

ALDHAM PARISH COUNCIL

REPRESENTING THE RESIDENTS OF
THE HISTORIC ESSEX VILLAGE OF ALDHAM ESSEX

RESPONSE

TO NATIONAL GRID'S
STATUTORY CONSULTATION ON

THE GREAT GRID UPGRADE
(NORWICH TO TILBURY)

xx July2024

1. THIS RESPONSE is submitted within time by Aldham Parish Council as the democratically elected representative body for the residents of Aldham to protect their village from the harmful effects of National Grid's ("NG's") The Great Grid Upgrade project ("the Project" formerly and improperly known as East Anglia Green), in response to NG's statutory public consultation. That consultation spans the period of 10 April 2024 to 26 July 2024.
2. From the outset, Aldham Parish Council submits the following general points as part of its objection to the Project:
 - 2.1. The Project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. Aldham Parish Council, for and on behalf of all of the residents of the village of Aldham in Colchester in Essex, want and demand an integrated offshore grid in the North Sea, because it has been shown by National Grid ESO that this approach saves £2bn of taxpayers money and reduces the overall infrastructure need by 50%. Aldham Parish Council hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group.
 - 2.2. What is more, NG is already involved in other undersea transmission projects, including Sea Link from Sizewell to Kent. Planning consent for a new subsea electricity superhighway between Scotland and England was granted by all relevant authorities in August 2023. Eastern Green Link 2 (EGL2) is a 525kV, 2GW high voltage direct current (HVDC) subsea transmission cable from Peterhead in Scotland to Drax in England, to be delivered as a joint venture between National Grid and SSEN Transmission. Aldham Parish Council believes that this has occurred due to the fact that overhead lines cannot be delivered on schedule, which, as a consequence of the resistance to the Project, will be the case here.

Aldham Parish Council submits that if 440km can go undersea elsewhere in the United Kingdom and be in use by 2029, why not 180km in East Anglia, also by 2029, to beat Net Zero and avoid the cultural and ecological vandalism that the Project would inflict on everyone who lives in or visits East Anglia, including Aldham. As a matter of principle, new electricity generated offshore should be transmitted offshore, making landfall as close to target population centres as possible. Any other solution is irrational and unreasonable, and subject to judicial review.
 - 2.3. As we commented in the first two non-statutory consultations (Consultation 1, conducted by NG in the Spring of 2002, and Consultation 2 that closed 21 August 2023) we believe NG's conduct of the Consultation is fundamentally flawed in law and, as a consequence, neither consultations can be relied upon by NG in formulating this statutory consultation. This fact has been confirmed in two separate legal opinions issued by Lord Charles Banner KC, a respected planning silk), which have been served upon but effectively ignored by the leadership of NG. In the conduct of both Consultation 1 and 2, NG have disregarded the Gunning Principles and flouted the rules contained within the Treasury Green Book. There has to date been no lawful consultation, because those consulted, inclusive of those who reside within Aldham, have only ever been presented with one option for the transmission of power under the Project, which is the use of pylons.
3. Aldham Parish Council takes the view that NG has acted to date in an arbitrary, unreasonable and unlawful manner, and Aldham Parish Council reserves the right, in due

course, to contest in court decisions taken by NG and/or government representatives that adversely affect the residents of Aldham.

4. What follows are the Aldham Parish Council's specific responses to the questions posed by NG in its statutory consultation:

Question 1: How would you describe your interest in Norwich to Tilbury?

A. Aldham:

- A1. Aldham is a village in Essex approximately 4.5 miles to the west of Colchester with the A120 (the old Roman road Stane Street) running to the south approximately 1.5 miles away. The village lies between the River Colne and Roman River valleys. There are two main village areas: the formally designated Conservation Area of Fordstreet to the north and the village centre around the Church. There are many other scattered properties (mainly linked to old farmsteads) typical of ancient countryside. The majority of the land is gently rolling arable farmland with a number of semi ancient woodlands scattered across the parish. The village is also recorded in the Domesday Book of 1086 but has an earlier history, as there have been Iron Age finds in the area and pottery that may indicate a Roman settlement. Today, the village no longer has a shop, school or pub.
- A2. Aldham is facing around 4.7km of pylons, some 2.61 % of Project length, and as proposed the pylon locations dissect our village. The plans indicate Aldham will "host" 12 pylons. This is around 2.7% of the Project total. In addition the overhead lines (OH) between the pylons will entrap our village creating a wirescape across our landscape. The project red line also illustrate the impacts will not be limited to the overhead line route, so the impacts on the bordering environment and historical features are relevant. Our views and comments refer to the whole village area.
- A3. This is a small village, with a population of 490, which tends to be stable and not migratory, so those who live here have a deep connection to their local environment. The following link provides a 3D interpretation created by one concerned villager on how the pylons will impact and decimate the character of Aldham village [Home - Aldham Against Pylons](#)

Section C and D :

Question 8 Do you have any comments on the following within Section C and D Babergh Tendring Colchester?

Part 1

A. Proposed overhead line alignment - Route map analysis:

- A1. The pylon alignment remains within the purple swathe of the first consultation, so this still means our village will be dissected by the pylons and associated overhead power lines. We

note that the route has been revised following the first consultation and that this will be beneficial to the properties and landscape to the northwest of the village centre and the grade 1 listed parish Church.

- A2. However, the move only partially solves one problem to cause another. Other historic buildings on the southeast side of the village will now be blighted by pylons and they will lie very close to habitation, approximately only 40m away in some cases.
- A3 Aldham is covered by sheets 6-8 of Section D of the s42 Consultation Plan (reference AENC-NG-ENG-PLN-0005). Each of the three sheets is considered in detail below.
- A4 Detailed Commentary on Sheet 6:

The pylons enter the Parish at its northernmost boundary with the River Colne and the adjoining parish of Fordham. Pylon TB049 (situated in Fordham Parish) is sited just 40m from the river bank and the OH line will cross the Essex Way, an important long distance footpath traversing the whole County from the west to the coast in the east. TB049 sits in a prominent location within the well used community woodland abutting the junction of the Essex Way with other PRow and permissive routes through the community woodland.

