



Colchester Borough Council

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Via Email

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Your ref: East Anglia Green

Our ref: 221119

Date: 15 June 2022

Dear Sirs

Proposal: National Grid electricity transmission project (East Anglia Green)
Location: National Grid East Anglia Green Project, North Colchester

I am writing to submit the initial conclusions of Colchester Borough Council in response to the non-statutory pre-submission consultation by National Grid on the East Anglia Green Project. We appreciate early engagement with this authority. As you will anticipate, our communities are deeply concerned about the potential of the scheme to impact on the quality of the environment that they currently enjoy and fear adverse impacts on public health from EMF (whether above or below ground).

We wish to submit a holding objection to the project, due to the serious concerns at the impact these proposals would have on our local amenity and countryside. We believe it is unacceptable to construct an entirely separate line of pylons west of the existing corridor. Unless and until we receive a robust evidence-based justification to support the design approach taken is the only possible option. Such evidence would need to demonstrate that the resultant harm is both necessary and unavoidable. In particular, we are supportive of the need for a coordinated strategy to provide enhanced transmission capacity based on an offshore solution that avoids the need to blight our landscapes and communities. We submit that further progress on the project should be suspended until the Holistic Network Design report is published and its potential implications for the project are understood. We are also aware of discrepancies in the consultation between the various published iterations of the maps illustrating the route corridor. These inconsistencies must be resolved and the consultation extended to allow for reconsultation of the communities affected on the basis of correct information.

Accordingly, for these reasons we request that the consultation is extended to allow these matters to be addressed and we reserve the right to comment further in detail, once we have received a response to the strategic matters identified.

In conclusion, we object to these proposals that would have severe repercussions for our Borough. This is causing deep concerns for our residents who believe that a decision to choose an onshore route, rather than an offshore one, has already been predetermined.

Given that the transmission industry knows that offshore coordination is the best solution; we question why East Anglian Green is not even prepared to look at delivering it, as our residents will need a full and transparent explanation of the difficulties, if they are to accept the new transmission line.

Additionally, an extension to the consultation is needed while clarification on the definitive proposals map is provided, and notifications sent to all affected property owners.

The current consultation seeks to explain at a strategic level the preferred route corridor and siting of the substation on the edge of Tendring District in close proximity to the Borough boundary with Colchester. However, the absence of the background evidence base applied (which we appreciate will be collated and shared at a later stage in the process) and weighting effectively dictates that we may only provide high level observations at this stage in relation to the fundamental choices made around the principal elements of project design including: the technology adopted, preferred route/siting, mitigation employed and in consequence, the key areas of environmental impact. At this stage, we cannot effectively scrutinise the decisions taken by National Grid on the alternatives considered in the absence of the relevant detailed background evidence base. In particular, we would like to request more information concerning the potential for sub-sea connections to avoid the need for onshore grid reinforcement entirely and to understand why this alternative has been effectively discounted.

Addressing each thematic area in turn:

Landscape

The impact of the scheme on landscape character has the greatest scope for adverse impacts, both directly upon the route corridor and its visual envelope. Whilst undergrounding is proposed and essential within the Dedham Vale & Stour Valley AONB, confirmation is required that this approach extends fully to the Project area and its visual envelope. Undergrounding is not a panacea, as it too has a significant adverse impact through the loss of mature planting and removal of historic landscape features. Furthermore, the associated Sealing End Compounds may blight localities and erode the visual benefits of undergrounding.

The preferred option corridor crosses the Dedham Area of Outstanding Natural Beauty (AONB). AONBs have the highest status of protection in relation to landscape and scenic beauty and the granting of development consent in this area will only occur under exceptional circumstances construction and development within the AONB should be kept to a minimum. Paragraph 5.9.11 of the Overarching National Policy Statement for Energy (EN-1) states that “*any projects [in AONB] designated areas should be carried*

out to high environmental standards, including through the application of appropriate requirements where necessary”

The extent of the proposed undergrounding within the Dedham Vale AONB must be clarified as being proposed where the visual envelope of the GREEN project's infrastructure (principally overhead lines, including pylons and conductors and Cable Sealing End (CSE) compounds) impacts on the Dedham Vale AONB, not just where it passes through it, i.e., it should not simply stop at the landscape boundary of the AONB. Given the current application to extend the Dedham Vale AONB to the northern extent of the Stour Valley, this visual envelope protection approach must be extended to encompass any areas that are outside the AONB but are still within the area of the Stour Valley safeguarded through the Dedham Vale AONB & Stour Valley Management Plan.

