

Cllr Sara Naylor, Lexden & Braiswick ward, Colchester City Council: Norwich to Tilbury Statutory Consultation response, 25 July 2024

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My interest in Norwich to Tilbury

I am a democratically elected Colchester City Councillor representing all the residents within the Lexden and Braiswick ward, which includes some of the rural villages and areas of open countryside and exceptional landscape that is most affected by National Grid's Norwich to Tilbury proposals.

The ward lies within Section D of National Grid's proposals. I represent residents in Aldham, Eight Ash Green, and West Bergholt and the rural properties which sit within the parish boundaries of these communities. The parish boundaries north of Colchester coincide with the ward boundaries. The area I represent also includes the Colne Valley up to the Rural North ward boundaries at Fordham, Wormingford and Great Tey.

Engaging with National Grid's proposals

In reaching an informed and cogent view about the proposal, I have reviewed the body of consultation materials provided by National Grid, attended consultation events and worked collaboratively with:

- the parish councils within my ward (Aldham, Eight Ash Green and West Bergholt),
- the senior NSIP planner at Colchester City Council funded by the former Government department, (DLUC), to produce the statutory consultee response to National Grid's consultation,
- the MP for Harwich and North Essex,

- concerned residents living within my ward boundaries and Harwich and North Essex constituency,
- Essex County Council and Colchester City Council elected representatives, and
- community campaigners against National Grid's single proposed solution of building pylons to transmit electricity from Norwich to Tilbury, including Essex Suffolk Norfolk Pylons.

I have gathered views from direct contact with these groups and individuals as well as outreach work including social media engagement, leafletting, and organising a well-attended public meeting. I have conducted my own research and campaigned on this issue since 2022. I have therefore formed an opinion based on views and expertise shared with me. Evidence of the overwhelming negative majority view of the proposal includes the fact that Sir Bernard Jenkin MP was returned as the area's MP on 4 July 2024 in part due to his record of campaigning effectively against National Grid's pylon proposals. Sir Bernard's work in lobbying government ministers and departments is recognised as valuable. It was a key issue during the general election campaign in the southern part of the constituency.

Section D - Colchester

Comments

Support for consultation responses

Having worked closely and collaboratively with the following consultees, I support the following consultation responses and rely upon submission references as part of this response:

- Aldham Parish Council (APC)
- Eight Ash Green Parish Council (EAGPC)
- West Bergholt Parish Council (WBPC)
- Colchester City Council (CCC)
- Sir Bernard Jenkin MP (Harwich and North Essex)

Important context for considering this consultation response

This submission relies upon, and National Grid's independent consultation response analysis should take full account of and give appropriate weight to, the evidence and views presented in the submissions of the above parties wherever referred to.

I give particular weight to the submission by CCC entitled: "Colchester City Council Response to a statutory consultation in accordance with sections 42, 44, 47 and 48 of the Planning Act 2008 (the "Act") for the project called Norwich to Tilbury ("the Project")". This document is referred to as "the CCC submission" in this document.

Objection to the strategic proposal for Norwich to Tilbury

I have worked closely and collaboratively as an elected member of CCC, which is a statutory consultee as a local planning authority. I contributed to its submission as an elected representative of CCC. I endorse its statement:

"... there is insufficient information in the 2024 statutory consultation documents to be certain about how much additional electricity transmission capacity is required in the

south-east of England and by what date, to fully evidence a strategic proposal that relies on onshore reinforcement technology, which includes the construction of overhead lines (OHL) and pylons, and a programme delivery date of 2030.”

Furthermore I share the same position:

CCC must therefore maintain its in-principle objection to Norwich to Tilbury on the following grounds, which are discussed in more detail below:

- *Object to the lack of evidence provided by National Grid Energy Transmission (NGET) to support the need and timing of Norwich to Tilbury by 2030.*
- *Object to NGET undertaking an accelerated programme of consultation to meet an uncertain 2030 programme delivery date on what CCC considers to be a predetermined strategic proposal and 2024 preferred route using predominately harmful onshore overhead line (OHL) and pylon technology, and prior to the conclusion of the Offshore Coordination Support Scheme (OCSS) and conscious consideration of ESO East Anglia Study Report (March 2024).*

Further evidential points made by CCC (paragraphs: 7-12, pp: 2-3, CCC submission) which follow the above quote can only lead to the conclusion that National Grid’s strategic appraisal process is flawed.