TB049 and TB050 are sited just below the 20m contour (using OS 1:25000 maps), slightly above the river which is about 15m above sea level (asl). This is similar to most of the buildings in Ford Street Conservation Area, making the pylons prominent in views out of the Conservation Area. Between TB049 and TB050 the OH line passes across a small plantation adjoining the south bank of the river, requiring the removal of a significant amount of habitat. Further habitat will be lost under the OH lines between TB050 and TB051 which sits on slightly higher land (nearer 25m asl) that forms part of Ford Street Hill. TB051 is approximately 120m east of the A1124 Ford Street Hill and 200m from the edge of the Conservation Area, which sits below the 20m contour line. TB051 will be prominent in views up the hill and out of the Conservation Area and will cause demonstrable harm to the setting of Ford Street Conservation Area. Furthermore, a construction laydown area (CLA) is shown to the north of TB051 even closer to the Conservation Area boundary (approx. 30m). TB051 and the CLA will also adversely affect the amenity of FP3 which runs east-west passing across the haul road between TB050 and TB051 to the edge of Fiddlers Wood on the Parish boundary, requiring closure or diversion.

The impact of the pylons and OH lines in the longer term will be increased in the short to medium term by the proposed haul road which connects to Mill Lane, Fordham, at the lowest point by Fordham Bridge and Fiddlers Wood on the boundary of the Parish. The proposed junction with the haul road would have an adverse impact on highway safety by reason of the steep incline either side of Fordham Bridge and restricted visibility on the west side as you descend from the south. Fiddlers Wood goes right up to the highway boundary and any improvement to visibility would require wholesale removal of trees and hedging to the detriment of the character of this rural area. Traffic speeds and volumes are high on this section of Mill Road, as it serves as a short cut around the north side of Colchester, and gives access to major industrial and commercial enterprises on the north side of Fordham village.

The haul road itself passes through a recognised flood plain, which is subject to frequent fluvial flooding of the River Colne, providing important flood storage capacity. The haul road would be an intrusive and unwelcome feature, even for a short period close to where the Essex Way crosses the River Colne again and would require temporary closure/diversion of FP4 that passes north-south along the western boundary of Fiddlers Wood. The haul road then crosses the path of the OH line between TB050 and TB051 passing closer to the river and Conservation Area increasing the detrimental impact on both.

The junction of the haul road with the A1124 on Ford Street Hill will be even more dangerous than the junction with Mill Lane Fordham. The A1124 carries a significant volume of traffic, often leading to queuing at the light controlled bridge over the River Colne at Ford Street. NG's own Traffic Assessment estimates there will be nearly 500 lorry movements a day. Speeds are often in excess of the 40mph limit on the hill and the Parish Council have secured ECC Highways permission to erect a temporary Speed Indicator Device at the entrance to the 30mph limit. Significant removal of trees and hedging and lowering of the banks to create adequate visibility splays would have a significant and permanent impact on the setting of, and approach to, the Ford Street Conservation Area from the south. The hill is on a slight bend and drops nearly 25m over the 400m from the junction with Green Lane at the top to where it enters the Conservation Area and the 30mph limit at the bottom.

TB052 on the west side of the A1124 would be at least 40m asl (15m above TB051) especially prominent in views out of the Conservation Area from New Road and from FP5 which runs north from New Road, only about 100m west of TB052.

At the top of Ford Street Hill lies Gallows Green, a Registered Village Green and County Wildlife Site, owned and maintained by the Parish Council. It is unclear what is proposed within the Draft Order Limits but a significant part of the Green is affected, including one of the ponds. Any damage would be unacceptable.

A5 Detailed Commentary on Sheet 7:

TB052 and TB053 marks the start of what in effect becomes the encirclement of the main built up part of the village, which has at its heart the Church of St Margaret's and St Catherine's with its spire of 100 feet (30m). The church is the dominant landmark on what is close to the highest point in the village. TB052 and TB053 will be prominent in views from Green Lane and New Road on the approach to the village and will diminish the importance of the church spire in the surrounding landscape. They will adversely affect the amenity of PRow FP5 and 7, which are effectively the only safe pedestrian routes connecting the church and village hall with Ford Street hamlet. TB053 is sited only 30m from Green Lane, emphasising its dominance at a key entry to the village.

The junction of the haul road with Green Lane is on a sharp bend immediately west of the proposed junction and the plan suggests extensive works to ensure highway safety with a corresponding adverse impact on the amenity of the Parish, with TB053 and TB054 effectively forming the gateway to the village in the same way as TB051 and TB052 will form a gateway to the conservation area.

The overall impact will be to create an intrusive and alien urban feature in what is essentially a rural area well outside the urban area of the city of Colchester.

TB054 will be 140m from the back of the nearest houses in Green Lane and will adversely affect the outlook from 20 properties on the south east side of the lane and Church Grove, creating an intrusive feature in uninterrupted views across open countryside. From Green Lane to a mid point between TB054 and TB055 the haul road is sited to the west of the pylons and OH lines meaning it will be less than 90m from the nearest property on Green Lane. This is likely to cause a loss of amenity through noise and disturbance for an extended period during construction.

The OH line continues to pass close to residential properties in Hines Close and TB055 is also only 140m from the rear of the nearest properties on the southside of Hines Close, adversely affecting residential amenity during and after construction.

Pylons TB054 to TB057 form a line angling away from Brook Road when approached from the south, creating a solid wall of lines and latticework that will harm the setting of St Margaret's and St Catherine's and views of the spire. Furthermore, there will be serious detriment to the setting of the listed buildings at Aldham Hall, from the proximity and impact of TB057 and in the short term from the proposed haul road crossing Brook Road between Aldham Hall and Brick Cottages. In particular, TB057 is only 100m south east of Brick Cottages and both properties will be affected by noise and general disturbance from the haul road and its crossing of Brook Road at a dangerous bend adjacent the entrance to Aldham Hall. Mature chestnut trees on the west side of Brook Road will reduce visibility but their removal would cause unacceptable harm.

