WHITE NOTLEY & FAULKBOURNE PARISH COUNCIL

Clerk: Angela Balcombe
6 Shires Close, Great Notley,
Braintree, Essex CM77 7FT

Tel: 01376 550927
E-mail: angiebalc@aol.com
www.whitenotleyfaulkbournepc.org.uk

The Planning Inspectorate
Environment Services, Central Operations
Temple Quay House
2 The Square
Bristol BS1 6PN

1 December 2022

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

The following response to the above Scoping Consultation has been taken directly from ***Pylons East Anglia Ltd, (****75 Church Road, CO5 0HB, Tiptree, Essex) with their agreement, and is the view of White Notley and Faulkbourne Parish Council.*

The concerns to be raised around the Environment Statement are:

1. Vulnerability to Climate Change (pylons vs offshore).
2. Impact to watercourse and mammals during construction work.
3. Effect on visual receptors (National Grid has not considered any visual receptors in White Notley and Faulkbourne).
4. Visual effects on people travelling by train.
5. Bat activity survey.
6. Impact on communities with existing infrastructure (I believe this does not involve our Parish).
7. Impact on farmland (underground cables as well as pylons).

Topics that should be scoped in to the ES

We set out below:

• Whole topics to be scoped back in

• Sub topics to be scoped back in

• Additional topics to be scoped in

• Additional comments relating to scoped in topics

i. Whole topics scoped out

Vulnerability to Climate Change

We disagree with NG that risk to infrastructure from climate change should be scoped out – it must be scoped in and alternatives including offshore and underground compared. Our reasoning is that on 27 October 2022, a Parliamentary Committee14 concluded:

- the UK's net-zero targets require the electrification of huge amounts of energy demand across the country and that this exposes the power system to enhanced vulnerabilities: electricity pylons and cables are more prone to disruption from extreme weather than gas, which relies mainly on underground pipes rather than overhead power cables.
- the energy sector was subject to an "adaptation shortfall" in relation to lightning, high winds and storms.

ii. Sub topics scoped out that should be scoped in

We list below elements scoped out of the SR that we believe must be scoped in.

Scoped out:	**Why scope in?**
Potential impacts on surface water are scoped out for biodiversity receptors in the ES during construction.	Watercourses are already stressed and in poor condition and this should be scoped in, irrespective of CoCP. Directional drilling should be considered in sections where cut trenches for underground cable are near watercourses.
Other notable mammals (brown hare (Lepus europaeus), hedgehog (Erinaceus europaeus), and harvest mouse (Micromys minutus))	The fact that NG notes that negative impacts could occur to 'other notable mammals' during construction (loss of habitat/habitat fragmentation/noise/light) means that this must be scoped back in. This, from the SR, indicates the level of disruption expected just for the haul roads*: "A temporary haul route would be constructed to provide access for construction vehicles along the working areas and to minimise impacts of construction traffic using the local road network. The position of the haul route would be determined as the Project evolves, the location would be assessed and presented in the ES. It is currently assumed that temporary haul route would have the topsoil stripped and hardcore placed on top of the subsoil, this would be delivered to site by Heavy Goods Vehicles (HGV). It would be sited*
	where possible to make use of existing access tracks where possible and avoid sensitive ecological locations and water crossing where possible. 4.5.6 The haul route for the OHL would be typically 12m wide to allow for a running track, topsoil storage and passing places where required (formed with imported stone and geogrid)". Underground sections require a swathe of up to 100metres wide (according to a National Grid webinar, Spring 22).

Existing environment and views – construction and operation (inc. maintenance) 13.9.12. Effects on visual receptors located outside of the ZTV are therefore proposed to be scoped out of the ES.	The 41 visual receptors selected by NG (Appendix H) are wholly inadequate for a 180km project with 50-metre high pylons. We have mapped NG's receptors and supporters across Essex, Suffolk and Norfolk have added key visual receptors that NG must include irrespective of Zone of Theoretical Visibility. Local residents have the knowledge of lines of sight and areas of greatest impact.
"Significant visual effects on people travelling by train on the Greater Anglia railway network are not anticipated due to the speed of travel, therefore this is proposed to be scoped out." (Scoped in, Wales)	This is clearly ludicrous. It must be scoped back in and we note that the visual receptors refer to trains anyway. Note that in North Wales, visual impact of pylons on rail travellers was scoped in. It must include the Sudbury to Marks Tey line – the famous Lovejoy line.
Bat activity surveys Where it is considered that habitat impacts would have a significant potential adverse effect on bats, bat activity surveys would be undertaken to establish a baseline. Based on the information outline in Section 8.12.42, it is considered that impacts on foraging and commuting bats can be scoped out for the sections of overhead line	Bats forage over a very wide area. They will be impacted by the construction of the pylons due to loss of habitat (specifically, in SR: Direct severance/ fragmentation of woodland and linear habitat features (e.g., hedgerows and watercourses). Direct loss of woodland with good connectivity to the wider landscape), noise and light. There can be no sections of the line scoped out and a 10km assessment area must be set – as in North Wales's pylons project scoping. So-called temporary impacts could have permanent impact on bat colonies. Some impacts will be permanent, when habitat is lost for good. The habitat avoidance policy set out by NG is already proposed to be breached in at least one place: in Aldham, Essex, where the pylons will pass directly over woodland. There needs to be a full assessment of habitat impact and it is imperative that bat activity surveys must be scoped back in.

iii. Additional topics to be scoped in

Existing infrastructure

The Scoping Report must scope in impact of existing infrastructure on communities who risk being sandwiched between the proposed pylons and existing pylons or roads/rail e.g:

- There is existing electricity transmission and distribution equipment in the study area including 400kV and 132kV OHL's and the 400kV substations at Norwich Main, Bramford and Tilbury
- Thurrock section EAG There are also three existing OHL which run through this area along the Scoping Report Corridor.
- The Braintree section contains existing 400kV OHL's and near to Chelmsford there are 400kv and 132k OHL's.
- The Babergh section west of Ipswich and the Great Leighs section north of Chelmsford contain two OHL's within the corridor of search.

It is imperative, too, that the ES will consider the impact of the doubling back effect of pylons at Ardleigh, which leaves residents living in a 'V' of pylons:

iv. Additional comments relating to scoped in topics

Visual receptors

We believe that the 41 visual receptors put forward by NG are wholly insufficient. They leave huge unassessed gaps along the route and many very key sites of importance unaccounted for. We have therefore asked our supporters to log key visual receptors in their own area that should be scoped in to the ES.

Undergrounding of cables – swathe width

The area of impact for the purposes of assessment of undergrounding cables must be set at the maximum of the several set out by NG. The SR report states a swathe of only 40-m wide is required for undergrounding. The non-statutory consultation documentation noted c60m-wide. At a NG webinar, Spring 2022, we were told that a swathe of up to 100m-wide is required. For the purposes of the ES, the swathe width must be assumed to be 100-m to ensure that all construction damage to ecology, habitats and archaeology is factored in.

Impact on farms

The impact of the 12-metre wide access roads must be scoped in to the ES. These roads will damage habitat and lead to security issues for land-owners. The impact of walkers using these roads to access previously undisturbed areas of countryside on wildlife must be assessed.

Yours sincerely

Clerk to White Notley and Faulkbourne Parish Council