

NORWICH TO TILBURY PROPOSAL

INTERESTED PARTY REFERENCE NUMBER: [REDACTED] (VILLAGES AGAINST PYLONS)

Dear Sir,

This is a supplemental submission made in response to **Document: 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2**, to **Document: 8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2** and to the proceedings on Day 2 of **Issue Specific Hearing 2**. We also address **Action Point 30 'Dedham Vale 2'** with respect to that hearing.

Dedham Vale

It is a great shame that the applicant continues to avoid the most fundamental duty set out in NPS-EN5 2.9.12 and 2.9.21, that of the need to 'avoid altogether' the Dedham Vale National Landscape even if the 'resulting route is somewhat longer and more costly in consequence'.

It is noteworthy that their answers to this point set out in Document 8.4.12 avoid the question entirely. For example, in their response to Little Horkesley Parish Council at 2.38 they speak of a host of relevant policies but not the one in question. This is a repeated pattern.

It is also noteworthy that National Grid fail to comment upon the acceptable harm to a National Landscape as set out in NPS EN5 2.9 which states that "residual damage is likely to be unacceptable in planning terms," and emphasises the need for robust mitigation or alternatives, such as undergrounding. Instead, they merely repeat that they have undertaken an assessment.

It is telling that National Grid repeatedly mis-state the requirements with respect to undergrounding. National Grid would have us believe that the presumption to use overhead lines applies strictly the instant a cable route crosses the boundary to the National Landscape stating in Document 8.4.12 that 'in response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects.'

This is a perverse interpretation of the requirement and wilfully misleading in the context.

NPS-EN5 is explicit that such interpretation would apply only where no part of the route crosses a designated landscape. NPS-EN5 is explicit that the presumption is reversed when it does and explicit that undergrounding is appropriate even in the mitigation of residual impacts to the Landscape.

It is very odd that National Grid make this statement whilst in the same response admitting that 'Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 (2024) require consideration of the effects (using the term 'harm') on a National Landscape. These are both the **direct** effects (i.e. physical effects on the designated area) and the **indirect** arising from infrastructure proposed outside the designated area.' They do not, however, address the question, choosing instead to refer to their previous submissions, which do not address it either.

It is noteworthy that the Applicant states that with respect to the Dedham Vale 1.3km is far enough away to have no impact when speaking of the western Sealing End Compound (Tilbury side) at Little Horkesley, but later in ISH2 when speaking of the Colne Valley said: 'And it is important to note that there would be a transition in terms of the level of effect, and there's not an absolute and abrupt change. So where we're seeing significant effect up to 1.5km, in some instances, we have identified visual effects that are significant beyond one and a half such as viewpoint.'. National Grids viewfall diagrams, as highlighted in our previous response, indicate that this sealing end compound and proximate pylons would be widely visible across the Dedham Vale.

The Applicant's response to Little Horkesley Parish Council once more acknowledges that harm will indeed occur. We have previously detailed that harm and highlighted that it is both significant and impacts the important characteristics of the Dedham Vale. We will not repeat the exercise here but refer you to our previous submissions.

We strongly concur with the verbal submission of Tendring Council at ISH2 that the position of the EACN was determined some years prior to the undertaking of any landscape assessment by National Grid, and that their approach has been entirely dictated by an attempt to back-fit to that position. Connection Agreements to the EACN at Ardleigh were offered to both North Falls and Five Estuaries long before work was undertaken in preparation for the statutory consultation or the current Inspection. National Grid has made no genuine attempt to avoid the Dedham Vale. We made this point at the Open Floor Hearings; National Grid have responded in Document 8.4.8 that they responded to it at the same hearing. They did not.

With respect to the Applicant's answer to LV1.15, they state that they have complied with the duty and in evidence refers to their discussion with the Dedham Vale National Landscape and Stour Valley Partnership. This is presumably intended to suggest agreement, but that agreement does not exist.

