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By email: NorwichToTilbury@planninginspectorate.gov.uk

Your ref (tba)
Our ref MJH/LANG 288371.0001
Date 23 September 2025

Dear Sirs/Mesdames

Re Application for a Development Consent Order ('DCO') re Norwich to Tilbury Pylon Scheme (Promoter: National Grid Electricity Transmission ('NGET'))
Our Client: Ms P Lang (Objector)

We are instructed by Ms P Lang of Headborough, Tey Road, Aldham, Essex CO6 3RX in respect of the above matter. Our Client asks that the Planning Inspectorate does not accept NGET's application for a DCO. Full reasoning follows.

Background

Our Client is a private landowner who is extremely concerned by the scheme and the DCO application that has been made.

Our Client has made representations in June 2022, August 2023 and Summer 2024 via email, with an automated acknowledgement receipt. We attach copies of Our Client's earlier letters for your reference.

In terms of those three letters, in each one Our Client raised various themes or issues (such as environmental (to include climate change), habitat, landscape, economic and heritage harms/impact) - regrettably, those representations don't appear to have been noted or heeded. Moreover, Our Client, in addition to making representations as to potential and/or likely harms and impact, made suggestions as to alternative or, at the very least, points for further investigation, scrutiny and deliberation. Our Client has outlined deficiencies in some of the evidential and technical information upon which NBGET seek to rely in applying for the DCO.

Partners: Mark Cornell, Jason Brady, Rebecca Mason, Steven Hopkins, Carol Toulson, Samuel Bawden,
Michael Harman, Beth Greig, Rachel Shaw, Lawrence Pearce, Rebecca Hempstead, Chris Milner, Matthew Downing
Consultants: Michael Wright
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Our Client believes that she is not alone in making the representations that she has.

Our Client has not received a direct response to her concerns. But Our Client does not complain as to this because she understands that this is a large application which, undoubtedly, has attracted a large number of representations. Our Client's complaint is not that NGET has not contacted her directly to respond to each of her representations made; she accepts that this would be logistically "challenging" for NGET, notwithstanding its own time, resource and budgetary constraints.

Our Client does complain that NGET has not given any consideration to the representations made by her And (Our Client believes) countless others. In simple parlance it looks as though NGET have, rather than consulted, simply set a position from which it [NGET] is not minded to depart. Moreover, Our Client says, NGET's position of intransigence suggests that it has never considered departing from its given position.

In other words, although "inviting" representations from Our Client and others, NGET have simply disregarded (or dismissed) these; apart from minor/de minimis changes to the predetermined, principally over ground/overhead, route.

This issue of lack of meaningful engagement and/or conclusion – demonstrated by no conscientious investigation, analysis and/or discussion of relevant issues and alternative options – is at the core of Our Client's complaint. And, as above, Our Client believes that her experience is neither novel nor unique; Our Client fears that many others have had the same experience.

It is in the above context that Our Client makes this request that you do not accept NGET's application for the DCO.

The (summary) basis for Our Client's request not to accept the DCO

For all the above reasons Our Client says that the consultations have been anything but a "consultation" and therefore that NGET's application for the DCO should not be accepted because it has not complied with the provisions of the Planning Act 2008 (notably Chapter 2, Part 5 thereto) nor acted in accordance with established legal principles known colloquially as the "*Gunning Principles*" and more recently reviewed in the case of *R (Moseley) v. LB Haringey* [2014] 1 WLR 3947.

Our Client refers to, and supports, the assessment of Lord Charles Banner given in 2022 that NGET's "consultation" process has been legally defective; those failings have not been addressed and, as such, have further "infected" this process and redented NGET's consultation regarding its proposed DCO entirely deficient.

Indeed, in the context of inadequate consultation, Our Client asserts that there are four main/key reasons why the DCO application should not be accepted, namely:

1. **Unlawful Predetermination:** NGET appears to have predetermined its preferred solution—overhead pylons—without lawfully consulting on viable alternatives such as underground HVDC cables or offshore grid options. This contravenes established legal principles, including the *Gunning principles* and the precedent set in *R (Moseley) v LB Haringey* [2014].
2. **Breach of Statutory Duties:** NGET's proposal/the DCO fails to, for example, meet obligations under Schedule 9 of the Electricity Act 1989 and Section 85 of the Countryside and Rights of Way Act 2000, particularly in relation to environmental protection and landscape preservation.
3. **Inadequate Environmental Assessment:** The Environmental Statement accompanying NGET's application does not demonstrably fulfil the requirements of Regulation 4(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Our Client says that a key issue is the lack of comparative analysis of reasonable alternatives.

4. **Failure to Apply Treasury Green Book Guidance:** NGET's application does not use the Treasury Green Book methodology. This undermines the integrity of NGET's cost assessments and project option evaluations, which are essential for lawful decision-making.

For all the above (summary) reasons Our Client says that the DCO should not accepted. Instead, NGET should be asked to revisit matters and undertake a proper/lawful period of consultation in which reasonable alternatives are considered, against reliable/robust information and properly costed in line with established guidance and principles.

Other

Our Client says that, in addition to similar representations made by individual persons and businesses, procedural issues have been experienced by – and also commented upon – by statutory consultees, to include the Essex, Suffolk and Norfolk County Councils. Notably, the County Councils have all made representations (i.e. complained) of the inadequate consideration of alternatives as well as the “consultation rounds” feeling like a *fait accompli*.

This, Our Client says, is both telling and damning of NGET/the DCO application. Simply put, NGET have given no credence to proper consultation nor of consideration to reasonable alternatives. The DCO application should not be allowed to proceed unless and until those deficiencies have been addressed [by NGET].

Conclusion

For all the above reasons Our Client hopes that you will not accept the application for the DCO. We thus invite you to confirm receipt of Our Client's request and thereafter as that you respond with your decision/response as soon as possible.

In the event that, notwithstanding this letter, you decide to accept the application for the DCO, we are instructed to record that Our Client fully reserves her right to seek appropriate relief from the Courts (i.e. Our Client reserves the right to make an application for Judicial Review and/or a Statutory Challenge of any “acceptance” of the DCO).

On behalf of Our Client, we look forward to hearing from you.

Yours faithfully



Holmes & Hills LLP

Enc(s)

From P Lang, [REDACTED]

NATIONAL GRID, EAST ANGLIA GREEN CONSULTATION RESPONSE**15 JUNE 2022**

I am responding to National Grid East Anglia GREEN pylons "consultation". I am well aware that these responses need to be measured and well-argued, and this will be. But first a taste of some well-justified local discontent.

I write against a background of decades of continuous degradation of countryside and farmland, badly-placed housing, roads and other infrastructure rammed through, often with little regard to local views or legal protection regulations (eg HS2, potentially Sizewell C). And now the wide open skies, landscapes SEGLand countryside of John Constable and Thomas Gainsborough's East Anglia are threatened, confronted with the totally unnecessary march of the giant pylons. How many more of these schemes do we have to fight off? The anger throughout the area is palpable.

This is compounded by the National Grid's "informal consultation", which is not proper, and made worse by inconsistent responses given at drop-in "information".

