

Deadline 5 – Response to ExQ2

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]

National Grid's Failure to Address the Examining Authority's Questions Regarding the Colne Valley

The Applicant Has Not Answered the Question It Was Asked

The Applicant's response to the Issue Specific Hearing Action Points does not answer the questions posed by the Examining Authority.

Instead, National Grid largely repeats route selection conclusions already contained within the Design Development Reports and Environmental Statement without addressing the substance of the Examining Authority's concerns regarding cumulative effects within the Colne Valley.

The Examining Authority's concerns are evident throughout its Written Questions, particularly 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. These questions consistently focus upon the interaction of landscape, heritage, ecological and community effects and whether those effects have been adequately assessed and weighed within route selection.

1. The Examining Authority Requested a Coordinated Assessment of the Colne Valley

The Examining Authority specifically requested coordinated masterplans for the Colne Valley incorporating:

- landscape;
- ecology;
- archaeology;
- rights of way; and
- built heritage.

The significance of this request is self-evident.

The Examining Authority was not asking for a further description of individual constraints. It was seeking an explanation of how those constraints interact and whether their cumulative significance had been properly assessed.

However, National Grid's response to ISH2 Action Point 34 does not provide such an assessment. Instead, the Applicant describes topography, woodland, archaeology, heritage assets, floodplain constraints and residential receptors individually before concluding that alternative routes would merely represent a transfer of effects elsewhere.

That response does not address the question posed by the Examining Authority. It merely repeats route selection conclusions already contained within the Design Development Reports. The concern regarding cumulative effects therefore remains unresolved.

2. National Grid Continues to Fragment the Assessment

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

The Applicant therefore recognises the existence of a continuous landscape corridor extending through Fordham, Ford Street and Aldham.

However, the Environmental Statement and associated examination responses continue to assess impacts separately.

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

The consequence is that there is no assessment of the combined effect of these impacts occurring within the same geographical area.

This is particularly important because the TB046–TB057 corridor contains one of the highest concentrations of environmental and heritage constraints along the route, including Ford Street Conservation Area, a high concentration of listed buildings, Grade I and Grade II* churches, Roman archaeology, Woodland Trust land, the Essex Way, public rights of way, floodplain landscapes, biodiversity corridors and clustered residential communities.

The Examining Authority's concern was whether this concentration of receptors creates exceptional cumulative sensitivity.

National Grid has not undertaken that assessment.

3. The "Transfer of Effects" Argument Does Not Answer the Question Asked

A recurring feature of National Grid's route selection evidence is the assertion that western alternatives would merely represent a "transfer of effects" to other receptors.

This reasoning appears both within the Design Development Reports and within the Applicant's response to ISH2 Action Point 34.

However, the Examining Authority's concern was not whether impacts occur elsewhere.

The concern was whether concentrating:

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

within the Fordham–Ford Street–Aldham corridor creates materially greater cumulative harm.

National Grid does not assess this question.

Instead, impacts are treated as interchangeable and capable of being transferred between locations.

That is not a cumulative assessment.

It is a route selection justification.

Consequently, the Applicant answers a different question from the one posed by the Examining Authority.

4. The Heritage Questions Remain Unanswered

The Examining Authority specifically raised concerns regarding the treatment of multiple heritage assets through Questions HE 1.8, HE 1.9, HE 1.13 and HE 1.15.

In particular, the Examining Authority sought clarification regarding the weighting to be applied to harm affecting multiple heritage assets and the adequacy of the Applicant's heritage assessment.

Despite these concerns, National Grid continues to assess heritage assets individually.

There remains no meaningful assessment of:

- cumulative setting effects;
- group value;
- intervisibility;
- cumulative effects upon the wider historic landscape;
- cumulative effects upon Ford Street Conservation Area; or
- cumulative effects upon the concentration of listed buildings within Fordham and Aldham.

The concern identified by the Examining Authority therefore remains unanswered.

5. The Landscape Questions Remain Unanswered

Questions LV 1.6, LV 1.7 and LV 1.28 demonstrate that the Examining Authority's concern extends beyond individual viewpoints.

The concern relates to the effect of the project upon the wider character and experience of the Colne Valley.

National Grid's response discusses routeing considerations and topography but does not assess:

- cumulative skyline intrusion;
- repeated ridgeline structures;
- sequential views;
- valley-wide visibility;
- cumulative impacts on the Essex Way;
- cumulative impacts on public rights of way; or
- cumulative effects upon the wider landscape character of the Colne Valley.

The Applicant therefore fails to engage with the issue raised by the Examining Authority.

6. The Rejection of Undergrounding is Unsupported

Disparity Between the Treatment of the Waveney Valley and the Colne Valley

A significant deficiency in National Grid's assessment is the markedly different approach taken to the Waveney Valley and the Colne Valley when considering the potential justification for undergrounding. The Applicant concludes that undergrounding within the Colne Valley is not justified. That conclusion was reached before any meaningful cumulative assessment was undertaken.

National Grid Accepted That Cumulative Environmental Sensitivities Justify Undergrounding

In the Waveney Valley, National Grid accepted that the interaction of multiple environmental constraints and sensitivities justified the use of underground cable rather than overhead line infrastructure. The justification for undergrounding was not based upon a single receptor or a single environmental designation. Rather, it reflected a combination of factors including:

- landscape sensitivity;
- visual effects;
- heritage considerations;
- ecological interests;
- topography;
- recreational value; and
- the overall character of the valley landscape.

