

Norwich to Tilbury Registration Comments

We write regarding proposals by the National Grid to build a new high voltage network from Norwich, Norfolk to Tilbury, Essex. Our residential property, [REDACTED] lies within the southern boundary of the Nationally recognised Dedham Vale National Landscape (“DVNL”)¹, abutting the draft order limits for the positioning of the undergrounded section of the cables, as shown on the interactive map. In preparing these comments we have had regard to all relevant documentation, including the important National Policy Statements, EN-1 and EN-5, and engaged with National Grid representatives at several local events.

We support the work and views of the Essex Suffolk Norfolk Pylons action group, in particular that consultation has been legally deficient since 2022. No alternatives have been presented and there is no evidence that National Grid has listened to the representations made to date.

We have been assured by National Grid that our comments will be carefully reviewed and considered. Given the impact the proposals will have on our everyday lives, we have spent a considerable amount of energy, time and money investigating and formulating responses to this consultation. We therefore respectfully ask that our comments are given due attention and consideration when deciding on the next phases of the process.

Summary

1. As an initial point, we are of the view that Central Government should be promoting the strategic development of an integrated offshore grid in the North Sea. This has been shown by National Grid ESO to save £2bn and to reduce the overall infrastructure required by 50%. There is therefore no need for this destructive project, which will bring severe harm to the environment, communities, landscapes and historical and cultural heritage and represent a significant threat to large swathes of East Anglian countryside. We support and endorse the submissions of the Essex Suffolk Norfolk Pylons Action Group. We do not consider the short explanation provided by National Grid Project Documentation to substantiate the decision to proceed as proposed.
2. In the absence of an integrated offshore grid, it is clear that underground cabling (as is proposed) should be installed when crossing the DVNL and also significantly beyond the southern DVNL boundary at Birchwood Road, Dedham, to mitigate against long term detrimental visual impacts to the setting of and within the DVNL. It is gratifying that the current proposals intend to extend underground cabling from the southern DVNL boundary to the proposed Tendring Peninsular EACN substation at Badley Hall, Bromley, in order to mitigate against long term, detrimental visual impacts to the rural landscape and countryside.
3. In the region of Birchwood Road, Dedham, proposed underground cabling should be located as far west as possible, adjacent to the A12, to minimise disruption during the construction phase to properties along Boxhouse Lane.

¹ DVNL and AONB are used interchangeably in this response.

4. In order to mitigate against detrimental visual impact on the setting of the DVNL, impact on heritage and destruction of landscape features, an additional length of undergrounding, as opposed to pylons (TB1 - TB35), should be included between the EACN substation at Badley Hall, Bromley to Great Horkesley (a distance of a mere c.9km).
5. Should pylons be installed between Ardleigh and Great Horkesley, the following should be accounted for:
 - a. Pylon design should be carefully considered with an aim to install as visually unobtrusive pylons as possible.
 - b. Extensive and appropriate planting should be carried out in order to reduce the detrimental visual effects of pylons, cable sealing ends or other structures.
 - c. Pylons should be placed such that they are virtually invisible from within the DVNL.
6. The Construction Compound and Construction Laydown Area, currently intended to abut the DVNL on Birchwood Road, Dedham, (JCCC04) should be relocated. The potential harm to the visual amenity of this important gateway to the Nationally recognised DVNL should not be underestimated. This location currently consists of far-reaching vistas of arable farmland which is flat in topography as seen from viewpoint 3.15. In the alternative, this harm should be mitigated by sensitive shielding from view. Potential disruption due to traffic, noise, vibration, light, litter and dust pollution should be kept to a minimum and properly mitigated against.
7. The proposed Primary Access Route (PAR 27) – Birchwood Road, Dedham, is ill-conceived and wholly inappropriate. The excessive potential increase in traffic movements of HGV traffic alone (in excess of 400%) in the vicinity, during the extended construction period would cause significant harm and nuisance to nearby residents and all existing road users, in addition to presenting a potential road safety risk. This bendy and narrow local road with no pavements regularly experiences traffic issues and congestion when just a few farm vehicles collect harvested crops from the fields, rendering the opposite carriageway impassable by larger vehicles e.g. the local bus. It is highly likely that significant problems will persist on a daily basis in connection with the flows of heavy HGVs and low loader vehicles associated with the construction and laydown areas proposed, being totally unacceptable in impact to all road users².
8. Should the project be allowed to go ahead, it is absolutely imperative that the build programme runs to time. It would cause unacceptable and irreparable harm to the DVNL and affected nearby residents if the project is allowed to run over schedule.

