

24th July 2024

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Dear Ms. Owen,

## **Formal response of Tendring District Council to the third Statutory Consultation**

### **Proposed application by National Grid Electricity Transmission (NGET) for a Development Consent Order for the proposed Norwich to Tilbury project, to reinforce the high voltage power network in East Anglia**

Please accept this letter as Tendring District Council's (TDC) response to the latest statutory consultation on the above proposal. This must be read in conjunction with the technical responses prepared by Essex County Council on behalf of local authorities in Essex affected by the Norwich to Tilbury proposals. Essex County Council's representation identifies a number of concerns shared by this Council including (in summary), but not limited to:

- Ecological impacts: e.g. likely disruption, during and after construction, to nationally and internationally important wildlife designations including the Stour and Orwell Estuary (SPA/Ramsar);
- Hedgerows and trees: e.g. lack of information with regards to potential impacts on specific hedgerows and ancient trees located within the draft order limits;
- Heritage impacts: e.g. limited recognition of and insufficient information on nearby designated and non-designated heritage assets, uncertainty around the impact of the development on their setting and significance;
- Landscape impacts: e.g. the likelihood of significant visual and landscape impacts of the development not only within close proximity, but across a wider area;
- Highways and traffic: e.g. reasonable working hours must be embedded within relevant documentation in the DCO to ensure impacted residents get respite periods, with monitoring and reporting to enable reviews where necessary, greater evidence on traffic flow and appropriate measures to mitigate
- Timing and need: the choice of route and timing has not received adequate strategic appraisal as identified in the Hiorns Smart Energy Network Report (Nov 2023) which concludes that Norwich to Tilbury is not needed by 2030

The response to this consultation from Tendring District Council primarily focusses on concerns raised by communities affected by the proposals and the potential mitigation and community benefits that must be considered if, against the Council's strong wishes, a Development Consent Order (DCO) is granted.

## Overview

This Council continues to object in the strongest of terms to the proposed Norwich to Tilbury powerline and connections to a main substation within the Tendring District. A significant number of residents from across Tendring have continued to contact the Council to express their serious concerns regarding the impacts on the local communities, the landscape and the wider environment - particularly in Ardleigh, Lawford and Little Bromley. The Council shares the concerns that have been raised and wants to ensure the matters raised are given serious consideration before any decision is taken with regards to the submission of a Development Consent Order application to the Secretary of State.

Tendring District Council along with all other authorities in Essex and many in Suffolk and Norfolk has previously and consistently made representations to National Grid at all stages of consultation raising strong objections to the Norwich to Tilbury proposal. It is the clear preference of this Council, along with many others in the region, that the powerline can be delivered offshore through a seabed solution. The Council like others is not satisfied that such an alternative has been given due and proper consideration in the planning process to date.

We acknowledge that amendments to the proposals have been made following previous non-statutory and statutory consultations, namely the undergrounding of cables all the way to the substation in Ardleigh, the East Anglian Connection Node (EACN). Despite this alteration there would still be a significant impact to our residents in Ardleigh, Little Bromley and Lawford and the surrounding environment. The fact remains that a significant length of the powerline will continue to be suspended above ground using pylons in a location within close proximity to the Dedham Vale National Landscape bringing about avoidable negative impacts on its precious landscape character by virtue of their height and visual intrusion on the setting of the designated area. The Council remains strongly opposed to the proposal.

The Council recognises that to reach the Government's target of net zero emissions by 2050, the way we generate, deliver use energy must change. The UK is already transitioning to clean, renewable energy which will provide cheaper and more secure energy. The Council itself is one of many that has declared a climate emergency and recognises the economic potential of the renewable energy industry, including the creation of jobs in the construction, maintenance and servicing of offshore turbines and wider innovation in green energy. The potential for Harwich in particular to play an important role in supporting green energy is recognised through the establishment of Freeport East and investments that have already taken place in the area.

## Failure to properly consider alternative options

However, in representing its local communities, TDC firmly believes that much greater consideration should be given to routing the powerlines around the coast on or beneath the sea bed. This would reduce and virtually eliminate the need for the significant and permanent negative impacts on communities, the environment, and the landscape whilst also reducing the complexities of land negotiations and access arrangements. The Offshore Coordination Support Scheme (OCSS) is awaiting the outcome of an initial high level study into the feasibility of coordinated options for offshore transmission infrastructure and TDC believes it is essential to receive and consider these findings before any further consideration is given to the current onshore proposals.

