

Langham Parish Council's Response to National Grid's Statutory Consultation on the Norwich-Tilbury Project

Objection to the Scheme

Whilst accepting the need to move power from the North Sea to London, Langham Parish Council objects to the current National Grid Norwich to Tilbury pylons proposal. This is on the basis of the arguments set out in consultation responses in 2022 and 2023 by this Parish Council, Colchester City Council, Essex County Council, the Essex Suffolk Norfolk Pylons action group and our MP Sir Bernard Jenkin, whose submissions, including to this Statutory Consultation, we endorse.

Consultation has been, and remains, seriously inadequate. Valid alternatives have not been adequately presented and assessed and the harm of National Grid's preferred solution significantly outweighs the benefits.

Alternatives that need to be properly evaluated, on a whole life cost basis, include a fully integrated offshore grid, and an HVDC system from Norwich to Tilbury via undergrounding and/or subsea. The subsea option includes a platform for Five Estuaries and North Falls offshore windfarms, which we welcome.

We specifically endorse the following extract from our MP's response to this consultation:

"Fundamental flaws exist in the design and needs-case for the components of the Norwich to Tilbury project in this constituency.

National Grid have repeatedly stated that the Norwich to Tilbury project would follow a different path without the East Anglia Connection Node. In turn the need for the East Anglia Connection Node is driven by two windfarms, both of which have offered to connect offshore, together with the Tarchon Interconnector. The Tarchon Interconnector is a commercial venture for the good of its shareholders which, per Arup and ESO does nothing to contribute to UK Energy Security whilst destabilising the domestic network and increasing bills for UK consumers by approximately £5bn. The Tarchon project drives unnecessary infrastructure that impacts the Dedham Vale National Landscape without adequately addressing existing network limitations.

As Member of Parliament for Harwich & North Essex, I strenuously object to the inclusion of the EACN within your proposals and the resulting damage caused. North Falls and Five Estuaries must connect offshore under the Offshore Coordination Support Scheme and Tarchon should be discontinued as against the National Interest, contributing as it does to a greater problem, not a solution.

Although they have not consulted on these, National Grid have identified alternative routes to those proposed in the Norwich to Tilbury project in their Strategic Options Lookback Review. One of these, EAS1, provides a solution in the event that the EACN is removed and is said to be approximately £140 million cheaper than Norwich to Tilbury. In reality this is likely to be an underestimate of the saving as it does not take account of offshore coordination and hence underground cable tracts to bring both windfarms into connection which would not be required. Alternatively, ESO identified Alternative 5b which, modified to remove the EACN, provides another alternative said to be deliverable at comparable cost but dramatically lower impact.

National Grid have repeatedly acknowledged that their existing plans risk significant harm to the Dedham Vale and have offered an inadequate section of undergrounding in mitigation. Despite this, damage to the landscape and setting of the Dedham Vale will continue to be severe. National Grid

highlights that up to 60 pylons will be visible from single locations within parts of the National Landscape and that across wide sections of the Dedham Vale full pylon structures will be visible. This analysis is faulty because of artificial 'cutoffs' employed. Studies which correct for these shortfalls demonstrate that reality will be far worse.

If despite the existence of less damaging alternatives plans are not modified, then National Policy sets out clearly that even residual impact to a National Landscape is unacceptable in planning terms. NPS-EN5 now dictates that the entire line of pylons from TB1 at Ardleigh to TB41/42 beyond Little Horkesley must be removed and the cables undergrounded, save for a small section near to Ardleigh where National Grid argue engineering infeasibility.

This infeasibility may be true, but is caused solely by a very poor choice of site for the East Anglia Connection Node (EACN) and the problem is one of National Grid's own making. This site is unsuitable and the EACN must be removed or an alternative site must be found. The Sealing End Compound west of Little Horkesley is similarly affected and must be moved further south to a location from which it and associated pylons are not visible from within the Dedham Vale. Since January 2024 National Policy makes it clear that re-siting and rerouting are required even if this causes a longer run of cable and, that being in the context of the Dedham Vale National Landscape, cost is not an appropriate consideration."

Langham Parish Setting & Context

Langham Parish forms a roughly north-south aligned rectangle of approximately 3,000 acres situated to the north of Colchester, with an overall population of just over 1,000 people. It is helpful to think of the Parish in terms of northern, central and southern sections, each of roughly 1,000 acres in size. **'Langham North'** lies entirely within the designated Dedham Vale National Landscape (formerly Dedham Vale AONB) and is a protected landscape. **'Langham Central'** is semi-rural with a mixture of farmland, some modest ribbon development of residential housing supporting a population of about 800 residents, and three small business parks in rural settings. **'Langham South'** is primarily open agricultural land, dotted with a small number of homes, a solar farm and one fairly large business park. Each section of Langham will suffer major (but different) primary mechanisms of harm during the initial construction and the subsequent operation of the proposed Norwich-Tilbury power lines project.