The OH lines between TB056 and TB057 and the route of the haul road will cross PRow(FP15) that link to Aldham Hall Wood creating further loss of amenity.

A6 Detailed Commentary on Sheet 8:

TB058 is situated 150m north of Brook House and close to PRow FP12, that runs from Brook Road adjoining Brook House, west towards Church House Wood (see below). To the north of TB058 lies Crapes Fruit Farm, a one hundred year old traditional orchard with a nationally significant range of apple varieties. This is a unique, 15 acre, Traditional Orchard (Priority Habitat) with some trees planted as long ago as 1922, by the present owner's grandfather. It specialises in heritage fruit, and lesser-known varieties of: apples, medlars, cherries, quince and plums. With unchanged land-use over such a long period, it has also become a haven for much wildlife, including newts, slow worms and grass snakes. Between TB058 and TB059 the OH lines and haul road will cross FP12 causing a detrimental effect on the amenity of the PRow for walkers. TB059 is sited within 30m of the point where FP12 turns north, adversely affecting views across to Church House Wood from FP13.

Church House Wood an Ancient Woodland (another Natural England Priority Habitat) is an ancient woodland renowned for becoming carpeted with bluebells in Spring, with sweet chestnut, cherry and mature elms surviving in the southeast corner closest to the line of the pylons. The haul road is insensitively routed only 20-30m from the edge of the wood, affecting the margins and the Draft Order Limit almost touches the outer edge of the wood. This will inevitably cause lasting damage to flora and fauna in this locality. Furthermore, the DOL and haul road between TB059 and the Marks Tey to Sudbury Branch Line appears to require the removal of two significant and ancient oaks

immediately SE of Church House Wood that stand in open fields on the line of former field boundaries.

TB060 is situated within a gently sloping pasture that falls towards the Roman River, adversely affecting the amenity of the Gatehouse, adjoining the level crossing on Bridleway20, linking to the A120 at Marks Tey and a well used recreational route. The section of OH line and proposed routing of the haul road between TB060 and TB061, is one of the most damaging to the landscape and environment within the whole Parish.

Between 2009 and 2019, Colchester Natural History Society and Essex Wildlife Trust carried out an extensive study of the Roman River. The final report, "The Roman River Valley Living Landscape report" [<https://www.cnhs.uk/roman-river-report>] found that:

The Roman River Valley Living Landscape contains one of the densest concentrations of designated sites in Essex and encompasses most of the original Roman River Conservation Zone. Rich in wildlife, it supports a variety of nationally threatened habitats which are in turn home to numerous species, both common and rare."

The Roman River Corridor is currently in consideration by Colchester City Council for the Local Plan, under the Local Nature Recovery Strategy (Environment Act 2021).

The gentle slopes of the Roman River Valley stretching from Great Tey to Marks Tey are not only an attractive and unusual landscape in this part of North Essex but at most times of the year have few if any buildings or modern incursions (apart from the railway line) to interrupt the view. When viewed from the bridges and level crossings on PRow (FP20, FP22 and FP 8) the intrusion caused by Pylons TB060 to TB064 will be detrimental to the visual amenity and cause significant harm to this important piece of open countryside.

In particular, from the south side of the bridge immediately west of Church House Farm on FP22, which sits at about 42-43m asl, and looking south/south east across the valley the unspoilt view will be interrupted by no less than five pylons. [This was verified using the National Grid digitised visualisation at the Consultation events held in May 2024].

The section of haul road between TB060 and TB061 will destroy BW20 at a particularly sensitive point where it drops down to the bridge that crosses the Roman River, taking out extensive vegetation and mature trees, including wild hops and spindleberry. Immediately south of this point the BW becomes a green lane with a spinney on its east side that provides another habitat for bluebells in the spring, with only limited access for farm traffic. FP18 will pass directly under the OH lines that will be most intimidating.

The last pylon in the Parish is TB061 which is situated on rising ground from the river, making it prominent in views across the Roman River Valley from the north.

A7 Summary of individual Pylon harm to the village of Aldham Essex

This analysis demonstrates the harm the National Grid (Norwich to Tilbury) proposal will have on attractive landscape across the Parish, on natural habitats, on flora and fauna and on recreational and visual amenity for residents and visitors. This impact will be repeated across the whole length of this proposed scheme and cannot be mitigated simply by altering the alignment, as this will cause different but similar harm wherever it is placed. What this, and other assessments in parishes along the route, highlight is that it is the

wrong solution for Aldham, Essex, East Anglia and the country as a whole. The harm and damage it will cause to the natural environment in the short, medium and long term in our view outweighs any benefit. It is a 20th century solution for a 21st century problem and needs to be replaced by cutting edge technology, such as HVDC, preferably under the sea, that meet national priorities whilst minimising environmental harm to interests of acknowledged importance.

The small Parish of Aldham is being asked to accommodate 12 pylons (2.7% of the total) across two sensitive landscapes in the form of the Colne Valley and Roman River Valley, which will cause demonstrable harm to landscape, habitats and ecology. Even if the damage could be argued to be temporary it will take decades to repair and many features will be lost permanently to make way for construction.

The alignment of the pylons at the entrance to Ford Street Conservation Area across the Ford Street Hill is insensitive and will cause demonstrable harm to the setting of the Conservation Area, exacerbated by the damage from works to facilitate construction.

The alignment and siting of pylons across Green Lane and Brook Road to the east and south of the main village will create an ugly encirclement and an intrusive gateway to the village from both these directions.

The impact on habitat, landscape and residential amenity will be devastating during the 4-5 years of construction and in the long term from the visual intrusion from the pylons themselves.