Therefore, this is a premature statutory consultation by National Grid for a single option (OHL) that is neither demonstrably necessary nor can OHL be said to be the only viable option that achieves the required objective which is to increase the national capacity to transmit electricity in the national interest. Other viable options have been advanced and accepted as such which would not require OHL to pass through the Lexden and Braiswick ward of CCC.

Important relevant points are made by the MP for Harwich and North Essex in his response (Para: 6-9, p. 1, Sir Bernard Jenkin MP: Response to Norwich to Tilbury Consultation. July 15th 2024, referred to as “Sir Bernard Jenkin’s response”) and are relied upon here as evidence for above point.

It seems therefore that the single option of OHL presented for consultation has more to do with meeting National Grid’s commercial interests rather than wholly in the national interest of energy security.

Government, and the Secretary of State in particular, whose role it is to make the final judgement, should have particular regard for this clear conflict of commercial and national interest when arriving at the decision about the propriety of this proposal.

The single option of OHL that has been presented for consultation must therefore be rejected.

I endorse CCC’s statement in its submission that:

- *CCC wishes to reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include OHLs and pylons.*

- *If an offshore approach is not possible an onshore HVDC fully undergrounded approach as is set out in the ESO East Anglia Study Report (2024) should be the next option tabled as it is clearly less visually damaging than the tabled scheme.*

Furthermore, National Grid has failed to take into consideration the significant legal opinion of Lord Charles Banner KC that the public consultation does not comply with the Gunning Principles.

However, if the single option presented for proposal was taken forward, despite the clear flaws in process and the lack of supporting evidence, then I make the following observations and comments.

Comments about the specific proposals

Proposed overhead line alignment

The proposed alignment would pass through the Colchester City Council (CCC) ward of Lexden and Braiswick, which is characterised by historic villages of a special character that are mentioned in the Domesday Book of 1086, ancient woodlands, rolling open countryside in and around the Colne Valley. The valley is widely agreed to be of an exceptional quality in terms of its topography, views and amenity, and also of historic and environmental national significance.

The proposed OHL alignment would cause significant harms to all the communities and land within Aldham, Eight Ash Green and West Bergholt parish council boundaries that would outweigh the benefits. Additional weight should be given to this factor particularly because the OHL option being consulted upon is not the only viable option available to National Grid. Viable alternatives, cited here as examples only rather than alternative proposals, are set out in para: 9, p.2; and para: 17-20, p.3, of Sir Bernard Jenkin MP's response.

Valued Landscape: The Colne Valley would likely meet the test of a Valued Landscape, which National Grid must therefore reasonably determine prior to proceeding further because the preferred OHL route meanders through the Colne Valley floor. There is no attempt by National Grid to mitigate the overbearing impact of proposed pylons on this special landscape or on the settings of rural properties of national importance that have been listed by Historic England including Highfields Farm (listing no: 1225094) to the east.

The imperative for National Grid to commission a Valued Landscape Assessment is strengthened by the evidence presented by CCC relating to the Colne Valley (para: 31-32, p.6, and in the PEIR section, CCC submission) and surrounds and the evidence that is further presented here.

It is important to note that, although not proposed in this consultation, it would be inappropriate for the pylon route to be moved further south towards West Bergholt's modern village centre as it would contravene planning principles set out by the Holford Rules. These rules require the pylon route to avoid residential areas and open plateaus such as the farmed fields that border the Essex Way as it rises from near medieval Cooks Hall, Grade II* listed, out of the Colne Valley towards 18thC Bergholt Hall, Grade II* listed, and the exceptional Church of St Mary, Grade I listed. The church features an original northern wall dated to 1,000AD which evidences signs of local worship on the site for over 1,000 years which continues to this day.

The Essex Way then continues past the Hall before it turns towards the modern centre of West Bergholt physically connecting the two centres, across open farmland, which are already intrinsically linked in the minds of residents. This pathway is in constant and daily use by residents enjoying the amenity of the landscape between and beyond the modern heart and the historic locus of the village, demonstrating its significance to local residents.