1. **Why haven't we been presented with options & alternatives?** These should include: cables under the sea, more pylons underground* and different types* of pylons. Alternatives should be presented with costs and impacts to the environment, so that the public and stakeholders can make an informed decision. '[Gunning principles](#)', which are recognised in law, require sufficient information to give 'intelligent consideration' and proposals to be at a formative stage. Instead this is a 'preferred option' already selected and presented without adequate information.
2. **How is this project 'green'? How many trees will be lost and habitats destroyed?**
3. **What will be the impact on listed properties along the route of the power lines?**
4. **What is the health impact on humans of power lines, and what is the difference between different methods of power transportation?**

** These alternatives are not an environmentally friendly panacea. 60 metre-100 metre wide swathes of land have to be disturbed either way, with accompanying unnecessary destruction of farmland, countryside, trees and natural habitat. The character of the landscape would still be changed irrevocably.*

As submitted by the OFFSET group of E Anglian MPs, I seek a coordinated offshore grid, which, by National Grid's own admission would save the consumer £6bn. I would argue that NOT to save that money would be potentially negligent. National Grid is already involved in the Sea Link undersea transmission project, from Sizewell to Kent. It is hard to see how National Grid could rule out doing the same thing in the case of East Anglia, to avoid the cultural and ecological vandalism that their proposal would inflict on everyone who lives in or visits the area. New electricity generated offshore should be transmitted offshore, making landfall as close to target population centres as possible.

I oppose the plans being consulted upon due to the shortcomings of the consultation, the lack of options being put before the public, the lack of a national strategy for energy distribution and the impact on the businesses, landscape, the environment, heritage, health and home-owners.

This project is NOT green. Pylons are the worst option, there should be an offshore grid

ALDHAM

Buildings and People

I start with a quote from National Grid's own documentation, under:

Main Risks, constraints and opportunities ... *"It is possible that multiple significant adverse effects would arise as a result of change to setting of listed buildings between **Aldham** and Little Tey from an OHL. Normal routeing and siting practices can be expected to afford some mitigation potentially along with additional reinforcement of planting to strengthen screening, though some consent risk to an overhead line solution may remain that may warrant consideration of further measures."*

I would argue that in such a flat area, hiding 50m pylons is not possible. Deciduous is the overwhelming tree type in the area, and the average height is 20m-40m. So, if screening means planting trees, it would probably not solve the problem; and even if it did, it would not start to do so, at the earliest, for half a century or more, allowing for normal rate of tree growth (average 45 cm p.a.). [Photo attached of pylon looming over treeless swathe of countryside. Also show is demonstrably impossible to screen behind trees]

[NB See later, under heading of Ecology and Biodiversity, for details of Natural England's Priority Habitat Inventory as applied to Aldham. These many designated areas will also make it very difficult to site the pylons appropriately].

Pylons should not go through Aldham. This is a small rural village, surrounded by woods and farmland. According to Historic England, the **National Heritage List for England (NHLE) names 34 Listed Buildings** in Aldham [see attached map], and Ford Street is a Conservation Area. These listed buildings range from as early as the original church site, 1210 through a barn from 1610 (and many other protected barns and cart lodges) houses from 1629 and earlier, up to the present day. Aldham, near the Essex/Suffolk border, is in a tranquil part of the wider tourist area of East Anglia. The increased 'industrialisation' of the countryside would have a seriously detrimental impact not only on people's enjoyment of it, but on house prices, and on the village, its farmland, businesses and tourism.

There is a long distance footpath, the Essex Way, which runs through Aldham, with paths leading off to join the large network of footpaths in the village, which are well used by residents and visitors alike. The construction of giant pylons would be a serious deterrent to their use, so amenity value needs to be taken into account. This is a walking area, and proposed pylons would loom over the area and blight the view of the river valley from the village.

There is also a potential risk to health. A quote from National Grid's book, on Electromagnetic Fields, notes there is *"some scientific evidence suggesting a possible link between unusually high exposure to magnetic fields and childhood leukaemia. Based on this evidence, magnetic fields are classed by the World Health Organisation (WHO) as 'possibly' carcinogenic'."*

Holford Rules: Holford Rule 3 states that the most direct line must be chosen. Aldham is a flat area, and it would seem that the Holford Rules (e.g.4 & 5, avoiding ridge lines) would be difficult to apply in hiding pylons. In order to avoid affecting the large quantity of above-mentioned listed buildings, and the Natural England Priority Habitat Inventory areas within Aldham (see later), it would appear to be impossible not to infringe Rule 3, above, because there would, I suggest, have to be too many Angle Towers, thus contravening Holford Rule 2 which states: *"provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction"*. So it would seem that best practice could not be observed.

This is one of the fastest housing growth areas in the country, with the need for local people to be able to enjoy their heritage and unspoiled open spaces only increasing in importance.

NO PYLONS. [Not in Aldham, not in East Anglia] We need a strategic offshore grid.

Ecology and Biodiversity

I would start by saying that I have minimal faith or trust in the mitigation or biodiversity offset systems employed by planners to make up for lost habitats. They are extremely poor, or non-existent, substitutes for the status quo, sometimes centuries-old established ecosystems; what are their inhabitants expected to do in the years it takes to re-establish, and where would they go in the meantime? Research over recent decades proves that a number of the inhabitants of the natural world become extinct as a result of these so-called 'schemes'.

As can be seen from the attached **Natural England map of their Priority Habitat Inventory** [see map] of the Aldham area, there are several areas which need to be avoided:

Ancient Woodlands

Hoe Wood (Woodland Trust)

Church House Wood, and probable other small area, part of Church House Farm

Chippetts Farm

Priority Habitat, Traditional Orchard – Crapes Farm

This is a unique, 15 acre, traditional orchard with some trees planted as long ago as 1922, by the present owner's grandfather. It specialises in heritage fruit, and lesser-known varieties of: apples, medlars, cherries, quince and plums. With unchanged land-use over such a long period, it has also become a haven for much wildlife, including newts, slow worms and grass snakes.

Priority Habitats, Deciduous Woodland:

Wick Farm

Along the River Colne at Ford Street

Ashington Lodge, Ashington Grove

Rye House

Old Rectory and beyond its northern boundary

Headborough – 6-acre deciduous woodland planted in 1989, which is older than that planted north of the Old Rectory. Should also qualify for Priority Habitat.

Landowners have been planting trees, copses and woodland in large numbers, some with government schemes, for decades. Diseased elms have been replaced since the 1970s. Hedgerows have been replanted by farmers and landowners to replace those which were ripped out in the 1960s and 1970s, in fields and along road verges and farm tracks. To have any of these cut down unnecessarily would be devastating, and as already mentioned it takes a lifetime for a new tree to grow. No mitigation would be acceptable, nor would it work. (Go offshore)

Wildflower meadows have been carefully established over many years, and through Stewardship schemes wildflower strips surrounding crops, providing for bees and other insects. All this, and tending new trees represents a lifetime's work. No amount of mitigation or biodiversity offset would compensate for the loss of any of this.

Just because some of these areas are not designated special in any way, does not mean that they are not. In its consideration of undergrounding in designated areas, the National Grid itself concedes that they are not the only places which need protection, by employing phrases like 'such as' and 'in particular' – thus intimating that these are not an exhaustive list. That not placing pylons in other areas may well be justified, and best decided at local level.

The wildlife in the area is just about managing, but it would not take much to tip many of the species onto the various Endangered Species lists. Of particular interest on the River Colne, and in its surrounding water meadows (a habitat-type which is becoming rarer thanks to cavalier house-building) are **water voles**, and little egrets. Government Stewardship Schemes, maintained over years, are protecting great crested newts in farm ponds. There are badgers, foxes, polecats, stoats, hedgehogs, bats and three species of deer in the Aldham area.

Many farmland and other birds are sadly no longer seen around Aldham. Some that are now on the **Red List: skylarks, house sparrows and starlings**, all nest around the village, the skylarks particularly in the fields between Tey Road, Brook Road and Rectory Road. These ground-nesting birds would be in severe danger from pylon construction. Bird strike against the wires is also a well-known cause of bird death, which is another reason to go offshore. No pylons.

