

## Response to specific issue hearing

**Project: Norwich to Tilbury Electricity Transmission Project (EN020027)**

**Interested Party: Caroline Homewood – Ford Street, Aldham and Fordham in Colne Valley**

**Interested Party Reference number:** [REDACTED]

# Failure to Assess Cumulative Harm in the Colne Valley

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## 1. Introduction

National Grid fails to assess cumulative harm in the Colne Valley, with specific reference to Fordham, and Aldham, including the Ford Street conservation area. Full quoted extracts from the Design Development Reports and Design and Access Statement are included to evidence inconsistencies and omissions.

The Colne Valley between Ford Street, Aldham and Fordham is assessed by National Grid as a series of disconnected issues. In reality, it is a single, highly sensitive landscape where multiple harms coincide spatially and visually. National Grid assess harm in isolation and downplay them as “minor” or “localised”. The Environmental Statement relies on limited viewpoints and has not fully assessed the landscape and visual impact pylons and cables will have within the Colne Valley on its footpaths, long-distance views and historic landscape character.

The failure to assess these effects cumulatively is a fundamental flaw in the Environmental Statement. It directly conflicts with policy requirements under NPS EN-1 and EN-5 of EIA regulations (cumulative effects requirements) and undermines the justification for the chosen route and infrastructure. The Examining Authority specifically raised this issue in its written questions, but National Grid did not adequately respond in the issue specific hearings.

## 2. Continuous Corridor Acknowledged (DAS)

Quoted extract (DAS §4.5.3–4.5.4):

“The overhead line crosses the River Colne, passes Ford Street Conservation Area and continues south past Aldham...”

**Rebuttal:** This confirms a single continuous sensitive corridor, yet impacts are not assessed cumulatively.

## 3. Concentration of Harm (DDR 2024 §5.4.139)

Quoted extract:

“There would be more residential properties within 200m of the alignment... The majority of these are concentrated at Aldham.”

**Rebuttal:** National Grid acknowledges concentration but fails to assess combined effects on this cluster.

## 4. Dismissal of Alternatives (DDR 2024 §5.4.137)

Quoted extract:

“This option would result in a transfer of effects from receptors in Aldham, Fordham and Ford Street...”

**Rebuttal:** This ignores cumulative intensity of harm and treats impacts as interchangeable. It ignores

concentration vs dispersion. There is no recognition that intensification of harm in one location equals cumulative harm.

### 5. Colne Valley Description (DDR 2024 §5.4.140)

The Colne Valley has not been considered or assessed as a valued landscape system. Quoted extract: “The River Colne valley comprises undulating landform with areas of tree cover and recreational use.”

**Rebuttal:** The valley is described but not assessed as a combined ecological, heritage and recreational system. National Grid mentions woodland, floodplain and ecology separately. There is no assessment of the combined effect of habitat fragmentation, tree loss, visual intrusion and recreational degradation. There is no acknowledgement of the Woodland Trust land, the Essex Way, the Roman corridor or Aldham’s inclusion in Colchester’s draft local plan as a green/blue corridor.

### 6. Constraints at Fordham (DDR 2024 §5.4.144)

Quoted extract:

“Constraints include floodplain, woodland, utilities and nearby residential properties around Fordham.”

**Rebuttal:** Pylon TB050 located next to the Ford Street conservation area is on a flood plain and is underwater in winter every year but this is not referred to. Constraints are listed individually but not assessed cumulatively.

### 7. Undergrounding Rejected (DDR 2024 §5.4.145–147)

National Grid fails to apply its own Waveney Valley logic to the Colne Valley and provides no explanation why the same combination of factors (and more) in the Colne Valley do not lead to the same conclusion:

- Heritage
- Valley landscape and topography
- Recreation
- Residential cluster
- Habitats and species
- Biodiversity

Quoted extract:

“The potential effects do not justify the use of underground cable... approximately 2.5km would be required...”

**Rebuttal:** This conclusion is reached without a proper cumulative assessment of visual, heritage and landscape harm and is inconsistent with the Waveney Valley justification. National Grid fails to acknowledge the explicit conflicts with the Holford Rules despite their KC at the specific issue hearing on 29<sup>th</sup> April 2026 confirming they still apply. National Grid’s design choice retains ridge top alignment and does not assess cumulative skyline intrusion and valley-wide visibility. EN-5 requires proper consideration of undergrounding where visual impacts are significant and National Grid have failed to identify the Colne Valley as a high cumulative impact zone and dismissed undergrounding prematurely. Whilst it is accepted that undergrounding comes with its own issues, disruption would be temporary and not the permanent industrial blight that pylons have on the Colne Valley.

## 8. Failure to assess combined heritage harm

National Grid fails to assess the combined heritage harm in the Colne Valley. The Examining Authority has acknowledged that “**weighting should be given to harm to multiple assets.**” In the villages of Fordham and Aldham, including Ford Street conservation area, there are 64 listed buildings. However, there is no mention in any National Grid assessment of Fordham’s Grade I listed church or Ford Street’s single lane Grade II listed bridge over which hundreds of HGVs and giant infrastructure plan to drive over. National Grid dismisses the significance of the archaeological sites located within the Colne Valley, claiming pylons on valuable archeological sites would have a “low adverse” and “minor” impact.

