

Response by Dedham Vale Society to National Grid's Connection Options Report

The Dedham Vale Society (DVS) has taken an active interest in protecting the Vale from inappropriate development since 1938 and today represents the interests of more than 800 members from the Dedham Vale and beyond who wish to defend the countryside in this area of national and international importance.

DVS welcomes the recognition in National Grid's (NG's) Connection Options Report (COR) that the Dedham Vale Area of Outstanding Natural Beauty (AONB) requires protection; and also the recognition that the long-advocated extension to the AONB to the Stour Valley south of Sudbury requires similar protection, and the consequent proposal to bury the new Bramford - Twinstead connection within the AONB and extension (henceforward, when we refer to the AONB, this is to be taken as including the extension).

Protecting the setting of the AONB

However, DVS considers the COR proposals insufficient to achieve their declared purpose. Protecting the AONB, respecting its particular landscape qualities, entails protecting its setting. This means protecting the significant views from within the AONB which involve features outside the AONB.

Views from the AONB of pylons outside the AONB

There are important views from within the AONB which are affected by the proposed overhead transmission line where it runs outside the AONB. The reason is quite simple: the AONB in this area is confined to valleys, those of the Stour, the Box and a tributary of the Box through Polstead - consequently, many of the pylons within the AONB itself are visible only at relatively short range - the pylons which affect the wider views are those on the high ground to the east and the west of the AONB itself.

This is not in dispute.

Drawing No. G1980.566a, attached, prepared by NG's environmental consultants TEP, forms part of the environmental baseline information to accompany the COR.

It shows the pylons of the existing 400kV line visible from selected viewpoints.

This gives a good approximation to the views which would obtain, were the new line to be built overground, since the proposed route follows the existing pylon line closely in almost all places, and the new pylons will be slightly taller than the existing ones.

It shows that many of the selected views from points within the AONB are of pylons outside the AONB itself.

This is inherent in the topography along the route. The most conspicuous pylons are not those in the river valleys, but those on the high ground on either side. It is the river valleys which are within the AONB. So undergrounding confined to the AONB still leaves conspicuous views of pylons on the high ground.

G1980.566a does not show all the relevant views. There are also views from within the AONB, not selected for G1980.566a, of pylons on the high ground between Leavenheath and Assington. These include views from the Stour Valley Path, which is of more than local significance being part of the European Long Distance Path E2 from Galway to Nice, Stoke by Nayland golf course and the B1068.

Numerically, there are 10 pylons within the AONB proper, and twice that number outside it, but visible from within it.

The importance of views of pylons outside the AONB

The COR (9.46 and 9.49) plays down the significance of these views from within the AONB, on the grounds that they are distant (over 2 km) and intermittent. This is deeply imperceptive. The views are among the most striking in the area. Walking or driving through the AONB, for much of the time there are no views as such. One is often looking at a hedge or the adjacent field, which has its rewards but is not a *view* (and frequently has little about it distinctive to the AONB). Being small-scale country with varied topography of little hills and little valleys, from time to time one emerges and is rewarded with views in the normal sense of the word – wider and longer.

The splendid views north from Stoke by Nayland over the Box valley towards Polstead are good examples. Some are from the Stour Valley Path, sometimes they have Polstead church in the background standing out against woods. But always, on the skyline, silhouetted against the sky, are the pylons.

Similar considerations apply to other views of the high ground pylons from the AONB.

They are intermittent, because in the AONB views are intermittent, and this scarcity, if you like, makes them the more valued. The pylons are often over 2 km distant, but since they are so big and so often seen against the sky, this does not prevent their impact being substantial. The question is not “How distant are they?” but “How conspicuous are they?”

To take a quite different landmark: Stoke by Nayland church is one of the most striking features of the district, set on its escarpment above the Stour with its great tower. It is visible from as far as Harwich, and is notable in views from miles away. It cannot seriously be contended that because it is distant in those views, and these views are intermittent, its contribution is negligible. The tower is, incidentally, the same height as the pylons proposed for the new Bramford – Twinstead connection.

