

I challenge the accuracy and veracity of the conclusions that the Applicant (National Grid) has reached in response to the summary of matters raised concerning the proposals at The Waltham Gap. NG uses finance and Ofgem as the reason no changes to their proposal can be made, and that changing the whole onshore project is not financially reasonable with their responsibilities to the bill payers. They have only proposed undergrounding in National Landscape areas. I request that the Examining Authority rejects the National Grid refusal to underground at the single pinch point of The Waltham Gap, and request that National Grid is instructed to underground the cables for the short distance between pylons TB135 – TB143 at The Waltham Gap. This has been requested by Chelmsford County Council and multiple other relevant representations. The reasons that I challenge the conclusion from NG is that the multiple cumulative harms at this point have not been correctly assessed in an additive way by National Grid. The slight increase in cost associated with changing to underground cables at The Waltham Gap is within acceptable financial variance for a NSIP. A short distance of underground cabling at The Waltham Gap does not affect the remaining 178km of the project and demonstrates that the NG consultation has been successful in balancing the needs of thousands of the population with NGs fiscal responsibilities to the nation.

The cumulative harms which should change the current plans from pylons at The Waltham Gap to a short length of underground cable are 1) NG considers that there will not be a RVVA effect on the property [REDACTED] and the proposals are therefore within the planning guidelines. I strongly disagree that their proposal does not constitute a breach of guideline. The guidelines states that pylons/infrastructure must not be “overwhelming in all direction” for a residential property. NG is proposing 3 pylons, all 60 -100m of the property in 3 different directions. The house only has views in these 3 directions and therefore in this case NG are ignoring planning guidelines and the project is overwhelming in all directions for this property. 2) NG agrees there will be residual permanent effects from the project on the landscape at The Waltham Gap. They have concluded that as the project is a Critical National Project (CNP) there should not be any changes to their planning proposal. At The Waltham Gap the number of disadvantages are greater than in other areas and there are a greater number of permanent residual effects which will affect a greater proportion of the population than at other areas in the project. At The Waltham Gap the balance of RR and excessive long-term residual effects on a large population (>5000) should define The Waltham Gap as an “exceptional case” and the choice of transmission infrastructure be converted to underground cable [EN-1 paragraph 4.1.7] 3) All views from Langleys House and deer park will have visible pylons from the run of pylons TB135 – TB143. This is based on the laws of physics that light and sight travels in straight lines, the flat geography of Essex meaning that all structures over 30m will be visible on the slightly elevated sides of the Chelmer Valley and the size of trees in Essex which are only 20 metres on average. This directly contradicts the Visual assessment that the impact on Langleys by pylons can be adequately mitigated. The only way it can be mitigated is to underground the short section at The Waltham Gap. 4)The NG assessment of visual effects considers effects on the visual amenity of people and is presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP 229] . NG is incorrect in the conclusion that the pylons will be obscured by riparian vegetation along the water course – again based on physics and topography and tree growth, all properties within 750m of this run of pylons will see the pylons multiple times a day from their houses, from their recreational activities and normal activities of daily living. 5) The route the pylons TB135 – TB 143 takes out approximately 4000 square metres of Best Most Versatile (BMV) agricultural land based on each pylon = 20m x 20m: the legs of the pylon preventing the use of machinery for cultivation so removing the land from cultivation; leaching of strongly alkaline chemicals from the concrete base which is an alkaline composite material; removal of all of trees and shrubs near the pylon removing habitat for pollinators. This is again a negative effect caused by the current choice of pylons 6) NG justifies that the pylons will have a low impact as “the area is sparsely settled”. The area is a large community, with a moderate sized settled population with 2 primary schools, 2 churches, a shop, a busy doctors’ surgery. The small wedge of the Chelmer Valley and the Waltham Gap has been designated a small area of green space as a recreational amenity for the population of Broomfield and The Walthams. Inserting 9 huge pylons across this small area is very damaging. NG has selectively interpreted the population and amenity use of this location and harm from the project at The Waltham Gap. The negative effects of the current planning proposal for this location reaches the threshold for reconsideration on the planning proposal at The Waltham Gap. 7) I agree with the NG statement that proposes ‘low height’ pylons between TB140 and TB143, inclusive, to be amended to ‘full height’ pylons. Should this occur, TB142 would be omitted from the Project, and TB141 moved to a position further away from [REDACTED] than is shown on 2.3 Works Plans – Section F [APP-022]. The adverse change of heightening TB140 and TB141 upon the residential visual amenity of [REDACTED] would be negated by both TB141 being further away from the property and there being fewer nearby pylon.

The Rule 6 letter has listed Health and wellbeing as a separate subject for the applicant to review, however National Grid has failed to identify Health and Wellbeing as a separate theme in the summary of themes (page 2). This has resulted in (Pages AF 1 – AF 227) omitting health and wellbeing as a registered theme. Health and wellbeing should be separated out as a distinct theme and appear as a discrete item in the summary of themes and in the appendices AF as instructed in the Rule 6 letter from the ExA.