

WHITE NOTLEY & FAULKBOURNE PARISH COUNCIL



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15th June 2022

Dear Mr Pettigrew,

SUBJECT: APPLICATION BY NATIONAL GRID FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE EAST ANGLIA GREEN OVERHEAD PYLON SCHEME

INITIAL REPRESENTATIONS FROM THE WHITE NOTLEY & FAULKBOURNE PARISH COUNCIL – DEADLINE 1 16th June 2022

This is a written representation submitted on behalf of The White Notley & Faulkbourne Parish Council in response to the application by NationalGrid for a Development Consent Order to construct a new 400kV electricity transmission line between Norwich and Tilbury.

The Parish and its electorate is directly and adversely affected by the proposed route and as such has a significant interest in National Grid's proposed scheme.

The Parish Council considers that there are a number of concerns and pitfalls with the proposed plan, and therefore an objection is made on the following grounds:

1. Integrated Offshore Approach

The proposed overhead pylon scheme is outdated. To achieve a sustainable energy network National Grid should be taking advantage of developments in offshore technology to minimise impacts on the environment, communities, and the landscape.

Erecting pylons to satisfy a short-term need is economically, environmentally and socially unsustainable. It is clear there is a need for a long-term holistic energy strategy and evidence from National Grid proves the most sustainable way to do this will be an offshoring main.

National Grid ESO undertook extensive research regarding an integrated offshore approach. This report concluded *'an integrated approach would save 18% in capital expenditures and operating expenses, which is substantial enough to conclude that the integrated design is a cheaper option for GB in terms of direct costs'*. The proposed overhead pylon scheme is therefore in direct contradiction to:

- a. Your commitment as stated in the Responsible Business Charter 2020 to *'deliver energy in a fair and affordable way'*; and,
- b. Your statutory duty to develop and maintain an *'efficient, co-ordinated and economical'* network.

A strategic offshore grid, coming onshore close to where the power is required at brownfield sites should be pursued. The strategic offshore grid will allow a "plug and play" entry for new renewable and nuclear plant developments envisaged under the Governments 2022 energy strategy. The new offshore wind developments and Bradwell B and Sizewell C will be able to plug into the new offshore grid with the minimum of damage.

The consultation has been premature to dismiss this option and has not properly considered the balance of impacts and losses.

2. Natural Environment, Visual Landscape and Wildlife

The proposed scheme is in conflict with the National Planning Policy Framework (NPPF).

Paragraph 174 states *'planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes'* The proposal for 180km of 50m high steel lattice pylons will have an undeniably detrimental impact on a huge area of valued countryside and will in no way *'enhance'* the landscape. The proposal is therefore a direct contradiction of planning policy.

Paragraph 30 of NPPF states developments should be *'visually attractive as a result of good architecture'*. The first steel lattice pylon was erected in 1928, being of pre-World War 2 design. Technology and design within the energy industry have evolved significantly since this time, yet this scheme completely disregards these advances. Should pylons be needed, then the new modern T- pylon design is more appropriate.

In direct opposition to this proposal, you are currently removing pylons in other areas to restore *'Britain's natural beauty'* and *'minimise the visual impact on the local landscape'*. This is clear evidence that steel lattice pylons are inappropriate unsustainable development.

Holford Rule 1 is to *'avoid altogether, if possible, the major areas of highest amenity value'*. Norfolk, Essex and Suffolk have an approximate total population of 3.5 million with many more millions who visit to enjoy the open unspoilt countryside. The proposed pylon scheme will pass through a large swathe of high amenity countryside with many public rights of way impacted. The only plausible way to satisfy Holford Rule 1 will be to underground the cable or more logically and economically as explained above, to put it offshore

Holford Rule 6 mandates to keep high voltage lines as far away as possible from smaller lines to avoid a 'wirescape'. The proposed line crosses or comes in sight of many smaller lines, and therefore will crowd the landscape and contradict Rule 6.

In construction of the pylons, the right of way zone below the pylons will need to be cleared of vegetation, and while these areas may be small individually, the total removal of these areas will disturb wildlife corridors for long distances, greatly impacting local wildlife and negatively affecting biodiversity.

It is understood that National Grid have chosen the proposed route to avoid coastal areas and the impacts on coastal birds. However, the current proposal will still affect huge populations of farmland birds. A sensible choice to avoid this issue altogether would be to underground or offshore the cable.

3. Food Security

In the current climate it is more imperative than ever that Great Britain has food security. The proposed route will pass through large areas of high quality arable and grazing land in the Parish. The cumulative area taken up by the pylons will not be insignificant. Not only will the area of productive arable and grazing land decrease but farmer's time spent working these areas will increase, producing food as they will have to manoeuvre around the structures. Increased time causes increased costs which with the loss of subsidies, high input costs and low food prices, will make it increasingly harder for farmers to turn a profit and as a result see food production levels decrease, making unreliable imports more prevalent.

4. Heritage Impact

Historic England's Conservation Principles, Policies and Guidance states '*potential conflict between sustaining heritage values of a place and other important public interests should be minimised by seeking the least harmful means of accommodating those interests*'. The landscape will be dominated by 180km of 400kv 50m high steel lattice pylons which cross close to and in sight of many heritage listed buildings in the Parish, including Faulkbourne Hall, a Grade 1 listed 15th Century Castle and Cressing Temple a set of 15th Century medieval barns built by the Knights Templar. The blight caused by the pylons will have an undoubtedly detrimental impact on the heritage of the property. The harm of this proposed scheme on heritage value greatly outweighs public interests. Conversely, an underground or offshore cable would avoid this conflict completely and therefore satisfy Government policy.