'Langham North' forms the very rural heart of the Dedham Vale nationally protected landscape, centrally situated between the more famous "Constable Country" villages of Dedham, Stoke by Nayland and Nayland. Here one will find St. Mary's Church, perched on the southern lip of the Dedham Vale, and providing John Constable's *most frequently* used viewpoint for several of his most famous paintings of Dedham Vale. *Appendix 1 lists just 10 examples of these works.*

The proposed trenching work through this treasured landscape will catastrophically scar it for several years both during and after the initial construction phase. This disruption cycle will then be repeated every ~40 years when the underground cabling reaches the end of its design life and needs to be replaced again and again. *Appendix 2 shows Langham Parish in grey, with all the land to the north of the bold purple line sitting within the Dedham Vale National Landscape.*

'Langham Central' houses about 80% of the Parish's population, centred around School Road which boasts a Community Centre, a Community Shop, a Pre-School, a public Recreation Ground, two Schools and a Village Pub. Immediately to the north lies the beautiful semi-wooded valley of the

Black Brook, which lies within the management remit of the Stour Valley Project Area abutting the Dedham Vale National Landscape. *Appendix 3 shows the designated Stour Valley Project Area sitting between the teal and purple lines.*

The proposed HGV access routes to the trenching areas will cause huge disruption to village life here for several years during the construction phase, overloading a number of minor roads that are totally unsuitable for the high volume of heavy vehicular traffic required to complete the installation work.

'**Langham South**' consists primarily of a flat open plateau of prime agricultural land with a smattering of residential houses, one large business park, and an extensive solar panel farm. Current project proposals envisage a long line of 50m pylons dissecting this area into two halves, with minimal scope for visual screening.

Harms Caused by the Project

Heritage

Langham North forms a large part of the central swathe of the Dedham Vale National Landscape. It can justifiably be considered to represent the very heart of "Constable Country" named in honour of England's most famous landscape artist, John Constable (b. 1776, d. 1837). The majority of the artist's works depicted the classic rural English landscape to be found in Dedham Vale, and *by far his most used viewpoint* was from close to St Mary's Church in Langham and indeed the very top of the Church Tower itself. The views in these paintings are generally recognisable and largely unchanged today, more than 200 years after they were painted.

The unspoilt rural landscape of Dedham Vale is much treasured by local residents and also attracts many visitors from across the world. The huge and long-lasting scarring of this landscape that will be caused by the 100m+ wide trenching swathe is in direct contradiction of **Section 245 of the Levelling-up and Regeneration Act 2023**, which requires all relevant authorities to seek to further the purpose of the designated landscape. For National Landscapes, this purpose is "conserving and enhancing natural beauty".

Archaeology

The project construction works are highly likely to destroy a significant number of archaeologically important sites within the Parish. Neolithic artefacts and evidence of an ancient settlement have been found in the fields close to Glebe House and Glebe Cottage, just east of Rectory Road (eg. follow this link: finds.org.uk/database/artefacts/record/id/1136150). Cropmarks in North Langham, close to the River Stour, show many circular patterns which are believed to be 4,000 year old burial mounds from the early Bronze Age. 2,000 years later the Romans built a villa close to the River Stour. Local Roman finds have included bricks, tiles, oyster shells, coins and a finger ring. The Roman Road from Colchester into Suffolk ran along the eastern edge of the Parish. The Saxons later established a settlement here, given the name Laingaham and mentioned in the Domesday Book of 1086. All of these sites lie directly in the path of the power line trenches and will be obliterated.

Environment, Habitat, Species

A team of concerned residents and Parish Councillors walked the entire project route through the Parish, together with a Colchester City Councillor, on the 26th June 2024. We estimated that over 900 trees will be permanently felled, without reinstatement, across the Parish. Trees to be lost include:

- Several prominent specimen trees close to the River Stour within the Dedham Vale National Landscape
- Close to 100 trees currently forming two decorative tree-lined avenues on the approach roads to Glebe Farm and Ewens Farm, just south of St Mary's Church
- Several hundred mature trees in nationally designated Deciduous Woodland surrounding the Black Brook
- Mature ancient specimen trees on Perry Lane and Langham Lane

In addition to the tree loss, a number of mature hedgerows will need to be removed, including several historic hedgerows within the Dedham Vale National Landscape north of St. Mary's Church.

