

Response to Appendix E – Action point 27. Colne Valley

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 response in Appendix E does not satisfy the Examining Authority's request for a coordinated masterplan for the Colne Valley. Rather than presenting a comprehensive strategy for addressing the acknowledged residual landscape effects of the Proposed Development, Appendix E comprises a constraints plan and a series of indicative opportunities which are expressly stated to be illustrative only and not commitments.

The Constraints Plan itself identifies a wide range of significant effects arising from the proposal, including new and close-range views of the overhead line from Fordham, Ford Street, Gallows Green and Aldham, effects on the setting of the Grade I listed Church of All Saints, impacts on public rights of way and National Cycle Route 13, and the permanent alteration of the landscape character of the Colne Valley through the introduction of large-scale transmission infrastructure. National Grid also acknowledges that the Project will cross the River Colne valley floor and influence the tranquillity and character of the valley. These are substantial and permanent landscape impacts.

Despite recognising these effects, the accompanying Opportunities Plans propose only broad and generic environmental enhancements, principally woodland planting, hedgerow creation, habitat connectivity and public rights of way improvements. Whilst these measures may provide ecological benefits, there is no evidence demonstrating that they would compensate for the principal landscape harm arising from the permanent introduction of a line of steel lattice pylons across a highly sensitive historic river valley. No assessment has been provided to explain how the proposed measures would reduce visual effects, restore landscape character, improve tranquillity or lessen impacts on heritage assets. The response is particularly deficient because there is no strategic landscape vision for the Colne Valley. A genuine masterplan would identify the long-term landscape objectives for the valley, explain how compensation measures would work together to restore landscape quality, identify priorities for implementation, and demonstrate how the overall environmental outcome would address the acknowledged residual harm. Appendix E does none of these things. Instead, it simply illustrates potential locations where enhancements might be possible, without explaining how they relate to the impacts identified on the Constraints Plan.

The Opportunities Plans also fail to respond specifically to the most sensitive receptors identified by National Grid itself. There are no bespoke proposals for Fordham, Ford Street, Gallows Green, Aldham, the Grade I Church of All Saints, the Essex Way, National Cycle Route 13 or the River Colne valley itself. Nor are there any heritage-led landscape proposals, such as strengthening the setting of listed buildings, restoring historic field patterns, or reinforcing the distinctive historic landscape character of the valley. Consequently, landscape, heritage and ecology are not integrated into a coordinated strategy as envisaged by the Examining Authority.

Equally concerning is the absence of any measurable outcomes or implementation strategy. The document contains no commitments regarding the extent of woodland creation, hedgerow planting, habitat restoration, landscape enhancement or public access improvements. There are no targets, no delivery programme and no funding mechanism. Furthermore, National Grid acknowledges that many of the proposed measures lie outside the Order Limits, that discussions with landowners have not taken place, and that delivery cannot currently be assured.

National Grid further weakens the value of Appendix E by repeatedly emphasising that the Opportunities Plans are illustrative only, do not represent agreed compensation, are not mitigation, would not alter the Environmental Statement assessment and should not be interpreted as an acceptance that landscape compensation is necessary. These repeated disclaimers significantly diminish the practical value of the document and demonstrate that National Grid has not approached the exercise as the development of a genuine compensatory landscape strategy.

Finally, National Grid frames much of its response as a legal argument regarding whether landscape compensation is required under the National Policy Statements and Regulation 122 of the Community Infrastructure Levy Regulations 2010. Whilst that policy position is noted, it does not answer the Examining Authority's request. The purpose of Action Point 27 was to explore what coordinated environmental enhancements could address the acknowledged residual landscape effects if development consent were granted. Instead of engaging constructively with that request, National Grid has produced a document that largely seeks to reserve its legal position while offering only indicative opportunities that remain untested, unfunded and unsecured.