It is facile to suggest that these impacts can be mitigated, nor is it practical to suggest changes or modifications to the alignment. This would just be tinkering and shifting the problem somewhere else. The reality is that any solution that involves OH lines and pylons will cause lasting harm and is unnecessary given proven technologies for under-sea cabling, or even improved and less intrusive undergrounding such as High Voltage Direct Current (HVDC) that National Grid themselves have acknowledged has a lower lifetime cost than pylons and OH lines

Section C and D :

Question 8 Do you have any comments on the following within Section C and D Babergh Tendring Colchester?

Part 2

B. Landscape (Pylon Impact):

B1. The combination of ancient landscape with historic buildings and a high density of listed properties was identified for Aldham in the first consultation as a key constraint for the Project. This was covered in Section K D13 of the Preliminary Routing and Siting Study April 2022 as follows:

“There is a large and scattered group of listed buildings between Aldham and Little Tey, mostly listed at Grade II but also including three Grade II* buildings and the Grade I listed Church of St James, Little Tey.”

- B2. We acknowledge that changes have been made to the original dark purple indicative route, but the village remains adversely impacted by the proposals. However, East Anglia is mostly flat, which makes screening very difficult. We believe the Holford Rules have not been fully met on a number of points:

Rule 2 - Avoid smaller areas of high amenity value, or scientific interests by deviation, provided that this can be done without using too many angle towers: Fordstreet is a Conservation area and the pylon route will unquestionably harm the environs of this part of the village. The views, settings and context of the conservation area will be clearly impacted and adversely altered. Additionally, the listed building complex at Aldham Hall will be adversely affected by the directional change of pylon TB 58, which will be of a denser structure to withstand the change of direction.

Rule 3 - Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers: Pylons near Aldham Hall will be highly visible as it is in open farmland with few trees and no hedges to partially shield the structures.

Rule 4 - Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees: The Norwich to Tilbury proposals run parallel to the coastline meaning the pylons naturally have to traverse many river valleys. Aldham sits on the ridge between the River Colne and the Roman River. It is impossible to avoid crossing this ridge as you cut across Essex, and it leaves the pylons and overhead lines making an imposing and daunting and unavoidable impact, which cause harm to our village.

Rule 5 - Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees: While we accept that the route through Aldham does follow the valleys and crosses obliquely, the trees we have will be unable to mask pylons of 45 to 50 high. It is not just pylons that are the issue for the residents of Aldham, it is the fact these are massive pylons and totally out of keeping with our rural landscape. At 100 feet, Aldham Church spire is clearly visible above the trees planted around it 158 years ago. No amount of tree planting will screen these proposed pylons. The present open landscapes provide wonderful, unimpeded views for miles. Pylons would wreck those views and industrialise for ever countryside vistas, which have been the same and known by our ancestors in some places for centuries. They have a history that fits with the ancient farms and houses that have grown within them.

SUPPLEMENTARY NOTES - Residential Areas: Avoid routeing close to residential areas as far as possible on grounds of general amenity. The main

grouping of residential properties is around Aldham Church in Hardings Close and Hines Close, and the roads leading to the Church.

- B3. In light of the above, Aldham Parish Council submits that as NG is unable to follow or comply with the Holford Rules, then it should take the Project offshore. We again assert that this Project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. Aldham Parish Council, for and on behalf of all of the residents of the village of Aldham in Colchester in Essex, want and demand an integrated offshore grid in the North Sea, because it has been shown by National Grid ESO that this approach saves £2bn of taxpayers money and reduces the overall infrastructure need by 50%. Aldham Parish Council hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group.

C. Alternative Tower Designs:

- C1. The Holford Rules also state that “*additional to adopting appropriate routeing, evaluate where appropriate the use of alternative tower designs now available where these would be advantageous visually, and where the extra cost can be justified.*” Those residents of Aldham who attended the consultation events were not convinced that the alternative pylons being touted were actually better than those originally proposed by NG. The T pylons benefit from a lower height, but we need to hear more on their drawbacks. For example, how many pylons would be required in Aldham if T pylons are used? Would their construction require a permanent access road to be left across our landscape? Would their footings require significantly more concrete to secure them? Can reports from Somerset that the T pylons there are noisier be refuted and is there evidence to confirm this? Residents report that these questions could not be answered at the Consultation meetings attended by Councillors at Copdock Witham and Langham.

D. Construction impacts:

- D1. Aldham Parish Council is deeply concerned over the damage and destruction that construction of the proposed infrastructure will have on our community and landscape. The 100m wide swathe to build the route will leave an irreversible scar across the village. We believe this will harm the landscape, damage biodiversity, damage water quality, and increase both air and noise pollution during construction. Access points to the haul road will have a major impact on those close by. Reports from current construction in Necton Norfolk demonstrate the impact of such large-scale construction and also the traffic chaos it is causing.
- D2. Air quality: In Aldham Parish Council response in December 2022 to the EAI Scoping Report for East Anglia Green Pylon proposals we stated air quality should be scoped in. The scale of the land included in the red line area in this consultation has increased the proximity to dwellings so concerns on air quality have increased. Data from National Grid already has Aldham with poor air quality – possibly due to the A12 so there is no scope for further deterioration.
- D3. Noise and vibration. The maps and plans in PEIR Vol II (25/27), Figure 14.1, Map 15/25. illustrate the high number of residential properties and a good number of community buildings that will be adversely affected by both the noise and vibration resulting from the pylon construction. The maps in particular clearly highlight the significant density of

properties and therefore people that will be negatively impacted by this onshore overhead line route.

- D4 Haul roads and construction: For years Aldham Parish Council have campaigned for weight and speed restrictions to reduce traffic impacts - we are only ever frustrated by a brickwall of inaction from the Highways Authority. Similarly concerns over the safety of the road due to potholes and the lack of pavements continues to be an ever present topic raised at parish council meetings. The significant and harmful construction phase will makes things even worse for residents. The proposals include details from National Grid (Vol III, Technical Appendices 4 of 4. Preliminary Construction Effects. Table A 16.3.1 (A1124 Halstead Rd is referred to on p 678).indicating HGV use will increase to 495 vehicles a day on the A1124 during the construction phase, a doubling of current traffic levels. This is unacceptable and unnecessary if other route options had been properly considered and assessed.

