

# National Grid (NG) Consultation on East Anglia Green Energy Enablement (GREEN) project

## Outline and principles of West Bergholt PC's response

Report by Chris Stevenson, Chairman West Bergholt Parish Council

### 1. Introduction

This report outlines possible headline responses to the consultation which ends on 16<sup>th</sup> June.

It is proposed that these headline response areas are agreed by the PC and that delegated authority is given to the Planning Committee to finalise the response at its meeting on 15<sup>th</sup> June.

In order that the Planning Committee can have early sight of the full response it is further proposed that Cllr Chris Stevenson compiles the full response for distribution to all Cllrs for comment and thence to the Planning Committee.

### 2. Headline Response Summary

Following informal soundings between Cllrs it is proposed that WBPC opposes the plans in their current form for the reasons set out in this report. It should be noted that the current consultation process is purely informal but follows the following stages which become formal:

- Informal Consultation -we are at this point: 21 April-16 June 2022
- Statutory Consultation – expected in April-June 2023
- Development Consent Order (DCO) Planning Application (and further opportunity to respond) – expected in December 2024
- DCO Inquiry - expected in 2026
- Construction 2027
- Fully Operational from 2031

There is every opportunity for the issues raised in the response to the current consultation to result in the plans being modified by NG such that WBPC can reassess its position either at the Statutory Consultation or via the Planning Application stages. In other words, the PC has plenty of time to consider this project and its stance towards it as it evolves.

To note that the two items above underlined are run by the Planning Inspectorate not traditional Planning Applications submitted to District Councils. As such WBPC is entitled to register itself as an “interested party” and appear or make formal submissions to the DCO Inquiry. The Inquiry is also different to “Appeals” and the Inspector will expect “live” changes to be made by NG as promotor or “live” submissions by interested parties to be made via edicts issued at the Inquiry!

### **3. Background**

NG is consulting on proposals to reinforce the high voltage electricity transmission network from Norwich Main substation in Norfolk to Bramford substation in Suffolk, on to Tilbury substation in Essex, as well as a proposed consultation to connect offshore wind generation.

The existing transmission network doesn't have the capacity to accommodate new energy generated by off-shore wind farms and Sizewell C as well as proposed interconnection with countries across the North Sea.

NG Electricity Transmission owns, builds and maintains the electricity transmission network in England and Wales. NG is regulated by Ofgem and financed through private investor capital. NG is listed on the Stock Exchange and was privatised in the mid 1990s from the former state-owned CEGB. Although NG has to apply for a DCO (because it is a Nationally Significant Infrastructure Project (NSIP)) and obtain Planning Permission, there is no Minister responsible for its work although BAES oversees Ofgem.

### **4. The Project in Outline**

The reinforcement to the transmission network would comprise mostly overhead line (including pylons and conductors) although some areas such as Dedham AONB would be undertaken via underground cabling.

The total length of the project is some 181kms and steel lattice pylons are proposed some 45-50m in height.

The proposal affects the WBPC area and parishes adjacent as well as of course all parishes to the south and north.

A lot more information is available on the website and the attached community newsletter. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/east-anglia-green>

A plan of the area of impact in WB is attached. A graduated swathe has been portrayed in the consultation material with the darker area (purple) highlighting the most likely line of the cabling. This can be viewed here

<https://eastangliagreen.participatr.io/index.php?contentid=27>

### **5. Benefits and Issues of Concern (a summary)**

It is worth remembering that the project is seeking to accommodate a lot of newly generated electricity from renewable and nuclear sources, and to act as a system that carries electricity across the country, not just for use in East Anglia. Nobody doubts that this is necessary whether from an energy security point of view, or cost to the consumer or

helping the country have a more balanced approach to fossil fuel or renewable energy supply. So when NG asks as it does about national energy priorities as it does in the opening questions of its consultation questionnaire the PC can be positive that some form of upgrade to electricity transmission is useful and important.

However, it is suggested in the PC reply that we concentrate on the issues proposed for the physical means of transporting the power across a large part of the country. Clearly as outlined in the proposed plan WB along with countless other parishes would become host to a line of overhead cabling and pylons passing to the north of Hillhouse Wood and extending from a point roughly near Kinckhams Barn (B1508) across to Fossetts Lane (near Kings Farm) when the proposal would then enter the parish area of Fordham. This would have an obvious detracting impact on the landscape and be visible from Hillhouse Wood, two public footpaths and the minor roads between the B1508 and Fordham. Depending on the siting of the pylons some properties may be affected in terms of proximity to the cables or the pylons. A plan attached to this draft shows the area affected.

This area despite not being an AONB it is pretty similar to “Constable Country” in terms of landscape value, and Cllrs will be aware of the beautiful landscape impacted from walking the footpaths, cycling or driving the lanes or visiting Hillhouse Wood. The landscape is undulating and gently sloping towards the River Colne. Historically this area was designated as a Special Landscape Area by Colchester Borough Council although it has lost that designation in recent years. The proposed pylons and cables would be visible from an important long distance regional footpath the Essex Way.