More Government Stewardship schemes helped to re-establish barn owl habitats, and they are now nesting regularly, directly under the proposed graduated purple swathe. No pylons – go offshore. There are also (fewer than there used to be) tawny and little owls. Their habitats would, yet again, be disturbed by pylons. No pylons – go offshore.

It is well-known that the disturbance of the ground caused by construction work causes severe damage to the soil-structure, whether by compaction from heavy vehicles, or churning of the soil due to digging thus destroying habitats. All of this can also restrict successful regrowth, and change the water flow patterns. Yet another reason, if one were needed, why there should be no pylons in Aldham.

NO PYLONS. [Not in Aldham, not in East Anglia] We need a strategic offshore grid.

Conclusion

While I am supportive of renewable energy, East Anglia GREEN is not a renewable energy project. It is a transmission project. Renewable energy must be taken to where it is needed in the least damaging way. That is via a strategic offshore grid, coming onshore close to where the power is required, at brownfield sites.

I endorse and support the position taken by the Essex Suffolk Norfolk Pylons action group that East Anglia GREEN's preferred option is the wrong one and that a strategic offshore grid must be pursued instead. We agree that the East Anglia GREEN consultation is inadequate, that there are errors and inconsistencies and that we have been presented with a fait accompli instead of options. There is insufficient evidence to make an informed response. The consultation is also premature, given the offshore transmission review due out imminently, and the forthcoming consultation for Sea Link. We share concerns that the consultation makes misleading environmental claims.

It was surely unnecessary for us to have had to spend valuable time setting out all of the above, as
(a) we should have been given more choices instead of this inadequate consultation, and
(b) it should be a given that the electricity transmission goes offshore.

NO PYLONS [NOT IN EAST ANGLIA] WE NEED A STRATEGIC OFFSHORE GRID

From P Lang, [REDACTED]

NATIONAL GRID, NORWICH - TILBURY "CONSULTATION" RESPONSE 15 AUGUST 2023

Sirs,

We are responding to the National Grid Norwich-Tilbury 2023 pylons "consultation", and start from the following premise*, and therefore consider all that goes after elaborates on this, and backs it up. This hare-brained scheme is causing unnecessary harm to tens of thousands of people not only in East Anglia, but throughout the UK where you have similar, misplaced, plans. It is a waste of our (and your) time, money and effort, and while I'm in favour of green energy, there is a known better alternative for its transmission on this occasion.

****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%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.***

National Grid's second "informal consultation", like the first, is deemed "deficient" by Charles Banner KC's Legal Opinions, because of lack of alternatives offered, and with Gunning Principles, and the Treasury Green Book rules being ignored. ***(Both Opinions attached to email).***

Runs of pylons are currently being removed in several places in Britain because, in short, they are eyesores: to "restore Britain's natural beauty" and to "minimise the visual impact on the local landscape. So, why plan to install thousands more throughout the country, where there are better alternatives.

National Grid is already involved in many other undersea transmission projects, including Sea Link from Sizewell to Kent. It looks as though the undersea section from Peterhead to Drax is also about to be approved. This was mooted due to "overhead lines non-deliverable on schedule". If 440km can go undersea there, 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 their proposal would inflict on everyone who lives in or visits the area. New electricity generated offshore should be transmitted offshore, making landfall as close to target population centres as possible. ***(See Alternative Transmission option charts, attached).***

The bizarre insistence of NG that this offshore grid would have to start from Norwich, makes no sense. Why go into Norwich from the wind farms in the first place? It needs to stay off shore, and be transmitted offshore, landing either at the old pylons at Bradwell, or at Tilbury.

The project is destructive and unnecessary, and its prosecution by NG is irrational and thereby unreasonable. We 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%. We hereby support, endorse and adopt the submission of the Essex Suffolk Norfolk Pylons Action Group.

NG has invested an enormous amount of energy, time and resources in pursuing its favoured and predetermined Norwich to Tilbury transmission route and is showing no signs of discussing, let alone taking on board, feedback about alternatives. NGET stubbornly refuses to engage on the offshore GRID, having chosen to present an expensive and half-baked strawman 'offshore' option from Norwich to Tilbury instead. But the East Anglian countryside needs to be preserved.

Your 'feedback' to our nearly 4,000 responses to your first deficient consultation, has been to ignore us. You have insulted us by tinkering at the edges of your proposed route, and completely ignored feedback to go for the obvious offshore solution, offshore.

I oppose the plans being consulted upon due to the shortcomings of the consultation, the lack of options being put before the public, the lack of a national strategy for energy distribution and the harm caused to businesses, tourism, landscape, the environment, heritage, health and homeowners. An offshore grid would be quicker to Net Zero, cheaper and more efficient.

Aldham - general

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%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.

The land in East Anglia is mostly flat, and our village, Aldham, is particularly so, and screening virtually impossible. The pylons will be visibly towering over the entire village (***see attached images, before and after, and comparative heights chart***) dwarfing Aldham Church spire at 35m, and even the distant historical Chappel Viaduct at 25m. Your arrogance in attempting to introduce 550-odd monstrosities at 50m high, with feedback from everywhere that they are neither wanted nor needed, never ceases to amaze me. THERE IS A BETTER ALTERNATIVE. The pylons would cause harm by being much too close to habitation, and the obvious alternative is to go offshore.

No 'mitigation' is possible, because the land is so flat, thus breaking the Holford Rules and causing harm, that an alternative method should be offered. A quote from National Grid's own documentation, under: **Main Risks, constraints and opportunities**, confirms this and other potential problems ... *"It is possible that multiple significant adverse effects would arise as a result of change to setting of listed buildings between Aldham and Little Tey from an OHL. Normal routeing and siting practices can be expected to afford some mitigation potentially along with additional reinforcement of planting to strengthen screening, though some consent risk to an overhead line solution may remain that may warrant consideration of further measures."*

I would argue that in such a flat area, hiding 50m pylons is not possible. Even though there are mature trees and woodland around, with deciduous the overwhelming tree type in the area, the average height is only 20m-40m. So, if screening means planting trees, it would probably not solve the problem; and even if it did, it would not start to do so, at the earliest, for half a century or more, allowing for normal rate of tree growth (average 45 cm p.a.).

As you can see from the (***attached***) maps, Natural England Inventory lists 10 Priority Habitats in Aldham (***inc map Headborough Wood***), and the National Heritage List for England shows 34 Listed Buildings in Aldham (***attached***), while the whole of Ford Street is a Conservation Area. The pylons would cause harm to all these assets, not only by altering their environment and habitats and agriculture, but by destroying the centuries-old historic settings of these places.

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 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. And 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.

South of the village the pylon route passes through the Marks Tey Brickpit SSSI 'impact zone' (SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England) They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.) As the Brickpit is all about geological interest, this could be significant.

The increased industrialisation of the countryside would have a seriously detrimental impact on people's enjoyment of it, also on Aldham and its house prices, its farmland, businesses and tourism.

Biodiversity in the wider area (including Aldham)

We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.

We would like to state first that 'mitigation' and 'biodiversity net gain' are very much a second best option, and should only be used where there is no alternative, and don't believe they can ever replace effectively the status quo. Whilst I understand there are situations where there is no choice with a development, and am all in favour of the developer being made to pay a large sum to improve where land is disturbed; however when there is actually a perfectly good alternative to pylons, it should be adopted, then there will be very limited need for 'biodiversity net gain' or 'mitigation'. That, among many other things, should make life easier and cheaper for NG.

