

Submission ID: S10FA4409

I am attaching my response to the Specific Issue Hearings concerning the Norwich to Tilbury Electricity Transmission Project and specifically to address National Grid's failure to properly assess the widespread adverse cumulative effects arising from the proposed pylon corridor between pylons TB046–TB057 through the Colne Valley, affecting Ford Street Conservation Area, Aldham and Fordham

**Response to the Examining Authority – Specific Issue Hearing
Norwich to Tilbury Electricity Transmission Project (EN020027)
Failure to Assess Widespread Adverse Cumulative Effects in the Colne Valley
(TB046–TB057) Ford Street Conservation Area, Aldham and Fordham**

Interested party number:

I write in response to the Specific Issue Hearings concerning the Norwich to Tilbury Electricity Transmission Project and specifically to address National Grid’s failure to properly assess the widespread adverse cumulative effects arising from the proposed pylon corridor between pylons TB046–TB057 through the Colne Valley, affecting Ford Street Conservation Area, Aldham and Fordham.

This submission draws upon:

- National Grid’s responses at the specific issue hearing
- National Grid’s own Design Development Reports (DDR) and Design and Access Statement (DAS);
- Written representations submitted by local residents and Aldham Parish Council;
- The Schedule of Deficiencies in National Grid’s assessment;
- and previous submissions identifying failures in National Grid’s methodology and policy compliance.

1. Failure to Assess the Colne Valley as a Single Sensitive Landscape System

National Grid assesses Fordham, Ford Street Conservation Area and Aldham as fragmented and isolated receptors rather than recognising the Colne Valley as a single connected historic, ecological and recreational landscape.

National Grid’s own Design and Access Statement acknowledges that:

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

This confirms the existence of a continuous corridor of sensitivity. However, the Environmental Statement fails to undertake any meaningful cumulative assessment of the combined effects arising from:

- ridge-top pylons;
- valley-wide visibility;
- repeated skyline intrusion;
- sequential visual impacts;
- heritage intervisibility;
- recreational degradation;
- habitat fragmentation;

- and the urbanisation of an otherwise rural valley landscape.

The Colne Valley is experienced by residents, walkers and visitors as a connected landscape system, not as isolated viewpoints. The Environmental Statement's methodology relies excessively upon static viewpoints and segmented receptor analysis, fundamentally underestimating the real cumulative experience of the scheme across TB046–TB057.

2. Concentration of Harm Ignored

National Grid expressly acknowledges that:

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

Despite acknowledging the concentration of receptors, National Grid fails entirely to assess the cumulative intensity of harm arising from clustering infrastructure around Aldham, Fordham and Ford Street collectively.

Instead, impacts are artificially diluted by treating them as separate and interchangeable effects. National Grid's assessment repeatedly refers to the “transfer of effects” between route options rather than assessing whether concentrating severe impacts within one highly sensitive valley corridor creates materially greater cumulative harm.

This approach materially understates the true scale of adverse impact.

3. Failure to Properly Assess Heritage Harm

National Grid has failed to assess the combined heritage effects across the wider Colne Valley landscape.

The villages of Fordham and Aldham, including Ford Street Conservation Area, contain approximately 64 listed buildings and heritage assets, including:

- Fordham's Grade I listed Church of All Saints;
- Aldham's Grade II* Church of St Margaret and St Catherine;
- Ford Street Conservation Area;
- the Grade II listed Ford Street Bridge;
- numerous listed medieval and post-medieval buildings;
- and significant Roman archaeological remains near TB047.

Despite this concentration of heritage assets:

- Fordham's Grade I church is barely addressed;
- there is no meaningful assessment of intervisibility between assets;
- no proper consideration of skyline intrusion behind the conservation area;

- and no assessment of the cumulative effect on the historic valley setting.

The Examining Authority has already identified that weight should be given to harm affecting multiple heritage assets collectively. However, National Grid continues to assess heritage impacts narrowly and individually.

The statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require special regard to preserving heritage assets and their settings. National Grid's methodology fails to properly apply those duties to the wider heritage landscape of the Colne Valley.