We strongly concur with the verbal evidence of Mr Simon Amstutz of the Dedham Vale National Landscape and Stour Valley Partnership made at ISH2: the Holford Rules have **NOT** been followed because they (National Grid) have **NOT** avoided the areas of highest amenity. We further concur that the use of undergrounding is a matter of policy, applied far too narrowly in the current proposals, and that it does **NOT** in itself satisfy the Section 85 requirement.

Mr Amstutz is exactly right when he says that the cumulative impact of all of the infrastructure associated with the Norwich to Tilbury proposals, in terms of the impact to the setting of the National Landscape of the Dedham Vale, must be considered. This must include the impact of North Falls, Five Estuaries, Tarchon and any other project which seeks to connect to the infrastructure.

Stating that they have complied with the duty does not mean that they have complied with the duty. Again, that pattern.

We reiterate: the Applicant has failed in their proposals to apply the requirements set out in policy and in law and has failed to address these requirements when questioned. The proposals are incapable of approval in their current form due to their harm to special qualities of the Dedham Vale which go significantly beyond the merely residual. The proposals cannot further the purpose of the Dedham Vale due to the degree of damage and the payment of a trivial sum by the Applicant to National Grid would not ensure it. (To be capable of consideration the quantum of any payment would need to materially outweigh the financial harm when measure using the Treasury Green Book, and even then we would argue it to be inappropriate).

The project must be routed **entirely away** from the Dedham Vale. It seems on the basis of National Grid's submissions, this consequently means that the EACN must also be moved entirely away from the Dedham Vale. Even if this is not undertaken, significantly more undergrounding would be required in order to eliminate views of pylons, sealing end compounds, and other infrastructure from with the Dedham Vale and to remove them from any external views of the Dedham Vale.

Colne Valley

The Applicant admitted at ISH2 that they have assessed the Colne Valley as being of high sensitivity and that significant effects would occur up to 1.5km away.

Few parts of the valley or its tributary valley are 3km wide. This amounts to an admission that significant effects would occur throughout the valley, yet no mitigation has been proposed.

The Applicant also admitted that they have assessed the impact on the Ford Street Conservation Area and to many of the listed buildings within it as significant, yet no mitigation has been proposed.

At no point during ISH2 did National Grid address the question they were asked: if this is a valley of special quality, which they admit, what assessment have they made or special consideration have they applied?

The evidence of National Grid's representatives 'Rebecca' and 'Harris Casey' at ISH2 was that no special consideration has been applied. They applied precisely the same methodology they applied everywhere else. This is manifestly insufficient.

In the absence of a landscape assessment by National Grid, Villages Against Pylons is supporting residents of the Colne Valley who will seek to commission a report by an appropriate expert. We hope that this will be available by Deadline 5 and would request that the EA take note of this aspiration, but are understanding if it is slightly delayed.

We fully support and echo the submission at ISH2 made by Fordham Parish Council: the proposals would entirely destroy the visual impact of the far reaching views within the Colne Valley and in particular from the Essex Way, which is one of the foremost footpaths in the Country.

