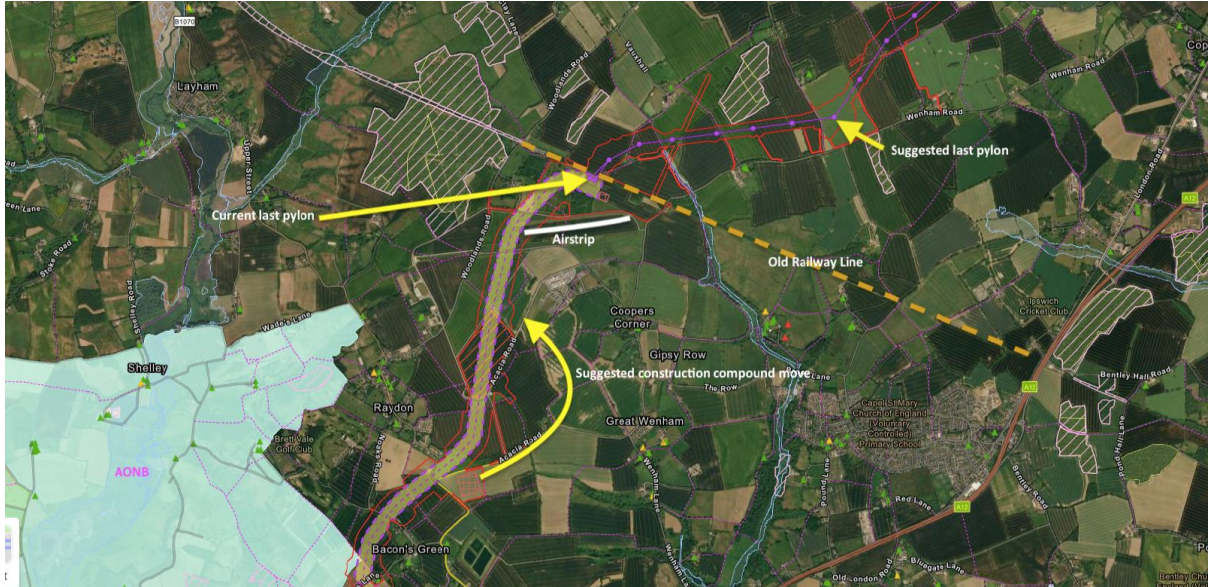
## **ADDITIONAL REFERENCED COMMENTS FROM HOLTON ST MARY PARISH COUNCIL**

In addition to the response to the specific request referenced above, Holton St Mary Parish Council respectfully submits further comments on some of the subjects about which the Inspectorate has raised questions with the Applicant, as these subjects have a significant relevance to Holton St. Mary (HSM). The Parish Council requests that these comments be accepted by the Examiner as though HSM Parish Council itself had been asked to respond to these questions. HSM has received no feedback from the Applicant about the cumulative impacts on the village of the temporary access road, the haul road, the Northern slip-road to the A12 at Junction 31 and proposed bellmouth works at the A12/B1070 junction and other matters. In the case of the access road we have proposed a solution that should be acceptable to the Applicant. The references below are taken from the ExQ1 document (deadline 10<sup>th</sup> April 2026) without repeating the Examiner's questions.

1.TT 1.12 The access road to the proposed Sealing Compound at Notley Enterprise Park from the Junction of the B1070 with the A12 to the North of Holton St Mary and its associated bellmouth is unsatisfactory and will create continuing traffic problems as more than 36000 vehicles travel through that junction per week.

Table 3.10 on Page 69 of Volume 6, Document 6.3 Chapter 3 states that the Cable Sealing Compound site preference is for Notley Enterprise Park. This would be connected to a new access road running just North of Holton St Mary Village (HSM) to the Four Sisters Junction with the A12 (Junction 31) that would require major modifications to the slip road, that appear not to be planned, a new bellmouth that would adversely affect two Listed buildings close by. Although the creation of this road rightly avoids traffic going along the very busy and unsuitable B1070 that runs through HSM, the Parish Council considers this to be sub-optimal as it is much too close to the village to mitigate noise, dust, light pollution, traffic and concerns about the mental well-being of the residents in particular the 50 or so on the North side of the village through which some 36,000 vehicles already pass each week.