The Borough is concerned to ensure that the consideration of landscape impact is not restricted to the areas of national designation as our communities value their landscapes for their distinctive qualities and the industrialising effects of pylons may be incompatible with their LCA qualities and tranquillity. The routeing and substation siting constraints (Table 3.1) only refer to nationally designated sites. GLVIA3 acknowledges that landscape value is not restricted to designated areas. Local designations must be considered, and the project needs to respond positively to the landscape qualities identified in Colchester's Landscape Characterisation (Chris Blandford Assoc. 2003). This baseline is now nearly 20 years old, and we suggest that a review is required to ensure an accurate baseline is employed.

When considering potential routing, careful consideration should be given to minimising any adverse impact on valued landscape features. This with particular reference to undergrounding matters within and bounding the Dedham Vale AONB, which, to comply with the Countryside and Rights of Way (CROW) Act should demonstrably propose measures designed to protect, maintain and enhance the landscape character & features of the Dedham Vale AONB and its environs in line with the Dedham Vale AONB Management Plan. This careful consideration should be extended to assessment of the impact of the wider East Anglia GREEN project's development corridor within Colchester Borough, both on the ground (any required working area) and within its visual envelope where compliance with and meeting the guidelines within the Colchester Borough Landscape Character Assessment. Negatives should be avoided, e.g., removal of Important hedgerows (as defined under the Hedgerows Regulations 1997), and positives promoted, e.g., the replanting and reinforcement of degraded hedgerows and woodlands along the corridor.

The siting of Cable sealing end (CSE) compounds (connections points between overhead and underground cabling) should be sensitively designed to complement the character of the landscape within which they are set so as to minimise any adverse landscape or visual impact. In the past such buildings related to major infrastructure projects within Colchester Borough have been designed to complement the local rural architectural vernacular, e.g., the Wormingford pumping station (just outside the Dedham Vale AONB) that served the Abberton pipeline project (2011-2012) as agreed

under planning app. 080194, where the pumping station serving the pipeline deliberately sits within the landscape as part of a farmstead and is designed to complement its setting, being built in the form of a large traditional barn with clay tile roof and black weatherboard cladding.

The infrastructure, including transmission lines, pylons and conductors should seek to minimise landscape and visual impact through the form and finish of their design, e.g., through professional colour analysis feeding into the design of the colour finish to the pylons and conductors. Sources of guidance on the positive use of colour e.g. The DV AONB Guidance on the Selection and Use of Colour In Development (2018) should inform the finishes on all new structures. Furthermore, a bespoke approach to design is required including the selection of pylon design (traditional lattice or 'T'-pylons) to minimise height and potential visual intrusion. Furthermore, the scheme should seek to deliver a dividend through the rationalisation of infrastructure including the removal of 132 KV overhead lines wherever possible.

Colchester has concerns that the proposed overhead link to the currently preferred East Anglian Connection substation (EAC) site may have an adverse landscape or visual impact on the edge of the Colchester conurbation and potentially the wider setting and separation of the Colchester-Tendring Garden Community. We suggest that further consideration is given to an underground connection to the substation thereby avoiding the need for a further sealing end compound as the corridor leaves the AONB. However, we also seek confirmation of the visual impact on the landscape of the connection substation as this would be dependent on the scale of the proposed EAC development and analysis of it through finalised landscape and visual (graduated swathe) assessment.

In terms of the Options appraisal, it is not transparent how the specific preferred corridor has been arrived at as no constraints mapping has been provided for scrutiny. In landscape terms, it is not clear why the run of pylons passes through rural Colchester rather than rural Maldon, i.e., runs South of Colchester rather than to the north otherwise than to avoid impacts on protected habitats for coastal birds. The justification for this is not provided. Among the list of 'constraints, local ecological and heritage designations such as LNRs and Conservation Areas have not been identified as 'seek to minimise' whereas landscape constraints below the national level have been included. Successive governments and national policy have directed local authorities for many years to move away from designating local landscapes such as Special Landscape Areas or Areas of Landscape Value. However, areas of sensitive and valued landscapes may still exist at a local level.

In Colchester, interrogation of the Open Countryside Report, and its associated figures, the Colchester Landscape Character Assessment 2005) that underpins the Open Countryside Report, and the Landscape Capacity of Settlement Fringes including Fig 6. Within the Open Countryside Report, Figure 1) reveals that outside the AONB, much of the landscape through which the pylons are proposed, outside that national designation, is landscape of high value.

There is a strong argument in landscape terms, that the corridor, if it needs to be routed north of the A12 is pushed further West of Colchester through landscape of lower or moderate value and is either undergrounded taking the shortest route when crossing the River Colne, most of which above Colchester was formerly a Special Landscape Area (and retains the character and qualities that merited that designation in the past) and is still judged as 'high value'.

A constraints mapping exercise is needed to collate spatially those landscapes that have been identified by local character assessment as of high or very high value to inform the route corridor.

