

Date: June 2024

National Grid Electricity Transmission by email

**Planning Act 2008 s42: Norwich to Tilbury Nationally Significant Infrastructure Project**  
**(NSIP) statutory consultation**

**RESPONSE OF GISLINGHAM PARISH COUNCIL**

This is the response of Gislingham Parish Council to the statutory public consultation, between 10<sup>th</sup> April and 26<sup>th</sup> July 2024, undertaken by National Grid Electricity Transmission for the proposed Norwich to Tilbury NSIP.

**Introduction**

Gislingham Parish Council considers their role of protecting and promoting the interests of the community, businesses, heritage and environment to be of the utmost importance and note its contribution to the unique character of Babergh, Mid Suffolk, Suffolk and the wider eastern region.

The Parish Council acknowledges the government's net zero commitment and is mindful of related energy security, carbon reduction and energy poverty issues.

However, the considerable and potentially devastating impacts of strategic energy development are of significant concern.

The comments in this response are offered in context with how these impacts may affect the Parish of Gislingham and, should the Secretary of State accept such an application for development consent and grant such consent, sets out the matters the Parish Council identifies as needing appropriate assessment, mitigation, compensation and the delivery of community benefits.

**Information about Gislingham**

Gislingham has approximately 1200 residents.

It has 38 Grade II listed buildings, 3 Grade II\* and one Grade I listed Church

It is a very active village with a Women's Institute Group, Gislingham Variety Club, a very active Church, Primary School and Nursery School, a busy Village Hall management team and a Silver Band (in existence for many years).

The Messenger (a monthly magazine that has won national awards for content and design, is delivered to every house in Gislingham and three other local villages and is provided free of charge).

This year there will be a music festival (GISFEST provided free of charge), the Summer Fair (free of charge), the Flower Festival (free of charge), the Flower and Produce Show (GISGAPS provided free of charge) and 'Safari Supper' plus numerous events organized in the Village Hall. Gislingham also has a History Hub. Residents regularly volunteer in roles such as footpath warden, tree warden and litter pickers.

Altogether a very active and a very strong sense of community.

We have 6 roads in/out of the village. Only one of these has pavements and only two have streetlights.

### **Principle of objection to development**

The Parish Council believes that the Norwich to Tilbury NSIP scheme will have a negative and devastating impact on Gislingham and believes that a pause to the scheme is essential to enable alternative solutions to be fully considered and consulted upon and that this strategic delay would be a rational response to objections in Gislingham and along the rest of the of the project route and would enable delivery of the objectives of increased green energy whilst minimizing the impacts of such developments on Gislingham.

The Parish Council is aware that there is a known and recognized likelihood of alternative technologies and/or infrastructure design arrangements and recognizing the findings of the Hiorns report that the need for extra transmission is more likely to be closer to 2035 than the National Grid's programme delivery date of 2030.

Indeed, the ESO report called for a pause and National Grid itself estimates that by 2034 the cost of going underground will equal the cost of pylon construction.

It is also of note that the Holford rules are not apparently being adhered to in as much as it calls for no sharp angles, in a straight line and with a natural backdrop wherever possible to minimize damaging the view.

### **Key impact issues**

The following are some of the main issues identified as being of significant concern in Gislingham. This list is not exhaustive and does not prejudice the consideration of any other issue, at this time, or in the future.

## Biodiversity

It is understood that the following landscapes/species/wildlife populations are variously threatened by their location within the red line. Current plans may need these to be cleared or otherwise seriously damaged to allow for production to continue in its current form.