² Preliminary Environmental Information Report Vol 1 April 2024

Detailed Comments

1. Development of an offshore energy grid

As an alternative to the environmentally damaging and visually obtrusive scheme as currently proposed, Central Government should be promoting and implementing the strategic development of a coordinated offshore electricity grid, to address the need for increased grid capacity which off-shore wind, coastal, new nuclear, and international interconnectors will undoubtedly demand.

2. Underground cabling should be installed when crossing the Dedham Vale National Landscape and significantly beyond it

While we recognise that – and fully support – the current proposal to use undergrounding (rather than pylons) throughout the DVNL and (crucially) its setting, we wish to reiterate the below arguments because they are of such importance. Undergrounding will still cause significant harm to the landscape and environment. National Grid should implement every possible means to avoid, minimise and mitigate for such damage inside and outside the DVNL. Needless to say, this includes the period of construction.

To reiterate the irrefutable argument to install underground cabling instead of pylons through the DVNL:

- AONB's (as they then were) were established under the Countryside and Rights of Way Act 2000 ("**CROW**"). The purpose of this designation is to *conserve and enhance* the beauty of such areas.³ It is certain that the beauty of the Dedham Vale DVNL would not be conserved – let alone enhanced – by the installation of 50-metre-tall pylons straight through it. It will also not be conserved or enhanced during the extraordinarily disruptive construction phase.
- National Grid Electricity Transmission (National Grid) are recognised as a statutory undertaker and are therefore subject to the responsibilities to conserve and enhance such regions.⁴
- Furthermore, as set out in National Policy Statement for Energy (EN-1)⁵, DVNLs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas. Again, beauty will not be conserved or enhanced with the installation of pylons, and neither will it be conserved or enhanced during the construction phase.
- According to the National Policy Statement for Energy (EN5-5), in DVNLs, the strong starting presumption will be that new lines should be undergrounded. This can only be reversed if the harm of undergrounding outweighs the landscape and

³ Section 85(1), CROW

⁴ Section 85(2)(c), CROW

⁵ Paragraph 5.9.9

visual benefit it would bring. There is nowhere near enough evidence in this case to reverse the strong presumption, and so underground cabling should be installed instead of pylons.

Therefore, when crossing the Dedham Vale DVNL, underground cabling (as is proposed) should be installed in order to mitigate against potential harmful impacts of overhead cabling and pylons. These impacts would be numerous. Detrimental visual impacts would be significant, as well as severe disruption during construction. In addition, the varied local flora and fauna would be significantly harmed – a protection priority as outlined in the Dedham Vale AONB and Stour Valley Management Plan 2021 – 2026. This statutory document also prioritises the natural features of the area, which would be destroyed with the installation of pylons and which would be devastated in the region of the undergrounding swathe.

As established above, overhead power lines will have a significant long-term visual impact on the setting of the DVNL.

Under CROW, the relevant local authority must ensure all decisions and activities must consider the potential effect they will have within the DVNL *and land outside its boundary*. This is clearly intended to encompass land immediately outside the DVNL boundary, such as that immediately south of Birchwood Road, CO7. It is highly logical, therefore, that no pylons, cable sealing ends nor construction compounds should be located within sight of the DVNL. If unspoilt views are maintained in the centre of the DVNL (where all one can see is land within the boundary), then it is very reasonable for unspoilt views to be maintained on the edge of the DVNL (where one can see land both inside and outside the boundary).

The National Planning Policy Framework regarding development within the setting of nationally designated landscapes states that development within their setting should be sensitively located and *designed to avoid or minimise adverse impacts on AONBs*.⁶ It is therefore clear that the care taken to mitigate detrimental impacts wholly within DVNLs should extend to those potential detrimental impacts on the boundaries.

The Electricity Act 1989 requires National Grid, when formulating proposals for new lines and other works, to have regard to the desirability of preserving natural beauty, of conserving flora, fauna, and geological or physiographical features of special interest. The desirability of conserving ‘natural beauty’ is, by definition, not confined to the nationally designated DVNL landscape, but should include other areas, such as the setting of it.

In addition, the Dedham Vale AONB and Stour Valley Management Plan 2021 – 2026 extends by definition to the area immediately south of Birchwood Road, CO7 and therefore the comments above regarding the need for undergrounding apply equally.

⁶ Paragraph 176

It logically follows that pylons, Cable Sealing Ends, and construction compounds should not be located in the vicinity of Birchwood Road, Parney Heath, Dedham, CO7. This is an important access route from the A12 into the key tourist area and area of high amenity and historic value: the Dedham Village. Undergrounding should extend significantly beyond the DVNL boundary such that pylons are not visible from the DVNL. This will mitigate against long term detrimental visual impacts in the setting of the DVNL and in single track country lanes such as Boxhouse Lane, Maltings Farm Lane and Hunters Chase and help to protect views of the existing valuable landscape characterised by scenic open vistas and beautiful countryside.