Relevant failings of the COR analysis

The COR analysis of this is deficient, not only in playing down the significance of many of these views on fallacious grounds. Its analysis by Study Area inhibits proper recognition of the importance of views of pylons in one Study Area from another. As noted above, many of the views of pylons from within the AONB proper (Study Area E) are of pylons in Study Areas D (Polstead) and F (Leavenheath/Assington), while one is in Study Area G (Stour Valley). Similarly, some of the views of pylons from within the Stour Valley (Study Area G) are of pylons in Study Area F.

Thus, while the analysis of Study Area E recognises that the overhead line options adversely affect a landscape of national importance and would fail to comply with the statutory purpose to conserve and enhance the natural beauty of the AONB (see eg COR 9.39), the analyses of Study Areas D, F and G deny this. They recognise that overhead lines in those areas would affect views from the AONB, but assert (COR 8.156, 10.156 and 11.194) that the effect is not so great as to affect the statutory purpose with respect to the AONB.

This is not compatible with the facts of how the overhead lines in question affect the AONB. As documented above, the pylons which affect views from Study Area E which involve footpaths, roads and tourist facilities of more than local significance, are predominantly in Study Areas D and F.

It is also at odds with the COR's own definition of scale of effects. This is at COR 5.90, which defines “Major negative effects” as arising from “a major scale of change to receptors, or effects on receptors of national and/or international importance, for which

reliable and effective mitigation cannot be guaranteed”. The AONB is admitted to be of national importance: it is admitted there is no effective mitigation of the views in question: this therefore fulfils the COR’s own definition of a major negative effect.

This leads on to a criticism of the COR’s general analytical approach. Each chapter discussing a Study Area assesses the effects of the different options on the landscape (eg COR 9.20 to 9.42 for Study Area E) and then, as a separate exercise, assesses the effects of the different options on visual amenity (eg COR 9.43 to 9.70 for Study Area E). But in this context what is relevant about the landscape is nothing other than visual amenity. Other aspects of the term *landscape* for environmental professionals like TEP, such as geology, settlement patterns and land use, are unaffected (other than trivially) by the NG project.

Indeed, it is noteworthy that the Oxford English Dictionary gives as the first meaning of *landscape* “A picture representing natural inland scenery, as distinguished from a sea picture, a portrait, etc.”, and the second meaning as “A view or prospect of natural inland scenery, such as can be taken in at a glance from one point of view; a piece of country scenery”. None of the OED meanings relevant to this exercise can apply other than to what is seen. So whence the distinction between “effects on landscape” and “effects on visual amenity”?

It is therefore indicative of a failing in the analysis that in respect of Study Area E, the COR concludes that overhead lines would have a *major* negative effect on the *landscape* (COR 9.39), but *moderate* negative effects on *visual amenity* (COR 9.65).

Specific requests

To meet the direct concerns of DVS, namely protecting (in the full sense) the AONB, the undergrounding proposed in the COR within the AONB proper requires to be extended east, to, we suggest, the Layham sand and gravel pit, where there is an ideal location for a sealing end compound in the worked-out area; and west, to a location south of Assington; while the undergrounding proposed in the COR within the AONB extension requires to be extended east, to a location east of Dorking Tye. Considering the two latter extensions together, it would be simpler, much more sightly and almost certainly cheaper to underground continuously from Twinstead to the AONB proper.

Wider issues

We have focussed above on the issues specific to DVS’ core concerns. But we have wider concerns, in terms of residents travelling outside the AONB; in terms of possible socio-economic effects eg on tourism; and simply to protect landscapes which are fine and historic, even if not statutorily designated, for their own sake.

Specifically, we support undergrounding in the Brett valley, on the basis that its scenery is similar to that of the Box and Stour, and that proper weight should be given to its cultural connections in terms of the significance of the East Anglian School of Art at Benton End.

And we support undergrounding in the Hintlesham area, in particular so as to protect Ramsey Wood SSSI and the setting of Hintlesham Hall.