- In the field on the left leaving the village towards the railway bridge there is a copse with a rare Black Poplar tree (waking.spruced.biked) together with a number of other trees and a considerable amount of varied wild life.
- An 800 year old boundary Oak which has a Tree Preservation Order on it (truffles.pump.rifled) and an avenue of trees may need to be cleared on Spring Farm.
- Lines of established trees Oak trees on Thornham Road on exiting the village (both sides) as far as the Swattesfield site. Over the railway arch there are established Oaks.
- Healthy Red Kite, Buzzard, Owl, Turtle Dove and many others at risk of pylon strikes. See report with more detail from volunteer conservationist on See Appendix 1 on page 7 and Appendix C on page 9.
- Interruption of game trails and natural paths used by deer etc. by fencing and construction sites
- Water meadow, where in a couple of hours 104 species of flora and fauna were identified, but the final total is likely to be much higher (between RG117 and RG118. (Multiple Environment surveys have been carried out on Spring Farm by third parties. The landowner has requested a copy of these and has been denied access to them).
- There has been an inconsistent approach to Sites of Scientific Interest (SSSI). These include Wortham Ling, Middle Wood and Offton and the Parish Council believes Gislingham should be included in this list.
- Ground nesting farmland birds e.g. Grey Partridge plus other wildlife e.g. badgers and weasels, brown hare and fallow deer. Please see Appendix A on page 7 and Appendix C on page 9 for further details of birds observed in Gislingham.
- Bats are known to be nesting in many locations with regular flightpaths in many locations within the 'red line'..
- No action has been taken to rule out highly protected species e.g. Hazel Dormouse and Great Crested Newt.
- The National Grid Baseline Assessment has identified public rights of way that are potentially high usage and have extensive connectivity and/or social significance and 3 of these are located in Gislingham (Near RG118, RG119 and RG114). According to the local branch of the Ramblers Association, Gislingham is particularly severely affected in this regard.
- Gislingham sits in the central part of the Plateau Claylands which are believed, by National Grid, to be directly affected by construction activity (particularly between RG117 and RG122) and in their words – "...direct effects arising would include the removal of some landscape features. There would be disturbance to mainly arable farmland, including the loss of some hedges, hedgerow trees and the margins of

woodland blocks. The introduction of construction compounds, temporary and permanent access tracks, temporary drainage works etc. all within an area which they describe as having an ancient organic pattern of fields, substantial hedgerows (many of great age), a rich stock of medieval buildings etc.

- Air quality. The air quality assessment that was undertaken by National Grid showed that the best air quality was shown to be in Gislingham. The Parish Council is concerned about how that will change given dust, fumes etc. generated during the 4-year construction process.
- Effects on Farming. Many acres of farms of highly productive farming land will be requisitioned for the project, leading to a long-lasting detrimental impact on soil through erosion and particulates. Crop yields will be badly, and possibly permanently damaged, with a resulting negative impact on food security and a knock-on effect on other the rural economy and local people working in the farming community or the agricultural supply chain members of the farming community.

### **Construction – Roads and pathways**

- It is believed that some footpaths will be closed temporarily and some permanently. Any public footpath along the red line will be affected and in Gislingham this includes – footpaths FP267/021 near pylon RG119, FP267/022 near pylon RG118, FP267/014 and FP267/014A RG114. Despite there being many horse owners in Gislingham, bridlepath FP267/014 is one of only 3 bridlepaths in the whole parish and the only one in the north of the village. We have been advised that no alternative routes are likely to replace these so they will be closed permanently. See draft comment from a local branch of the local Ramblers Association see Appendix B on P8.
- The loss of the footpath over the railway line is of concern and cannot be underestimated. It is an arterial route that connects Gislingham to Thornham and Thornham Walks and beyond into the surrounding area. It is a particular favourite of runners, walkers, dog exercisers and children.
- Local traffic and through traffic will be driven onto the roads away from those being used for construction traffic but the detail of those is as follows:
  - Back Street** Single track with limited passing places. Housing, no pavement, no lights. Used by many walkers, horses, local traffic and farm traffic.
  - Finningham Road** Mostly 2 lanes but with a significant number of pinch points/passing places. No pavements, no lights. Used by horses, local traffic and farm traffic.
  - Mill Street** Mostly 2 lanes with some pinch points. Highly populated, no pavements. Common route for children walking to school. Also used by local traffic, school traffic, horses, school buses and farm traffic.
  - Burgate Rd** Mostly single track with passing places. No pavements, no lights. Used by buses and local traffic going to Diss and many walkers.
  - Mellis Road** Mostly 2 lane but with pinch points and passing places, no pavement, no lights. Used by school traffic (going to Mellis Primary) and walkers.