Again, we appreciate that current proposals extend undergrounding to the proposed EACN Substation at Badley Hall, but we reiterate arguments here that this proposal should be maintained.

Following the logic set out under heading (2) (and again in the absence of an integrated offshore grid), we support undergrounding as proposed from Birchwood Road, CO7 to the EACN Substation at Badley Hall, Bromley. This is required to mitigate against detrimental impacts to the important landscape character and visual amenity in this locality.

Indeed, as noted in the National Planning Policy Framework regarding development within the setting of nationally designated landscapes, where poorly located or designed, *development within the settings of AONBs can do significant harm*. Given the extreme proximity to the DVNL, this area should have the potentially huge detrimental effects of pylon locations mitigated as much as possible, by extended undergrounding.

3. Specific Location of underground cabling within the DVNL at Boxhouse Lane

The proposed underground cabling in the vicinity of Boxhouse Lane, Parney Heath, Dedham, CO7, should be located as far west as possible, as close as possible to the existing A12 corridor and distant from residential properties located along Boxhouse Lane⁷, in order to minimise the detrimental impact of the construction phase.

It is extremely confusing that the undergrounding swathe is proposed to directly abut Park View and Petalo Lodge when there exists a field of 550 metres within which the swathe can be placed.

It would significantly improve the livelihood and day to day life of the residents of Boxhouse Lane if the swathe was placed as far west as possible. As proposed, the swathe would be directly visible from the living quarters of Park View, and the traffic, dust, noise and light pollution for the construction period would cause considerable nuisance and harm. The construction period is currently estimated at 4 years, but it would be sensible to add a significant period of delay to this estimate given the history of delay in infrastructure projects in the UK. By way of example, Hinkley Point C and the Elizabeth Line overran by a significant number of years. Clearly, the more distance that can be put

⁷ Such as Park View, The Pines, Mistra, Chestnut Cottage, The Sanctuary, Petalo Lodge, Kiddles Farm and Parkside Farm.

between the construction site and the residential properties of Boxhouse Lane, the less harm will be caused. This is a hugely important consideration and would massively improve the day to day lives of those families living in this area.

Further, the location of cables adjacent to the A12, as well as being highly sensible and more convenient for construction logistics, is consistent with infrastructure design across the country, with utility services commonly installed alongside main road routes.

In the event that the undergrounding swathe remains in its current position, careful consideration should be given to ways of minimising the detrimental impact of the construction phase on the neighbouring properties e.g. compensation for nuisance, reduction in working hours or weekend working, minimisation of noisy construction activities, and timely completion of works to enable reinstatement back to original landscape as early as possible.

As residents of Boxhouse Lane frequently witness, a number of the protected muntjac deer living in the locality regularly migrate through gardens, passing through boundary hedges east to west specifically the garden of Park View, Boxhouse Lane, across the open fields and proposed undergrounding site towards woodland adjacent to A12. What mitigating measures are to be put in place to allow for this?

The water table across the whole of Parney Heath is notoriously high and in times of high rainfall the whole area is frequently subject to flooding and overflowing ditches. Significant assurances and mitigation measures are sought regarding the drainage and water management proposals for the construction phase and specifically regard should be had on the impact on Park View ditches.

4. Undergrounding should be extended further between EACN, Ardleigh and Great Horkesley

As we have explained above under heading (2), it is a matter of simple logic that the setting of a Natural Landscape should not be detrimentally impacted by infrastructural proposals. This position is reflected by the statutory duties placed upon the National Grid as a statutory undertaker. If the National Grid does not comply with these duties (i.e. it does not conserve and enhance the beauty of the National Landscape and *its surrounding area*), then it will be in contravention of the law.

With that in mind, it is clear that there should be no detrimental visual impact imposed upon the DVNL and its setting by the proposals. As it currently stands, pylons sited in the vicinity of Dedham Road and along Wick Lane, Ardleigh, (Towers TB13-TB21) would be seen from the southern boundary of the DVNL. The topography of this area is flat, and at a distance of c. 1km, 50-meter-high pylons would be clearly visible. It is obvious that the sight of such pylons from *within* the DVNL does not conserve (let alone enhance) the beauty of the area and its surroundings. It therefore follows that, if pylons are installed within sight of the DVNL, National Grid will be breaching its statutory duties.

The landscape in question is of great value and is directly comparable to that of the nearby DVNL. On this evidence alone it should be protected by undergrounding. In terms of a few specific examples:

- Boxted WWII Historic Airfield, Langham, CO4 5NW – this museum and airfield is of great cultural value. The site often holds open days which attract all ages and educate visitors on the area's historical importance. As well as this, a run of pylons will cause obvious and grave danger to aircraft taking off and landing.
- In all the same ways as we have discussed for the DVNL above, pylons will have enormous detrimental impacts on the landscape character and visual amenity of National cycle network routes through Langham village and the surrounding area.
- The visual impact will extend to the long-distance footpath through the Essex countryside, the Essex Way, in the Horkesley area. This footpath spans the width of the county and is of huge significance to the local residents and visitors.