HSM Parish Council has suggested on several occasions that the access road AND the Cable Sealing Compound north of the B1070 should be moved further North. Our specific proposal as outlined in our last representation is that the new access road should be constructed from between junctions 32A and 32B of the A12 North of Capel St Mary parallel to the disused railway line. This line leads to Hadleigh; North of Notley Enterprise Park and Raydon airfield so, the last pylon should be moved further to the North East and the Cable Sealing Compound moved appropriately. This is shown on the map below.



This route is infinitely better as it would dramatically reduce the number of affected properties, is virtually all on field edges/headlands and with direct access to a grade separated junction at Capel St Mary only requiring a large bellmouth. Moreover, any adverse effects on the two Grade II Listed and other properties on the B1070 Northern slip-road to the A12 would be avoided as would be the requirement for a storage compound by the A12 there.

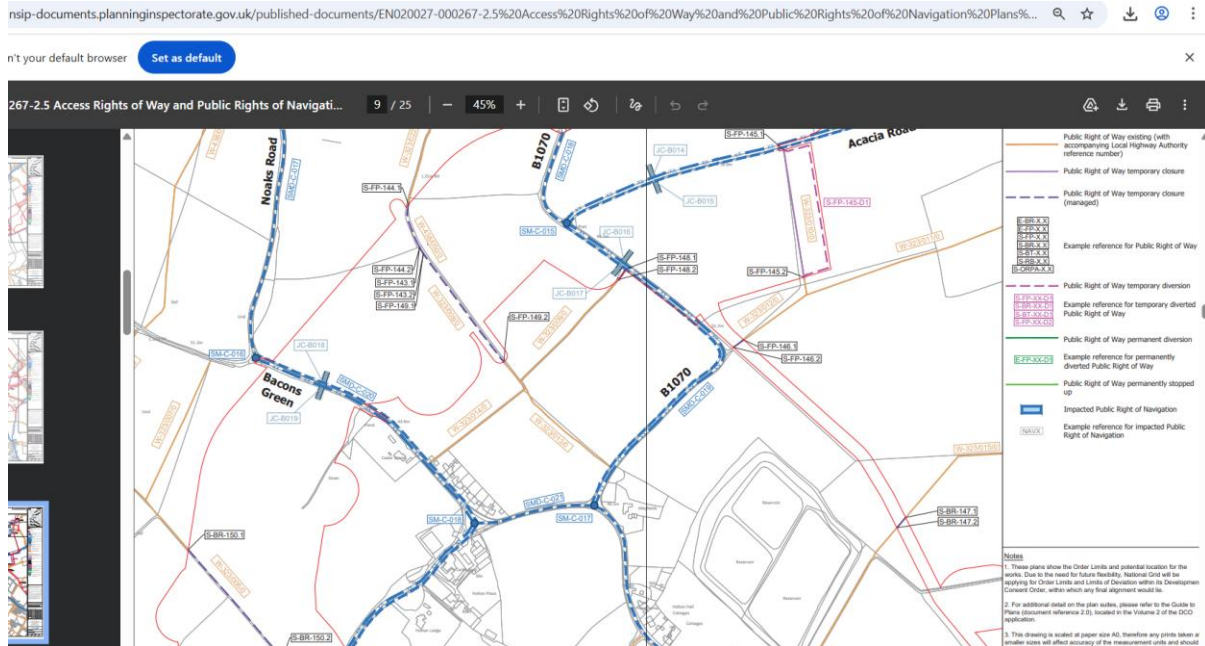
It would appear that this alternative to the preferred location at Notley Enterprise Park was not considered at any time by the Applicant since no mention of this possibility appears to be contained in Document 6.3. Further, the Applicant has made no attempt to engage with the Parish Council about this. Therefore, HSM Parish Council, requests that an analysis of this alternative be made before any decision is reached.