**Thornham Road** 2 lane traffic which is the main road to join the A140. Used for up to 1,000 car journeys local and through traffic per day, school buses to and from Hartismere High School, horses and farm traffic.

A SECTION OF THIS ROAD, WHICH IS VERY CLOSE TO THE EDGE OF RESIDENTIAL PART OF THE VILLAGE, FALLS WITHIN THE 'RED LINE' AND IS DESIGNATED TO FORM PART OF A HAUL ROAD. THIS WILL CAUSE MASSIVE DISRUPTION FOR RESIDENTS (SEE ABOVE THE LOCAL USAGE DETAILS) NEEDING TO TRAVEL EAST OUT OF GISLINGHAM, WHICH A SIGNIFICANT PERCENTAGE OF VILLAGERS DO ON A DAILY BASIS AND WILL DRIVE TRAFFIC ONTO LESS SUITABLE ROADS, INCREASING CONGESTION, POLLUTION AND THE RISK OF ACCIDENTS.

**National Grid** have estimated that peak construction time will be 2029

The estimate is for 127 HGV 7 days a week for 4 years plus 94 light goods vehicles plus an unknown number of workers vehicles.

With an average 1 HGV every 5.5 minutes that means an increase in a 12 hour day, weekday flow of 371%

- School buses collect from and travel along Mill Street, Mellis Road, Thornham Road and Back Street
- Many roads will have traffic management (lights and delays)
- The speed limit on the haul roads will be 60mph – in an area that has wild life and where efforts are to be made to reduce noise and dust pollution.
- All the local roads will be impacted and degraded even though they don't have direct construction traffic
- The hours of construction are far too long, at 7 to 7 Mon to Fri, 8 to 5 Sat, Sun and every bank holiday – **for 3 to 4 years.**
- The vibration caused by this traffic is of concern particularly when close to buildings and in one case a Grade II listed building, which will only be a couple of hundred feet from a pylon (Spring Farm).
- Potential run off from sites of particulates, fuel etc. and the likely contamination of land and river.
- The effect of fumes and dust on air quality is a concern.
- A Highway Laydown Compound has been allocated in the village. It is unclear whether this Highway traffic has been included in the Construction Traffic or whether Highway Traffic will be using the already congested public highways or the construction roads. If so, what volume of extra traffic is to be expected?

### **Historic Environment**

- Gislingham is a historic settlement that appears in the Domesday Book (<https://opendomesday.org/place/TM0771/gislingham/>). With 38 buildings on the National Heritage List for England and many more with important historical features, the proposed development will cause permanent damage to the significance of Gislingham and its historic setting. The NPPF defines significance as “the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical

presence, but also from its setting.” (<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#decision-making-historic-environment>)