Those landowners affected by the haul roads are shocked at the scale of what is proposed and the damage that will be done to create this new highway. The need for a 100m wide area for the road, the drainage and the storage of top and subsoil moved will create a massive scar across of village. Given the high proportion of retirees in the village few will live to see this damage regenerate.

Aldham Parish Council also request that any splays to access the haul roads to the highway network are sited and constructed to minimise damage to hedgerows and trees. The current proposals are simply bulldozing anything in the way with little regard for environmental damage.

- D5. **Overall we believe the proposed Project is in conflict with the National Planning Policy Framework** (“the NPPF”). Paragraph 174 of the NPPF stipulates that “*planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes*”. The proposal for 12 giant pylons across a 4.7km stretch of our village 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. Also, 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. Design and technology have evolved significantly since this time, yet this Project completely disregards these advances. **Offshore is the only sensible alternative.** Aldham Parish Council also notes that in stark contrast to the Norwich to Tilbury proposal NG 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 and constitute unsustainable development. Moreover, the implementation of the Project would damage businesses and tourism, as a result of the harm done to the countryside and footpaths, deterring visitors, painters and leisure seekers.

E. Design and Development:

- E1. NG stubbornly refuses to engage on the integrated offshore grid option, having chosen to present an expensive and half-baked ‘on shore offshore’ option from Norwich to Tilbury instead. NG does not intend to wait for the implementation and proposals from the Offshore Co-ordination Support Scheme (“the OCSS”). It intends to proceed with the existing Project regardless. Backchecking and review has been limited only to onshore

routing. There is no evidence that backchecking has included backchecking offshore options.

- E2. Cost benefit ratios: The ‘Hiorns report for Essex, Norfolk and Suffolk county councils exposed serious holes in the needs case for this major overhead line, citing overestimation of the urgency of connection. The report also showed feasible offshore solutions could accommodate the extra power flows at much lower costs than previously quoted. The new ESO East Anglia network study also shows a HVDC underground line from Norwich to Tilbury to be another viable alternative. Aldham Parish Council urge that the Norwich to Tilbury line should now be paused for review whilst need, timings and alternative solutions are investigated more thoroughly. An offshore solution (a second subsealink) or HVDC undergrounding is strongly preferred to the proposed overhead line.

F. Biodiversity:

- F1. The Parish contains 10 Natural England Priority Habitats, five of which are affected by the proposed OH lines. Holford Rule 1 is “*avoid altogether, if possible, the major areas of highest amenity value*”. These damaging proposals from NG clearly fail to meet Holford Rule 1.
- F2. 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. Aldham provides part of that unspoilt countryside. In addition to the network of 23 public rights of way, which include a long stretch of the Essex Way, our village has the Woodland Trust-owned Hoe wood with permissive access in addition to a number of County Wildlife Sites and Natural England Priority Habitats. The proposed pylon scheme will pass through and be highly visible from our high amenity countryside with many public rights of way impacted.
- F3. In addition, East Anglia is a known migratory route for birds of passage in Spring and Autumn. There are swallows and martins nesting in the area, and also whitethroat, blackcap, cuckoo, and willow warbler as summer visitors. Bird strike against Pylon wires is a well-known cause of bird death, which is another reason to go offshore, to avoid the harm of pylons. In particular the proposed pylons for Aldham dissect the flight path of birds flying from the River Colne estuary and the various RSPB and Abertton bird sanctuary to the River Colne flood plains of Aldham and Earles Colne. Pylons Ref. No. TB 055: TB 056 and TB 057 will certainly cause death to geese, swans and other birds that fly in a V formation. Aldham is also at the northern edge of the migration route of the Turtle Dove and the current proposals will negatively impact on co-ordinated action to improve and encourage habitat for nesting Turtle Doves between Aldham residents and the RSPB as part of Operation Turtle Dove
- F4. We again assert that the Project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. Aldham Parish Council, for and on behalf of all of the residents of the village of Aldham in Colchester in Essex, want and demand an integrated offshore grid in the North Sea, because it has been shown by National Grid ESO that this approach saves £2bn of taxpayers money and reduces the overall infrastructure need by 50%. Aldham Parish Council hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group.
- F5. We also note that The Electricity Act (1989) requires NG, when formulating proposals for new lines and other works, to “*have regard to the desirability of preserving natural beauty, of conserving flora, fauna, and geological or physiographical features of special interest and of protecting sites,*

buildings and objects of architectural, historic or archaeological interest; and shall do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.” The desirability of conserving ‘natural beauty’ is not confined to nationally designated landscapes and that our village most certainly has its own special and cherished natural beauty that should be conserved.

- F6 Wildlife Impacts. While landowners have been promised copies of the ecological surveys conducted by National Grid these have not been forthcoming. Formal survey of the parish has been conducted by a number of organisations including the RSPB and as part of the Breeding Bird Survey on behalf of the British Trust for Ornithology, RSPB and the Joint Nature and Conservation Committee. 17 species on the Red list of conservation concern have been recorded in areas affected by the pylon route including: Turtle dove, Cuckoo, Swift, Lapwing, Herring gull, Skylark, Starling, Fieldfare, Spotted fly catcher, Nightingale, House Sparrow, Yellow Wagtail, Greenfinch, Linnet Redpoll and Yellow Hammer. All these species will be harmed by the pylons and the work associated with their construction.

