

Planning Act 2008

Comments from

James Finch

**Suffolk County Councillor for the Stour Valley Division
and**

Vice Chairman of the Dedham Vale Area of Outstanding Natural Beauty

on

the first stage of the Consultation

held between

21st April and 16th June 2022

by National Grid Electricity Transmission (NGET)

upon

**Proposals to build a new 400kV electricity line between
Norwich and Tilbury**

My Background

I am the Suffolk County Councillor for the Stour Valley Division and am in my 14th year as the elected County Councillor in the Stour Valley Division.. I am also the Vice Chairman of the Joint Advisory Committee for the Dedham Vale Area of Outstanding Natural Beauty (AONB). The Vice chairman of the Partnership for Dedham Vale Area of Outstanding Natural Beauty (AONB) with the Stour Valley project area and was thus very much involved in the discussions and consultation in the first phase of Bramford to Twinstead project from 2009 – 2013. I have contributed to the informal pre-application consultations with a response to you on 6th May 2021 and with a response to the formal Consultation on the same project on 18th March This has given me useful background for the my contribution to the informal consultation of this second project in the area.

My Division includes the following villages:- *Assington, Boxford, Bures St Mary, Edwardstone, Groton, Leavenheath, Lindsey, Little Cornard, Milden, Nayland with Wissington, Newton, and Stoke by Nayland with residents of whom I have a close working relationship. My role as Vice chairman enable me to gain knowledge of the whole of the AONB area.*

In summary the graduated swathes of the project are near to this area:-

- A new overhead line alignment to the north of Holton St Mary which which potentially includes a sealing end compound
- The mid section of the Dedham Vale AONB which incorporates a new underground cable section from Holton St Mary to the region of Birch fall Corner, north west of Ardleigh.
- A proposed new overhead line from Ardleigh to a new Substation near Bradley Hall, South West of Lawford.
- Bradley Hall and running to the north of Colchester through to Great Horkesley: a new overhead line in the vicinity of the AONB boundary Crossing the A134.
- A wider swathe from Great Horkesley to the north and west of West Bergholt and northwest of Fordham Heath and Marks Tey.

My understanding of the current position

My understanding of the current proposals is, as communicated through the following documents and briefings:

- The East Anglian Green Energy Enablement (GREEN) project Background Document – April 2022- NG-NSC-00002
- General arrangement plans – a set of A2 Maps for the whole route (most useful) .
- A Virtual briefing to Suffolk County Councillors on 14th April 2022 with Simon Pepper, Senior Project Manager and the team.
- Attendance at two NGET Public Exhibitions
 - 7th May in West Bergholt Orpen Memorial Hall, West Bergholt
 - 17th May - Holton St Mary Village Hall, Holton St Mary,
- A Councillors Group briefing on 13th May with Cllr Richard Rout, Graham Gunby and Phil Watson.
- A field day on 20th May with a tour of The East Anglian Green Energy Enablement (GREEN) route in Suffolk and north Essex with John Foster, Graham Gunby, Phil Watson focussing on the area of the AONB and Hintlesham, south of the southern boundary of the AONB in North Essex, Bramford, Gipping Valley and Waveney Valley.
- A Dedham Vale AONB and Stour Valley Partnership panel meeting on 26th May 2022.

- A Virtual Meeting on 26th May 2022 with Suffolk County Council Cabinet Member, Richard Rout, and Officers Graham Gunby, and Phil Watson with Suffolk and North Essex Councillors.
- Knowledge developed from contact and discussion with James Cartlidge MP for South Suffolk throughout 2021/22 to the present day particularly with reference to the output from the Off-Shore Electricity Grid Task Force (OFFSET) consisting of local Members of Parliament chaired by Sir Bernard Jenkin..
- Further Regular liaison with Suffolk County Council colleagues including Cllr Richard Rout, Cabinet Member for Environment and Graham Gunby, Planning Development Manager, and Phil Watson, Senior Landscape Officer, Suffolk County Council and John Foster of Media Matters Ltd.

My Key messages of this response.

My responses should be read in conjunction with the responses from the following organisations: Suffolk County Council (SCC), The Dedham Vale AONB and Stour Valley project, The Dedham Vale Society, The Suffolk Preservation Society and Parish Councils and representative bodies within my Division. I have had an input into the responses of both the SCC and the Dedham Vale AONB. I concur with many of the views expressed by these organisations in the documents I have seen.

In the following paragraphs I summarise the messages I wish to particularly highlight on the effects of this project in Suffolk and North Essex.

SUMMARY

- I consider that the Department for Business, Energy & Industrial Strategy (BEIS) alongside Ofgem - the energy regulator for Great Britain's, National Grid (NGET) and Government should **urgently** consider establishing greater co-ordination of electricity generation and transmission to minimise environmental impacts in the future. As a result, BEIS should press hard for the urgent re-instatement of the second and more undersea cable projects from the coast of Suffolk to the River Thames to prevent any further harmful effects to the landscape and the Skyscape in East Anglia. I am disturbed that in this consultation there is no reference to any other route options that NGET have considered and discarded without giving the pros and cons of each option thus preventing any input from local residents.
- I welcome the proposals to underground in the AONB and Stour Valley sections from the vicinity of Holton St Mary to Dedham Heath. However, as Vice Chairman of the Dedham Vale and Stour Valley AONB Partnerships, I have serious concern on the ability of parts of AONB to deliver its statutory purpose during the construction of the underground cabling and the establishment of any Sealing end Compounds which may be required. It is very reasonable that appropriate mitigation for this undergrounding is provided due to the inability to carry out its statutory responsibility
- I consider that additional undergrounding **in the setting of the AONB** is justified and should be undertaken to avoid impacts to the nationally designated landscape. It is essential that the Visual Impact of any proposed pylons located **outside** the AONB should be recognised where they are **visible from within the AONB** together with the impact they have on the skyline in this part of South

Suffolk and North Essex, and therefore cables should also be also undergrounded where possible and local farming practices permit.