- National Grid’s documentation recognizes the setting of the listed buildings but the proximity to Spring Farm (Grade II <https://historicengland.org.uk/listing/the-list/list-entry/1180592>) is far closer than it should be and the impact on its setting and on the views enjoyed by many walkers, both local and visiting holidaymakers, is significant. This site also has an undesignated medieval moat: <https://heritage.suffolk.gov.uk/Monument/MSF15878>. National Grid states that there is no suitable mitigation to reduce this “significant negative effect”. Given the permanent nature of the impact on Spring Farm by pylons RG117-119, the Parish Council would suggest that considerations for mitigation should include going underground.
- The Grade I listed Church of St Mary (<https://historicengland.org.uk/listing/the-list/list-entry/1033123>) is the oldest and most significant historic building in Gislingham and its setting will be permanently affected by the proposed pylon route, particularly RG116 and RG117. Route H06-A2 will bring a considerable amount of traffic and construction works that may cause irreparable harm to the medieval church fabric and churchyard, both of which are in constant use. The neighbouring Church Farmhouse (Grade II NHLE REF:1033124) will be similarly affected. Currently, the 17<sup>th</sup> Century bell tower is, at 18.3m, the tallest building in the village. This will be dwarfed by the 50m pylons that will harm the setting of this and other listed buildings in the village, notable Ivy House Farm (Grade II\* NHLE REF: 1180705). Grade I listed churches are specifically mentioned in the NG Design Development Report as reasons for route decisions (e.g. 5.4.39, 5.4.43). In the Waveney Valley, the setting of a Grade I listed church is a key factor in the proposal to underground there (5.4.51).
- All the listed buildings situated to the North of the village will have their views and setting adversely affected by RG108-RG116 e.g. The Old Guildhall (Grade II\* NHLE REF: 1180771). This has been exacerbated by the proposal to realign the route at Mellis further west (NG Design Development Report 5.4.64.) Those that lie to the East of the village e.g. Hidcote House/Laurel Farmhouse (Grade II NHLE REF: 1180621) will have their setting affected by RG117-RG124. The siting of RG113 to RG116 on the highest land anywhere in Gislingham will compound the negative impact on the unique landscape and the historic setting of the village, adversely impacting the residential amenity for the whole village.
- The appendices to the NG Design Development Report on Historic Environment para 2.26-2.29 referring to NPS EN-1 Par 5.9.11. 5.9.24 and 5.9.30 and 5.9.36 need to be applied to the proposals for Gislingham, in particular the “nature of the significance of the heritage assets and the value that they hold for this and future generations.”

## **Flood Risk**

- Gislingham has had significant flooding in the last year with only 1 single track road in and out of the village accessible for part of the time and repeated flooding at Thornham Road, Finningham Road and Mill Street. Taking over agricultural land and building roads is bound to have a detrimental effect, with issues such as run off etc.
- A representative of the National Grid, at the consultation, said that they knew where the flood plain was but, as it was pointed out, this doesn't always equate to where flooding occurs. If all roads are blocked, and their access points flooded, how will construction continue?

## **Public Health**

- Close proximity of pylons is considered to be a risk to public health (see note about Spring Farm in second bullet point in Heritage and 4<sup>th</sup> bullet point up in Construction).
- A substantial residential area lies in unacceptable proximity between RG116 and RG119.
- House prices and interest in the village are already being affected by knowledge that this project is being considered and decided on.
- There has been a mental health impact because of uncertainty, house prices (see previous note), expected loss of village amenities, community spirit feels under attack ( see second bullet point under Construction).
- Possible drop in air quality - fumes, dust etc. plus disturbances caused by vibration, noise and light pollution from the construction sites, material storage sites and haul roads.
- Loss of important and well used footpaths for regular exercise (see second bullet point under Construction).

## **Appendix A - Volunteer conservationist report submitted to the Parish Council about the impact on Gislingham's bird population**