The timing and need of the project are questioned by two recent studies. ECC commissioned an independent report The Hiorns Smart Energy Network Report which concludes that in terms of 'need' Norwich to Tilbury is not required by 2030, existing capacity could extend until 2035. A report conducted by the Electricity System Operator (ESO) into the proposed network reinforcements in East Anglia draws similar conclusions, stating that the Norwich to Tilbury overhead line can be deferred by

five years. The council urges National Grid to consider these findings as further evidence to pause the current process and review alternatives, including offshore and HVDC options.

The Council questions whether the significant carbon footprint of the development as proposed, particularly during the construction phase, would be offset by the benefits of the renewable energy it is being built to accommodate and transport. It is necessary to properly assess and understand what the embodied carbon emissions will be from the project as a whole; and for that to be compared to that for an equivalent offshore solution. Related to this are concerns about the inefficiency of pylon technology energy loss along the lines and also in terms of their resilience to heat and other extreme weather events. The Council is not satisfied that more modern and efficient technologies have been properly considered.

The fact that Sealink and the potential Tarchon interconnector to Europe rely on off-shore technology is a clear indication that a coordinated offshore solution is not beyond reasonable comprehension and technical achievement. The Council notes recognition at government level that new technologies such as High-Voltage Direct Current (HVDC) undergrounding could provide a more appropriate means of transmitting electricity than the century-old technology of pylons; and that the general presumption for the use of pylons (based on old data) ought to be reviewed following the 2024 General Election. The Council welcomes new research into these alternative technologies and would suggest that any DCO for Norwich to Tilbury would be premature ahead of a review.

To date, the Council and many other interested parties have not been provided with an adequate explanation as to why an offshore/seabed solution is not being given further consideration and fears that the legitimate concerns of residents, communities and other bodies have continued to be totally ignored.

Even if National Grid was able to demonstrate, to the Council's satisfaction, the necessity for the powerline to be located on-shore, it would still question why undergrounding of the powerline cannot be achieved given the advancements in technology referred to above. Furthermore and irrespective of that point, the Council would still question the need for the route to abruptly divert into the north-west of Tendring, rather than having an EACN substation located more closely to the principle alignment and direction of the Norwich to Tilbury connection. This would significantly reduce the length of the powerline needing to be suspended by pylons, with any further connection to off-shore windfarms being delivered under the ground.

## **Local impacts**

The considerable community anxiety caused by the prospect of large-scale intrusive physical onshore infrastructure is a significant concern for the Council. The cumulative impacts of the Norwich to Tilbury powerline, the huge Lawford EACN substation, two customer substations (for North Falls and Five Estuaries) within close proximity, the possible Tarchon interconnector and all associated cabling through Tendring are substantial and totally avoidable if an offshore approach were to be adopted.

There is scant support being offered to the communities and individual residents by National Grid, which must be addressed urgently. Communities in Tendring are potentially at the epicentre of all of the above proposals and special recognition of their concerns must surely be given. The potential impact on the physical health of those living in close proximity to both the overground and

underground infrastructure, as well as the substations, needs further exploration and evidence collection to ensure the safety of those residents.

Whilst TDC welcomes the amendments resulting in the undergrounding of cables from the Dedham Vale National Landscape (formerly Area of Outstanding Natural Beauty) to the East Anglian Connection Node, there is still concern regarding the impact of the swathes required to facilitate this level of infrastructure. Not just in terms of the immediate impacts in a visual sense and the recovery time for those habitats that will be disrupted. Again, an offshore solution would avoid all such issues.

The undergrounding through the National Landscape fails to address the concerns of the residents of Ardleigh (shared by TDC) about large scale intrusive physical infrastructure running past their community. If the development is to proceed, the Council continues to argue for the section from the EACN onward toward Colchester also being undergrounded – a relatively short stretch of the powerline in the context of its overall length and scale.