A lot of the following applies to householders down the entire route through the East Anglian countryside. Landowners have been planting trees, copses and woodland in large numbers, some with government schemes, for decades. Diseased elms have been replaced since the 1970s. Hedgerows have been replanted by farmers and landowners to replace those which were ripped out in the 1960s and 1970s, in fields and along road verges and farm tracks. To have any of these cut down unnecessarily would be devastating, and it takes a lifetime for a new tree to grow. No mitigation would be acceptable, nor would it work, and harm would be caused to our trees.

Wildflower meadows, too, have been carefully established over many years, and through Stewardship schemes wildflower strips surrounding crops, providing for bees and other insects. All this, and tending new trees represents a lifetime's work. No amount of mitigation or biodiversity offset would compensate for the loss of any of it. Pylons would cause harm to decades of careful nurturing and growth.

The wildlife in the area is only just about managing, so it would not take much to tip many of the species onto the various Endangered Species lists. Of particular interest on the River Colne, and in its surrounding water meadows (a habitat-type which is becoming rarer thanks to cavalier house-building) are **water voles**, and little egrets. Government Stewardship Schemes, maintained over years, are protecting great crested newts in farm ponds.

There are badgers, foxes, polecats, stoats, hedgehogs, pipistrelle bats and three species of deer in the Aldham area. **Oak Bolete mushrooms (see 2 attached photos)** have also been found under a group of oaks on our land, quite rare, and associated with Ancient Woodland. Harm would be caused to all the above through the pylons' construction and existence.

UNESCO has nominated East Anglia as a World Heritage Site, on the route of the East Atlantic Flyway: a major migratory route for birds of passage in spring and autumn between southern and northern hemispheres. We have had swallows nesting in our shed for all of the 52 years we have lived here, and in the area there are also, among others: martins, whitethroat, blackcap, cuckoo, and willow warbler as summer visitors. Bird strike against the wires is a well-known cause of bird death, which is another reason to go offshore, to avoid the harm of pylons. **(See Birds Superhighway, attached).**

Many farmland and other birds are sadly no longer seen around Aldham. Some that are now on the **Red List: skylarks, house sparrows and starlings** nest around the village, of which the ground-nesting skylarks would be at particular risk of harm from the construction and existence of pylons.

More Government Stewardship schemes helped to re-establish barn owl habitats, and they are now nesting regularly. There are also (fewer than there used to be) tawny and little owls. Their habitats would be disturbed and harmed yet again, by pylons.

Landscapes and countryside

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%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.

Views are an integral part of the appeal of East Anglia, and not just to those who live here, but to all those who work, or are attracted to visit or holiday in the area. One of the main draws is the wide-open countryside, which allows for vast open sky views, which would be seriously harmed by the installation of pylons. Charles Kingsley wrote of the "overhead arch of heaven more ample than elsewhere". It is part of our heritage and what has helped to build our culture over the centuries

The open landscapes provide wonderful, unimpeded views for miles. Pylons would wreck those, 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 which fits with the ancient farms and houses which have grown within them.

There is a peace and tranquillity which allows for the sound of birdsong to be heard through the quiet, and it welcomes you in, and encourages people to linger in the area and to take long walks through the large network of footpaths, byways and old lanes. These views and landscapes would be blighted if pylons were looming overhead through a vast swathe of countryside.

There would be damage to businesses and tourism, caused by the harm done to the countryside and footpaths, deterring visitors, painters and leisure seekers.

Heritage and Agriculture

There is no need for this destructive project. We want an offshore grid in the North Sea

The heritage of East Anglia has been touched on already but there are further details in the attached ***(Heritage/Culture report)***. As can be seen from that, the natural landscape of the region has dictated the local agriculture, which to an extent then dictates the types of houses we all lived in in the past, and to some extent still do. The clay lands help produce our food, and building materials, thatching reeds from the Broads, and sheep made the area rich from their wool over the centuries.

It is a part of England beloved of artists – think Constable, Gainsborough, Munnings and Ravilious, to name but a few. To ‘underground’ some of the Constable country AONB would solve nothing: ***This underground alternative is not an environmentally friendly panacea. 60 metre-100 metre wide swathes of land have to be disturbed either way, with accompanying unnecessary destruction of farmland, countryside, trees and natural habitat. The character of the landscape would still be changed irrevocably.***

The NFU has joined their collective voice to those of 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 huge; if we get an integrated offshore grid, none of that would have to be paid. A win-win situation.

All this, and its people, are interconnected and whilst I appreciate things can’t stay the same for ever, the preservation of our countryside is of great importance. The destruction caused by construction of, and living with, pylons will do harm.

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.

It is well-known that the disturbance of the ground caused by construction work causes severe damage to the soil-structure, whether by compaction from heavy vehicles, or churning of the soil due to digging thus destroying habitats and the seed bed. All of this can also restrict successful regrowth, and change the water flow patterns. Yet another reason, if one were needed, why there should be no pylons where an offshore grid is possible: cheaper, quicker and easier.

This is one of the fastest housing-growth areas in the country, with the need for local people to be able to enjoy their heritage, and **unspoiled** open spaces increasing in importance.

Design and Development

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%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.

The most glaring omission in the Report is in relation to offshore options. It was evident from the consultation process that many people wanted to know why NG did not proceed with a significantly less invasive offshore grid option. However, the Report fails to make any serious attempt to address these questions, making only glancing and offhand references to costs, referring readers to its website for answers to the cost analysis, which most people are unlikely to do. The Report states that the cost of NGET's offshore option is significantly more expensive than an onshore option. There is no attempt by NGET to take a planned approach to an offshore grid instead of offering piecemeal connections to wind farm operators which then result in the need for pylons. NGET is all too aware of NGESO's 2020 report which found £2bn of savings and a reduction in infrastructure of 50% with an integrated offshore grid.

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 (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.

NG maintains that pylons are the default transmission of choice (which they are not) and also appears to be taking an entirely blinkered approach, for reasons which we can only guess at. Because pylons are the wrong answer, why would we waste time choosing designs? They would all destroy the landscapes they stride across, just in different ways: the construction of new roads and hard-core tracks and the destruction of land and landscapes/farms/habitats/environment/settings of houses is common to all. The larger ones do just that, and require the construction of vast concrete bases. More of the he smallest would be required, and they need a permanent road underneath for servicing, as they can't be climbed. All of which causes harm unnecessarily to all of the aspects already discussed. When there is a perfectly good alternative – the offshore grid. We despair at the breath-taking obduracy of NG and their partners in crime.

Climate Resilience

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, lengthy heatwave.

Extremes of weather are not limited to Scotland and Sicily, even in East Anglia we have had hurricane force storms and 40 degree heat record in 2022. These events need to be factored in to our choices. To go offshore would alleviate these problems.

Why have we never been given any alternatives from which to choose, apart from pylons? NG ESO have stated that the offshore grid is viable.

Why has the transmission method always been pre-determined, and pre-justified, contra to the Gunning Principles, in both deficient informal consultations of 2022 and 2023.

Your infamous “review and back check” system is simply laughable. In spite of the viability, it continues to ignore completely the offshore grid, when undersea cables are being installed not only by you around the UK, but round Europe and the rest of the world. An offshore grid would grant the flexibility within the North Sea also to plug into other European electrical circuits and to reciprocate when there are variable wind speeds.

What's the point of wasting time on consultations and all they entail, with nothing to consult on, and all the money and effort that it involves for you and us. (There will be thousands of people like me, and organisations, desperately trying to write their responses by 21 August, when we should all be enjoying our summer holidays. Why should we have to defend ourselves against the pylon onslaught when it is so clearly wrong?).