The principle established by the Applicant is clear: where a concentration of environmental, heritage and landscape constraints create exceptional sensitivity, undergrounding represents the appropriate solution.

The Colne Valley Exhibits Comparable or Greater Cumulative Sensitivity

The same cumulative assessment has never been undertaken for the Colne Valley. The corridor between TB046 and TB057 contains an exceptional concentration of receptors including:

- Ford Street Conservation Area;
- High density of listed buildings;
- the Grade I Church of All Saints, Fordham;
- the Grade II* Church of St Margaret and St Catherine, Aldham;
- Roman archaeological remains;
- Woodland Trust land;
- Green/blue corridor;
- the Essex Way;
- extensive public rights of way;
- biodiversity corridors;
- floodplain landscapes;
- valley-wide views;
- ridgeline visibility; and
- concentrated residential communities.

The cumulative interaction of these receptors has been a consistent concern raised by residents, parish councils and the Examining Authority. Yet National Grid has never undertaken a comparable cumulative assessment to that which underpinned its conclusions in the Waveney Valley.

National Grid Has Applied Different Evidential Standards

The criticism is not that National Grid reached a different conclusion, it is that National Grid has applied a different evidential approach.

In the Waveney Valley, cumulative environmental sensitivity was treated as a relevant consideration capable of justifying undergrounding. In the Colne Valley, National Grid has assessed heritage, landscape, ecology, recreation and residential harms separately and then concluded that undergrounding is not justified. This is not comparing like with like.

The Applicant has effectively undertaken a cumulative assessment in one valley and a compartmentalised assessment in the other.

The result is that the conclusion regarding undergrounding in the Colne Valley is not supported by an equivalent analytical process.

Failure to Explain Why the Valleys Are Treated Differently

The Examining Authority specifically sought further explanation regarding the differing characteristics of the Colne Valley and the reasoning underlying route selection and alternatives assessment.

National Grid's response to ISH2 Action Point 34 does not adequately explain why the cumulative combination of:

- heritage assets;
- conservation area designation;
- archaeological significance;
- recreational value;
- ecological interests;
- floodplain character;
- ridgeline visibility; and
- residential receptors

within the Colne Valley does not justify the same consideration of undergrounding that was afforded elsewhere. Instead, the Applicant largely repeats route selection conclusions and asserts that alternative routes would transfer effects to other locations.

That response does not answer the critical question. The issue is not whether impacts occur elsewhere. The issue is why cumulative impacts of a type considered sufficient to justify undergrounding in the Waveney Valley are considered insufficient in the Colne Valley.

No satisfactory explanation has been provided.

Consequences for the Weight to be Given to the Undergrounding Assessment

The consequence is that the Applicant's rejection of undergrounding within the Colne Valley cannot be regarded as robustly justified.

If cumulative environmental sensitivity was capable of justifying undergrounding in the Waveney Valley, then the Applicant must explain by reference to a consistent methodology why the cumulative combination of heritage, landscape, ecological, recreational and residential impacts within the Colne Valley does not justify similar consideration.

The Applicant has not done so.

Accordingly, the conclusion that undergrounding is not justified within the Colne Valley should be afforded limited weight.

The Examining Authority should not be satisfied that a consistent assessment methodology has been applied across the Project, nor should it be satisfied that the cumulative impacts of the scheme upon the Colne Valley have been properly evaluated before the dismissal of undergrounding as a potential mitigation measure.

The conclusion that undergrounding is not justified depends upon an assessment methodology whose adequacy has been repeatedly questioned throughout the Examination. This is particularly important because NPS EN-5 requires proper consideration of alternatives and the minimisation of adverse landscape and visual effects.

The Applicant cannot reasonably conclude that undergrounding is unnecessary whilst simultaneously failing to assess the cumulative impacts that undergrounding would avoid.

7. Conclusion

At every "consultation" it has been demonstrated that the Applicant has failed to undertake an adequate assessment of the cumulative harms to the Colne Valley. The Applicant has failed to act upon this. The Applicant's casual remark in at para 34 of 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points, that it is too late in the process to consider alternatives highlights its approach and demonstrates the Applicant has not adequately met its statutory and regulatory obligations. National Grid cannot rely upon its own failure to justify pylons in the Colne Valley.

Viewed fairly, National Grid's response to the Issue Specific Hearing Action Points does not provide new analysis. It merely repeats conclusions already reached through an assessment methodology whose adequacy is itself in dispute.

The Examining Authority's concern was whether the Colne Valley should be assessed as a coherent landscape, heritage and ecological system exhibiting cumulative sensitivity. At the Specific Issue hearings, the Examining Authority acknowledged "weighting should be given to harm to multiple assets."

The Applicant's response does not undertake that exercise. Consequently, the Examining Authority is left without an answer to the central question repeatedly raised throughout consultation, examination and the Written Questions process: whether the concentration of heritage, landscape, ecological, recreational and residential impacts within the Colne Valley creates exceptional cumulative harm requiring a different routeing solution or greater use of undergrounding.

Until that question is properly addressed, the Applicant's conclusions regarding route selection and undergrounding should be afforded limited weight.