

Draft response 21 August 2023 deadline

Q1. How would you describe your interest in Norwich to Tilbury?

This response is being made on behalf of Aldham Parish Council and our residents. This follows a village meeting on 17 July and an open Parish Council meeting on 25 July and a final village meeting on 16 August when the proposals were discussed.

Aldham is a village and civil parish situated 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 some 1847 acres in size.

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 which may indicate a Roman settlement. Today the village no longer has a shop school or pub.

Aldham falls within Colchester Borough (now City) Council local authority. This covers a 21.7 km length of overhead pylons. 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.

Aldham Parish Council wish to note that the impacts of the project will not be limited to the purple swath corridor area so the impacts on the bordering environment and historical features are relevant. Our views and comment reflect impacts on the whole village area.

In the current Colchester Local Plan Spatial Hierarchy, the lack of facilities left Aldham outside the Sustainable Settlement category in the other villages grouping. Other Villages are defined by “tightly drawn settlement boundaries which reflect the core community focus of each village and protect the intrinsic character and beauty of the countryside”. This sums us up fairly.

From the 2011 census the village has a population of 490 resident and 210 properties. Our population tends to be stable 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/) <https://aldhamagainstpylons.co.uk/>

Section A Q2 to 3 South Norfolk Not applicable

Section B Q 4 5 mid Suffolk Not applicable

Section C and D Babergh Tendring Colchester

Q6. Do you have any comments on the following within this section?

Proposed overhead line alignment.

The pylon alignment remains within the purple swath of the first consultation so this still means our village will be dissected by the pylons and associated overhead power lines. Aldham Parish Council notes 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.

Aldham Parish Council will encourage parishioners and landowners to submit their own comments on individual pylon locations, so we have made our comments under a number of headings as follows:

Landscape

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 some 1847 acres in size.

Pylon Impact

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.*

We acknowledge that changes have been made to the original dark purple indicative route, but the village remains adversely impacted by the proposals. 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 altered. Additionally the listed building complex at Aldham Hall will be adversely affected by the directional change pylon TB 58 which will be of a denser structures 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. Pylon 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 has traditionally been fortunate to sit 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 impact on 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. Its not just pylons that are the issue for the residents of Aldham it's 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 pylons.

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 Cloes and the roads leading to the Church.

Alternative Tower Designs

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 Parishioners that attended the consultation events were not convinced that the alternative pylons being touted were actually better. The T pylons benefit from a lower height, but we need to hear more on their drawbacks.:

- How many pylons will be required in Aldham if T pylons are use?
- Will their construction require a permanent access road to be left across our land scape?
- Will their footings require significantly more concrete to secure them?
- Can reports form Somerset that the T pylons there are noisier be refuted – do you have evidence to confirm this?

Construction impacts

Aldham residents are increasingly concerned over the damage and destruction that construction of the proposed infrastructure will have on our community and landscape. The 100m wide swath to build the route will leave an irreversible scar across the village. We believe this will harm the land scape, damage biodiversity damage water quality increase air pollution and increase 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.

Overall Aldham Parish Council believes 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 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 scheme completely disregards these advances. Offshore remains our preferred option.

We also note that in stark contrast to the Norwich to Tilbury proposal National Grid 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.

Biodiversity

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 23 public rights of way - which includes a long stretch of the Essex Way our village has the Woodland Trust owned Hoe wood with its permissive access too. The proposed pylon scheme will pass through and be highly visible from our high amenity countryside with many public rights of way impacted. The only plausible way to satisfy Holford Rule 1 would be to underground the cable or more logically and economically, to put it offshore.

We also note that The Electricity Act (1989) requires National Grid, 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.

Aldham parish council notes that 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.

Heritage

This is a hugely significant aspect for Aldham; of the 225 listed buildings along the entire length of the scoping corridor Aldham has 19 or some 8 % of the buildings NG have identified in the Scoping Report. 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 properties and the conservation area of Fordstreet. We are clearly very disproportionately affected.

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 be incongruous.

Colchester has a limited number of protected lanes which 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 lanes 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. And for aesthetic value is 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.

Business

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.

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 can't work around pylons.

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.

Social and health impacts

Many parishioners 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 options to underground or offshore the cables available, we question why you are prepared to expose our village to 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. The scale of this project (it is hard to avoid signs where ever you travel in East Anglia) combined with the number of consultations and the volume of associated material is overwhelming for many.

In the November 2022 EAI scoping document you report under 7.6.10 that *The background concentrations of PM10 do not exceed 50% of the objective (40 μ g/m³). The highest concentration within the study area is 20.0 μ g/m³ at Aldham and the lowest is 14.0 μ g/m³ at Mucking.* We are concerned that any major building project as you propose would only add to this already high figure.

Proposed pylon locations

Nick Winser's (Electricity Networks Commissioner) report states there is no agreed and public guidance as to how, where, and why lines should be onshore or offshore, overhead or underground, lattice pylons or novel designs. Further that there is no agreed and public guidance on how system design should balance different environmental benefits and costs. This guidance is essential not just for the public but for landowners who will be directly affected by this planned infrastructure. This will enable landowners to question more accurately what is being proposed by a scheme. 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.

