Response to National Grid Assessment of the Colne Valley and Failure to Assess Cumulative Effects

Norwich to Tilbury Electricity Transmission Project (EN020027)

Interested party number [redacted]

Introduction

This submission concerns National Grid's assessment of the Colne Valley, including Fordham, Ford Street Conservation Area and Aldham.

The principal concern raised throughout consultation, statutory consultation, written representations, Issue Specific Hearings and responses to the Examining Authority's Written Questions has been consistent: National Grid has failed to assess the cumulative effects of the Project on the Colne Valley as a whole.

The concerns raised in this submission are supported by the Examining Authority's Written Questions, including DES 1.6, LV 1.6, LV 1.7, LV 1.28, HE 1.8, HE 1.9, HE 1.13, HE 1.15, BIO 1.21 and ALT 1.8, together with National Grid's Design and Access Statement, Design Development Reports and Applicant's Response to ISH2 Action Point 34.

Failure to Address the Examining Authority's Concerns

The Examining Authority has repeatedly identified concerns regarding cumulative effects, landscape character, heritage impacts, route selection and alternatives.

Most significantly, at LV 1.28 the Examining Authority specifically requested coordinated masterplans for the Colne Valley (including Fordham, Ford Street and Aldham) incorporating landscape, ecology, archaeology, rights of way and built heritage. This request implicitly recognises that these matters should be assessed together rather than as separate environmental topics.

National Grid's response to ISH2 Action Point 34 does not provide the cumulative assessment sought by the Examining Authority. Instead, it describes routeing considerations, topography, woodland, archaeology and heritage constraints individually before concluding that alternative routes would merely represent a transfer of effects.

The central concern identified by the Examining Authority remains unanswered.

National Grid Acknowledges a Continuous Corridor but Does Not Assess It as One

National Grid's own Design and Access Statement confirms that the overhead line crosses the River Colne, passes Ford Street Conservation Area and continues south past Aldham.

This identifies a continuous corridor rather than a series of isolated receptors.

Yet impacts are assessed separately in topic chapters rather than cumulatively.

- Heritage is assessed separately.
- Landscape is assessed separately.
- Ecology is assessed separately.
- Recreation is assessed separately.
- Flood risk is assessed separately.
- Residential impacts are assessed separately.

As a consequence, National Grid never evaluates the combined significance of these effects occurring simultaneously within a single landscape corridor.

The Colne Valley is a Unique Concentration of Sensitive Receptors

The TB046–TB057 corridor contains an exceptional concentration of sensitive environmental and community receptors including:

Heritage

- Ford Street Conservation Area;
- Grade I Church of All Saints, Fordham;
- Grade II* Church of St Margaret and St Catherine, Aldham;
- High concentration of listed buildings;
- Roman archaeological remains;
- historic farmsteads and barns.

Landscape

- River Colne valley landscape;
- elevated ridgelines;
- long-distance views;
- valley floor settlements;
- highly visible slopes and skylines.

Ecology

- Woodland Trust land;
- woodland habitats;
- biodiversity corridors;
- green/blue infrastructure;
- Roman River corridor links;
- Local Nature Recovery Strategy opportunity areas.

Recreation

- Essex Way;

- public rights of way;
- bridleways;
- recreational walking, cycling and equestrian routes.

Communities

- Fordham;
- Ford Street;
- Aldham;
- clustered residential receptors.

Residents and interested parties have repeatedly identified these features throughout consultation and examination. National Grid identifies many of them individually but never assesses their interaction or cumulative significance.

Failure to Assess Concentration of Harm

National Grid acknowledges in DDR 2024 §5.4.139 that the greatest concentration of residential properties within 200 metres of the alignment occurs at Aldham.

However, this acknowledgement is not followed by any assessment of the consequences of concentrating multiple impacts in one location.

The relevant planning question is not whether impacts occur elsewhere.

The relevant question is whether concentrating:

- heritage harm;
- visual harm;
- landscape harm;
- ecological impacts;
- recreational impacts; and
- residential impacts

within the same corridor creates exceptional cumulative harm.

National Grid has never undertaken that assessment.

The "Transfer of Effects" Argument Does Not Address Cumulative Effects

National Grid repeatedly relies upon the assertion that alternative routes would simply transfer effects elsewhere.

