

Great Waltham Parish Council

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Response of Great Waltham Parish Council (“Council”) to the statutory consultation issued by National Grid in relation to its proposals to upgrade the transmission network between the existing substations at Norwich Main in Norfolk, Bramford in Suffolk, and Tilbury in Essex.

1. The Council has reviewed the documentation issued by National Grid in relation to the above statutory consultation. It has also received feedback on the proposals from its parishioners, verbally at various meetings and also by correspondence. It also understands that many parishioners will be making their own individual responses to the consultation.
2. The Council’s position remains unaltered from that articulated in its responses to National Grid’s two previous non-statutory consultations. To reiterate what was stated previously:

“[While the Council] fully supports the installation of North Sea wind farms to generate abundant clean electricity, [it] does not support, and objects strongly to, the proposal for 180km of 50m high pylons to carry electricity from the offshore windfarms and other sources from Norwich to Tilbury. In [its] opinion [...] the pylon structures cannot be adequately screened or masked and therefore would have an irreparable and adverse visual and landscape impact on the very flat and open East Anglian countryside. In the Chelmsford area, the pylons will be visible over a large residential area and an unacceptable level of amenity loss and planning harm will be caused”.

3. The Council notes that the statutory consultation proposals for the Great Waltham area have not materially altered from those indicated in the second non-statutory consultation. What is being proposed will still cause harm to the heritage assets of Langley Park, the Great Waltham Conservation Area and the high proportion of listed buildings of historic value in the area. The Council is not convinced National Grid has properly considered the objections it received previously, since it has made only small cosmetic changes to its designs, and ultimately has chosen to press on regardless of what the people of East Anglia desire for their countryside.
4. The Council believes National Grid has continued to fail to adequately address both the short- and long-term harms created by its proposals against the perceived benefits it has been keen to draw attention to throughout its consultation literature. In effect, the Council believes National Grid has chosen to reverse-engineer a scheme based on a premeditated decision to use pylons come what may.
5. The Council’s view is that National Grid has failed to take proper account of:
 - a. the Electricity System Operator’s East Anglia Network Study 2024 which considers nine options and timescales, including offshore and HVDC underground alternatives;
 - b. the Hiorns Smart Energy Networks review published in November 2023, commissioned jointly by Essex, Suffolk, and Norfolk County Councils which challenged the proposed delivery date of 2030, and suggested that the need for additional transmission capacity would be closer to 2035, which would allow consideration of more acceptable options; and

- c. the Offshore Coordination Support Scheme (OCSS) and has taken the view that only consideration of Norwich to Tilbury power transport is required by assuming that the power from the wind farms is already transported to Norwich, when the reality is that it is not, but such contracts may be in place.

The Council believes that with proper consideration of these insights better solutions than those proposed by National Grid are available, and that National Grid has failed to consult properly (or at all) on alternative methodologies.

6. The Council believes National Grid has chosen a solution which introduces:
 - a. Severe visual and noise blights created by the use of pylons;
 - b. A severe impact on property prices along the route, especially for those homes and businesses most directly affected;
 - c. Significant loss of amenity value, including impacts on heritage sites and tourism in the area, and constraints on residents' normal outdoor leisure activities (both during and after construction work);
 - d. A permanent loss of areas of productive, mainly Grade 2, agricultural land;
 - e. Permanent harms to the countryside by the creation of access roads and the use of existing country lanes which will be entirely unsuitable for the number and type of heavy vehicles which will inevitably be required over a prolonged construction period; and
 - f. A failure to recognise the severe financial impacts and inconvenience to residents caused by travel and other general disruptions during construction of an overland route.

The Council believes all of these adverse effects can be eliminated or substantially mitigated by using alternative methods of power transmission.

7. The Council's position is that the placement of overhead pylons anywhere in its parish is entirely unacceptable and will continue to be strongly opposed. This includes not only the route cited in the statutory consultation, but also any other future alternative route(s) which may come to be proposed. Be in no doubt, National Grid pylons will be equally unwelcome anywhere in the parish and its proposals to impose them on the community will always encounter the same level of opposition. The Council stands in solidarity with all residents and other county, city and parish councils who oppose the use of pylons anywhere in Essex, Suffolk and Norfolk under this scheme.
8. The Council believes that alternative solutions which avoid the use of pylons must be used. This could be either offshore cabling or onshore undergrounding (its preference would be a HVDC solution), or a combination of both. It also believes the technologies associated with these alternatives will be sufficiently mature within acceptable timescales to be used for the scheme. Their implementation would immediately resolve its parishioners' concerns over National Grid's current plans to despoil their countryside. It would avoid the use of unsightly pylons and the permanent sacrifice of countryside from the harms cited in paragraph 6. above.
9. The information National Grid has provided to justify the proposed route suggests that while cursory consideration of alternatives to overhead lines and the use of pylons has been made these have been rejected, primarily (or solely) for reasons of cost. National Grid's documents rely heavily on National Policy Statement EN-5 in relation to the Government's position 'that overhead lines should be the strong **starting presumption** for electricity networks

developments **in general**' (our emphasises). However, these very words provide the reasons its proposals do not need to be followed: viz., this is general, not specific guidance, and even if overhead lines are the starting point, there is no reason they should be the final position once all factors are fairly and appropriately considered.