Other

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%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.

- Firstly, a major point: The name of your new project is Norwich to Tilbury. Why on earth bring all the electricity in to Norwich? If you costed it properly, the route would remain out at sea, transmit undersea from the wind farms direct to Bradwell or Tilbury, then come onshore. This way it would be quicker, cheaper and easier. Only a tiny percentage (8%) of the electricity transmitted will be used in East Anglia, and that hardly requires 112miles of new pylons rampaging through its countryside.
- There is also a potential risk to health. A quote from National Grid, on Electromagnetic Fields, notes there is “*some scientific evidence suggesting a possible link between unusually high exposure to magnetic fields and childhood leukaemia. Based on this evidence, magnetic fields are classed by the World Health Organisation (WHO) as ‘possibly’ carcinogenic’.*”
- The **2023 Nick Winser report** suggested a few ideas, but in general his opinion of our electricity industry appeared to be underwhelming. I will touch on just three of his comments, none of which filled us with confidence:
 1. He recommended that you should be more transparent, explain everything to your customers, and that once we “understand” the situation it would all be fine. Actually – no. That is quite patronising and we all understand too well what's not going on that should be. And we need an offshore grid, NOT old-fashioned 20th century technology.
 2. Winser stated that the lack of strategic planning was lamentable (my word), and should have started much sooner.

3. He suggested bribing communities to make them take the pylons. Not a good look, and not going to work. Especially in somewhere like East Anglia where there are a lot of very wealthy landowners who would not be remotely interested in some paltry sum you might try to foist on us to degrade our land. So, back to square one.
4. 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, the Treasury Green Book rules should be used to balance economic social and environmental impacts and I would fully support this .

“Consultation”, “Drop-In” Events, Acquiring consultation documents

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%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.

1. As you will see from the (***attached***) copy emails between me and Donna/Harry, we complained early on about the timing of the “consultation”, and the location of the “drop-ins “. (Both in inverted commas: the consultation because it is not one; and the events where you could not drop-in as they were too far from the small rural villages whose inhabitants are affected). We had an inadequate reply, so wrote back again. No further response.

If I were a cynic I might suggest that the timing of the consultation was a ploy to make it as difficult as possible for people to participate and respond. If not a ploy, it was – at the very least – an execrable bit of planning for when people were away on holiday or harvesting.

2. And the same applies to locations: I went to Witham on 20 July: Half an hour by car from Aldham, no public transport. Hard-to-find place. No parking - had to find car park, and pay for it. Minimal, small signage, barely visible from the road, and unreadable if passing by car. Door still firmly locked at 2pm. Not terribly welcoming. Anyone might think they did not want us to find them. People reported similar from Lawford and Chelmsford. Disgraceful.

I really hope it will take someone at least as long to read properly my response, as it took me to trek across to Witham and back, returning with no new information, and to acquire your hard copy documents, and then to research and think about my response and now to type it up. You should all be ashamed of yourselves for taking absolutely no notice of any of our very valid points.

The 2022 locations were more convenient. Maybe somebody decided you got too many visitors/responses ...

3. Acquiring your documents was another chapter of disasters:

24 July, early morning, telephoned and requested 8 documents, some duplicates for a friend.

31 July, 2 documents arrived.

I phoned again, was told the other 6 would arrive when available.

A few days later 2 large files arrived, at the Special Delivery rate of £15.75 (disorganised and expensive)

Finally on 7 August the last 4 arrived.

IF YOU SAY WE CAN ASK FOR THEM, AT LEAST HAVE THEM AVAILABLE IN GOOD TIME.

This just adds to our pressure of struggling to take in your mountains of information before Monday 21st Aug.

Overall, both so-called consultations have been declared deficient by a leading barrister, giving us no alternatives to choose from, and breaking the Gunning Principles; pre-determined and pre-justified. In a second opinion on the 2023 consultation, his conclusion was that NGET's approach to the Treasure Green Book is legally flawed.

Your communication which was sent out in July to all those affected was not – as noted in our first consultation response – a 'Community Newsletter.' That sounds way too cosy. It was, in fact, serving notice of a process announcing forthcoming destruction and inconvenience which would change many people's lives, not in a good way, for ever. And affect, also badly, the lives and livelihoods of thousands of others.

Not impressed.

Comments on parts of some of your Documents

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%. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action group.

Time is too short to wade through all the documents, but you might as well just have said 'No, nothing going to change, not listening'. So: a few phrases, chosen at random, which do not instil confidence:

... the routeing and siting exercise has sought to reduce the impact on landscape character and visual amenity ... So, translated = not succeeded.

.. underground cables should be used to avoid impact of an overhead line ... So: use an offshore grid instead, then you avoid all these difficulties.

You could also avoid using the following phrases, regularly repeated, by going offshore:

Reduce impact

Consider doing

Work with to avoid

Work closely with to plan

Reduce concern

Concerns can be raised

Minimise disruption

Disturb soil = remove top soil and replace, would no longer be necessary if offshore.

Conclusion

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

THERE IS THE OBVIOUS SOLUTION. Currently the wind farms make their own piecemeal arrangements for transmitting onshore. How much better if they could plug directly into an integrated offshore grid to carry the electricity direct to London. It would be simpler, more efficient, quicker and cheaper for several reasons. NG ESO itself in 2020 agreed that the offshore grid would save £2bn versus the unplanned, piecemeal and pylons approach: 50% less infrastructure, easier planning due to no objections, no legal delays or fees; no compensation, community bribery or compulsory purchase. It would of course also be better for agriculture and communities.

Finally, the countryside in terms of wildlife habitats, would not have to be degraded; and by now we are all aware that our lives are inextricably linked to the environment and we continue to interfere with it at our peril. No amount of “mitigation” or “biodiversity offset” will make up for the habitat loss which would be caused by this destructive project. We are in the 21st century, so dump the pylons and move for an integrated offshore grid.

None of the above has changed my mind with regard to the paragraph with which I opened:

***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%.
We support and endorse the submission of Essex Suffolk Norfolk Pylons Action group.***

Attachments to accompanying email/s

Word Document – 23 NG Consultation Response, P Lang

Folder – [REDACTED]

Aldham listed buildings map

Aldham Priority Habitats map

Image: Aldham with pylons

Image: Aldham without pylons

Alternative transmission options

Report: Bird Superhighway

Emails – [REDACTED]

Image: Height comparisons

2x Legal Opinions

2x photos of Oak Bolete

FORMAL OBJECTION - Response to Norwich to Tilbury Formal Consultation, Apr-Jul 2024

“Greening the Great Grid Upgrade” – Suffolk Preservation Society & CPRE – May 2024

I object strongly to the N to T project, and all the facts in this Response point to a valid case AGAINST pylons, and FOR better alternatives. The following seven concluding Recommendations from the above Report neatly sum up a starting point for me:

- i. Halt work on the Norwich to Tilbury scheme
- ii. Consider need and the risk of overbuild
- iii. Deliver better strategic planning
- iv. Deliver enhanced offshore integration for E Anglia
- v. Deliver a new Great Green Grid via the new Electricity Transmission Design Principles
- vi. Implement a more participative approach to community engagement
- vii. Start a new national conversation about energy infrastructure, place-making and the role of planning for net zero

I OBJECT to the Norwich to Tilbury scheme, and request it is placed on hold, whilst we are offered alternatives to pylons: an offshore grid, upgrades of existing OHLs, or HVDC undergrounding which is cost equal to or cheaper than pylons. It would be quicker and better. The recent Hiorns report states that the scheme is not justified, and anyway earliest need 2035, not 2030. The lack of offered alternatives makes all the consultations ‘deficient’ (Charles Banner, KC Opinion – Gunning Principles, below).