Bergholt Hall's lands originally continued behind the hall and included Hillhouse Wood (or Hill House Wood), an ancient wood, on the edge of the Colne Valley. Hillhouse Wood was gifted to The Woodland Trust in 1993 following residents' fundraising drive including many personal donations. Last year the village commemorated the 30th anniversary of the campaign to save the woods from private buyers in an article in the West Bergholt Bulletin. It is looked after by villagers as The Friends of Hillhouse Wood. The uninterrupted views from Hillhouse Wood across the Colne Valley, (visual receptor 4.05), to the other side of the valley are an important part of the setting of the Hall, the Church and amenity of the ancient wood itself. This view would be marred by pylons that would dominate the landscape. Important points are made in the CCC submission about the visual harms caused by the pylons being far more significant than the >1km claimed by National Grid. I note that only one visual receptor has been located in this exceptional landscape and support the CCC request for further visual receptors to 1.5km, and further to 2km, to be established within the Colne Valley to capture and document accurately the significant harm on this exceptional landscape (para: 346-349, pp. 64-65, CCC submission).

Significant historic and cultural value: Cooks Hall (listing no:1225091), Bergholt Hall (listing no: 1266531) and the Church of St Mary (listing no: 1225120) should only be understood as highly valued nationally important heritage forming a continuous physical and cultural connectivity spanning centuries. Evidence of the cultural significance strengthening over time is significant and the historic settings are strongly linked to the modern village nucleus. The village's name 'Bergholt' is Saxon meaning wood on the hill, an unambiguous link between the village and Hillhouse Wood. Therefore the village, its residents and the landscape to the north can only be understood as inextricably and historically connected. The open farmland that lies between the historic and modern centres of West Bergholt is criss-crossed with well-used PRoW that lead past the Church of St Mary to the upper edge of the Colne Valley slope and into Hillhouse Wood, which add further weight to its vital cultural and historic importance locally.

Cooks Hall is not only a building of exceptional national architectural importance, but it has also been found to be of national historical importance. It has been identified by a historian as the family home of the chaplain to Katherine of Aragon, Henry VIII's first wife, who was part of a significant time in history. The chaplain, Thomas Abell, travelled to Spain on Katherine's behalf to try to halt divorce proceedings by Henry VIII arguing that the King was motivated by his infatuation for Anne Boleyn. The setting of this building is therefore extremely sensitive.

The Church of St Mary remains an important part of village life hosting concerts, weddings and the tradition of an annual candlelight carol service with standing room only. Carols are accompanied by a hand-pumped organ in this exceptional religious setting on the last Sunday before Christmas. Many residents walk to the Church for the dusk service in homage to past generations who lived and worked in West Bergholt and would have trod the same path to worship. The church retains its oak strong box where historians discovered ancient parish records relating to villagers, some of whom are ancestors to families that still live locally.

Significant harms to Aldham village: Aldham village is one of, if not the, most affected community by the proposed pylon route. Following close consultation with the residents of Aldham, which appears in the Domesday Book, and its Parish Council the harms of the pylon line cannot be overstated as it will dissect the village destroying its established character with an overbearing encirclement of wiring and pylons that will tower above the 100ft spire of the Grade I listed village church. Proposals would mean 12 pylons in Aldham on a 4.7km route. I note and support CCC's evidence and point (para: 351-2, pp 64-65, CCC submission) that visual receptor 4.06 demonstrates the significant negative harm to Aldham. Given the impact on the village it is unacceptable of National Grid to have provided only one visual receptor.

There have been some changes since the informal consultations which shifted the pylon route and it now blights a different part of the village with, in some cases, a pylon metres away from homes.

APC has produced a detailed response to the consultation about the pylons proposed for its area. I endorse pages 3 to 8 Aldham Parish Council's Response to National Grid's Statutory Consultation (July 2024), which sets out clearly the extent of the harms that Aldham will suffer if the proposal goes ahead. In particular I note the summary on page 8 which notes the devastating impact on the sections of the Colne Valley and Roman River Valley that are settled and established, but sensitive, landscapes where nationally important species thrive.