Aside from unwanted landscape degradation including damage to ecosystems during construction there are many areas where it is felt that the proposal is fundamentally flawed. The PC does not have to confine itself to commenting only on physical impact with its boundaries but is free to make strategic comments too. With this in mind the following seem very relevant points of objection

#### **Point A – Inadequacy of the Consultation**

- Despite over a year of work being carried out no proper engagement has taken place with parishes or other organisations. Under the Gunning principles, consultation should take place before substantial work has been undertaken. This has clearly not been complied with by NG
- Some of the large pictures in the consultation material are quite frankly insulting showing ramblers and cyclists enjoying the countryside without a pylon in sight! This is meant to reinforce the view that it is a Green project with only beneficial outcomes which is disingenuous
- It's a poor consultation with no options on the table to make proper informed responses on, including the location and whether the cables should be buried or on pylons (or what sort of pylons) or indeed out to sea. When pressed the NG representative at the exhibition admitted that other consultations had presented the public with options and alternatives.

- The Development Consent Order application (the name given to national planning applications) will need to demonstrate how the plans put forward have evolved during consultation and it seems that by providing one option this will be impossible to demonstrate undermining any credibility and fuelling huge resentment. NG should provide dedicated engagement with all organisations and this needs to happen

### **Point B Inadequacy of the technical solution being put forward**

Many people have commented that a more “modern” method of transmission is needed rather than the pylon and cable approach which has been around for decades.

- Of particular concern is the dismissal of the sea bed or sea routeing options, extremely puzzling when two such proposals have been approved by Ofgem linking Scotland with the north of England  
<https://www.nationalgrid.com/electricity-transmission/document/140956/download>
- The impact on the landscape in East Anglia generally is unacceptable. In an age where we cherish our countryside more and more, we need to pass it on to future generations intact and enhanced. Even if buried the excavation area needed is 100m wide which has its own impact. This approach is advocated in Dedham Vale AONB but it is not a “green” solution and will destroy landscape in the process of burying the cables.
- NG’s own strategic reports suggest that a seabed borne “ring main” would save the country £6B, and avoid every wind farm, nuclear power station etc devising its own pylon-based cabling system to reach the grid from the coast resulting a fragmented and piecemeal approach  
<https://www.nationalgrideso.com/document/183031/download>

See summary NG slide attached as well.

### **Point C – a piecemeal approach and a lack of strategic planning**

- This is a piece of infrastructure which should be planned and at least part funded by government as is the case with nuclear. If not then it will always be piecemeal, and cost driven as the NG was privatised in the 1990s and naturally shareholders do not want to pay for environmental mitigation. The environment is seen as a largely “free” resource. There is no government minister involved here just the planning system. Many including an MP group have and are lobbying for the government to adopt a more strategic planning approach.?

### **Point D – alliance with neighbouring communities and areas and seeking further information**

- This is only the start. There will be what's called a statutory consultation next year followed by a full planning application and public inquiry. Some communities have concerns over health, blight, effect on house prices and proximity to the corridor of areas of housing. So there is every reason to challenge NG, and to play our part by joining with our neighbours and getting the best result we can long term.

## **6. Stakeholder Environment**

There has been a huge reaction to the proposals as evidenced by MP involvement and comment, radio and TV interest and various interviews. The following is just a snapshot to cover some important points that the PC needs to be aware of.

### a. Neighbouring Parishes

We have been sent Fordham's objection and similar objections are expected from all other parishes affected. Fordham cites the following areas of concern: health, blight, landscape and ecology impact, impact on property prices.

### b. Wider Local Authorities

From inspection of social media and print media publications those in Suffolk and Norfolk and those elsewhere in Essex have universally rejected the proposal. Most for similar reasons as above. The Essex Association of Local Councils (EALC) is believed to be making representations for a better solution also.

### c. MPs

An MP group has been meeting for over a year now led by Sir Bernard Jenkin our local MP. A letter attached has been sent to Government. It covers similar points.

### d. Pressure Group

A strong alliance has built up over the last few weeks and has a petition of over 8,000 signatories to date. Technical and legal experts are examining the proposal and posing a whole host of questions. See [www.pylonseastanglia.co.uk](http://www.pylonseastanglia.co.uk)

## **7. Options**

There are several options open to the PC:

- Make no comment
- Support the proposal
- Object to the proposal

The PC is invited to choose an option although the recommendation is to oppose.

## **8. Conclusion and Recommendation**

This is a major consultation and so making no comment is inappropriate especially given that an exhibition was held in the Orpen Hall giving the plans a good airing in the village and wider parish area. West Bergholt forms but one small part of the proposals but opting out of responding will send completely the wrong message either to our neighbours or to the NG.

Supporting the proposal, at the very least seems completely premature as there are lots of unanswered questions and a great deal of information that NG will have to reveal and discuss in the coming months and years.

Opposing the proposal would seem to present the best course of action both from a strategic point of view and the impact on the landscape in the parish. It also helps build an alliance with other authorities and MPs to draw government into the picture. So the wording of the recommendation is:

**“The PC opposes plans being consulted upon to build a transmission network of cables and pylons across parts of East Anglia due to the shortcomings of the consultation, the lack of options being put before the public, the lack of a national strategy for energy distribution and the impact on the landscape and environment in this parish and many others.”**

There is also a consultation response form which (if desired) could be completed and submitted. It is not though strictly necessary to do this as we will have a minuted and public position to send in, but it is further recommended that the Planning Committee considers a detailed response to the questions raised in the survey form, and if appropriate sends this to NG along with the principal areas of objection above. The Planning Committee meets on 15<sup>th</sup> one day before the close of the NG consultation which allows a response to be submitted electronically via the website prior to the deadline.