10. With this in mind, the Council is not convinced that, as National Grid suggests, its preferred use of pylons will ultimately be the most economical solution once all associated costs are properly considered. In particular, the Council believes National Grid has failed to take proper account of the costs for substantial compensation to home and business owners (including the likely compulsory purchase of properties) which it considers inevitable under the proposals. In addition, there has been inadequate provision made for post-implementation costs for removing construction infrastructure, such as access roads, which landowners would want to return to productive use. The Council's view is that while using overhead lines may be National Grid's starting assumption, other fairer and more equitable solutions should be its final answer. Unfortunately National Grid's approach to date has shown no signs of introducing flexibility, innovation and a holistic financial assessment into its thinking.
11. In addition, the Council is not convinced that any green credentials created and enhanced by policy decisions to implement offshore wind farms will be maintained by then constructing 158 kilometres of steel and concrete pylons across unspoilt countryside.
12. Insofar as National Grid's proposals impact Great Waltham parish directly, it will be aware of the issues it has introduced in its proposals by the use of pylons in the so called 'Waltham Gap' location (the part of the route proposed for pylon numbers 134 to 142 inclusive, of which 139 to 142 inclusive are in Great Waltham parish). The Council believes this challenge provides the perfect example of why an HVDC solution would garner, if not support, then grudging acceptance locally. The Council believes its parishioners would tolerate one or two years of disruption if it avoids 50 years or more of blight by pylons. The Council anticipates that all East Anglians would prefer an underground solution, in the same way they have accepted temporary disruption in the past to accommodate similar large-scale national infrastructure projects for underground gas pipes.
13. The Council's view is that National Grid has, unwittingly or otherwise, allowed perceived financial imperatives (not least its own profit margins and shareholder value targets) to cloud its judgment and take precedence over any arguments that more expensive (and likely less profitable) options are preferred not only by those most directly affected, but also end users. That is, National Grid has chosen the profit motive over what consumers regard as being more precious – the preservation of the rural countryside in which they live and work.
14. The Council also asserts that National Grid's pylons solution introduces harms which will blight heritage assets in its parish (see paragraph 3. above), and indeed along the whole proposed route. In addition, they will blight the parish and surrounding area as a tourist attraction. In reality, there is no upside to deploying pylons beyond National Grid's assumption that their use is the cheapest solution overall – a premise which the Council strongly contests.
15. While it can be difficult to put a price on loss of amenity and aesthetic qualities, the Council believes that National Grid has made no worthwhile attempt to quantify the price of the permanent destructive effects to the countryside of what it is proposing. National Grid cites regulations which require it to provide a 'value-for-money' solution, but fails to quantify how aspects such as the loss of a view or the denuded quality of life in future have been considered, quantified, and priced into its calculations. In doing so National Grid has assumed that customers always want the cheapest solution and because of that are willing to accept any and all adverse consequences. The Council considers this to be a profound misconception based on muddleheaded thinking.

16. The Council believes that its parishioners in particular, and residents in Essex, Suffolk and Norfolk in general, place a far higher value on their countryside than does National Grid, and that they are more willing to bear a financial cost of keeping what they have than National Grid wishes to concede. The Council cannot see any evidence that National Grid has consulted either East Anglia residents or customers in general on their preferences in relation to ultimately paying more in the short- and medium-term for their power supply if it is necessary to avoid the longer-term blight the proposals in the consultation would impose. Why has National Grid chosen not to consult on this and seek residents' and consumers' views on such a crucial question?
17. In summary, National Grid's proposals in the statutory consultation are wholly unacceptable to the Council. There are alternative solutions, but National Grid has chosen to disregard them, not least, the Council believes to protect profit margins and shareholder dividends – this too is unacceptable. The Council believes large infrastructure projects of the type National Grid are proposing must carry the informed consent of the majority of those directly affected, a threshold which it has comprehensively failed to meet (and seemingly even recognise) in what has been proposed under this consultation. The Council believes National Grid should go back and fundamentally reconsider its proposals and consult properly on alternative solutions which satisfy the concerns of people whose lives the current proposals will otherwise blight, and in many cases, ruin.

Great Waltham Parish Council
June 2024