4. Failure to Assess Landscape and Topographical Harm

The alignment between TB046–TB057 places pylons prominently on elevated ridgelines above Ford Street, Fordham and Aldham. Multiple submissions identify that pylons are intentionally positioned:

- on hilltops;
- alongside the River Colne;
- adjacent to floodplain land;
- and parallel behind Ford Street Conservation Area.

National Grid has failed to properly assess:

- skyline impacts;
- winter visibility;
- cumulative valley-wide visibility;
- and the sequential experience of infrastructure from roads, footpaths and settlements.

This directly conflicts with the Holford Rules, particularly the requirements to:

- avoid areas of highest amenity value;
- follow natural landform;
- and avoid skylines where possible.

The Colne Valley is a highly valued landscape containing:

- Woodland Trust land of “regional conservation significance”;
- the Essex Way long-distance footpath;
- public rights of way across the valley;
- floodplain landscapes;
- wooded ridges;
- and a tranquil rural setting closely related to the Dedham Vale National Landscape.

National Grid describes these features individually but fails to assess their cumulative interaction as a single landscape system.

5. Failure to Properly Assess Recreation, Ecology and Amenity

The Environmental Statement does not adequately assess cumulative impacts upon:

- the Essex Way;
- Woodland Trust land;
- permissive bridleways;
- biodiversity corridors;
- recreational users;
- or the wider amenity value of the valley.

Aldham Parish Council identifies that pylons would be visible from every public right of way in the parish and that 8 of 19 public rights of way would be affected during construction.

National Grid has failed to assess the combined effects of:

- habitat fragmentation;
- tree loss;
- visual intrusion;
- recreational degradation;
- and industrialisation of the valley environment.

6. Inconsistent and Unjustified Rejection of Undergrounding

National Grid rejected undergrounding within the Colne Valley on the basis that:

“The potential effects do not justify the use of underground cable...”

However, this conclusion was reached without first undertaking any proper cumulative assessment of:

- landscape harm;
- heritage harm;
- skyline intrusion;
- recreational harm;
- biodiversity impacts;
- or valley-wide visual effects.

At the Specific Issue Hearing on 29 April, National Grid acknowledged that similar combinations of factors justified undergrounding within the Waveney Valley. No adequate explanation has been provided as to why identical or greater cumulative sensitivities in the Colne Valley do not justify the same approach.

This inconsistency significantly undermines the credibility of National Grid’s route selection and alternatives assessment.

7. Fundamental Deficiencies in National Grid's Methodology

The attached Schedule of Deficiencies identifies numerous failures within National Grid's assessment methodology, including:

- failure to assess TB046–TB057 as a continuous cumulative impact zone;
- failure to assess clustered receptors cumulatively;
- failure to assess combined heritage setting impacts;
- failure to assess skyline and ridgeline effects;
- failure to assess combined ecology and recreation impacts;
- and failure to properly trigger undergrounding consideration under EN-5.

These are not isolated omissions. They represent a systemic failure to properly assess the true extent of cumulative harm arising from this section of the scheme.

8. Conclusion

National Grid's own documents acknowledge:

- concentrated residential receptors;
- multiple environmental constraints;
- sensitive landscape character;
- heritage assets;
- recreational use;
- floodplain conditions;
- and valley-wide sensitivity.

Yet these factors are never properly assessed cumulatively.

The Environmental Statement therefore materially underestimates the widespread adverse cumulative effects the Norwich to Tilbury scheme would have upon:

- the wider Colne Valley landscape;
- Ford Street Conservation Area;
- Aldham;
- Fordham;
- and the TB046–TB057 corridor as a whole.

This represents a fundamental flaw in the Environmental Statement and undermines the reliability of the Applicant's conclusions regarding landscape, visual, heritage and cumulative effects.

The Examining Authority is respectfully requested to give substantial weight to these deficiencies when considering the adequacy of the Applicant's assessment and the justification for the chosen route alignment.

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