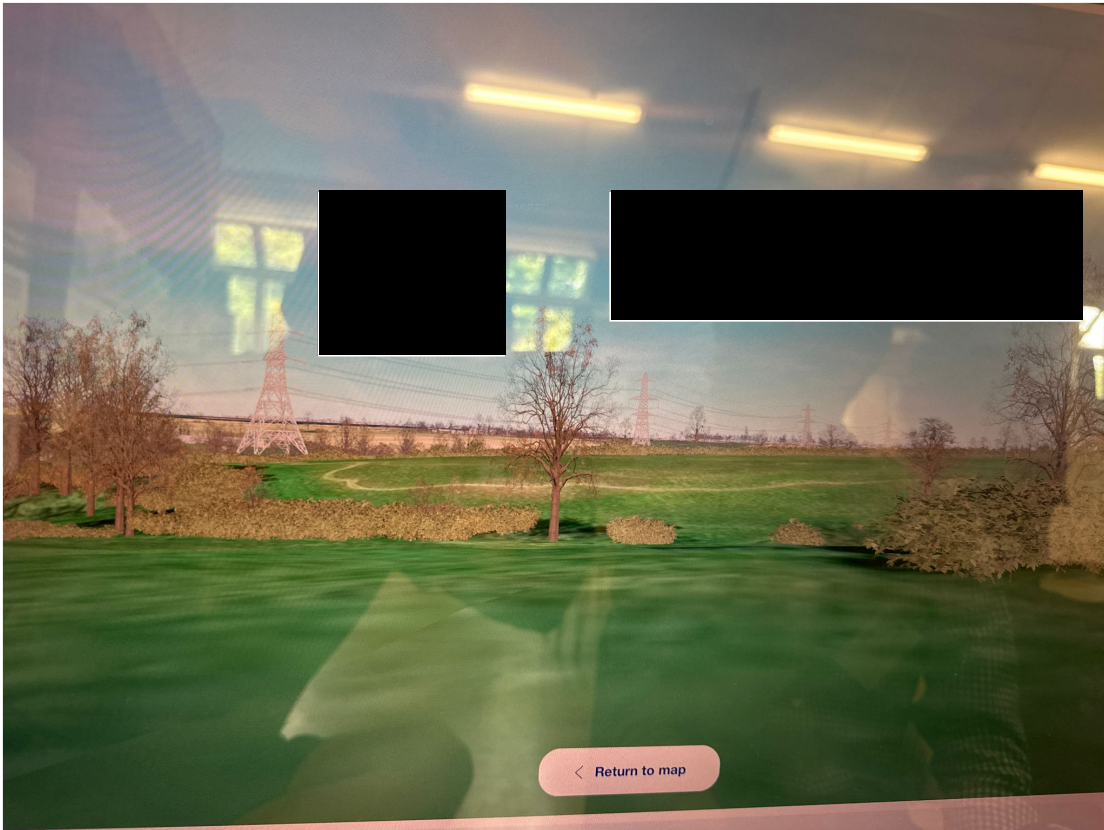
Although not within a National Landscape, the essential quality of this valley is not significantly different to that of the best parts of the Dedham Vale and it is worthy of protection. There is nothing within National Policy which prohibits undergrounding here and indeed it is recognised that in special locations and when impact is far reaching, which surely it is in this case due to the views of the valley visible from Colchester and due to the presence of the Essex Way and the high footfall there, undergrounding can still be appropriate.

In Document: 8.4.1.2 National Grid state: "The setting of Highfield Farm (1225094), Kings Farmhouse (1266530) and Fordham Place (1222602), has been assessed by the Applicant. This has been carried out in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]**, and in line with professional guidance, including 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'. The assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment."

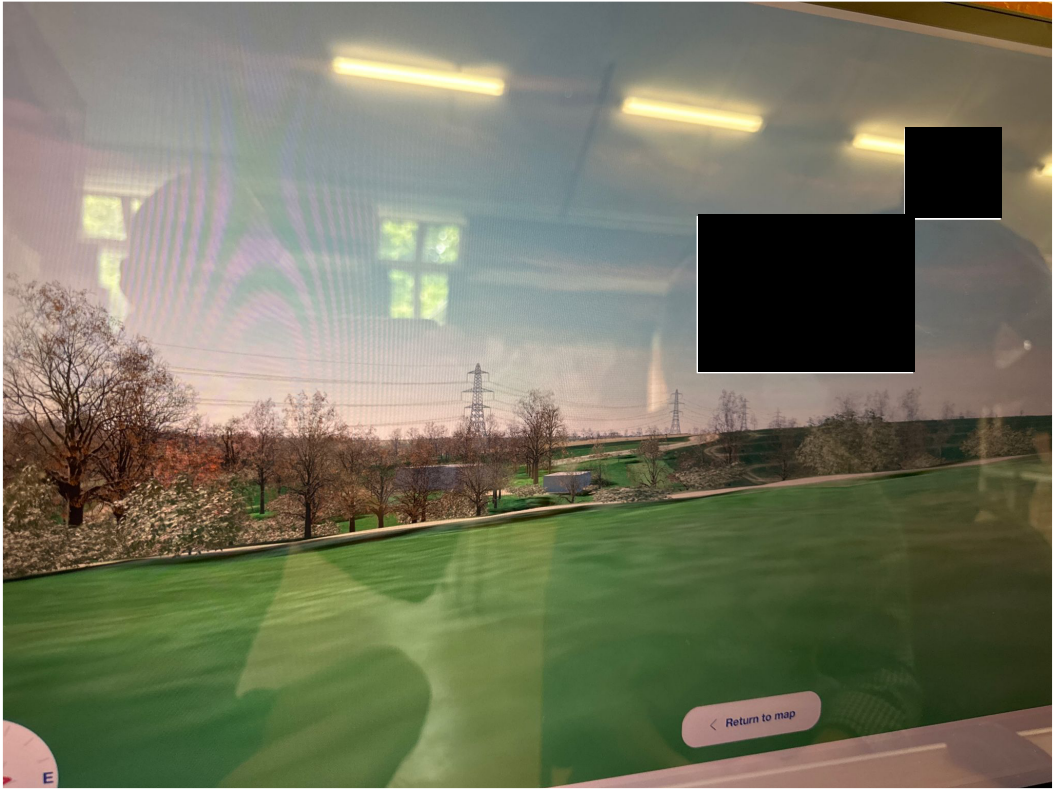
It is remarkable that National Grid failed to identify harm and have included no relevant viewpoints in respect of these important listed buildings at the top of the Colne Valley, closest to the Dedham Vale for your consideration.

