



Boxted Parish Council
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Re: National Grid - Norwich to Tilbury Great Grid Upgrade (formerly East Anglia GREEN)

2nd Non-Statutory consultation June - August 2023

Executive Summary of objection:

Boxted Parish Council continues to object to the proposed Norwich to Tilbury powerline, on two key principles:

- 1) Unacceptable damage to environment, with particular note to the extensive damage of undergrounding through the Dedham Vale AONB, resultant threats to biodiversity and ecology and the continued risk of harm to wildlife most notably all airborne species.
- 2) Unacceptable impact on landscape character, with particular note taken of the proximity to the Dedham Vale AONB, but also dereliction of the entire 180km line of East Anglian countryside.

Whilst these concerns might normally be argued against by declaring this a “strategic infrastructure project of national importance” in this instance however the short-sightedness of National Grid’s proposal and the ineptitude of their consultation process fortifies our opinion that this proposal is not fit for purpose. National Grid have not suitably demonstrated that they have considered all options to mitigate for environmental damage.

We support the Essex Suffolk Norfolk Pylons Action Group:

We endorse the representations made by the Essex Suffolk Norfolk Pylons Action Group, who with the support of many Town and County Councillors have called for further considerations and exploration of the integrated offshore grid option.

If the connecting of North Sea wind farms to the UK grid is intended to save our environment, climate and landscape, then we should not achieve goal that by tearing up and running rough shod cabling all over the very landscape and environment we seek to protect.

Consultation Deficiencies:

We support the view of Charles Banner KC, whom concluded that the first non-statutory consultation was deficient due to ‘after the event rationalisation of alternatives and failure against two of the Gunning Principles’. Mr Banner warned that unless remedied, the consultation risked infecting later stages. It is therefore disappointing to see that this current consultation does nothing to rectify those deficiencies. There has been no attempt by National Grid Electricity Transmission to take a planned approach to the significantly less invasive offshore grid option instead of offering piecemeal connections to wind farm operators, which then result in the need for pylons onshore through East

Anglia. A fully integrated offshore grid in the North Sea has been shown by National Grid Electricity System Operator Limited in 2020 to save £2bn and to reduce overall infrastructure by 50%.

Irrelevance of Cost Options:

On a national scale, the difference between 2 and 5 bn is almost irrelevant. Such evenly rounded figures thrown about by Nation Grid, of 2bn here, and 5bn there, to try to justify the chosen option, do not at all do justice to the true cost and impact that such a scheme would cost to the local economy of the region which stands to gain nothing from having this power transmitted across it. Not forgetting that National Grid is not some benevolent public authority doing it's best to furnish the population with lovely green energy. It is a privately owned, predominantly by private companies from overseas jurisdictions, infrastructure magnate. Why should we, the people who are being imposed upon, truly care that they want to create wealth for their shareholders by going with the cheapest and quickest option, to the detriment of an entire region of this nation's population?

No sum of money discussed so far constitutes any fair resemblance of the impact on tourism revenue throughout East Anglia, which will be impacted as the landscape character is irrevocably damaged. Nor does it do justice to those who will see their house prices crumble, or their land value damaged, or their crop yields impacted. Nor does it do justice to the years of construction traffic, road closures and diversions, footpath closures, diversions and permanent realignments. No amount of attempted compensation shall do justice to any of these costs and the overall impact on the inhabitants along the pylon route. All for lack of investigating a better option or investing in a stronger more efficient offshore grid.

Policy Considerations:

National Policy Statement for Electricity Networks Infrastructure EN-5 requires National Grid (NG) to appropriately consider alternative technologies, which would include offshore subsea routing. There is no evidence that NG has given it suitable consideration, only to write it off even before the first consultation.

The Alternative:

An integrated offshore option, which replaces this current proposed piecemeal approach, with a coherent strategy to connect offshore wind farms off the East Anglian coast with offshore undersea connections has, thus far, only been vaguely assessed. The 'Backcheck and Review' report vaguely discusses one 'offshore route' as an alternative but offers a convoluted route involving increased cost and seems to be offered as appeasement – it is NOT a fully integrated offshore grid which is being suggested by the OffSET group of MPs, County, District and Parish Councils, and the Essex Suffolk Norfolk Pylons Action Group. A strategic approach would take electricity generated offshore straight to the Thames Estuary and future proof the system for further investment. It would also take account of the proposed hydrogen hub at Harwich/Felixstowe which would require a substantial electricity supply – something not mentioned anywhere on NG's present plan.