G. Heritage:

- G1. This is a hugely significant aspect for Aldham. Of the 225 listed buildings along the entire length of the scoping corridor Aldham has a disproportional 19, or some 8%, of the buildings NG have identified in the Scoping Report, yet the 4.7km of corridor in our village (out of 180 total) is only 2.0% of the route length. In addition, there are a further 20 listed buildings in the village just outside the scoping corridor. This includes several Grade 1 Listed properties and the Conservation Area of Fordstreet. We are clearly most disproportionately affected.
- G2. Our Grade 1 Listed church is the tallest building in the village at 100 feet (30m) including the weather cock. The 12 proposed pylons are all to be 50% taller than this, which would dwarf the spire and be thoroughly incongruous and out of place. The church and surrounding trees have been in place since 1855, and the trees still do not ‘screen’ it. So how could trees be expected to hide 50m pylons?
- G3. Colchester has a limited number of protected lanes that are an important feature in our landscape. They continue to have an articulating role, providing insights into past communities and their activities through direct experience of a lane’s historic fabric. Foxes Lane (COLLANE10) runs toward the eastern boundary of Aldham and has a Group Value Association score of 2, as the lane has direct association with one or more historic settlements or other significant heritage assets of broadly the same date. For aesthetic value it scores a 2, as the lane has a variety of aesthetic features or forms/alignment and / or a significant view. The proximity of the pylons will clearly harm the status of this protected lane and any construction vehicles must avoid using this route.
- G4. Furthermore, Natural England Inventory lists 10 Priority Habitats in Aldham, and the National Heritage List for England shows 34 Listed Buildings in Aldham while the whole of Ford Street is a Conservation Area. The proposed pylons would cause harm to all of these assets, not only by altering their environment and habitats and agriculture, but by destroying the centuries-old historic settings of these places.

H. Climate Resilience:

H1. Pylons are often wrecked in extreme storms, due to climate change, resulting recently in part of Scotland being without power for weeks. They are susceptible to fire, as well as weather conditions. At the other end of the scale, the electricity supply cut out in Sicily on 27 July 2023, due to underground cables failing in the extreme and lengthy heatwave. Extremes of weather are not limited to Scotland and Sicily, even in East Anglia we have had hurricane force storms and a 40 degree heat record in 2022. Due to climate change, these events need to be factored into our choices. To go offshore would alleviate these problems.

I. Business / Agriculture:

I1. Arable farming is the main land use with some horticulture and livestock production. Construction impacts will be considerable causing disruption for several years. However, the post construction impacts of Pylons will occur in perpetuity. Future cropping is likely to be very different to current agricultural practices. New crops are emerging and the role of tree planting will increase. Pylons and overhead lines will prevent these being planted.

I2. The NFU also supports the thousands of people who want an offshore grid, in underlining that pylons are far from the ideal answer from the farmers' point of view, and each farmer will have different needs both logistically and monetarily. The cost of farmer compensation in an area like ours will be vast and if we secure an integrated offshore grid, then none of that would have to be paid. Nor would it have to be paid to communities or landowners. Going off shore is less costly and incur less delay.

I3. Climate change also means irrigation is increasingly needed for cropping. Moving pipework and irrigators beneath pylons is a safety risk. The efficient use of water is also hindered if straight lines are interrupted by pylons or access roads. More efficient spray boom irrigators certainly cannot work around pylons.

I4. Several businesses in the village are based on tourism and leisure where the scenic nature of the village is key. These include boating, garden centres, cafes, Maize mazes, sunflower and pumpkin patches, and occasional hosting of forest schools' weddings, music events and other occasional exhibitions and walks. There is a renowned apple shop at Crapes farm while two of the farms also host shoots. Glamping and tourist accommodation are also available. All of these are present in our small village and all are predicated on the natural beauty and special character of the area and all will be harmed by the proposed pylons.

I5. Public Rights of Way (PRoW): Aldham has an impressive 22 Public Rights of Way which includes one bridleway and a section of the Long Distance path The Essex Way. Other sections of the PRoW network in Aldham have been recognised and named (Millers Drift) in recognition of their special nature. The PRoW network has been on increasing value to residents both during Covid19 lockdown and as a result of rat running on the road network. There are limited pavements in the village centre and in Fordstreet but no pavements linking the two parts of the village or the village to neighbouring villages. There is no pavement to Marks Tey with its rail station and superior bus connections. Our roads are affected by rat running during A12 repairs A120 blockages (these are notoriously frequent) and will be again by the planned A12 widening scheme from National Highways. The Pylon proposals will close 8 out of the 19 footpaths, some 42% of paths. More damaging is that this represents over 52% of PRoW distance in the village some 7235 m

out of the total 13636 m of PRow. The pylons will be visible from EVERY one of the 19 PRow's in the village so all 19 will be harmed and suffer a loss of amenity.

J. Social and Health Impacts:

- J1. Many residents have raised concerns over the health impacts of living close to pylons. There is a wealth of 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 offshore option available, we question why NG are prepared to expose our village to this risk. In the absence of such guidance many have argued that the Treasury Green Book rules should be used to balance economic social and environmental impacts and Aldham Parish Council would support this.

Section C and D

Question 9: Do you have any further comments on our current proposals within this section?

- A1. Aldham Parish Council again asserts here that the Project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. Aldham Parish Council, for and on behalf of all of the residents of the village of Aldham in Colchester in Essex, want and demand an integrated offshore grid in the North Sea, because it has been shown by National Grid ESO that this approach saves £2bn of taxpayers money and reduces the overall infrastructure need by 50%. Aldham Parish Council hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group
- A2. Mitigation measures: While we are deeply unhappy with the pylons only option being provided by the consultation we also feel we should comment , with out prejudice , on a number of mitigation measures we would like to discuss and agree with National Grid if Aldham is forced to host this harmful infrastructure. Details of mitigation measures were not adequately covered in the consultation so we have outstanding queries on the following:

Pylon design T pylons have been installed in Hinckley Point Somerset to lessen the impact on the landscape. T pylons benefit from a lower height and a smaller footprint but we need to hear more on their drawbacks. These details were not to be found at the consultation events so it is not yet possible to say if they are a viable mitigation if a sub sea route is not adopted. Concerns we have over T pylons include:

- How many pylons would be required in Aldham if T pylons are used?
- Would their construction require a permanent access road to be left across our landscape? And if so why – surely other ways to deliver maintenance could be found?
- Would their footings require significantly more concrete to secure them?
- Would they provide adequate height to cross the Marks Tey to Sudbury railway line

- What length of T Pylons would be considered – we have heard arguments both on aesthetics and for engineering reasons that T pylons and lattice Pylons are not to be mixed?
- Can reports from Somerset that the T pylons there are noisier be refuted and do you have evidence to confirm this?