Biodiversity

The principal impacts on biodiversity are inevitably as a consequence of undergrounding and the loss of established habitats. The Preliminary Routing and Siting Study report Routing Constraints in Table 3.1 refers only to statutory designated sites and non-statutory local designations should be included e.g. LoWS. Routing to the north and west of Colchester avoids potential adverse impacts on the estuaries and Abberton Reservoir. However, adverse impacts on woodlands, trees and hedgerows (especially those retaining ancient coppice stools) also need to be avoided.

The preferred option corridor includes multiple patches of ancient woodland of varying sizes. Paragraph 5.4.13 of the Overarching National Policy Statement for Energy (EN-1) states that "*the secretary of state should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location clearly outweigh the loss of the woodland habitat*". We submit that the scheme requires appropriate landscape buffers to be embedded into the project design, and that the finalised option corridor is designed and planned to avoid any detrimental consequential direct and indirect impacts. This includes, the risk of water-borne pollution, air pollution, dust deposit, change to local hydrology, increased recreational pressure and informal access points and soil compaction.

At present, the Environment Act identifies a minimum 10% gain required in biodiversity. The Environment Bill received Royal Assent on 9 November 2021, meaning it is now an Act of Parliament. At present mandatory biodiversity net gain is likely to become law in Winter 2023 and we believe that the project should seek to be exemplary to ensure that a positive dividend is delivered for green infrastructure and biodiversity.

Heritage (built and archaeology)

It is acknowledged that insufficient detail is provided at this stage to accurately assess the scale/nature of the scheme's impact on below ground heritage assets of archaeological interest. However, from the information provided, it is clear that archaeological impact may occur along the entire line of the development, whether from pylons supporting overhead cables, or (particularly) from excavations for underground cables in Dedham Vale. Dedham Vale is rich in archaeological sites, primarily identified as cropmarks, with areas of prehistoric funerary activity particularly evident. Some of

these assets are scheduled, such as a henge monument to the north of Boxted Cross (Colchester Historic Environment Record no. 9096).

The impact of the scheme on heritage assets of archaeological interest, both designated and undesignated, should be assessed via an archaeological Desk-Based Assessment (DBA). This should include an assessment of cropmarks, and sufficient detail on below ground disturbance likely to be caused along the route. The information provided by this document will then guide the archaeological strategy as the scheme goes forward. It is advised that this preliminary study is carried out at the earliest opportunity to inform the need for trial trenching to be undertaken to inform our understanding of impact within the preferred corridor.

The impacts on built heritage will be primarily in terms of the setting of designated and non designated heritage assets, and the contribution made by their setting to their significance. The methodology for the assessment of impact should follow guidance set out in Historic England's guidance (GPA Note 3: The Setting of Heritage Assets (2017)). We are aware that the entire route corridor potentially affects an ancient settled landscape, rich in heritage assets from every period. These include individual assets and significant groups within and comprising historic churches, villages, hamlets, farmsteads and country houses. The wider rural setting of these assets will be eroded to varying degrees by the scale and industrialising effect of pylons and effective, bespoke mitigation is required as part of the proposals to ensure that any adverse impacts are minimised and, where possible, avoided entirely. A heritage impact assessment needs to be undertaken for all designated assets within the preferred route corridor. Mitigation may include the removal of non-essential existing 132 Kv overhead lines, landscaped-scaled planting to screen and filter views and localised bespoke solutions to protect key views and planned landscape settings.

Conclusions

Colchester Borough Council is deeply concerned that the environmental quality of the Borough is not eroded by the EAG Project in terms of landscape, cultural assets, biodiversity and green infrastructure, but moreover the tranquillity of its rural communities and the vitality and economy of the affected areas. We request further information is provided about the alternative technologies considered and why these cannot be deployed to avoid the potentially harmful impacts of a predominantly overhead onshore scheme. Tourism is a key driver for the economy of the Dedham Vale and we are concerned about cumulative adverse impacts arising from energy infrastructure projects on the wider designation and project area. The proposed route corridor is close to Dedham and the many hospitality businesses and jobs that depend on the special qualities of that area.

We are keen to emphasise that the preferred northern and western corridor affects attractive and unspoilt countryside on the northern edge of Colchester as it joins open countryside (Langham, West Bergholt, Great Horkelesley, Boxted) in an area of high recreational value and many rural villages (Aldham, Ford Street for example) which are in areas of high local scenic value with rich cultural heritage. We are consequently

concerned to ensure that the wider Borough is safeguarded with the choice of technology and route robustly justified and that the scheme has embedded effective mitigation, in order to fully address the adverse impacts yet to be identified and quantified.

Yours faithfully

Andrea Luxford Vaughan

Councillor Andrea Luxford Vaughan
Portfolioholder Planning & Infrastructure
Colchester Borough Council