At one of their open events, we were provided with visualisations from some of these locations which we have included below. The impacts are, as you can see, devastating. We apologise for the quality of these graphics: whilst we were allowed to take photographs, we were not provided with high quality downloads.

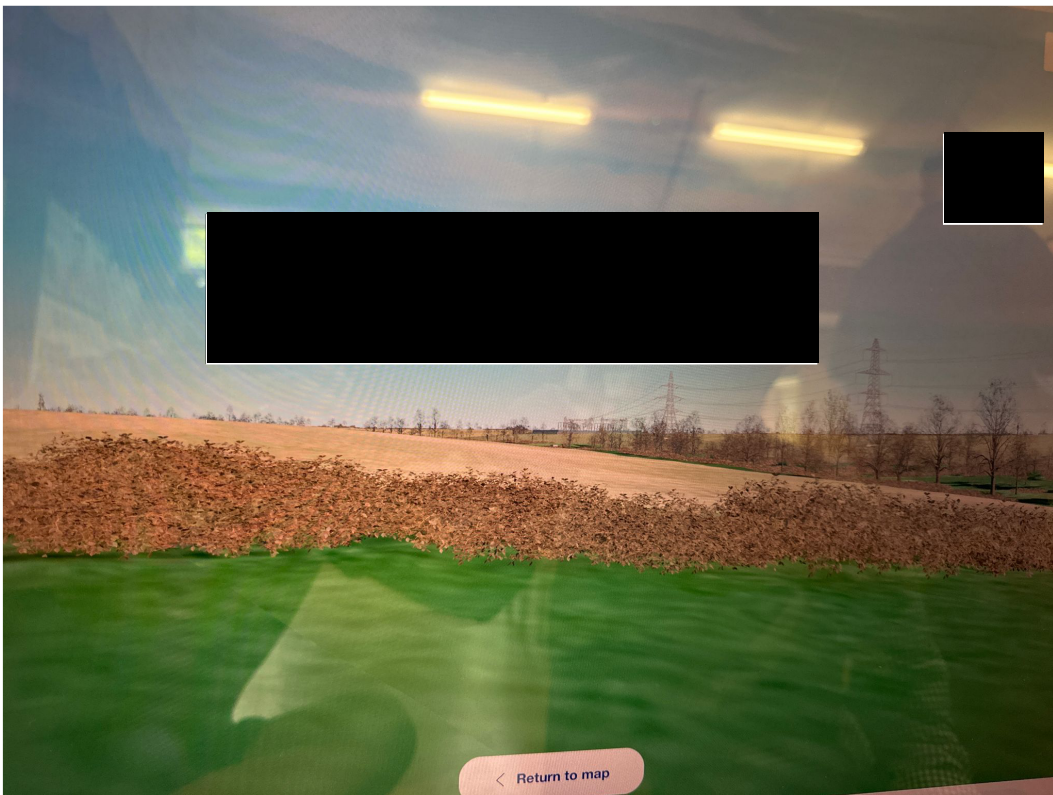
In order to mitigate the harm, the undergrounding section which commences at Great Horkesley should be extended through the Colne Valley to a point beyond Aldham, which would serve both to protect this valley and to substantially eliminate harm to the Dedham Vale (in the event that the latter is not 'avoided entirely').