Installation of pylons as is currently proposed in Ardleigh, Langham, Boxted and Great Horkesley will cut through a significant number of residential properties. As well as being hugely psychologically damaging for these residents, the presence of such pylons renders their property virtually un-sellable.

In conclusion, it is clear that proposed pylons TB1 to TB35 from the EACN at Ardleigh to Great Horkesley, a distance of a mere approximately 9 km, should be replaced by further undergrounding, therefore negating the need for any pylons at all in this locality and mitigating against the issues discussed above.

5. Factors to consider should pylons be installed

As stated above, pylons should not be installed in the DVNL, or anywhere in the vicinity of, or visible from, this important protected landscape. However, in the extreme scenario they are installed, the following precautions should be considered.

Any proposal for the positioning of pylons should be carefully considered in terms of pylon design, in order to minimise the harmful visual impact to the setting of the AONB. The 'T' pylon or lower height lattice pylon is likely to have less detrimental impact and should therefore be installed to mitigate against visual harm.

Extensive and appropriate planting should take place to mitigate the significant detrimental visual impacts on the locality and setting of the DVNL.

6. The location of Construction Compound currently intended to abut the DVNL south of Boxhouse Lane (JCCC04) should be relocated

The Construction Compound and Construction Laydown Area, currently proposed to abut the DVNL on Birchwood Road, Dedham, (JCCC04) should be relocated. The potential harm to the visual amenity of this important gateway to the Nationally recognised DVNL and Dedham Village Conservation Area should not be underestimated. This location currently consists of uninterrupted far-reaching vistas of arable farmland which is flat in topography as seen from

viewpoint 3.15. The creation of a construction and laydown compound housing up to 27, metre wide cable drums and aggregate storage of up to 4m in height, fuel storage, construction vehicle storage, double storey office space, meeting facilities, welfare facilities and crane platforms would represent a complete change to the character of the area from beautiful farmland into an industrial facility – wholly at odds with the significant landscape designation of the DVNL.

The levels of disturbance to nearby residents due to harm caused by noise, dust, and light pollution and significantly increased traffic movements would be totally unacceptable.

In the alternative, this harm should be mitigated by sensitive shielding from view, adjustments to working hours and consideration to local residents. Potential disruption due to traffic, noise, vibration, light, litter and dust pollution should be kept to a minimum and properly mitigated against.

It does not make sense to, on the one hand, proceed with undergrounding of cables from the DVNL to Badley Hall (i.e. preserving the beauty of the setting of the DVNL), while, on the other, building an enormous construction compound within that very setting. The setting of the DVNL must be preserved and enhanced at all times, with disruption kept to an absolute minimum. It does not follow that a construction compound should be situated virtually within the DVNL. From the day construction begins on the compound to the day the final piece of it is removed, there will be continuous (24 hours a day, 7 days a week) disruption. That is unacceptable in an area which is protected by national legislation.

The construction compound should clearly be re-located. It seems to us (and many other local residents) that an alternative location which does not disrupt the established beauty of the Dedham Vale should be found.

7. The Primary Access Route PAR 27 will cause significant harm and is wholly inappropriate

The proposed Primary Access Route (PAR 27) – Birchwood Road, Dedham, is ill-conceived and wholly inappropriate. The excessive 258% increase in weekday flows by HGVs and articulated vehicles during the extended 4-year construction period would cause unimaginable harm and nuisance to nearby residents and existing road users, in addition to presenting a potential road safety risk. This bendy and narrow local road with no pavements regularly experiences traffic issues and congestion when just a few farm vehicles collect harvested crops from the adjoining fields, rendering the opposite carriageway impassable by larger vehicles e.g. the local bus and long traffic queues to develop. It is highly likely that significant problems will persist on a daily basis in connection with the flows of HGVs and low loader vehicles associated with the construction and laydown areas proposed, causing unreasonable disturbance and inconvenience for local residents, visitors and all road users. (Footnote Preliminary Environmental Information Report Vol 1 April 2024) Reconsideration should be given to a more appropriate location for this industrial facility.

8. Construction must run to time

Should the project be allowed to go ahead, it is absolutely imperative that the build programme runs to time. It would cause unacceptable and irreparable harm to the DVNL and affected nearby residents if the project is allowed to run over schedule.

We again respectfully request that all comments raised above are given due consideration.
Sally-Ann and Kevin Head

Owners of residential property –