- The proposed new row of 50 metre pylons between Lawford and Marks Tey should be candidates for undergrounding because it is within part of the setting of the AONB and it's proximity to the Stour Valley itself. These additional pylons on "virgin" relatively flat landscape will have a significant visual impact on the beauty of this landscape and its Skyscape.
- It was very regrettable that this proposed Swathe identified in the East Anglia Green (ATNC and AENC in NOA) was not shared before the closure of the Bramford to Twinstead consultation on 21st March 2022. There is no doubt that this will have an impact on the Hintlesham and Burstall area in particular, and the eastern end of the Dedham Vale AONB. Likewise it regrettable that this East Anglia GREEN Project consultation is being closed before the imminent publication of the revised Network Options Assessment in July 2022 as this will have a significant impact on this project which will need to be included without the opportunity for local informal consultation with local residents.

KEY MESSAGES

- **Poorly timed public engagement for one of the largest cable construction projects since the 1950's.**

I acknowledge the imperative to proceed quickly to support the net zero ambitions, but this should not be at the expense of proper engagement, quality of evidence gathered or its thorough consideration in face-to-face meetings.

I am also concerned by the timing of this consultation in advance of the publication of the Holistic Network Design, and an updated Network Options Assessment later this month. I consider that this consultation exercise should be extended to reflect the very real chance of fundamental changes in the policy framework against which this scheme is being consulted on.

- **Impact of more 50 metre Pylons in the setting and vicinity of the AONB in South Suffolk and North Essex**

In the section from Holton St Mary Via Lawford right across north of Colchester to Marks Tey the visibility of the new 50 metre Pylons from the AONB and their impact on the existing AONB are leading many local residents to strongly argue for the protection of this area by the undergrounding of this whole stretch. An Environmental Impact Survey is required which I hope will highlight the impact on Tourism.

- **Impact of 50 metre Pylons in the Waveney and the Gipping valleys**

Where there are no existing pylons in these picturesque valleys, they do warrant serious consideration for further undergrounding of the cables. No options have been considered for the alternate use of pylons such as the recently introduced T pylons down in Somerset. (*I would like to visit these to see whether these would be compatible with the Suffolk landscape before any decisions are made*).

- **Sealing End Compounds - Stour Valley East and Dedham West – Economic Assessment**

No data has been shared within the documentation that proves the overall cost of pylons is a "lower overall cost" to the project. To come to such a conclusion, and to convince my residents, a peer reviewed Economic Cost Analysis including a "Whole Life Cost Comparison" (50+ year) of the proposed Pylons alongside the undergrounding of this stretch should be given. This

should include all capital costs - access roads and equipment and the cost of maintenance ongoing of both options with a comparator of power losses economically quantified included in this assessment.

➤ **Dedham Vale and Lawford / North Colchester / Great Wenham areas potential landscape harm from Sealing End Compounds.**

Despite having efforts to landscape these compounds they do detract from the natural environment within the Vale. As this stage no detail has been given on the location of these compounds in Suffolk and North Essex. I strongly recommend that these are minimised by extending the quantity of this route being undergrounded and moving the route well away from sensitive areas – especially the Dedham Vale AONB.

➤ **Impact on Local houses during construction and ongoing.**

There are areas where private housing will be severely disturbed during the construction phase because where pylons are proposed, the local lanes will be used for construction materials. Once completed as per the proposed plan, several houses will be severely impacted by the 440 kV pylon with some having pylons proposed on either side of them in the area going down to Lawford, North East of Colchester. Further pylons will make this impact even more severe and unacceptable. There are others in the area closer than 100 metres of the proposed route in the area of Great Horkesley as well as being in the vicinity of the AONB Boundary.

➤ **Effects on Community Skills & the Tourism and Hospitality businesses.**

It is with regret that the effect of this project on the local Tourism and hospitality businesses had been excluded from the scope of the consultation as it was in the Branford to Twinstead consultation. This was highlighted in early consultation by the Suffolk County Council officers and myself. In my Division in particular, Tourism is one of the major income generators in this part of Suffolk because of its proximity to the AONB. The Tourism annual income generated in Suffolk is estimated to amount to £2.1bn per annum in a large part due to the attraction of the beauty and tranquillity of the landscape within Suffolk and in particular the two designated AONBs in the county.

There are some small airfields within the area – eg Raydon – where no effort has been made to avoid the flight path.

➤ **Mitigation**

The applicants should propose a substantial package of funding to compensate for the undoubted detrimental impacts that will arise from this development upon the local area and the local communities, should it be approved by the Secretary of State.

There will be additional significant inconvenience during the construction phase circa 4 years. There is particular concern over the additional traffic created throughout the area. Traffic flow or volume data should be calculated and the from which mitigation is rightly due.

Areas for mitigation to be considered should include the removal of obsolete 132kV network which could be facilitated by the new line in conjunction with the grid supply points say at Lawford.

There will be a long-term effect on the tourism and hospitality businesses caused by the detrimental effect on the beauty of the local landscape and skyline, for which this part of the country is renowned. Creative ways of compensating for this should be discussed with local authorities and all the local communities.

James Finch – 15th June 2022