Views from Coney Byes Farm, rear garden, across valley.



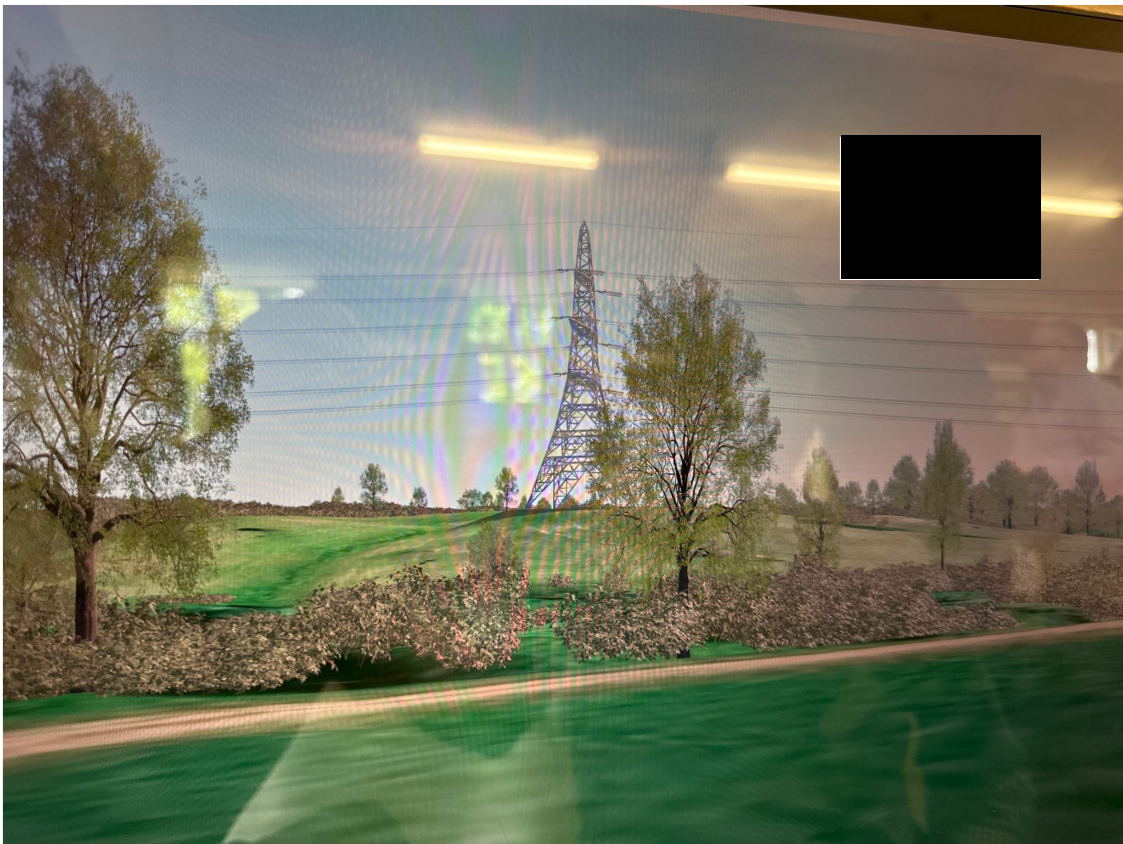
Highfields Farm, towards Fordham



Highfields Farm, towards Dedham Vale



Kings Hall, along valley towards Fordham



Kings Hall, front facing valley road



Kings Hall, towards Dedham Vale