Aldham residents would like to have detailed responses to these queries before we could understand and comment on their impact on our village.

Pylon positions. We note the preferred route in the original purple swath overhead line route alignment was changed in Consultation 2. We have also read the review of routing options provided in this consultation in the document Design Development Report. That reviewed the comments made in Consultation 2. Considerable work had been done by National Grid to review alternative routes to both West and East of Aldham and this is welcome.

The details determining which route should be adopted describe a number of drawbacks of the alternative West and East routes around Aldham. *viz*: Visual effects are anticipated on both alignments; Both alignment options would also have landscape effects. The alignments would conflict with landform; ecological effects are anticipated on both alignments; and both alignments are likely to result in effects to all grades of listed buildings.

Section 4.151 of the Design Development Report concludes “on balance given the longer alignment and increased heritage effects these alternatives were less preferred”. Aldham Parish Council believes that all these arguments are applicable to the preferred route being consulted on. This is a clear illustration that there are significant harm from Over Headlines irrespective of the route taken. This is why an off shore route must be properly considered. Undergrounding is an alternative that should also be reviewed in particular HVDC.

Screening and landscaping. The most iconic building in the River Colne valley is Chappel Viaduct the 32 arches made of over 6 million bricks that opened 175 years ago. The most iconic building in Aldham is the Grade 1 listed Parish church that was completed in 1855. The viaduct is 75 feet high the church spire is 100 foot high; despite 170 years of growth both are still very visible. The 12 pylons will be at least double the height of the viaduct. Screening and landscaping will not conceal the pylons during the lifetime of the majority of Aldham residents, if ever.

If damaging pylons are forced upon our village we will wish to have meaningful discussions with National Grid on what screening and landscaping they feel is possible.

HVDC undergrounding HVDC undergrounding and/or offshore. HVDC cables offer huge advantages over AC. In the March 2024 ESO Review, an option which included HVDC undergrounding all the way from Norwich to Tilbury scored very highly. Another takes power via HVDC cables from Norwich to Tilbury by sea, with an offshore platform for Five Estuaries and North Falls. Both must be very seriously considered. There is simply no need to build pylons. Aldham Parish Council wished to see National Grid fully consider the option of HVDC if they will not consider a meaningful integrated offshore option.

Existing network. Has the existing network been fully upgraded using latest technologies such as TS Conductors and Magic Balls. This would provide additional time to fully develop a meaningful coordinated offshore grid.

Community benefits: The consultation last year (closed 15 June 2023) and associated Government response in November 2023 gave a broad indication of what is being considered. As yet there is no firm guidance and no statutory requirements. Aldham Parish Council supports any Community Benefits to be made Statutory and payments to be mandatory. This should apply to both direct benefits to individuals and wider Community benefits. We note the consultation option preferred in the Government response was for direct benefits up to £10,000 per household within 300m of the infrastructure and for Community wide benefits up to £200,000 per KM of overhead lines. The lack of clarity over “up to” is alarming to Aldham residents. However we also note the tiny cost per UK house hold bill such figures would give - £2 or £3 per house per year so we would expect payments to be no less than those quoted. Aldham residents do not agree with National Grid CEO John Pettigrew who has stated communities should accept infrastructure as part of our civic duty. National Grid are not a public utility but a listed company with a value in excess of £42bn. Communities like Aldham expect to be treated fairly if NG impose pylons across our village. This also applies to landowners who face easements being taken at very outdated prices.

Section 9 General Considerations

Question 18: : Is there anything you would like us to consider as we finalise our proposals?

- A1. Aldham Parish Council needs to see a fully costed offshore route option presented. We know that pylons will harm our village irrevocably. Different pylon designs all come with different challenges that will all be detrimental. For example, T pylons are less able to go around bends, require closer spacing, require more concrete in the footings and there is a major question around needing to leave access routes to them all across our village. The impact of the proposed lattice pylons on our community is easier to imagine and we can see no benefits at all to our village.

Section 10 Our Consultation

Question 19: Please let us know how you heard about this consultation.

- A1. Aldham Parish Council hosted a village meeting on 7 May 2024 to gather views of residents. Around 70 people attended. Communications from National Grid their agents Fisher German and Terra Quest have been numerous so people were aware of the consultation. However the range and large volume of correspondence on the proposals has left many people confused – the land interest surveys in particular have been intrusive and unnecessary at this time. At a village meeting last year on 15 August, around 33% of those present reported they had not received written notification of Consultation 2. Given the short duration of the consultation this will restrict the number of people from Aldham making a response. This is an unacceptable flaw in the process.

Question 20: Please rate the information we have published in terms of how clearly it was presented and how easy it was to understand.

- A1. No more than average overall, but the volume of consultation material is significant and unreasonable to expect lay people to cope with the necessary research and write-up required for our responses, in such a short time. Earlier consultations were also hampered by being expected to respond *inter alia* to associated consultations on Community Benefits, National Planning Policy Statements, the Electricity Network Commissioners Report and Consultation on NSIP. This it is too demanding for voluntary, time-pressed members of the Aldham Parish Council. The capacity to handle this level of input is exacerbated by the initial shortness of time allowed which was then compounded by the 2024 election extension which was after our village meetings and the timetable we had rushed to work towards for our agreed response. See below for further comments on the impact of the election 2024.

Question 21: If you attended one of our public consultation events, how did you find it?

- A1. The locations were all a long way from Aldham and not easy to access by public transport. Bad, small signage and sometimes limited parking affected some venues. Aldham residents not only struggled to find a venue, but also a car park and had to pay for it. Timings were not ideal for those working or with family commitments. The material presented did not include a full range of options to consider, so we believe it does not meet the Gunning Principles for consultation (*see* below are comments question 23)

Question 22: If you attended one of our public consultation events, how did you find it?