At all three Consultations, National Grid has failed to follow the **Gunning Principles**. Three of these, which affected us, are as follows.

- proposals should be at a formative stage, where a final decision has not yet been made, or preformulated, by the decision makers. **This is not the case.**
- there should be sufficient information to give ‘intelligent consideration’. The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response. **This was not our experience – no alternative cost/benefits.**
- ‘conscientious consideration’ must be given to the consultation responses before a decision is made. Decision-makers should be able to provide evidence that they took consultation responses into account. **This has not been the case for the informal consultations in 2022 and 2023, and we don’t anticipate that anything will change for the 2024 Formal consultation.**

While we agree we need the green energy, the transmission needs to come out of the stone age, and power generated offshore needs to be transmitted offshore to the target landing spot, brownfield near London. 37,000+ people so far have signed a petition against pylons and in favour of HVDC offshore or under-ground.

Mandatory Treasury Green Book guidance has not been followed by NGET and claims that Ofgem required the cheapest solution are untrue.

National Grid's (NG) Norwich to Tilbury pylons, would cause extreme and unnecessary **damage, disruption and destruction to East Anglia**, in many ways: to the countryside and landscapes, heritage, house-prices, tourism and the environment. 424 Public Rights of Way in the area would be affected – redirected or closed, temporarily or permanently. On the East Anglian plateau, mitigation is mostly impossible. Pylons built 50 years ago are still entirely visible

The **construction** period would require the felling of over 1.8m trees, and 6m hedge plants. Your relentless long, daily, working hours would be unrelenting, causing yet more harm to quality of life. There would be 495 HGVs (that's nearly double the normal number) on the A1124 Halstead Rd every day including weekends, plus extra 346 other construction vehicles daily.

Rural lanes will be blocked, some roads closed, inevitably many jammed due to the excess traffic in an area with most main roads already beyond capacity. Access (haul) roads will be constructed across the countryside where needed, causing profitable agricultural land to become less productive over the years. Crop yield will fall due to major soil disturbance and the existence of pylons, with approx. 10m x 10m bases to be worked around by modern large farm machinery. Any farmer employing Zero Dig methods will suffer harm. **Footpaths will be diverted, and closed temporarily, some permanently.**

The proposed N to T line is the longest ever proposed by NG, and **by their own admission comes with many 'unknowns', adding to planning difficulties on such a large project**, and their inability to predict, account accurately, or apparently even estimate contingencies. We believe the pylon costings are totally inadequate and do not take into account a myriad of unconsidered figures.

So, in addition to the basic costs there will also be: **vast proper compensation** per pylon, and for business loss, crop loss, house purchase, community benefits, three Consultations, on-going delays and legal fees, judicial review, land agents, Fisher German and other consultants, etc. The flat-rate per pylon and for pylon access in subsequent years is the same across the country irrespective of circumstances, unchanged since 2010.. This needs to be updated, it is not fair.

With the ever greater effects of climate change, as manifested in more and greater storms, and stronger winds, pylons have already been shown to be vulnerable to collapse. **They are not resilient.** HVDC under sea or underground would not be subject to these extreme events.

We have noted that under the **Visual Impact Provision (VIP) scheme, government grants are handed out to remove existing pylon runs.** In order to: *'conserve and enhance the natural beauty, wildlife and environmental heritage within our most protected landscapes.'* (as NG acknowledges on its website). It would therefore appear logical not to build pylons in the first place, unnecessarily, or in the wrong locations.

Advantages of HVDC cables – which offer several benefits over traditional Alternating Current (AC) cables, particularly in specific contexts such as long-distance transmission or under sea cables. Here are some of the key benefits of HVDC cables compared to AC cables:

1. Reduced Transmission Losses
2. Stability and Control
3. Lower Electromagnetic Fields
4. Space and Visual Impact
5. Technical Challenges with AC
6. Flexibility in Network Design
7. Cost-Effectiveness for Long Distances

Harms

As set out in this response, there are numerous demonstrable HARMS, all along the route. All of which could be avoided by undersea cables:

Trees & Hedges - millions ripped out. Mitigation is impossible on such a vast scale.

Agriculture - made less productive, by construction and presence of pylons

Habitats, Ecology, Environment – wildlife corridors disrupted or destroyed forever over large areas. Mitigation impossible on that scale.

Bird strikes on OHL – hundreds of swans killed in just one event. Evidence of thousands of others

Nature Reserves, AONBs, SSSIs and equivalents – impinged upon, and disrupted
Landscapes – ruined, broad E Anglian views formed over centuries, destroyed forever.
Heritage, Listed Buildings and their settings, Archaeology – disrupted, and ancient settings destroyed forever.

Economy, both local and national, will be seriously harmed:

Businesses and Tourism – disrupted, and harm causes loss of business

Tourist attractions and camp sites – disrupted, harm causes loss of business

Walking, cycling, golf courses, riding and riding schools – countryside disrupted and spoiled.

Footpaths, bridleways – disrupted, diverted, some closed forever

Rural roads and others – disrupted, temporary closures

Pubs, cafes, Hotels, Restaurants – disrupted, harm causes loss of business

House prices – losses of up to 40% are already being caused by the uncertainty of pylon blight, and catastrophic construction disruption

Hazards to Aviation – air ambulance, military helicopters, hot air balloons, light aircraft, gliders

Hospitals and Nursing Homes & other health facilities will be disrupted

Health, mental and physical - both affected by threat of, and presence and construction of pylons

Schools, colleges, universities disrupted

Formal Consultation 2024 – Deficiencies Report

This formal document was drawn up in 2024, but most of the deficiencies were evident in the informal consultations of 2022 and 2023. All three consultations have been and remain inadequate. There has, in general, been an over reliance on digital media, which does not suit everyone.

It is noted that feedback from major Stakeholder – Essex Suffolk Norfolk Pylons Group – in their very detailed Responses to both your Informal Consultations, 2022, 2023, has been ignored by NG.

The Gunning Principles have not been followed because we have only been offered a pre-formulated option, not at the formative stage. We have been offered no alternatives apart from pylons, pylons or pylons.

Summary from Deficiencies Report - Essex Suffolk Norfolk Pylons

1.1. The issues that we highlight in this 'Norwich to Tilbury' Statutory Consultation report can significantly prejudice stakeholders in several ways:

1.1.1. Reduced Participation and Representation

1.1.1.1. Timing and Duration: The overlap with the local election season and the shortened consultation period means that many stakeholders, including local councillors and residents, had limited time and opportunity to engage with the consultation process. This reduces the breadth of feedback and the representativeness of the responses.

1.1.1.2. Scheduling and Accessibility of PIEs: Holding Public Information Events (PIEs) far from the pylon route, poorly signposted, and scheduled during work hours limits the ability of a broad cross-section of the community to attend and voice their concerns. This skews participation towards those who are retired or not working, thus excluding younger and working stakeholders.

1.1.2. Insufficient and Misleading Information

1.1.2.1. Lack of Documentation: The absence of critical documents in libraries and at PIEs, coupled with the difficulty in obtaining physical copies, prevents stakeholders from fully understanding the project's scope and impact. This hampers their ability to make informed responses.

1.1.2.2. Misleading Statements and Inaccurate 3D Imaging: Incorrect information provided by National Grid (NG) representatives and the misleading visual representations of the project's impact can lead stakeholders to form opinions based on false premises. This compromises the quality of their feedback and can mislead decision-makers.