DDR §5.4.137 and the Applicant's ISH2 Action Point response both repeat this argument.

However, this does not answer the concern raised throughout consultation and examination.

The issue is not whether alternative routes are impact free.

The issue is whether the concentration of multiple adverse effects within Fordham, Ford Street and Aldham creates materially greater cumulative harm.

National Grid has not assessed this question.

Instead, impacts are treated as interchangeable and capable of being transferred between locations without considering cumulative intensity.

Failure to Assess Combined Heritage Harm

The Examining Authority specifically requested consideration of the weighting to be given to harm affecting multiple heritage assets (HE 1.8).

Despite this, National Grid continues to assess heritage assets individually.

There is no assessment of:

- cumulative setting effects;
- group value;
- intervisibility;
- combined effects on heritage significance;
- impacts on the wider historic landscape.

The Colne Valley contains one of the highest concentrations of heritage assets along the route, including approximately 64 listed buildings, Ford Street Conservation Area, Roman archaeology and nationally important churches at Fordham and Aldham.

National Grid fails to address the concern identified by the Examining Authority.

Failure to Assess Combined Landscape Effects

The Examining Authority identified concerns regarding visual baseline assessment, visual routes and coordinated landscape planning through LV 1.6, LV 1.7 and LV 1.28.

National Grid's assessment continues to rely upon individual viewpoints and receptor-based assessments rather than evaluating:

- cumulative skyline intrusion;
- repeated ridge-top structures;
- sequential views;
- valley-wide visibility;
- effects on long-distance routes;
- effects on the Essex Way;
- cumulative impacts on the character of the Colne Valley.

The proposed alignment introduces large-scale industrial infrastructure into a landscape that derives much of its character from openness, historic settlement patterns and valley landforms.

These effects should be assessed collectively.

They have not been.

Failure to Properly Consider Undergrounding

The rejection of undergrounding represents one of the most significant deficiencies in National Grid's assessment.

National Grid rejected undergrounding within the Colne Valley on the basis that the effects did not justify underground cable.

However, DDR §§5.4.145–147 reached this conclusion without first undertaking any meaningful cumulative assessment of:

- heritage impacts;
- conservation area impacts;
- landscape impacts;
- biodiversity impacts;
- recreational impacts;
- residential impacts;
- ridgeline intrusion; and
- valley-wide visual effects.

Consequently, the decision to reject undergrounding was reached before the full scale of cumulative harm had been evaluated.

The conclusion is not supported.

This is particularly significant given National Grid's obligation under NPS EN-5 to properly consider alternatives and minimise adverse effects on landscape and visual amenity where significant impacts arise.

Inconsistency with the Waveney Valley

The Examining Authority specifically questioned National Grid regarding its approach to the Waveney Valley and the reasons for routeing and undergrounding decisions in that location.

National Grid has not demonstrated why a comparable concentration of:

- heritage assets;
- conservation areas;
- ecology;

- recreation;
- floodplain landscapes;
- residential receptors; and
- ridgeline visibility

within the Colne Valley should be treated differently.

The approach is inconsistent.

Conclusion

The Examining Authority has repeatedly identified concerns regarding cumulative effects, heritage impacts, landscape character, alternatives and the need for coordinated planning within the Colne Valley.

National Grid's responses acknowledge many of the individual constraints affecting Fordham, Ford Street and Aldham but continue to assess them separately.

The Applicant has failed to address the fundamental concern raised throughout consultation and examination: whether the concentration of heritage, landscape, ecological, recreational and residential impacts within the TB046–TB057 corridor creates exceptional cumulative harm requiring a different route or greater use of undergrounding.

National Grid refer glibly to ..."finally at this stage, and bearing in mind the cost and programme implications of change at this stage..." as a justification for disregarding their statutory and regulatory duty. The issues outlined above have been raised at every consultation, but National Grid have either ignored or dismissed them without justification or due consideration and now say it is too late.

The Environmental Statement, route selection process and rejection of undergrounding are not supported by a robust cumulative assessment and should be afforded reduced weight by the Examining Authority.

The Examining Authority is respectfully requested to give substantial weight to these deficiencies when considering the adequacy of the Applicant's assessment, the justification for the chosen alignment and whether additional undergrounding should be required within the Colne Valley.