**Rebuttal:** National Grid assesses assets individually but fails to assess the combined heritage landscape, the intervisibility across ridge lines, the valley and the conservation area intensifying harm to multiple assets.

### Consultation Feedback Ignored (DDR 2025 §7.3.1–7.3.2)

Quoted extract:

“Passing to the west of Aldham, Fordham and Ford Street...”

“The alignment to the east is considered appropriate and consistent with policy.”

**Rebuttal:** Feedback identifies cumulative harm, but is dismissed without transparent reasoning.

## 9. Evidence from Submissions

Residents identify TB046–TB057 as the most impacted corridor, combining:

- Heritage assets
- Conservation area
- Archeological sites
- Recreation including the Essex Way walk
- Biodiversity
- Habitats and species
- Green/blue corridor
- Roman River Valley
- Colne Valley
- Floodplain
- Woodland Trust land
- Ridge-top pylons

**Rebuttal:** National Grid does not assess this corridor as a single cumulative impact zone.

## 10. Conclusion

National Grid’s own documents acknowledge concentration of receptors, sensitive landscape, and multiple constraints, yet fail to assess them cumulatively. This was brought to National Grid’s attention at the start of the consultation and every opportunity since, but has been ignored. This represents a fundamental flaw in the Environmental Statement and undermines the justification for the chosen route and use of pylons.

The Examining Authority have identified that National Grid have failed to assess the adverse wide spread cumulative harms that this scheme would have on Fordham, Aldham (inc. Ford St conservation area) and the wider Colne Valley. There are **many** and they are **significant**. A diligent assessment of this area at the outset would have shown it is the wrong place for pylons and cables, please hold National Grid to account.

National Grid fails to adequately assess the impact of the **specific issues** listed in the Examining Authority’s agenda in relation to the Colne Valley. They are **widespread** and **adverse** and by way of illustration of the cumulative impact I comment on the location of each of the proposed pylons:

<b>SPECIFIC ISSUE</b>	<b>PYLONS</b>	<b>FAILED ASSESSMENT</b>
<b>Air Quality</b>	<b>TB046</b>	No assessment of the impacts on air quality on Fordham All Saints Primary School and children’s heath
<b>Biodiversity</b>	<b>TB048</b>	No assessment of impact on established trees forming part of the Fordham Hall Estate, managed by the Woodland Trust
	<b>TB049</b>	No assessment of bird strike risk of pylon set on the ridge of a hill with woodland either side and migrating geese
	<b>TB049 -TB051</b>	No assessment of land included in Colchester’s draft local plan as green/blue corridor
<b>Design</b>	<b>Colne Valley</b>	No transparent assessment of alternatives or applying Waveney justification
<b>Flood risk</b>	<b>TB049 – TB051</b>	Flood plain acknowledge, but disregarded. TB050 on land that floods every winter
<b>Health &amp; wellbeing</b>	<b>All</b>	Disregarded. No meaningful assessment of the impact on loss of amenity, landscape, heritage and the effect on local business owners’, farmers’, residents’ mental well being compounded by poor engagement. No assessment of the value of the open recreational green spaces (walking, running, horse riding, cycling) on physical and mental health.
<b>Historic environment</b>	<b>TB045 – TB057</b>	In the parishes of Aldham, including the Ford St conservation area and Fordham there are 64 listed buildings (see schedule attached)
	<b>TB048 – TB052</b>	On top of hills over looking and encircling the Ford Street conservation area that lies on valley floor
	<b>TB046</b>	Next to Grade I listed Church
	<b>TB047</b>	On top of Roman Villa described by National Grid as having “low adverse” and “minor” impact
	<b>TB054</b>	Next to St Margarets Grade II listed Church
<b>Landscape</b>	<b>Colne Valley</b>	Disregards the Holford rules No assessment of the topography of the Colne Valley or mitigation for hill tops and limited shielding Aldham, forms part of the Roman River Valley and the Colne Valley and the Ford Street conservation area is on the valley floor Colne Valley considered a valued landscape with North Essex by the local community and was formerly designated a Special Landscape Area in earlier Development Plans
<b>Public Rights of Way</b>	<b>Colne Valley</b>	Construction will close 8 of 19 of the public rights of way, including the Colne Valley Way, amounting to 7km. All will suffer lasting visual harm.
<b>Socio-economics</b>	<b>TB046 &amp; TB049</b>	No assessment of impacts on heritage-based hospitality businesses like the Shoulder of Mutton and Three Horseshoes, both listed properties that rely on the heritage, rural landscape and amenity values of this area.
<b>Transport</b>	<b>Colne Valley</b>	No credible assessment of how our narrow rural roads will deal with hundreds of HGVs daily and giant infrastructure passing over the single lane listed bridge in Ford Street.