The Black Brook habitat is home to otters, eels, freshwater mussels and many other species including reptiles and bats, all of which will be totally disrupted by the proposed trenching route.

Much of the land close to the River Stour is very wet and prone to flooding, which will complicate the construction and trenching activities across the river flood plain. There will inevitably be huge disruption to wildlife, flora and fauna along the River Stour corridor passing through the heart of the Dedham Vale National Landscape. National Grid appears to have totally underestimated the potential practical difficulties and environmental impacts in this floodplain, as explained in more detail in Stratford St. Mary Parish Council's response to this consultation.

Landscape

The Landscape of Dedham Vale has achieved worldwide fame as "archetypal lowland pastoral English countryside", primarily through the works of John Constable, but also Thomas Gainsborough and more recently Alfred Munnings. It has rightly been protected as an Area of Outstanding Natural Beauty for over 50 years since its official designation in 1970. In 2023 it was re-designated as a National Landscape with further increases to the protections offered to it.

National Grid's decision to use underground AC multi-cabling rather than pylons will in no way save this small protected National Landscape from utter devastation over many years. Construction is likely to take several years, reinstatement will take several more years, and the whole process is then likely to become a repeating cycle every 40 years or so due to the finite design life of the cabling system. It frankly beggars belief that such desecration can be proposed within one of our most cherished National Landscapes.

Additionally, National Grid appears to have totally ignored recent changes to National Policy Statement EN5, which came into force in January 2024 and which contains specific wording designed to put beyond doubt the question of whether cables adjacent to a National Landscape should be underground.

In **Langham South**, a long line of pylons are proposed to march across an extremely open rural landscape, with minimal opportunity for any screening or visual softening.

Proximity to houses

The construction swathe passes within 200m of approximately 75 homes within the Parish, resulting in stress, uncertainty and direct adverse financial impact on house values and house saleability for all affected homeowners. No compensation packages have currently been put in place.

Proximity to businesses

The construction corridor passes close to several businesses within the Parish, with economic impacts ranging from significant up to catastrophic in the case of Langham Hall Estate, a 500 acre estate set entirely within the Dedham Vale National Landscape and offering a range of outdoor leisure pursuits and holiday rentals. Appropriate compensation packages have not yet been put in place.

Roads

Langham's road network comprises a small number of main village "artery" roads, supplemented by a larger number of much smaller rural lanes, many of which are single track with very few passing spaces. The impact of high volumes of large construction vehicles on **Langham Central's** "artery" roads will undoubtedly cause significant congestion, delays and noise for all village residents over a period of two to three years or more. The smaller rural lanes in **Langham North** and **Langham South** are totally unsuitable for HGV traffic, and mis-routed HGVs could easily become totally stuck causing serious road blockages for residents living along these country lanes.

National Grid's own projected figures for likely vehicle movements indicate a particular problem for the junction between Wick Road and Perry Lane, which they suggest will see a **1458% increase** in HGV movements compared to the projected baseline immediately prior to the start of construction.

This increase is actually likely to be an underestimate, because the projected baseline of 4 HGV movements per day seems unrealistically high for a dead-end lane serving only a dozen homes.

Agricultural Land

Landowners who are required to host pylons and/or underground trenching on their arable land in Langham Parish are all opposed to this project. The placement of pylons and trenching as planned will create legal restrictions on the ability to access and farm the land effectively, with no current plans for any compensation. The land used for haulage roads will take many years to recover as it will no longer drain naturally. And in the trenching zones, these problems will not constitute a one-off impact, but a repeating cycle due to the periodic need to replace the power lines every ~40 years.

Public Rights of Way

Trenching activities across the Dedham Vale will completely sever two very important long distance public footpaths: the Essex Way and the Stour Valley Path. Both of these routes are well-used and important for green tourism business in the area. They are also regularly used for large annual trail running events such as the SVP100, SVP50 and the Essex Way Ultra attended by hundreds of people each year. Disruption is likely to be caused for 2-3 years during the initial project construction phase, with visual harms continuing for several more years after construction completion, whilst the landscape gradually recovers.

In addition to the disruption to these two nationally known footpaths, at least 9 other local footpaths in the Parish will be disrupted (footpaths no 1, 3, 17, 20, 21, 22, 44, 45 and 54), seriously affecting local residents' ability to enjoy the peaceful rural landscape.