I note and agree with APC's view that there can be no mitigation for an OHP routed option through Aldham and that they concur with other consultees noted at the start of this submission that the solution is to recognise the flawed nature of the strategic option assessment which in turn nullifies this statutory consultation. The only effective mitigation is the inclusion of other viable alternatives: offshore grid, or, in certain circumstances, HVDC undergrounding.

Proposed pylon locations (comments on specific pylon locations, refer to the numbering in the plans and [interactive map](#), which can be found at nationalgrid.com/norwich-to-tilbury)

The proposed pylon locations affecting Lexden and Braiswick ward (TB035 to TB060) are inappropriate to the landscape of exceptional quality and communities that are listed as settlements in the Domesday Book. If the proposal was to go ahead, then the only possible mitigation is to underground through the Colne Valley and through Aldham.

I support the CCC position (para: 31, 32, p.6, CCC submission) that the area from West Bergholt, past Fordham and Aldham and into Marks Tey and Great Tey should be undergrounded for landscape reasons across the Colne Valley and for amenity reasons in neighbouring Aldham, in particular.

CCC's position, which I endorse, is that this landscape is of exceptional quality and value. The Council's position is that it would be proportionate, given the scale of the evidenced harms, for NGET to commission a Valued Landscape Assessment of the Colne Valley. CCC needs to be involved in defining the scope of such a document to ensure its validity (para: 31, 32, p6, CCC submission). The reasons for this are set out in the Landscape section of the Council's response to the PEIR (para: 56 onwards, p10 onwards, CCC submission).

Despite the scale of the project, it does not appear as though the effects of the Project on national or regional landscape character have been assessed and this is a flawed approach.

With regard to specific pylon locations, I refer and endorse the following paragraphs in this regard in Sir Bernard Jenkin's response (2.1 'In the Colne Valley and Tributaries, paras: 2.1.1 to 2.1.6, pp13-14).

In particular I endorse consultees' specific concerns raised relating to pylons:

With regard to Aldham I make the following observations about the unacceptable level of harms to the heritage settings of listed buildings, the impact on the community experience of a settled quiet rural way of life, the historic nature of the area which is mentioned in the Domesday Book, and the impact on individual householders of overbearing pylons positions that are +/- 100 metres from their homes and gardens. In particular the following pylon locations: nine numbered TB059 to TB052, cause significant harms to the village splitting the community of 490 residents into three parts. TB055 and TB054 are particularly egregious impacting on the enjoyment of homes that back on to the pylons. Construction laydown areas for TB054 overlay gardens and roads.

With regard to Eight Ash Green I make the following observations about the unacceptable level of harms to the impact on the community, which is spread out and includes new housing at John Flower Avenue on the Halstead Road. Pylon locations at TB053 to TB046 will have significant harms to the amenity of the Eight Ash Green community and outlying rural homes and farms to the north and east including Great Porter's Farm, Henhouse, Fiddler's Farm Cottage. Farming and grazing land will be impacted by the construction phase and its overall viability for agricultural purposes.

With regard to the Colne Valley, relating to Sheet 5 of 9 reference AENC-NG-ENG-PLN-005 in Section D, I make the following particular observations: pylons TB047 to TB041 will cause an exceptional level of significant harm to the Colne Valley, details of the harms to this valley as a whole and in relation to the communities situated within and in natural linked proximity must be understood holistically. Specific harms to aspects of the landscape and communities are evidenced throughout this response and should be considered as part of this point. TB041, TB042 and TB043 are particularly harmful to the amenity of Hillhouse Wood, an ancient wood positioned on a high ridge to the south of the OHL whose value to the community is demonstrated by the campaign to save it for the public in 1993 by the residents of West Bergholt who clubbed together to gift it to The Woodland Trust. It is in constant daily recreational use. The health benefits of being in unspoilt nature and walking daily are significant. These will be significantly harmed by the pylon project. Currently there are rolling open uninterrupted views across the valley exceeding 1km around the public track leading to Hillhouse Wood (indicated by Track and Path (um) directly north of Hillhouse Wood label).