## 2. DCO 1. A24 - Article 16 (Temporary closure of streets and public rights of way)

Holton St Mary Parish Council draws the Inspectorate's attention to the number of roads and Public Rights of Way due for managed closure to the West & East of Holton St Mary.

Please see Picture 1 shown below of how the village will be cut-off by road closures and PoW closures. In this regard no mention is made of how the road from Raydon to HSM via Noakes road will not become a rat run.

Picture 1 - HSM showing haul road disruption to the West of the village



Where will traffic be diverted during managed road closures? How often and for how long with these closures take place? No details have been provided. NB there are over 5000 traffic movements per day on average along the B1070 through Holton. During the past road closures, smaller surrounding lanes have been damaged by large vehicles taking inappropriate diversions. How will National Grid manage this? What quantifiable mitigation? What damage repair to smaller roads is planned post construction due to excessive wear and tear? What notice will be given of closures?

NB - managed closures of S-FP-144.1; S-FP-143.1; S-FP-143.2; S-FP-149.1; and S-FP-149.2. This is the only footpath from Bacon's Green to Raydon and is to be subject to managed closures throughout construction. What alternatives will National Grid put in place to allow residents safe pedestrian access to the amenities in Raydon for the duration of the construction? What notice of the closures will be given?

### 3. TT 1.12 - Junction and link capacity - 1

The area to the east of the village is part of the Suffolk Cycle Network and will be subject to regular closures. (Ref: <https://www.routeyou.com/en-gb/route/view/4386523>)

### 4. BIO 1.7 - Badger setts and construction

We would be happy to discuss badger setts confidentially with the Inspectorate as we would rather not divulge more details in writing in the public domain. The issue is pressing for Holton St Mary. We welcome the Inspectorate's request for further information on how the ExA can be confident that, in any locations where main setts may require closure, sufficient time has been allowed for; so that any necessary works would be fully completed and replacement setts occupied before construction commences.

### 5. BIO 1.20 - Assessment of effects on trees, hedgerows and woodland

HSM Parish Council looks forward to the applicant's submission of the details as so many hedgerows and oak trees will be taken out by the haul road as it approaches and transects the west of the village, plus the new proposed temporary access road north of the village. More information can be supplied.

### 6. Heritage Assets

## **HE 1.6, HE 1.7 and HE 1.8, HE 1.9 and HE 1.11 and HE1.12. - Harm & Level of Harm to Heritage assets**

We commend the Examiner for raising these important questions. HSM has six Grade II Listed properties nearby or adjacent to the haul road and two on the East of the North slip-road to the A12 at Junction 31. We request transparent information about how the term 'negligible' was arrived at considering the closeness of these assets to the works, not just during the construction period but thereafter, and including the possible effects on their structural integrity, ambience and setting. Further, mitigation or avoidance of these effects appears not to have been presented. The listed buildings are Dewlands, Pintins, Tiffins, Lark Hall, Holton Place and Mayfields near or adjacent to the haul road. Moreover, unlisted Laits barn will be adversely affected by its proximity to the haul road. Four Sisters farmhouse and its separate barn on the North B1070 slip-road to the 12 are Grade II listed. Pintins and Tiffins will be affected by the proposed drainage works on Sandpits Lane. HSM requests information from the Applicant as to why the activities along the haul road near the nearby properties will not cause structural damage including to the foundations of these buildings.

### **7. HW Health and wellbeing**

HSM Parish Council would like to draw the Inspectorate's attention to the cumulative impacts on the general disruption and the residents' health, wellbeing and level of anxiety.