## Schedule of listed buildings

### Aldham, including the Ford Street conservation area and Fordham

PROPERTY	GRADE	LIST ENTRY
<b>FORDHAM</b>		
1 Church of all Saints	I	1239789
2 Fordham Hall	II	1267740
3 Fordham Hall barn	II	1273566
4 Fordham Hall barn East	II	1239812
5 Oak House	II	1239790
6 72 Church Road	II	1239819
7 Three Horseshoes pub	II	1239808
8 Fordham war memorial	II	1452952
9 Idols cottage	II	1267711
10 Rams Farmhouse	II	1239837
11 Rams Farmhouse barn	II	1239876
12 Barn Fletchers Farmhouse	II	1222605
13 Moat Hall	II	1239833
14 Archendines Farmhouse	II	1267737
15 Cattles Barn	II	1239788
16 Suttons Farmhouse	II	1267747
17 Old Timbers	II	1266270
18 Valley Cottage	II	1267736
19 Plummers Farmhouse	II	1239831
20 Thrifts Cottage	II	1239832
21 Threshers	II	1267751
22 Plummers Cottage	II	1267750
23 Penny Cottage	II	1239862
24 Marks Gate	II	1267752
25 Congregational Chapel	II	1239830
26 Kenmore Fruit Farmhouse	II	1239829
27 Rectory	II	1239828
<b>FORD STREET CONSERVATION AREA</b>		
28 Wash Farmhouse	II*	1239836
29 Friars Farnhouse	II	1267731
30 Friars Farmhouse Barn	II	1239835
31 Barnards Farmhouse	II*	1239874
32 Shoulder of Mutton pub	II	1239834
33 Shoulder of Mutton outbuilding	II	1239834
34 Ford Street Bridge	II	1273567
35 The Bridge House	II	1110890
36 Riverdale Cottage Wall	II	1170044
37 Riverdale Cottage	II	1110891
38 The Old House	II*	1337411

39	The Queens Head	II	1110886
40	Queens Head Studio	II	1110887
41	Threshers	II*	1110885
42	Aldham Carpentry	II	1110888
43	The Bunches	II	1110892
44	Ferndale Valley House	II	1337410
45	Rose Cottage	II	1110883
46	The Malting	II	1110884
47	Fore Acres	II	1110889

#### **ALDHAM**

48	St Margaret St Catherine Church	II*	1170063
49	Old Hill House	II	1110893
50	Green Farmhouse	II	1170055
51	Bentalls Cottages	II	1337412
52	Crapes	II	1306225
53	Old Rectory	II	1306223
54	Mott's Cottage	II	1337414
55	Half a Loaf Cottage	II	1110896
56	Church House Farmhouse	II	1170085
57	Hoe Farmhouse	II	1337413
58	Hoe Farmhouse NE Barn	II*	1170078
59	North Barn Hoe Farmhouse	II	1110895
60	Peakes	II	1110897
61	Peakes Barn	II	1306188
62	Brick Cottages	II	1169966
63	Aldham Hall	II*	1306270
64	Aldham Hall Wagon Lodge	II	1337391

## Schedule of Deficiencies – National Grid Assessment (Colne Valley Section)

Ref	National Grid Statement / Paragraph	Deficiency Identified	Evidence / Rebuttal
1	DAS §4.5.3–4.5.4 – Route passes Colne Valley, Ford Street, Aldham	Fails to treat area as single cumulative corridor	Documents confirm continuous route yet impacts assessed separately
2	DDR 2024 §5.4.139 – Properties concentrated at Aldham	No cumulative assessment of clustered receptors	Acknowledges concentration but no combined impact analysis
3	DDR 2024 §5.4.137 – Effects ‘transferred’ by western route	Mischaracterises cumulative harm	Ignores intensity of impact in Aldham/Fordham/Ford Street cluster
4	DDR 2024 §5.4.140 – Description of Colne Valley	Descriptive only, no valuation or cumulative analysis	Fails to assess combined landscape, ecology and recreation value
5	DDR 2024 §5.4.144 – Constraints at Fordham	Constraints assessed in isolation	No combined assessment of floodplain + woodland + residential + heritage
6	DDR 2024 §5.4.145–147 – Undergrounding rejected	Conclusion reached without cumulative assessment	No holistic evaluation of visual + heritage + landscape harm
7	DDR 2025 §7.3.1–7.3.2 – Western alternative rejected	Consultation feedback not properly evaluated	Cumulative harm concerns dismissed without transparent reasoning
8	TB046–TB057 corridor	No assessment of continuous impact zone	Area contains heritage, ecology, floodplain and residential receptors
9	Heritage assessments	Assets assessed individually only	Fails to assess combined setting impacts across valley
10	Landscape assessment	Fails to assess skyline and ridge-top cumulative effects	Contrary to Holford Rules and visual impact policy
11	Ecology and recreation	No cumulative assessment	Woodland Trust land, Essex Way and habitats assessed separately
12	Policy application (EN-5)	Failure to trigger undergrounding consideration	Cumulative impacts would meet threshold for alternative solutions