1.1.2.3. Wrong consultation end date on community update sent Friday 28 June. Stated Friday 29 June instead of 26 July.

1.1.3. **Inadequate Consideration of Alternatives. No Alternatives Presented**: The failure to present and consult on alternative solutions, such as offshore or underground cabling, limits stakeholders' ability to weigh different options and advocate for less harmful solutions. This can lead to a biased consultation outcome favouring NG's preferred option.

1.1.4. Legal and Procedural Deficiencies

1.1.4.1. Inadequate Adherence to Gunning Principles: The consultation fails to meet several Gunning Principles, particularly the requirements for sufficient information and adequate time for consideration and response. This legal deficiency can prejudice stakeholders by invalidating the consultation process and undermining their ability to influence the project's outcome effectively.

1.2. The **highlighted issues collectively prejudice stakeholders** by reducing their ability to participate meaningfully, form informed opinions, advocate for alternatives, protect their economic and environmental interests, and manage the emotional impact. **Addressing these deficiencies is essential** to ensure a fair and comprehensive consultation process that genuinely reflects the concerns and needs of all stakeholders.

The **Online Feedback Form has never been user-friendly**, and as the Consultation Deadline draws nearer, it has become more and more evident that the website is inadequate, and has been crashing often – with a frivolous “oops” message. This is completely unacceptable when people are already upset by your damaging project, and are trying to send you a serious message, when under extreme time pressure.

Aldham

Heritage and Archaeology

Our local environment would be damaged by 14 pylons surrounding Aldham village. There are Listed buildings inside this zone, whose fragile foundations could become damaged due to the noise and vibration from construction work. [Vol II 25/27, Figure 14.1, Map 15]. The settings of listed buildings would be altered forever. We are also aware of large drops (decreases reported of between 20%-40%) in house prices due to the uncertainty caused by pylon blight. There are 34 Listed Buildings in the village, and Ford Street is a Conservation Area.

Taken from “Aldham” by Angela Green

Traces of occupation were found thirty years ago. A worked flint thought to be Palaeolithic, was found near the Traditional Orchard, Crapes. Neolithic worked flints have been found in the south-west and two more were found, separately south of Rectory Road; these are now in Colchester Museum. Many Iron Age and Roman fragments were found in the south-west and almost as many at Wick Farm, perhaps the site of Romano-British occupation. Also donated to the Museum: the upper half of an Iron Age quern, for hand-grinding corn, and another, near Fordstreet.

A Roman box tile was found east of Church House Wood and another south of the Colne near Fordstreet. Many of the Roman fragments were found near medieval potsherds, maybe indicating favoured settlement sites. The largest number of medieval pottery finds was near How Hill.

Along with much evidence of rich finds in nearby villages, indeed all over this “Roman” area, especially Fordham, the above is an indication that finds would continue to be discovered, so the integrity of the ground in the area should be retained.

Aldham Environment

We feel you have not taken into account the environmental value of the prime **Roman River Corridor** (*Briefing attached*) jointly with Marks Tey and Great Tey (in consideration at Colchester City Council under the Local Nature Recovery Strategy). The area also encompasses 10 Natural England Priority Habitats: 3 Ancient Woodlands, Traditional Orchard and 6 Deciduous woodlands. The inevitable environmental disruption of decades-old habitats, meadows, paddocks close by can only harm local wildlife. All the above is unnecessary, as there are other options.

In view of unreliable and extreme rainfall, the addition of further concrete and building will add to the already high flood risk. There are parts of the village which now flood regularly after heavy downpours, which did not used to.

The ripping up of hedges, trees and all other habitats will damage irrevocably our valued countryside, ecology and environment. Valuable wildlife corridors will become interrupted, some temporarily, some permanently. Either is disrupting and harmful for the creatures concerned.

As to flora and fauna, this is a small rural agricultural village, with many pockets of different habitats as stated in paragraph one above.

A limited list of some of the more important species:

Oak Bolete mushrooms (*Attached photo*), found near oak trees on Tey Road. These are rare in England, but are normally found in areas of previous ancient woodland. If they are here, they will be elsewhere in the area.

Newts and great crested newts in various ponds round the village, which travel between ponds. Ground disruption will harm and disorientate them.

Mammals (*Attached photo of 50 years of established small animal tracks*): 3 species of deer – fallow, roe and muntjac, with cast-off antlers found regularly in local woodland. Polecats, badgers, hares, wood mice, otters, hedgehogs. Again, many species travel surprisingly long distances each day and will be seriously distressed, disorientated and confused by the noisy changes to their surroundings, established wildlife corridors & habitats which your actions would produce.

Birds (*Attached list of birds in the area since 1972*) The NG proposed Norwich to Tilbury project would only harm further the difficult lives of these birds – those already on the Endangered Lists. The numbers of bird species on the British Trust for Ornithology (BTO) Red List has increased from 36 to 70 since first list in 1996. Summarised here, those from Aldham area now, and included on red and amber lists.

From Landscape Report – Landscape Partnership , June 2024

Given the close proximity of various settlements to the proposed development (for example ... **Aldham** ...) it is likely that at least some viewpoints could cross the residential visual amenity threshold. Such matters are not considered in the PEIR and will be reserved for the full LVIA and ES. A detailed assessment could identify a need for substantial amendments to the scheme and should be considered earlier in the design process whilst there is still an opportunity to vary the route alignment or the proposed mitigation accordingly.

Soil Report (Dr David Dent, commissioned by ESNP)

Acid Sulphate Soils: a serious hazard

Dr David Dent, a leading soil expert and former Director of ISRIC-World Soil Information, has identified serious flaws in the soils assessment in National Grid's environmental report and highlights the risk posed by acid sulphate soils in some wetlands:

"These soils contain pyrite, which oxidizes to form sulphuric acid upon exposure to air, leading to highly acidic conditions approaching battery acid. This not only threatens aquatic life due to acid drainage but also risks corroding foundations, potentially leading to structural failures...The National Grid's failure to adequately identify and address these risks is alarming."

Income Impact (from results of ESNP Business Survey, June 2024)

The anticipated impact of the Norwich to Tilbury pylons project on income varies significantly among businesses, with estimates of potential losses ranging from 1% to 100%. Several businesses predict devastating effects, with some anticipating a total closure, resulting in a 100% loss of income. Many respondents are unable to quantify the exact financial impact but expect substantial disruptions, with a few estimating losses of up to 75% to 90% during the construction phase.

Some businesses, particularly those in tourism and hospitality, foresee a 10-50% decrease in revenue due to the negative visual impact of the pylons and increased traffic from construction activities. Agricultural enterprises expect significant losses in crop yields and land value, with one business predicting a 100% loss of income from their primary growing field. Overall, the uncertainty and scale of potential losses highlight the severe economic threat posed by the pylons project to local businesses. See appendix for full list of responses.

- Farming businesses will see a devaluation of their farmland and property. The installation of pylons will disrupt cropping patterns and access to fields, particularly impacting topsoil, trees, and hedges.
- The project will cause substantial damage to valuable agricultural land, affecting productivity and the ability to maintain existing farming practices.

- Farmers considering diversification into leisure or hospitality-based projects, such as farm stays and holiday lets, will face setbacks due to the presence of pylons, which deter potential visitors.
- **Conclusion of Survey results**
- The Norwich to Tilbury pylons project presents numerous challenges for East Anglian businesses. From visual pollution and operational disruptions to long-term economic impacts, the project threatens the viability of various sectors, including hospitality, agriculture, and local services. Urgent reassessment is essential to protect the interests of the local business community and preserve the region's economic health and environmental integrity.