We refer to:

Picture 1 – above - showing the road and PoW closures proposed to the West of the village;  
Picture 2 – below – showing the disruption to residents North of the village due to proposed new access road, with its scheduled 500 plus HGV movements per day.

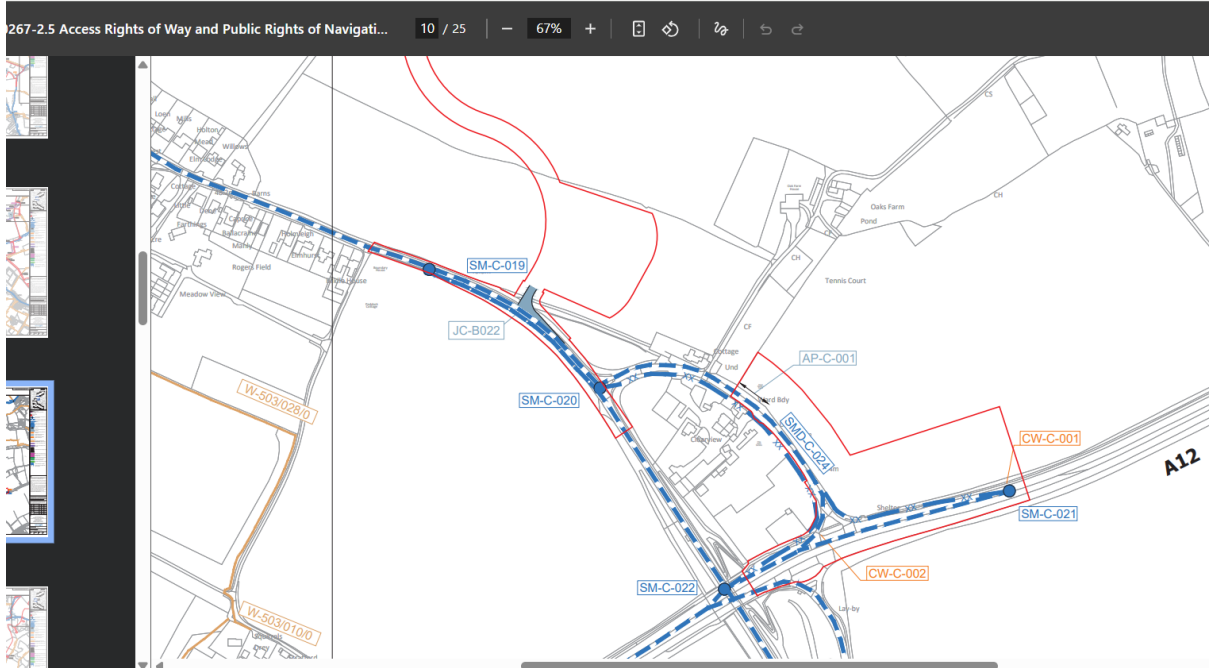
And

Picture 3 – below - showing the disruption to residents in the East and at the A12/B1070 junction and slip road proposals.

