

## **ALDHAM AGAINST PYLONS**

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REPRESENTING THE RESIDENTS OF  
THE HISTORIC ESSEX VILLAGE OF ALDHAM

### **RESPONSE**

TO NATIONAL GRID'S  
SECOND NON-STATUTORY CONSULTATION ON

**THE GREAT GRID UPGRADE**  
(NORWICH TO TIBURY)

**18<sup>TH</sup> AUGUST 2023**

1. THIS RESPONSE is submitted within time by **Aldham Against Pylons** (“AAP” *see*: [www.alldhamagainstpylons.co.uk](http://www.alldhamagainstpylons.co.uk)), which is the representative body formed by the residents of Aldham to protect their village from the harmful effects of National Grid’s (“NG’s”) The Great Gid Upgrade project (“the Project” formerly and improperly known as East Anglia Green), in response to NG’s second non-statutory public consultation. That consultation spans the period of 27<sup>th</sup> June to 21<sup>st</sup> August 2023 with responses due by the close of that period.
2. From the outset, AAP 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. AAP, 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%. AAP 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. It also looks as though the undersea section from Peterhead to Drax is about to be approved. AAP 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. AAP 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. Like the first non-statutory consultation (“Consultation 1”), which was conducted by NG in the Spring of 2002, NG’s conduct of this second non-statutory consultation (“Consultation 2”) is fundamentally flawed in law and, as a consequence, neither consultations can be relied upon by NG in the statutory consultation scheduled for 2024. This fact has been confirmed in two separate legal opinions issued by Charles Banner KC, a respected planning silk (*see*: **Attachments 1 and 2**), 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. AAP takes the view that NG has acted to date in an arbitrary, unreasonable and unlawful manner, and AAP 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 AAP’s specific responses to the questions posed by NG:

### 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 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” 14 pylons. This is around 2.7% of the Project total. The project will not be limited to the purple swathe corridor area, 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 *see: [here](https://aldhamagainstpylons.co.uk/)*

### Question 6: Do you have any comments on the following within Section C and D Babergh Tending Colchester?

#### A. Proposed overhead line alignment:

- 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.

#### B. Landscape (Pylon Impact):

- B1. The combination of ancient landscape with historical 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, AAP 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. AAP, 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%. AAP 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 do you have evidence to confirm this?

**D. Construction impacts:**

- D1. AAP is increasingly 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. **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 14 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.** AAP 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. NGET stubbornly refuses to engage on the offshore GRID, having chosen to present an expensive and half-baked '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.

**F. Biodiversity:**

- F1. Holford Rule 1 is "*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. 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. The proposed pylon scheme will pass through and be highly visible from our high amenity countryside with many public rights of way impacted. What is more, 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.
- F2. We again assert that the Project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. AAP, 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%. AAP hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group.
- F3. 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.

**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 very disproportionately affected.

- G2. Our Grade 1 Listed church is the tallest building in the village at 100 feet including the weather cock. The 14 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 joins 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.

**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 AAP would support this.

**Question 7: Do you have any further comments on our current proposals within this section?**

- A1. AAP again asserts here that the Project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. AAP, 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%. AAP hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group

**Question 16: Pylon design: Is there anything you would like us to consider as we carry out our assessments?**

- A1. AAP 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.



**Question 17: Please let us know how you heard about this consultation.**

- A1. At a village meeting 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 18: 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 moderate 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. Moreover, it is too demanding for voluntary, time-pressed members of the AAP Committee to be expected to respond *inter alia* to associated consultations on Community Benefits, National Planning Policy Statements, the Electricity Network Commissioners Report and Consultation on NSIP. The capacity to handle this level of input is particularly affected by the shortness of notice, and the shortness of time allowed for consultation and response.

**Question 20: If you attended one of our public consultation events, how did you find it?**

- A1. The locations were all a long way Aldham and in part not easy to access by public transport. Bad, small signage and sometimes limited parking. 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 22)

**Question 22: Do you have further comments about our materials, consultation process or any suggestions for how we can improve our consultation?**

- A1. Like consultation 1, this Consultation 2 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 the summer period is not acceptable. Harvest and holidays inevitably limited the number of people who were able to find the time to visit drop-in events and respond to the second deficient consultation that we have been faced with. In addition, 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.

## **5. AAP 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 NGET. 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. AAP 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. AAP 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. AAP, 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%. AAP hereby support, endorse and adopt *mutatis mutandis* the submission of the Essex Suffolk Norfolk Pylons Action Group

Submitted this **18<sup>th</sup> day of August, 2023,**

by the **AAP Committee**

for and on behalf of all of the residents of the village of Aldham.

**Attachments:** Opinions of Charles Banner KC

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