

Norwich to Tilbury Electricity Transmission Project (EN020027)

Deadline 8 Submission

Interested Party Reference: [REDACTED]

I have participated throughout this Examination as an Interested Party and have lived in Aldham for over twenty years. During that time I also volunteered for the Woodland Trust, surveying and recording veteran and notable trees for the Ancient Tree Inventory within this locality. My submissions throughout the Examination have therefore been based upon detailed local knowledge of the landscape rather than a general opposition to the project.

Having considered National Grid's responses throughout the Examination, I remain unconvinced that my principal concerns have been satisfactorily addressed. Whilst the volume of documentation has increased considerably, the underlying issues remain substantially unchanged.

1. The Environmental Baseline Remains Unreliable

One of my principal concerns throughout the Examination has been the accuracy of National Grid's environmental baseline.

I have highlighted omissions and inaccuracies relating to veteran and notable trees within the Aldham area. As someone who surveyed this area for the Woodland Trust, I know that the Ancient Tree Inventory contains a significant number of notable trees that do not appear within National Grid's mapping.

Most concerning is the apparent mislocation of the two veteran oaks on Tey Road. These are well-known veteran trees whose true position is easily verified, yet National Grid's plans show them in a different location. I also highlighted the complete omission of numerous notable trees that form part of the same publicly available dataset.

These are not minor drafting errors. Accurate baseline information forms the foundation upon which environmental assessment is built. If important environmental assets have been omitted or incorrectly represented, confidence in the subsequent assessment of effects and proposed mitigation is inevitably reduced.

2. The Aldham and Fordham Masterplans Are Not Genuine Masterplans

I remain disappointed by National Grid's response to the Examining Authority's request for coordinated Masterplans for Aldham and Fordham.

Many Interested Parties independently concluded that these documents are little more than illustrative opportunity plans rather than genuine masterplans, and I share that view.

The proposals themselves suggest a lack of detailed understanding of the landscape they seek to improve.

For example, habitat connectivity is proposed in locations where the Woodland Trust has already spent many years creating and managing habitat corridors between Chalkney Wood, Hoe Wood, Fiddlers Wood and the Fordham Hall Estate. Similarly, environmental enhancements are suggested in locations that already possess mature hedgerows, woodland or established ecological management.

Rather than demonstrating a coherent long-term landscape strategy, many of the proposals duplicate existing conservation work already undertaken by the Woodland Trust, local authorities and landowners.

The documents also remain illustrative only. They provide no certainty regarding landowner agreement, delivery, funding, implementation or long-term management. They therefore provide little confidence that

these measures would ever be realised in practice.

Planning decisions of this importance should not be based upon aspirations. They should be based upon secured, deliverable and enforceable mitigation.

3. National Grid Has Not Demonstrated Compliance with the Holford Rules

National Policy Statement EN-5 states:

"The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules."

In my view, National Grid has not demonstrated that this requirement has been met in respect of the Colne Valley.

The Holford Rules seek to minimise impacts upon areas of high amenity value through careful route selection and sensitive design.

Instead, the Examination has demonstrated continuing disagreement over landscape assessment, mitigation and the treatment of valued environmental assets. Rather than resolving these issues, National Grid has frequently relied upon future strategies, illustrative proposals and later approvals.

That approach does not demonstrate that the scheme has been designed, so far as is reasonably possible, in accordance with the Holford Rules.

4. The Examination Has Revealed a Pattern of Deferred Mitigation

One of my overriding impressions after participating throughout this Examination is that too many important matters have been deferred until after consent.

National Grid has increasingly relied upon indicative opportunities, future discussions with landowners, outline strategies and illustrative proposals.

These may describe intentions, but they are not secured mitigation.

Planning decisions should be based upon evidence of deliverable proposals rather than aspirations that may or may not be implemented at some future date.

Similarly, I have often found that concerns raised by Interested Parties have been answered by referring to numerous other documents rather than directly addressing the issue that was raised. This has made it unnecessarily difficult to determine whether those concerns have genuinely been considered. The Examining Authority itself has encouraged substantive responses rather than references to other documents, and I share that concern.

5. My Principal Concerns Remain Unresolved

Having participated throughout this Examination, I remain of the opinion that National Grid has not adequately addressed the principal concerns that I have consistently raised.

Those concerns include:

- the accuracy of the environmental baseline;
- the treatment of veteran and notable trees;
- the adequacy of the Aldham and Fordham Masterplans;
- the absence of secured, deliverable mitigation; and

- the failure to demonstrate compliance with the Holford Rules and the expectations of National Policy Statement EN-5.

The Examination has undoubtedly produced a substantial volume of additional documentation. However, more documents do not necessarily equate to better evidence. In my opinion, many of the fundamental concerns identified by local residents at the beginning of the Examination remain unresolved today.

Final Comments

I appreciate the considerable work undertaken by the Examining Authority throughout this Examination and the opportunity afforded to Interested Parties to contribute.

However, after following the Examination from beginning to end, I remain concerned that National Grid has not demonstrated that this proposal has been designed so far as reasonably possible to avoid unnecessary harm to the Colne Valley, nor that the proposed mitigation is sufficiently robust, deliverable or evidence-based.

Having lived in Aldham for over twenty years, and having spent many years recording and studying its veteran trees and landscape as a Woodland Trust volunteer, I simply do not recognise the picture of the area that emerges from many of National Grid's assessments. My concerns arise not from opposition in principle to new electricity infrastructure, but from first-hand knowledge of the landscape that would be permanently affected.

For these reasons, I respectfully ask the Examining Authority to conclude that National Grid has not adequately demonstrated that the environmental effects of the proposed development have been properly assessed or that the mitigation proposed is sufficient, secured or deliverable. I therefore ask that these outstanding concerns are fully reflected in the Examining Authority's recommendation to the Secretary of State.

Martin Orpen