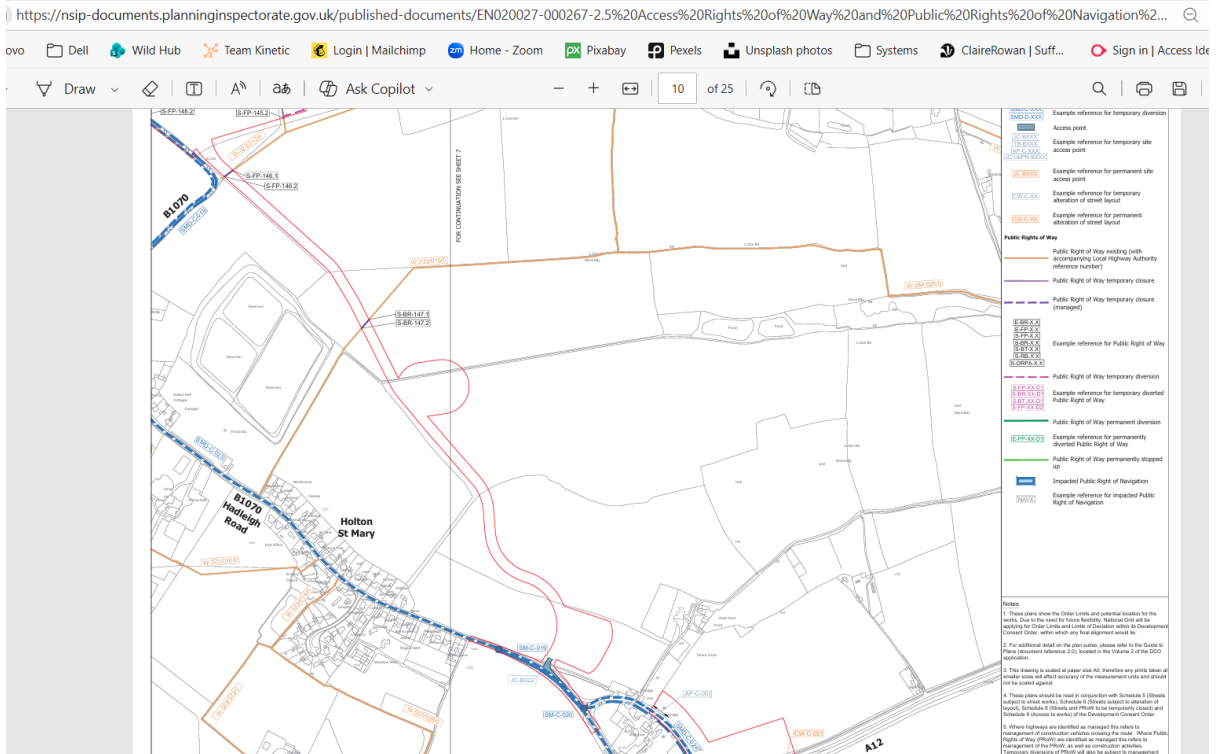
**HW 1.1,1.10,1.13**, Residents of the village are already expressing their distress at the proposed disruption to their lives, their children's lives, journeys to work, access to families, emergency access etc. road closures, excessive noise, vibration, dust, light pollution seven days a week for 10-12 hours a day, including bank holidays, is already causing severe anxiety for many. Not knowing exactly when this will start, how long it will continue and how they will be able to plan their lives for a duration of four years or more is very challenging. The works will adversely affect resident's ability to sell their homes, adding to the stress. Cumulative impacts on residents' health and wellbeing must be assessed and sufficiently mitigated.

**Picture 2 - HSM showing the A12 junction works and entry to new access road**

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Picture 3 - HSM showing access road to the north of the village



## 8. LV 1.30 - Outline landscape and ecology management plan

Holton St Mary Parish Council reemphasises the need for National Grid's night-time works, including construction/storage depots and workers' and cable sealing compounds etc and the lighting thereof to comply with National Landscape advice on Dark Skies lighting

(<https://coastandheaths-nl.org.uk/2023/08/07/new-landscape-lighting-design-guide-published/>). HSM is

less than a mile from the National Landscape and at higher altitude, so light pollution is a serious concern that National Grid appears not to have addressed.

**9. NV 1.4 - Noise general/precision – 2**

HSM wishes to know how noise affecting the village and individual residents will be mitigated and what scientific evidence National Grid can attest. Reduced operating hours may help; however excess levels in daytime must be eliminated. One example would be to prohibit vehicle reversing warning alarms.

Also, noise levels above Babergh District Council's guidelines must be avoided., i.e. below 34 dBA, or 10 dBA above background level at night. The effect on residents must be assessed and the hours reduced as necessary, even if it prolongs the construction period.

**(ENDS)**