The webinar we had booked into was cancelled due to the election 2024. The replacement event (on 11 July 2024) occurred after our scheduled Parish Council Meeting so was too late to be of value to Councillors.

Question 23: Do you have further comments about our materials, consultation process or any suggestions for how we can improve our consultation?

- A1. Like consultations 1, and 2 this Statutory Consultation appears to be predetermined and the staff at the events are only able to comment on the single option being presented *i.e.* pylons. This falls foul of the Gunning Principles, where meaningful options should be presented at a formative stage to allow the consultation to gather views on them and to enable NG to come to the correct conclusion. We are also disappointed that the NG Offshore Option is not a coordinated offshore ring but a strange hybrid with power coming onshore to Norwich main before going back out to sea. This is clearly not efficient and without a costed integrated offshore grid in the North Sea option there is insufficient

information to give 'intelligent consideration'. The old pylon runs and substation at Bradwell should also have been brought into the discussion, but have not been mentioned.

A2. Given the lasting impact of the proposals the 8 week consultation over both the non statutory and statutory consultations is not acceptable. The delayed spring farm workload and Easter and half term holidays inevitably limited the number of people who were able to find the time to visit drop-in events and respond to the third deficient consultation that we have been faced with. In addition, last year, at the village meeting on 15 August 2023, a number of those present reported that the online consultation response form was difficult to use and material was lost if they took a break from submitting the form to gather information. This has frustrated many and resulted in some being unable to complete the form. At the current time few comments have been received to allow us to comment on the on-line questionnaire this time

B1. Wider policy considerations:

The **Hiorns report** for Essex, Norfolk and Suffolk County Councils exposed serious holes in the needs case for this major overhead line, citing overestimation of the urgency of connection. We believe this justifies halting work on the Norwich to Tilbury scheme: The report also showed feasible offshore solutions could accommodate the extra power flows at much lower costs than previously quoted.

The **ESO East Anglia network study** (March 2024) also shows a HVDC underground line from Norwich to Tilbury to be another viable alternative. The Norwich to Tilbury line should now be paused for review whilst need, timings and alternative solutions are investigated more thoroughly. An offshore solution (a second subsea link) or HVDC undergrounding is strongly preferred to the proposed overhead line.

The **Winsor report** underlines the need for better strategic planning: Whilst the recent government focus on strategic planning of the grid is most welcome, more ambition is required, especially in securing greater offshore co-ordination, if the volume of infrastructure (and hence the impact footprint) is to be reduced by half, as previously predicted by ESO. This must occur at pace as the Centralised Strategic Network Plan (CSNP) is further developed. The CSNP must frontload more rigorous environmental assessments (SEA) to provide a more holistic analysis of onshore and offshore options. To provide better balancing of environmental and community constraints, the CSNP must be opened up to inputs from wider environmental and community stakeholders.

National Policy Statements should not include a starting presumption of overhead lines. Why would one presume a pylon when the vast majority of new power is offshore? Pylons are hugely unpopular, old-fashioned and extremely damaging to communities, heritage, businesses and the environment. The NPS's should be amended to state. "The most appropriate technology for each situation should be selected applying Treasury Green Book guidance in the selection of alternatives."

C1. **Election 2024 and political instability**

Aldham Parish Council notes and shares the concerns many of the Prospective Parliamentary candidates have raised prior to the 2024 election. We are also alarmed by some of the disregard that has been shown to rural communities in the willingness by some parties to commit to delivery of infrastructure at any cost. But the underlying frustration

remains with the lack of strategic planning by Government – there have been 6 Secretaries of State for BEIS / DESNZ in the past 3 years. The Winsor Report also highlighted this lack of strategic thinking and we therefore believe the Norwich To Tilbury proposals should **be paused** until a meaningful strategic assessment and plan can be developed.

5. ALDHAM PARISH COUNCIL Conclusions:

- 5.1. An integrated offshore grid brings environmental, social and system benefits. We should not accept the legally deficient and flawed approach being taken by NG. In fact, the needs-case set out by NG is self-fulfilling: there is only a need to reinforce across boundaries in this region because NG have elected to bring the power on shore here in the first place. Setting that aside, existing capacity is more than sufficient for all future predicated scenarios.
- 5.2. Aldham Parish Council have reviewed this as well as we can in the limited time and expertise at our disposal. As drafted, this Project would change our village for ever, so we are disappointed that the offshore under sea route has not been properly assessed by NG. We recognise wind power from the North Sea must be transmitted to consumers, but this should be via a coordinated offshore grid. Such a grid has been shown by NG ESO (in 2020) not only to be deliverable but hugely beneficial. 50% less infrastructure will be required for a coordinated grid than the current piecemeal approach. That results in cost savings to consumers of £2billion and benefits to the environment and communities.
- 5.3. Aldham Parish Council is gravely concerned that NG are using the scale of the project (the largest in a lifetime?), the ongoing energy crisis and geopolitical instability, and the complexity of the DCO process to steamroller this Project through. The recent Winsor Report rightly highlights a woeful lack of strategic planning and due process over recent decades that has led to the current pressure on communities like Aldham. Our village should not be irreversibly damaged due to past inaction. The lack of decisions then should not lead to wrong decisions now. If we are serious about green energy, then we must deliver it with green infrastructure and that means including a fully costed integrated offshore grid option in the consultation.
- 5.4. We conclude as we started by saying again that the Project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. Aldham Parish Council, for and on behalf of all of the residents of the village of Aldham in Colchester in Essex, want and demand an integrated offshore grid in the North Sea, because it has been shown by National Grid ESO that this approach saves £2bn of taxpayers money and reduces the overall infrastructure need by 50%. Aldham Parish Council hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group

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Submission respondent details:

Submitted this **xx day of July 2024**
by the **ALDHAM PARISH COUNCIL**

for and on behalf of all of the residents of the village of Aldham.
Email contact via
clerk@aldhamparishcouncil.gov.uk

Attachments: Opinions of Lord Banner KC latest responses to be included when received?

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