With regards to the relatively new addition of a potential interconnector at EACN the Council needs significantly more information regarding this. Concerns have already been raised about the size and land take required for the EACN, the implications of an additional Interconnector at or close to this site have not been fully publicised. As such this will require additional consultation when further information is available. Because this statutory consultation stage still lacks key details, it leaves the Council with very little confidence that communities will have been given a proper opportunity to engage in and understand the proposals before a formal DCO submission is made.

There is still a great deal of uncertainty within the farming community about how the proposals will affect their livelihoods. Concern around the legacy impacts on soil quality in terms of disturbance from energy being transported through the cables and implications for land drainage as well as well water, any data held on this would provide clarity. We support the targets set for BNG uplift and note that significantly more detail is needed on how this will be achieved.

Whilst the Preliminary Environmental Information Report (PEIR) is an extensive document, the response from Place Services highlights several areas where information is not robust. Specifically in Tendring, there is a lack of reference to potential geoarchaeological and paleoenvironmental deposits. Information regarding Great Bromley, Little Bromley and little Bentley in the Bronze Age section appears inconsistent as it relates to Roman Road. Certain non-designated assets that appear on the Historic Environment Record have been described as ‘low value’ this is very questionable and needs reassessing.

Regarding the Historic Environment, the Council is thoroughly disappointed that relevant policies in Tendring District Council’s adopted Section 2 Local Plan are not referenced. The Landscape Character Area surrounding the proposed East Anglia Connection Node (EACN), with its wide, open, endless rural horizons, will be irrevocably changed by the construction of the EACN and the associated pylons extending towards Colchester, impacting Ardleigh. The scale of the EACN and the height of the pylons will be visible from significant distances, introducing an intrusive industrial visual aspect to an otherwise uninterrupted open, rural setting.

In conclusion, this proposal introduces substantial and wide ranging negative impacts on the local area and many questions remain unanswered. All these issues are avoided through the proper consideration of an off-shore solution.

## **Mitigation Measures**

The Council acknowledges and accepts its role as a consultee on Nationally Significant Infrastructure Projects and not the determining body along with the possibility, despite all the reasons the Council objects, that a DCO could succeed and permission is granted for the Norwich to Tilbury proposals. Without prejudice to its strong objections to the scheme, the Council would seek the strongest package of mitigation in the event that consent is granted in an attempt to address the significant impacts highlighted above.

It is the Council's view that impacts of climate change and efforts to mitigate it are unevenly distributed. A just transition aims to maximise the benefits of climate action and minimise negative impacts on those most affected. The transition to renewable energy should be fair, inclusive, and create positive opportunities for all. Currently, Tendring, as a host authority, is experiencing a disproportionate level of the negative impacts and thus the Council should expect a stronger focus on mitigation than might be expected in other locations along the proposal's route, along with some significant and tangible benefits.

The proposed Ardleigh EACN on its own will bring about substantial impacts – but when considered in combination with the potential nearby customer sub-stations for North Falls, Five Estuaries and potentially the Tarchon interconnector, the impacts will be overwhelming and concentrated on the locale of nearby communities. The cumulative impacts of these developments are not being addressed by any agency or stakeholder in a properly coordinated manner and thus any mitigation package – particularly relating to landscape and transport impacts ought to be substantial and designed comprehensively to avoid years of uncoordinated disturbance and a damaging patchwork of landscaping schemes.

Particular consideration must be given to the strict control of construction traffic – confining it to clearly defined routes and limitations to working hours that minimise the noise impacts during quieter periods when background noise levels are lower and the tranquillity of the countryside can be best maintained.

Increases in HGV traffic throughout the construction phase and the lifetime of the projects, the combined effects of visual blight, environmental blight all point to detrimental impacts across our communities, environment and economies for which mitigation will need to be substantial, comprehensive and planned from the outset. Issues that are all avoidable with an offshore solution.

## **Community Benefit**

Again, without prejudice to the Council's strong in-principle and reasoned objections to the current scheme, it accepts the possibility that the DCO could be granted. As well as mitigation to minimise the substantial impacts, the Tendring community – as the epicentre of the project – ought to be able to expect significant social and economic community benefits, commensurate to the significant impact that the development will bring.