Breaches of Holford Rules

Langham Parish Council believe there to be 4 breaches of Holford Rules:

1. *Choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological significance.* Breach: 'Significant negative' impacts on designated heritage

sites are apparent and admitted. The use of underground AC cabling through the Dedham Vale National Landscape actually maximises rather than minimises the negative impacts when compared with HVDC cabling, either underground or better still offshore.

2. *Choose tree and hill backgrounds in preference to sky backgrounds.* Breach: the pylon route through Langham South will create extensive sky backgrounds.
3. *Protect existing vegetation, including woodlands and hedgerows.* Breach: There is to be extensive destruction of trees and hedgerows, important nationally designated deciduous woodlands, mature and ancient hedgerows, two decorative tree-lined avenues, and several large specimen trees within the Dedham Vale National Landscape.
4. *Avoid routing close to residential areas as far as possible.* Breach: the long line of pylons to be installed in Langham South will pass within 1km of approximately 40 residential homes and within 200m of approximately 12 residential homes.

Consultation Deficiencies

Langham Parish Council is of the unanimous view that it has not been consulted in a way that is open, fair or transparent. Neither the Council nor any local residents were consulted when the proposals were at a formative stage. The route was pre-determined. The decision for pylons was also predetermined. This is wholly against the Gunning Principles.

National Grid has made no attempt to assess the adverse impact of the proposals on the mental health and wellbeing of affected residents. This is an important omission in the process.

National Grid has made no attempt to assess the adverse effects of the proposals on property prices and property saleability. This is an important omission in the process.

National Grid do not seem to be aware of the presence of businesses in the area and have not assessed the adverse impacts upon them.

Further specific deficiencies include the following:

1. The maps sent to householders are large scale area maps, generic and lacking in important detail and a clear explanatory key to symbols used
2. The interactive online map does not show homes other than listed buildings
3. Internet access is required to fully access the proposals and their supporting information
4. The public consultation/information events have been held at times that exclude many working people from attending
5. The supporting documents on National Grid's website are not labelled or indexed in a way that makes them straightforward to access and search. It seems that information is being deliberately obscured

Mitigation Opportunities

As stated in the introduction to this document, Langham Parish Council is of the unanimous view that the current consultation process has been inadequate and that serious alternative solutions to the proposed pylons need to be transparently assessed before a definitive decision on implementation can be made.

If, nonetheless, the current project gains approval, then Langham Parish Council seeks further mitigation as follows:

- The re-planting of all hedges that are removed during construction (where these do not pose a proximity risk to underground power lines)

- The planting of replacement trees wherever possible, either in-situ or in suitable nearby locations
- The putting in place of clearly marked diversions to the Essex Way and Stour Valley Footpath throughout the full construction period
- Serious investigation of the feasibility of creating a temporary new construction works entrance directly off the A12 on the north side of Perry Lane, to avoid HGV mayhem on the residential roads of Park Lane/Wick Road/Perry Lane
- A programme of planting and screening for the route of any pylons through the Parish, to mitigate the impact of their intrusive height and to compensate for habitat loss, by the implementation of a Biodiversity Net Gain project that will benefit the local community
- The provision of realistic financial compensation packages for the serious economic and welfare harms to the owners of residential properties, agricultural land and other businesses situated close to the Pylon and Undergrounding routes.

Langham Parish Council

25th July 2024

Appendix 1: Partial List of John Constable's Paintings Depicting Dedham Vale from close to St Mary's Church in Langham

Dedham Vale and Church (1800)

The Vale of Dedham (1808)

Dedham Vale: Morning (1811)

The Glebe Farm (c. 1830)

The Glebe Farm (1830) – Tate National Gallery

The Vale of Dedham (1828)

Dedham Vale (1802) – Victoria & Albert Museum

Dedham from Langham (1813) – Tate National Gallery

Dedham from Langham (1820)

The Glebe Farm (1827) – Detroit Institute of Arts

Appendix 2: Langham Parish and the Dedham Vale National Landscape

Langham Parish is shown with a grey overlay.

The Dedham Vale National Landscape boundaries are shown with a bold purple line.

Map credit: Tom Fairbrother, National Landscape Communications Officer



Appendix 3: Langham Parish and the Designated Stour Valley Project Area

Langham Parish is shown with a grey overlay.

The designated Stour Valley Project Area lies between the bold teal line and the bold purple line.

Map credit: Tom Fairbrother, National Landscape Communications Officer