A fully integrated offshore route can deliver certainty, has fewer landowners, the major one being the Crown Estate, for bringing cables onshore, and this owner is common to any number of offshore schemes 2 bringing power onshore. This would mitigate the variety and number of parties affected by compulsory purchase orders, planning blight and diverse claims against NG. The changed circumstance of the Vattenfall investment in North Sea wind being put on hold surely begs the question whether this Norwich to Tilbury project is necessary in its present form and does it not give a breathing space to develop offshore alternatives to support the Government's Net Zero intentions?

Boxted Parish – Impact of proposal

In the proximity of Boxted, the proposed pylon line crosses swathes of farmland with wide open views on the aptly named “Great Horkesley Farmland Plateau”. As such the pylons will be visible for miles around. Some undergrounding has now been proposed in this second consultation in the vicinity of Great Horkesley where it was suggested in the first consultation that the pylons would be visible from within the AONB. We argue that the entirety of the Pylon line from Great Horkesley to Ardleigh is visible from within the AONB, and therefore has a direct impact on the landscape character and natural beauty of the AONB, for which it has been designated Outstanding.

The Boxted Neighbourhood Plan (fn1), Objective 2, seeks to protect and enhance the green spaces within the Parish, and Policy LC1 specifically deals with “Coalescence with Colchester Urban Area”. In order to preserve the landscape character and avoid coalescence the policy states “.. do not materially reduce the green gap between Boxted and urban Colchester..”. The proposed Pylon line runs directly through this exact green gap that is intended to be preserved. With the development of the Colchester Northern Gateway Sports park, the green gap between Boxted and Colchester has already been reduced (albeit it’s a sports park, but the development and the light pollution produced therein do encroach on the parish). The green gap that remains therefore is all those fields that lie on either side of Langham Road, Langham Lane and Straight Road, exactly all that land which the Pylons are proposed to cover. If this were a planning application at local level this would be a direct contravention of Boxted Neighbourhood Plan, policy LC1.

Furthermore, this line of pylons where it crosses the Boxted Straight road, follows Langham Road and crosses Langham Lane will create a ‘wirescape’ and fails to comply with Holford Rule 6. It will be the only thing visible whenever entering or exiting Boxted, and many journeys to and from Boxted will involve crossing the pylon line more than once due to the sinuous nature of the road structure in this area.

Although the proposed line crosses the AONB is outside of the parish boundary of Boxted, Boxted considers itself a part of the entire AONB. We are fortunate to have a small part of the AONB within our parish, and therefore feel it is within our duty to protect and preserve the entirety of the AONB as well as the surrounding countryside that serves as the backdrop to the Dedham Vale itself. The parish has received great support and funding from the DV AONB, particularly for the Boxted Wildlife Group that has endeavoured to raise awareness of our native flora and fauna and promote wildlife friendly initiatives. We are therefore horrified to learn of the proposed 120m wide swathes of destruction that will be wrought on the AONB by the undergrounding of the cables. In the vain attempt to reduce the visual impact to the human eye, the alternative has been deemed more favourable to physically destroy and disturb the very environment that we seek to preserve and hold in such high regard, being of “outstanding beauty”. The two simply are not compatible, indeed neither option should even be considered. The powerline should simply not go anywhere near an AONB. The fact that it needs to because National Grid has already decided, with little consultation, to onshore multiple windfarms to a substation at Ardleigh needs to be reviewed with utmost urgency. This cyclical argument of needing to route the pylons here, because they’ve already decided to route the offshore connections here can not be allowed to stand and does not stand the test of fair and decent logic.

Additional Considerations:

- Holford Rule 7 states that alternative tower designs should be considered where they are visually advantageous. Again, we would have expected this to be implemented where it passes close to listed buildings and crosses or passes near to PROW.
- Holford Rule 5 stipulates that, where possible, pylons are placed in valleys, prominent ridges are avoided, woodland is avoided, and everything possible is done to protect woodland and hedgerows and safeguard visual and ecological links. Yet the proposed route through Bosted cuts through multiple field hedgerows and PROWs with ancient hedgerows. We cannot see any effort being made to protect visual and ecological links. Undergrounding as an alternative is even more abhorrent as it not only spoils visual character of the environment and landscape, but physically harms and destroys the landscape, hedges, watercourses, drainages and wooded copses through which it will need to be bulldozed.
- The 'East Atlantic Flyway' migratory bird route which covers this part of Essex has been recommended by the Department for Culture, Media and Sport as a site to be considered by UNESCO for World Heritage Status. This status, if granted, recognises places that are of "outstanding universal value to humanity" and should be protected. We have huge flocks of geese at risk of 'bird strike' if this pylon alignment were to proceed. The migratory birds descend into the AONB to make use of the River Stour. They gather in fields identified as undergrounding locations and compounds where the pylon line transitions to underground. In particular some of the proposed locations for the undergrounded cables to cross the River Stour are presently planned to be directly through large open wetlands adjacent to the Stour, which are not only havens for migratory wildfowl and other migratory birds but are also essential environments for a whole host of freshwater flora and fauna.
- The fenced cable sealing end compounds where the proposed overhead lines go underground as they cross the existing 400 kV overhead line, will require access tracks to permit servicing from the public highway. We cannot comment on these intentions as insufficient information has thus far been provided. The access routes would provide further intrusion and industrialisation.
- We note that no information has yet been provided relating to construction camps, their size and proposed location.
- Compensation for homeowners needs to be considered at this stage, particularly if it has not yet been factored into cost estimates that have been used to rule out the offshore option to-date. The recent increases in the Bank of England base rate will be putting mortgage payers under significant pressure. Coupled with a 30% to 40% decrease in valuation of properties because of pylons nearby, some homeowners will simply be unable to secure a loan on their property at the point of remortgage. Unless compensation can be provided equal to the loss in valuation, some homeowners will be forced out of their property through no fault of their own.
- We would be interested to know if the proposed pylon route is being provided as a private infrastructure scheme and who is providing the funding? Can financial certainty for delivery and compensation be demonstrated?
- NG has previously promoted this as a 'green project' but do not appear to have calculated impact to the environment or carbon footprint into the options appraisal. In addition to any direct impact on habitats, there will be a significant amount of CO₂ released into the atmosphere during the manufacture and installation process – especially from concrete and not least from the very production of the steel pylons.
- To comment at the next stage of consultation we would like to see comprehensive comparisons with a fully integrated offshore proposal before we start to consider what is most "cost" effective.

If pylons do prove to be lowest impact from an environmental perspective NG's approach should be along the lines of what is minimally invasive.

Further comments on the consultation Process:

The consultation asks us to rate the information NG has published in terms of how clearly it was presented and how easy it was to understand. It goes on to ask for further comments about the materials used in the consultation process and asks for suggestions as to how the consultation could be improved. Importantly, NG must improve its consultation by following the Gunning Principles for consultation, recognised in law. Thus far NG has failed to follow the Gunning Principles:

- a) The first Gunning Principle stipulates that the consultation must be at a time when proposals are still at a formative stage - yet this consultation has not reconsidered any decision which had previously been made. NG had decided on a route corridor last year; it had been predetermined. The same scheme has been presented again with just some minor changes to the alignment in some areas.
- b) The second Gunning Principle has yet again been breached in this consultation, as it was in the first. We have simply not been given sufficient levels of information to enable us to make an intelligent 5 comparison of the impacts of a scheme which would not involve pylons (offshore), particularly given the short eight-week consultation process. The information provided should relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response. This simply has not been the case in this second non-statutory consultation, nor was it the case in the first.
- c) "Community Newsletters" were only delivered with a nominal (minimal) distance of the proposed pylon alignment. Ideally, they should be delivered to every inhabitant of every parish through which the line passes or touches. Many may live more than a kilometre from the line but will pass by/under and be effected by it and the construction of it, on a daily basis. They deserve to be informed.
- d) Drop-in events were arranged at short notice, and many found it impossible to attend due to the timings; those commuting from London simply could not get to the venues by 7pm, similarly those attending College did not have an opportunity to attend a physical presentation to consider the hard copy plans at scale in detail. Similarly, there were no weekend drop-in sessions in our region making attendance even more challenging. This is, and remains, unacceptable and demonstrates contempt for those who seek proper engagement in the process, particularly as this was also a failing of last year's consultation.
- e) The age demographics of our community often make on-line access impossible. The June 2023 Community Newsletter posted to households provided only a basic map of the whole proposed project with no detail and was difficult to interpret. Many in our community therefore remain uninformed. For those who did manage to view the scheme online they attempted to view the 'static map', which the majority of lay consultees would be familiar with, but it was illegible as it was impossible to zoom in with any clear definition. Even after we pointed this out at the Chelmsford Racecourse event no effort was made to improve it for the latter stages of the consultation period. Again, NG showed complete contempt. The interactive maps themselves were not particularly user friendly and did not even show all the existing power lines, giving a false impression. Those who attended the drop-in event either at Chelmsford City Racecourse or in Witham received contradictory information from those staffing the events. Some staff could not answer the most basic questions and encouraged questions to be emailed. Responses to these emailed questions frequently took in excess of three weeks meaning it was difficult to give consideration within the timeframe required.
- f) There was inadequate time for consideration and response, the widely accepted period is twelve weeks, yet NG only provided an eight-week consultation over the summer holiday and harvest period which made it difficult for many to attend drop in events and to read, understand and respond to the

consultation. With this in mind, as with the first non-statutory consultation held last year, a low response from the public should not be interpreted as a lack of interest. Non-engagement in the consultation should not be interpreted as support for this project.