5. Private Loss

Section 122 of the Planning Act dictates that the Secretary of State will need to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily. Further guidance explains that there must be compelling evidence that the public benefits derived from the compulsory acquisition will outweigh the private loss suffered by those who land is acquired.

Your Corridor Preliminary Routeing and Siting Study and other documentation does not address any assessment of private loss, therefore you have not proved that the perceived

public benefits outweigh actual private loss, or that there are no reasonable alternatives to compulsory acquisitions that would have a lesser impact. As such, the Secretary of State will not be in a position to determine that the route option(s) selected represent(s) the most equitable balance of public benefit versus private loss against the alternatives.

This is an embedded failure that cannot be resolved unless the option assessment is undertaken again, with proper consideration of private loss for the alternative options undertaken. This is because, in the *Approach*, any detailed assessment of private loss can only occur after statutory consultation as it is only at that point National Grid intend to engage with landowners with a view to reaching agreement for the rights sought. With this proposed approach, detail of private loss to be suffered to landowners will be determined much too late to undertake an assessment of whether the public benefit outweighs the private loss suffered. Critically, once the option that is intended to be carried forward to application has been formally consulted on, it will be too late for alternatives (with potentially lesser impacts on private loss) to be considered.

The failure to assess the public benefit and private loss of alternatives was a fundamental reason for the Secretary of State's refusal of the Aquind Interconnector DCO in January this year. In the decision letter, the Secretary of State set out:

'Portsmouth City Council noted its concerns that the Applicant had not made any assessment of the private loss to be suffered in consequence of the different options available and had not weighed that loss against the public benefits of the proposed development.'

'Therefore, further investigation should have been undertaken to ensure that sufficient evidence was available in its application documents to support the preferred choice of route taken forward by the Applicant.'

Although the project is at a relatively early stage, National Grid has arrived at a preferred route, with no meaningful alternatives considered, and no assessment of private loss for the preferred route, or with the alternatives already dismissed.

6. Consultation Process

The consultation process has been misleading and biased. The documents posted to affected parties and on the website depicted images of beautiful open countryside with the large title 'East Anglia GREEN'. To a casting eye it is not apparent the proposed scheme involves intrusive industrial steel pylons, which are in no way 'green'. This is misleading advertising.

The response document begins with several biased and leading questions. This is inappropriate in a consultation process, and suggests the representations submitted are being twisted to fit National Grid's agenda. Resultantly, the response from the consultation will be invalid and cannot be relied upon to accurately understand public opinion. The consultation response should not therefore be used as a basis for any later Statutory Consultation.

The CPRSS document is not accessible. It is difficult to understand and there is no clear explanation of the cost of the project and the alternatives. Due to the complexity of this document, the consultation period was not long enough to seek sufficient advice and

research on the project.

The consultation is deficient when judged against the Gunning Principles. The first Gunning Principle is that *'the consultation must be at a time when proposals are still at a formative stage'*. National Grid have only presented one option and have prematurely dismissed alternatives including underground and undersea routes or upgrading existing infrastructure. The consultation is merely a back-checking and tick box exercise.

Paragraph 2.8.4 of the extant National Policy Statement for Electricity Networks Infrastructure (EN-5) states that: *"wherever the nature or proposed route of an overhead line proposal makes it likely that its visual impact will be particularly significant, the applicant should have given appropriate consideration to the potential costs and benefits of other feasible means of connection or reinforcement, including underground and sub-sea cables where appropriate. The ES should set out details of how consideration has been given to undergrounding or sub-sea cables as a way of mitigating such impacts, including, where these have not been adopted on grounds of additional cost, how the costs of mitigation have been calculated."*

National Grid have failed to properly consider underground or sub-sea options, or set out detailed costings including private loss, mitigation, and compensation, therefore are in contradiction with the National Policy Statement.

A new consultation is essential and must be run in accordance with the Gunning Principles, Treasury Green Book and NPS EN-1. The new consultation MUST present proper options including that of an offshore ring-main, MUST allow sufficient time for reasoned consideration; and MUST present the facts and costings necessary to consider this proposal in a proper manner.

7. Health

It is acknowledged that there are conflicting studies regarding the risk of cancer and childhood leukaemia caused by living close to the electromagnetic fields generated by high voltage cables. With the alternative options to underground or offshore the cables available, why would you choose to accept this risk?

The proposed pylons may not only affect physical health but will undoubtedly have a huge impact on the mental health of people living in their vicinity, resulting in an adverse impact on quality of life.

8. Conclusion and Recommendations

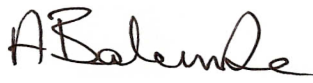
It is abundantly clear that all the options have not yet been properly assessed, and the proposed scheme is in conflict with many of National Grid's own principles and national policy.

The entire consultation needs to be revised and re-run as it is not fit for purpose. National Grid must fully set out all alternatives including offshore, brownfield substation options, undergrounding, options to follow existing infrastructure such as railways or the A12, and T-pylons, alongside calculations of private loss, human and environmental impacts.

We welcome the opportunity to engage in this consultation and to work with you to find

a sustainable and appropriate scheme.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Balcombe'. The signature is written in a cursive style with a large initial 'A'.

Angela Balcombe
Clerk to the Council