

Consultation Response



Cllr Lewis Barber - Member CC <Cllr.Lewis.Barber@essex.gov.uk>

25/07/2024 06:21

To: contact@n-t.nationalgrid.com

Dear Sir/Madam

I object to the Norwich to Tilbury pylon proposal as the representative for Constable Division on Essex County Council and a ward member of Lexden and Braiswick Ward on Colchester Council.

It is important that energy infrastructure is upgraded to increase our capacity to deliver cheaper, greener and more secure energy supplies. However, the current proposals by NGET for Norwich to Tilbury are not appropriate. Instead, an integrated offshore grid should be committed to to achieve consumer and macro-objectives.

The current Norwich to Tilbury proposals will do irrevocable harm to the areas I represent, among others. For starters, the proposals fail to act in accordance with National Policy Statement for Electricity Networks Infrastructure (EN-5). Pursuant to NPS-EN5:

- the proposals ought to have "avoided altogether" the Dedham Vale, taking an alternative route even if longer and more costly;
- if they do go through the Dedham Vale then they are required to underground the full length of cable from Ardleigh to beyond Fordham because "even residual impacts are unlikely to be acceptable in planning terms".

The current proposals are, therefore, a clear breach of national planning policy from the outset. Likewise, the infrastructure proposed is antiquated and represents poor value for money for consumers and wider society, including businesses, compared to alternative options.

There is also significant environment, human, community landscape and heritage impacts of the proposals. I refer to the following documents as evidence of these.

- NGET's Approach by Fuller Long;
- Heritage Survey and associated survey and map results.
- Archaeology Results;
- Landscapes NGET's Approach by the Landscape Partnership;
- For landscapes MAPS set by Nigel Cowlin Ltd;
- The viewpoints as identified here: <https://www.google.com/maps/d/viewer?mid=1cu-HdnJdQKeHpzCIH0TWokTQmpSIAY&ll=51.95091224011093%2C1.204737345692517&z=3>
- Environmental Impact Assessments has significant deficiencies, as highlighted by Essex Suffolk Norfolk Pylons Campaign Group to which reference should be made to.
- Soils by David Dent
- Public Rights of Way, as assessed by Simon Polley (a member of a Ramblers Association) shall be significantly affected, totalling 424 impacted through restrictions or inaccessibility across three counties.
- Lack of sufficient flood risk assessments, including no worst case assessment.

More broadly, the evidence base provided by Essex Suffolk Norfolk Pylons Campaign Group demonstrates the material harm and inappropriateness of these proposals to the purported objectives:

I also note that NGET has no discretionary purchase scheme, relies on a flat rate per pylon and for access irrespective of local conditions and that such rate has not increased since 2010.

Finally, the deficient consultations are a grounds for rejection of the current Norwich to Tilbury proposals. I refer to the Lord Charles Banner KC's legal opinions on the matter and the failure to conform with the four rules of the Gunning Principles on consultation law.

Overall, the current Norwich to Tilbury proposals are unacceptable in form. I strongly support the alternative integrated offshore grid as the primary means of delivering greener, cheaper and more secure energy supply to the area. If such an integrated offshore grid is not supported, then it must be an underground system that is implemented, not pylons.

Kind regards,
Cllr Lewis Barber
Member for Constable Division

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