4.7.Environmental Impact 2024 – numbers from ESNP Environmental Report

4.7.1. An appraisal of the documentation supplied by NGET to support its Statutory Consultation for the Norwich to Tilbury pylons project highlights a number of serious concerns about the approach taken.

4.7.2. We submit a detailed appraisal (below) of NGET's approach as part of our submission to the Statutory Consultation. In summary, we note the prevailing (mistaken) conclusion throughout the Preliminary Environmental Information Reports that a terrestrial pylon route is the only feasible scenario, despite:

4.7.2.1. the decision-making process lacking thorough transparency;

4.7.2.2. decisions to date being at times based on inconsistent quality of data (e.g. google maps used for identifying species) and therefore lacking a claim to be entirely evidence-based;

4.7.2.3. notable omissions in significant impacts on the physical, chemical and biological aspects of the environment (e.g. the presence of acid sulphate soils);

4.7.2.4. a flawed consultative process that shows little evidence of issues raised verbally and in submitted reports being taken into account;

4.7.2.5. numerous tenuous assumptions needing further clarification and justification, e.g. that biodiversity impacts are of local concern only, whilst ignoring the IUCN red list of threatened species;

4.7.2.6. assumed lack of direct impacts to particular sites, and over-optimistic assumptions regarding distance decay of several threats (and apparent omission of others) from development and operations;

4.7.2.7. lack of application of the mitigation hierarchy;

4.7.2.8. Lack of evidence regarding capacity to deliver sustained biodiversity net gain;

4.7.2.9. failure to present worst-case effect assumptions in line with national policy statement EN-1's requirement (4.3.12);

4.7.2.10. lack of evidence of consideration of how the scheme impacts duties under the Environment Act 2021 in relation to environmental targets and the Government's Environmental Improvement Plan 2023 (in line with national policy statement EN-1's requirement 4.6.10).

4.8. The above leads us to conclude that the project fails against the precautionary principle.

Heritage Report 2024 – Fuller Long, Witten by Virginia Gillece

1.1.1. The proposed Norwich-Tilbury line poses a substantial threat to East Anglia's rich historical and cultural heritage. The scheme will result in a permanent, landscape-scale, change that will result in harm to the significance of countless heritage assets and their settings. The scheme will also undermine the value of house prices, which, in the case of the thousands of listed buildings likely to be affected, will disproportionately affect the necessary costs homeowners are willing to invest in property in the area of the scheme and reduce investment need to conserve these buildings as heritage assets in to the future. In tandem this may also result in decline in the area's heritage capita and its attractiveness as a tourist destination.

1.1.3. The principal grounds for objection relate to the following: the flawed methodology employed by National Grid, including; failure to meet statutory obligations and compliance; failure to provide a sufficiently robust assessment of the heritage resources; failure to undertake a sufficiently robust assessment of the validity of desk-based assessment through full and appropriate 'on site' assessment; failure to address methodological concerns raised by consultees during scoping (such as Historic England); a failure to adequately justify the arbitrary use of distance and designation grade to scope out heritage assets from assessment, and the failure to identify how setting(s) contributes to the significance of identified heritage assets in the way and degree required by National and Local legislation.

1.1.4. Based on the above, and in order to address the heritage concerns raised in this statement, it is strongly recommended that alternative solutions such as underground cabling are explored, as no mitigation measures can be implemented where significant harm is identified, regardless of where the line is routed. These measures will help balance development needs with the preservation of the region's historic assets going forward

From Archaeology and the Norwich to Tilbury Proposal – ESNP July 2024

Summary

1.1. NGET is failing in its duties to preserve the significance of sites of archaeological interest, to assess the likely worst-case effect of the project and to appropriately mitigate any identified adverse effects. There are a number of weaknesses with the methodology employed by NGET in the PEIR.

- 1.2. Not only that, but NGET is failing in its duty, under Gunning Principles, to give conscientious consideration to consultation submissions which alert it to risks to known (and unknown) archaeological sites, their settings, and the landscape in which they are located.

The following is partly from the Response of Aldham Parish Council, July 2024
In Aldham, there are many 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. This is likely as shown by extensive finds from many different periods, in nearby Fordham.

Conclusions

Taken from: **Counsel's Opinion (Lord Charles Banner KC) July 2024**

Leading planning barrister, Lord Charles Banner KC has found further legal deficiencies in National Grid's approach. He says, in an opinion (for the ESNP group) which was finalised this week, that National Grid's consultation, "falls short of adequate pre-application consultation sufficient to enable a Development Consent Order application to proceed to examination".

Lord Banner adds, "Professional reports that accompany the campaign group's response to the consultation demonstrate procedural and methodological errors in National Grid's approach to landscape, heritage & archaeology, soils and the environment, which if not corrected (and any corrections properly consulted upon) would present fundamental difficulties for any DCO application."

If it is better for EGL 3&4 to go Offshore, why NOT East Anglia?

In NG's own words [Doc 151426 / Para 5.0.3], offshore is regarded as better for at least 4 reasons here, in brief: 1. HVDC flows easier to control 2. In case of faults, AC would need higher capacity 3. HVDC much lower lifetime costs 4. Long onshore AC line carries much higher delivery risk 5. For these 4 reasons, OHL discounted.

The following, taken from the Eastern Green Link 3 & 4 (Two long undersea cables from NE Scotland to Lincolnshire) NG Consultation, are proof that East Anglia has not been offered the best alternatives available, which have been adopted for EGL 3&4.

Para 5.0.2 <https://www.nationalgrid.com/document/151426/download>

- **Power flows on AC transmission system circuits cannot be controlled to the same extent as can be achieved using HVDC connections.** This lower level of controllability can result in higher power flows particularly during transmission system fault conditions.

- Taking account of the potential for higher power flows that could be expected, therefore to provide the potential equivalent capacity, the AC option would need to consist of a high capacity (6,930MW) double circuit route to meet any high loading during fault conditions.
- The required capacity HVDC links over the proposed distance have comparable capital costs, but **much lower lifetime costs than the alternative onshore AC** option in this case.
- It is also recognised that **delivery of an onshore solution with a long route length, carries much higher delivery risk** than the HVDC reinforcement proposals (EGL3 and EGL4) that are currently being progressed. The use of overhead lines is not considered to be feasible because they cannot be delivered by the required 2030 timescale.
- Consequently, an option **using overhead line technology is not considered to meet the identified need for additional transmission system capacity and therefore, was discounted.**

If you can transmit these under the sea, along with Sealink and most of Peterhead to Drax; and if Continental Europe are employing undersea cables where possible; and if you already have six Interconnectors, UK – Denmark, Belgium Netherlands, Germany etc, what argument can you have for not doing the same for East Anglia?

WE OBJECT to the scheme, and request it is placed on hold, whilst we are offered alternatives to pylons, which would all be quicker, better and cheaper (ESO. 2020 and 2024) in the long run :

- an integrated HVDC offshore grid,
- upgrades of existing OHLs
- HVDC undergrounding which is cost equal to or cheaper than pylons.

The recent Hiorns report states that the scheme is not justified, and anyway earliest need is 2035, not 2030. The lack of offered alternatives makes all the consultations 'deficient' (Charles Banner, KC Opinions). A majority of MPs, & the following Councils all object: Essex, Suffolk & Norfolk County, Colchester, Chelmsford, Ipswich, most District/Local & Parish. We also totally endorse all the views set out in the official response of the ESNP group.

P Lang, [REDACTED]

[REDACTED]

July 2024

Attachments to email: Roman River Valley briefing; Oak Bolete mushroom photo; Small Animals' ancient tracks photo; Aldham Birds List 1972-2024