In terms of delivering social value the Council expect to see legacy funding for the lifetime of the project to ensure current and future generations of Tendring residents can reap the benefits of employment in the green energy sector. Thus a significant package of legacy funding commitments to fill the gaps in green energy skills starting with education and moving up onto training and employment will be requested. Social value has particular relevance in Tendring where there is a high

danger that the transition to green energy and the positives around it in principle, could exacerbate existing deprivation issues in particular locations thus making it socially unjust.

The Council will seek to engage with National Grid on a without prejudice basis as to how they can support our communities and the DCO must insist on the use of local providers wherever possible and supporting our ambition that allows our workforce to become highly skilled across the renewables sector. The Council would expect to see community benefits that are tangible and genuinely impact the lives of those who will be blighted by these proposals should they be accepted. In line with the Council's own forthcoming planning policies to promote active travel and improve people's health and social outcomes, the Council will want to explore investment in the district's strategic cycle infrastructure particularly along the coast affected by the offshore elements of the associated Five Estuaries and North Falls schemes enabling both commutable and leisure routes. This will support our residents in accessing existing infrastructure by being able to make active travel choices they will also support our leisure and tourism strategic aims.

To support the fight against climate change and to enable residents to access measures that will improve both the energy efficiency and affordability of their homes, a sensible proposition could be a package of funding, available to those households located within an agreed proximity and thus most affected by the Norwich to Tilbury proposals, for retro-fitting existing properties with an appropriate combination of insulation and energy efficient technologies such as heat pumps and/or solar panels in excess of any funding currently available via government.

It will also put forward a case to secure funding for the acquisition and/or remediation of property in the Freeport area to maximise investment opportunities in the green energy sector and future local employment. Given Tendring's location at the epicentre of Norwich to Tilbury, North Falls, Five Estuaries and potentially Tarchon, it would be perverse and socially unjust if locations like Harwich and the A120 corridor cannot be placed the forefront of innovation and employment in the green energy sectors and thus efforts and funding to achieve that must be maximised.

In its position as local authority representing the concerns of affected communities, this Council would like to acknowledge and welcome the fact that Parish Councils and local residents will have produced and submitted their own responses to this consultation setting out both their concerns about the proposals and various suggestions for mitigation. Ardleigh and Little Bromley Parish Councils in particular have invested considerable time and effort in campaigning, obtaining local information, drawing upon valuable local knowledge and formulating reasonable mitigation suggestions. Tendring District Council thanks the Parish Councils for their work and would insist that if National Grid genuinely values positive and proper community consultation and engagement, it must give their representations full and serious consideration.

### **Summary of the Council's position**

Tendring District Council remains strongly opposed to the Norwich to Tilbury powerline scheme and associated EACN within the Tendring District for the following reasons:

- A more appropriate offshore/seabed solution and emerging technologies have still not been properly considered as alternatives – solutions that would eliminate the vast majority, if not all, of the concerns raised about the impacts of the current proposal;
- The proposal will have a number of significant environmental and community impacts that must be considered cumulatively with other schemes including Five Estuaries, North Falls and

the potential Tarchon interconnector; and which could all be avoided through an off-shore solution; and

- The proposal still raises numerous unanswered questions, leaving fears that the concerns raised by our communities have not been properly considered or taken seriously.

If the Council and the residents of Tendring are forced to accept that a DCO is to be granted and the Norwich to Tilbury and other associated developments are to proceed, the mitigation required to minimise the impact on the countryside and the transport network will need to be substantial, comprehensive and commensurate to disproportionate impact of the overall scheme on Tendring and, in particular, the Lawford, Ardleigh and Little Bromley area.

Furthermore, if the development is to go ahead, it is only right that local residents reap a commensurate level of community benefit given the focus of negative impact on Tendring. Maximising the potential for local people to obtain skills, training and employment related to the development itself and associated growth in the green energy sector will be something the Council will want to explore with National Grid – particularly given the role of Harwich and the A120 corridor at the heart of Freeport East. Funding for local community projects, widening and improving the district's walking and cycling network and any other incentives for those residents most affected by the schemes should be explored.

All of the above is without prejudice to the Council's strong objection to Norwich to Tilbury and strong view shared with other authorities and interested parties that alternative solutions need to be properly considered.

Yours Sincerely



Gary Guiver

**Director of Planning**

**Tendring District Council.**

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