For these reasons, Appendix E cannot reasonably be regarded as the coordinated masterplan requested by the Examining Authority. It identifies the harm but fails to provide a coherent, evidence-based, deliverable or measurable strategy capable of compensating for the permanent landscape and visual effects of the Proposed Development within the Colne Valley. Accordingly, little weight should be afforded to Appendix E as evidence that National Grid has adequately addressed the issue of landscape compensation.

Once again, no attempt has been made to consider the cumulative harm the intended pylons will have to the historic and high amenity Colne Valley. Appendix E attempts to justify the location of each pylon, but the justifications are impossible and evident to anyone who visits the area. The only tall buildings in the area are church spires. 50mt pylons are the equivalent of a 15 storey block of flats so to suggest that pylons can be "filtered or screened by intervening buildings" is not true. I specifically refer to National Grid's numbered points:

2. Pylons are located in open fields with little or no screening. The assertion that 50mt pylons and cables can be largely filtered or screened by 2 storey buildings and 2-3mt hedges is impossible. The sloping landform is gentle, which characterises the Colne Valley's special landscape. To state this will "largely filter or screen" pylons from Fordham Village and the Grade I listed Church is not possible or true.

3. To suggest that views towards the Project from within the Ford Street conservation area are filtered in places by intervening buildings, landform and vegetation is absurd. National Grid is placing pylons on high points of the valley to exacerbate harm to the Ford Street conservation area. The location of Pylon TB48 is approximately 30mts higher than the Ford Street conservation area, so increasing the pylon height to 80mts. TB49 is in an open field and located on a slope (approximately 15mts) higher than Ford Street behind hedge that is approximately 4mts high. TB51 is also situated 40mts higher than Ford Street. The run of pylons are located in elevated positions that will loom over and encircle the Ford Street conservation area. The claims made by National Grid about the Project being filtered by intervening buildings, landform

and vegetation is not possible or true.

4. This is a contradictory statement. The Colne Valley is to be devastated by pylons and cables and National Grid claim it's direct route minimises effects on mature woodland and riparian vegetation. Not possible and not true.

5. Not true. Most of the land on which the run of pylons from TB45 to TB52 is land that is open to the public and forms part of the Fordham Hall Estate, not just the routes shown. Most of the land is open grazing land with hedges and some trees but no trees anywhere near the height necessary to offer genuine filtering from pylons and cables.

TB48 is right by the roadside some 35mts above the Ford Street conservation area and next to the Roman archaeological villa. TB51 and TB52 are at the top of valley located either side of the A1124 the main road into the Ford Street conservation area. At present, the drive into the Ford Street conservation is beautiful, from the high point of the valley (shown numbered 6 on the map) you have open views of the Colne Valley and then drop 40mts into the Ford Street conservation area. The map clearly shows the high concentration of listed buildings in the village. Pylons TB51 and TB52 and the associated cables will become the gateway into the Ford Street conservation area

8. National Grid acknowledge the high public amenity value of the Colne Valley but offer no mitigation.

9. National Grid is locating pylons on raised valley sides and is not opting for a route where better use of the valley floor could be utilised.

11. Not true. No trees in the Woodland Trust managed estate will obscure the pylons. It is derisory to put this forward as a solution. Even if a small part of the bottom of the pylon is obscured all the cables running between the pylons will to be visible. No buildings, landform or vegetation will obscure the cables which will strewn diagonally across the Colne Valley from Fordham, via the Ford Street conservation area and onto Aldham.

12. Again, there may be minor shielding of a small part of the foot of the pylon, but the pylon and cables will be clearly visible for miles around.

13. Not true. As outlined above, the Ford Street conservation area is going to be particularly harmed by National Grid placing pylons in elevated positions.

15. This is an elevated positions, some 40mts above the Ford Street conservation area (total height of 90mts). No vegetation or landform will mitigate the harm of the pylon and cables at this location.

16. Not possible and not true. No views are going to filtered from the pylons and cables here.

17. The mature trees and woodland blocks referred to are not even half the height of the pylons. Not possible and not true.