I refer to and support West Bergholt Parish Council's submission which usefully sets out the impact on the northern reaches of the civil parish, the Colne Valley, (figures 1 & 2, p:2, National Grid Norwich to Tilbury Pylons/Trenching Statutory Consultation 2024, West Bergholt Parish Council).

The Colne Valley, if assessed, is highly likely to meet the test of Valued Landscape as set out by the Landscape Institute, which is the accepted arbiter.

In my view, and that of the overwhelming majority of residents that I represent, the landscape is of comparable quality to that of the Stour Valley and Dedham. Locally the three landscapes are considered to be contiguous and it is artificial of National Grid to segment them for the purposes of its proposed project when the area should be viewed as one.

National Grid must carry out a Valued Landscape assessment.

There is no acceptable mitigation for these pylon locations other than undergrounding, with HVDC strongly preferred to AC as the construction trenching required is significantly narrower and therefore the harms to this exceptional landscape would be minimised.

With regard to West Bergholt, the civil parish northern rural reaches are very much part of the community of West Bergholt. This includes the Colne Valley. There is significant harm to the dissection of the Colne Valley. TB039 and TB040 are unacceptably close to Coney Byes Farm and Coney Byes House, Highfield Farm, King's Farm, Kinckhams, Dunedin Cottages, Sprawls Farm and Pond Farm. All are listed with Historic England and their historic settings are harmed by the pylon locations. West Bergholt's historic locus and West Bergholt's modern nucleus are in very close proximity to the OHL. The amenity of the village, whose residents use the Colne Valley on a daily basis, is directly affected as detailed elsewhere in this document. Also alternative pylon sitings, which might be proposed as a mitigation at some future point, nearer to the historic or modern centres of West Bergholt would be significantly harmful to the village and **must not be scoped in** at any time. Evidence about the exceptional nature of the land that provides the physical connectivity between the heritage buildings to the north (Cooks Hall, Bergholt Hall and The Church of St Mary) and the modern nucleus of West Bergholt has been documented elsewhere and should be considered here.

Proposed Cable Sealing End (CSE) compound locations

I endorse the position of CCC submission and the strategic rationale of Sir Bernard Jenkin MP's response about viable alternatives. Alternative viable routes for the transmission infrastructure, including offshore or other overground routes, removes the need for the Norwich to Tilbury route to pass through Lexden and Braiswick ward entirely and/or undergrounding, in place of TB035 and all pylons subsequently to TB060, through Aldham via HVDC, in preference to AC, removes the CSE at location TB035 and TB036. This point should be seen in the context of demonstrating viable alternatives to the proposal under consultation are available. Further work and engagement must be done by National Grid to evidence the harms and benefits of alternatives, and these should be offered for meaningful public consultation. The current consultation is deficient and flawed in this regard.

Our proposals for construction, including temporary and permanent access roads and tracks, compounds and associated requirements

Construction works must not materially change the rural nature of the unclassified roads network, such as Crabtree Lane access to CSE location TB035 and TB036. For example, no straightening or widening of country lanes and tracks or meandering B roads. All damage to the road network due to increased HGV movements must be reinstated during the construction phase to ensure that local road users do not damage their vehicles. Consideration must be given to agriculture and prioritised to allow essential food production activities to continue optimally. There must be a careful assessment of adjustments to avoid the loss of any veteran trees or blocks of trees or hedging at any of the locations in the Lexden and Braiswick ward area. Construction works must not take place outside of the standard hours permitted by CCC which includes limited Saturday working and no Sunday working. All temporary surfaces must be removed promptly and the ground restored quickly. Permanent new haul roads must be fully justified and agreed with CCC. Bulky and overbearing equipment and materials must be brought

onsite only when needed and otherwise kept at a suitable storage location away from the rural construction area.

Other comments

I note that National Grid has no discretionary purchase scheme, relies on a flat rate per pylon and for access irrespective of local conditions and that such a rate has not increased since 2010. This is clearly unfair to those property owners whose homes are clearly blighted along the route that is within the Lexden and Braiswick ward.

9 of 9 pages.

End of Norwich to Tilbury statutory consultation submission from Cllr Sara Naylor, Lexden and Braiswick ward, Colchester City Council, 25 July 2024.