As a volunteer conservationist, I have dedicated 12 years of my non working life alongside two other volunteers to aid the recovery of the grey partridge in the local area equating to thousands of hours of habitat work, supplementary feeding and legal predation control in the spring months. The grey partridge has declined by 95% since 1980 and is a red listed ground nesting bird. They are a barometer species for the wider health of farmland and where grey partridges thrive, other farmland species do well. I speak as an individual and not on behalf of the landowners on whom's land I operate which falls all the way along the pylon route through wickham abbey, Finningham and into Gislingham. We have had huge success with the birds population winning the East Anglian Grey Partridge Award by the Game and Wildlife Conservation Trust. We have taken them from two pairs of birds in this area to over 170 last autumn. There are few sites in Suffolk where this bird thrives as it does along this proposed corridor. Grey Partridges are birds of open ground and low disturbance. Skylarks, yellow hammers, oyster catchers, lapwings, turtle doves and brown hares are all species that have done well as a consequence of our work and all breeding successfully along this proposed pylon route. I am greatly concerned by the effect the pylon build process will have on the dispersal of these iconic farmland birds. Disturbance will undoubtedly move them out onto land where habitat is unsuitable/non existent and where there is no management. They will certainly then not survive through to the following spring to sustain the local population. When they are gone from the landscape they are gone. This would be devastating for me and my team and those that walk the area and enjoy seeing a bird that maybe only their grandparents remember seeing abundantly on this local landscape. I am on the land along the pylon corridor in all hours, dawn, dusk, using my eyes and ears, I am there in the depth of night spring, summer autumn and winter with my thermal and night vision technology and frequently see bats, otters and have sat next to nightingale singing their hearts out. I know the wildlife there like the back of my hand. I have seen and spoken to the pylon surveyors in daylight hours and have been aware of their movements on the land but never at the hours where those species would be out! I am very interested to learn of their ecological findings. I am a firm believer in the need to urgently tackle climate change and the progression of our countries infrastructure with renewable energy but this area of land is some of the most productive arable land in the country and the fact that excellent crops are coming off this ground and biodiversity is increasing makes it a very special place. We must take our national food security very seriously and therefore the looming solar farm that may come as a result of the pylons also greatly concerns me. I believe this would be hugely shortsighted of officials to sanction such a project on this area of outstanding productivity.

Adam Steed.



## Appendix B – Extract from a draft report to Gislingham Parish Council from a local branch of the Ramblers Association

### Overall Impact on Public Rights of Way

Most of the route is proposed to be above ground pylons and will impact on many footpaths and Public Rights of Way (PRoW) in Norfolk, Suffolk and Essex with 195 affected. There will be severe impacts during the construction phase, and when completed there will be a permanent visual intrusion on the landscape.

The typical lifespan of an overhead line would be at least 40 years, depending on use and location. Over this time, the overhead line would be subject to regular inspection from the ground using a small van to check for visible faults or signs of wear in line with the maintenance requirements at any point in time. This requirement will have a permanent negative impact on footpaths and the enjoyment of the countryside.

It is not acceptable for a large number of PRoW to be closed during the lengthy construction period of 4 years and it is therefore important for Ramblers to discuss these concerns with National Grid and the relevant Essex PRoW officers to ensure that more PRoWs are kept open during construction.

The construction phase should be as short as practical at each location and as many existing PRoWs as possible must be retained during the construction phase, with only limited PRoW closures and diversions to be agreed with the Ramblers and local authorities. PRoW must be managed throughout the construction phase to ensure that they can continue to be used safely. It is important that public safety is maintained where there are moving vehicles along the construction routes. The proposed construction sites and routes must be physically separated from existing or diverted PRoW using mesh, heras, or other similar types of fencing, to maximise the safety of walkers and other users.

Proposed mitigation and management measures relating to PRoW during the construction phase must include maintaining access to and along existing PRoW, or their agreed diversions, with a minimum width of 2.0m, to allow for comfortable walking and passing each other safely. On completion of the construction phase all closed or diverted PRoW must be reinstated to at least the existing width and standard.

All the pylons and other facilities should be fenced with wire mesh fence and palisade fencing. Should not be used, as it is very intrusive. National grid should identify improvements to the public rights of way network that could be gained on completion of this project

## **Appendix C - Additional detail about birds**

All the following are on the BTO Red List - (Critically Endangered).

There are 70 species (red list) all together but here are the ones that we see in Gislingham:

Grey Partridge.  
Turtle Dove.  
Yellowhammer.  
Greenfinch.  
Starling.  
Housemartin.  
Linnet.  
Skylark.  
Swift.  
House Sparrow. Tree Sparrow.  
Fieldfare.  
Lapwing.  
Cuckoo.  
Woodcock.

This is not necessarily a comprehensive list.

The BTO Amber List includes the following species that are regularly seen in Gislingham

Tawny Owl  
Mallard  
Moorhen  
Various species of Gull  
Wren  
Song Thrush

This is not necessarily a comprehensive list.