(If you would like to comment on specific pylon locations, please refer to the numbering in the plans, which can be found here experience.arcgis.com/experience/ba2cbd9ac64c4723847fae8637d50df3)

- Proposed underground cable locations Not applicable.
- Proposed cable sealing end (CSE) compound locations Not applicable
- Proposed East Anglia Connection Node (EACN) substation Not applicable.

Q7. Do you have any further comments on our current proposals within this section?

Aldham would fully support the Essex Suffolk Norfolk pylon group view that There is no need for this destructive project. We want an integrated offshore grid in the North Sea as it has been shown by National Grid ESO to save £2bn and to reduce overall infrastructure by 50%.

Section E Braintree F Chelmsford G Basildon and Brentwood h Thurrock Qs 8 to 15
Not applicable

Q16 Pylon design Is there anything you would like us to consider as we carry out our assessments?

Aldham Parish Council wish 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 lattice pylons on our community is easier to imagine and we can see no benefits to our village.

Q17. Please let us know how you heard about this consultation.

Emails and letter to some Councillors with affected property. At the village meeting on 15 August 2023 around 33% of those present reported they had not received written notification of the consultation. Given the short duration of the consultation this will restrict the number of people from Aldham making a response.

Q18. Please rate the information we have published in terms of how clearly it was presented and how easy it was to understand.

Overall Moderate: the volume of consultation material is significant and when coupled with the associated consultations on Community Benefits, the revision of the National Planning Policy Statements, the Electricity Network Commissioners report, the Consultation on NSIP all swamps a small Parish Council. Our capacity to handle this level of input is understandably depleted and we are deeply unhappy that so much is being thrown at us as once.

Q19. Did you attend any of the following?

Yes; online webinar and face to face meetings at Langham and Witham

Q20. If you attended one of our public consultation events, how did you find it?

Generally informative with wide range of staff and materials present

But for other Parishioners the locations were remote and not easy to access via public transport

Timings were not ideal for those working or with family commitment.

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 comments question 22)

Q21. If you attended one of our online webinars, how did you find it?

Less useful than the face to face events but was OK as an introduction to the NG proposal

Q22. Do you have further comments about our materials, consultation process or any suggestions for how we can improve our consultation?

The 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 to enable NG to come to the correct conclusion.

We are also disappointed that the National grid offshore option is not a coordinated offshore ring but a strange hybrid with power coming onshore to Norwich main before going back to sea. This is clearly not efficient and without a costed integrated offshore grid in the North Sea option there is sufficient information to give 'intelligent consideration'.

Given the lasting impact of the proposals the 8 week consultation over the summer period is not acceptable. 30% of our councillors are farmers so harvest is a busy time.

Added to this is the raft of other associated Government consultations that we need to consider as follows:

1. Community Benefits for Electricity Transmission infrastructure Closed 15 June 2023. See [here](#)
2. National Planning Policy Statements revision consultation Closed 23 June 2023. See [here](#)
3. Electricity Network Commissioner (Winser) report Published 4 August 2023. See [here](#)
4. Reforms to the NSIP consenting process closes 19 September 2023. See [here](#)
5. National Grid Norwich to Tilbury Closes 21 August 2023. See [here](#)

This clearly means the capacity of the Parish Council is too stretched to consider all aspects currently being reviewed. This feels like a deliberate tactic to stifle our views.

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 able to complete the consultation. around

Q23 to 26 equality and Diversity Not applicable to Parish Council

Q27 Any Further comments

Aldham Parish Council have reviewed this as well as we can in the limited time and expertise at our disposal. As drafted the National Grid project will change our village for ever so we are disappointed that the offshore under sea route has not been properly assessed by National Grid.

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 National Grid 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 for consumers of £2billion and benefits to the environment and communities.

We are gravely concerned that National Grid 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 steam roller this 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. No 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 coordinate offshore ring main option in the consultation.

Aldham Parish Council sees no need for this destructive project. We want an integrated offshore grid in the North Sea which has been shown by National Grid ESO to save £2bn and to reduce overall infrastructure by 50%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group and the Aldham Against Pylons Group.

Aldham Parish Council

Colchester

Essex

17 August 2023

Annex 1 consultation Questions

Consultation Questions: 27 in total as follows not all relevant to Aldham

Q1. How would you describe your interest in Norwich to Tilbury?

Q2 to 3 Section A South Norfolk

Q 4 & 5 Section B mid Suffolk

Section C and D Babergh Tendring Colchester

Q6. Do you have any comments on the following within this section?

- Proposed overhead line alignment.
- Proposed pylon locations
- (If you would like to comment on specific pylon locations, please refer to the numbering in the plans, which can be found here experience.arcgis.com/experience/ba2cbd9ac64c4723847fae8637d50df3)
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Consultation website <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/norwich-to-tilbury/public-consultation>

Email to with name address and post code contact@n-t.nationalgrid.com