**Offton & Willisham Parish Council Response**

**for the**

**Norwich to Tilbury Pylons/Trenching Statutory Consultation 2024.**

The Parish Council of Offton & Willisham is formally objecting to National Grid's Great Grid Update proposal due to the significant adverse impacts it will have on the villages and its communities.

While accepting the need to move power from the North Sea to London, Offton & Willisham Parish Council objects to the National Grid Norwich to Tilbury pylons proposal.

This objection is based on the arguments set out in consultation responses in 2022 and 2023 by this Parish Council and by the Essex Suffolk Norfolk Pylons action group, whose submissions, including to this Statutory Consultation, we endorse.

Consultation has been and remains inadequate, valid alternatives have not been presented and the harm of National Grid’s preferred solution, significantly outweighs the benefits.

The Parish Council of Offton & Willisham urges National Grid to reconsider the route and scope of the Great Grid Update. We advocate for alternative solutions that would bypass our parish or implement underground cabling to minimize visual and environmental impact. We believe that preserving Offton's unique environmental, historical, and social fabric is of paramount importance and that any development should strive to protect these irreplaceable assets.

We respectfully request that our objections be taken into account and that a comprehensive review of the project's impact on Offton be conducted. It is essential that any decisions made prioritize the preservation of our parish's character and the well-being of our community.

Alternatives that we support are:

* A fully integrated offshore grid
* Or HVDC\* from Norwich to Tilbury, either underground or subsea. The subsea option includes a platform for Five Estuaries and North Falls, which we welcome.

**Introduction to Offton & Willisham**

Offton & Willisham is a very rural parish in Mid Suffolk, characterized by its rich heritage, natural beauty, and tranquil environment. We believe that the proposed development will irreparably harm our community in across a number of key areas:

1. **Environmental Impact:**

Offton is home to Middlewood, a medieval coppice and a designated biological Site of Special Interest. Middlewood boasts a diverse ground flora typical of ancient woodland, with species such as common twayblade, early purple orchid, and butterfly orchid thriving under the canopy of predominant oak trees. The construction activities associated with the Great Grid Update pose a significant threat to this delicate ecosystem. Disruption to the soil, that could lead to a loss of biodiversity and the irreversible degradation of this ancient woodland.

We have thriving wildlife in and around the Parish with a large following of residents. Not only are there a varied amount of birds, such as Barn Owls, Little Owls etc, there are Doormice, Otters, Deers, Water voles and Bats, both of which are extremely sensitive to the area in which they live. They are a testament to the peace and serenity that Offton provide.

This peace and serenity will be taken away by a development of this kind in this particular site. The truly green environment that is Offton & Willisham and the thriving and settled wildlife would be decimated by this Great Grid Update.

The development would cause long term damage, loss to more than just the residents, it would be loss of wildlife which has taken time to develop, the loss of local views, used by many as an aid to leisure and sightseeing and the loss of quality of life. Because of the small nature of the parish, the proposed development would have an even greater impact and long term cumulative effect to degenerate the environment once thriving for both resident/public and wildlife alike.

There is no consideration in the current consultation material of the environmental impacts (in either relative or absolute terms) of the discounted alternatives. The Consultation documents talk in very high level terms about landscape, nature and heritage designations which could be affected. Note the use of the word ‘could’. This is not an assessment or study of the actual environmental effects.

National Grid has not evaluated the relative environmental impacts of the preferred route corridor against the alternatives which involve no or considerably fewer pylons. This failing is exacerbated by the fact that National Grid is under a legal duty, pursuant to paragraph 1(1) of Schedule 9 of the 1989 Electricity Act, “when formulating” its proposals to the “to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archeological interest” and to “do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects”.

In the present case, the proposals have already been formulated, without consideration of how the impacts of the preferred route on these statutory considerations compare to the impacts of alternatives which involve no or considerably fewer pylons.

1. **Heritage and Landscape:**

The village of Offton & Willisham has a substantial proportion in comparison to total dwellings of Grade 2 listed properties, which contribute to the historical and architectural fabric of our community. The visual intrusion of modern infrastructure associated with the Great Grid Update will detract from the aesthetic and heritage value of these properties. Moreover, due to the proposed route, the construction process poses a risk to the structural integrity of these historic buildings, which are particularly sensitive to vibrations and other disturbances.

Offton & Willisham Parish Council vehemently opposes the Great Grid Update proposal by National Grid, due to the detrimental impact it would have on the rural setting and character of our community. Offton & Willisham’s charm lies in its idyllic countryside, characterized by vast fields, winding single-track roads, and unspoiled natural landscapes. The proposed grid update threatens to irreversibly alter this rural setting, jeopardizing the very essence of our community.

First and foremost, the installation of large-scale infrastructure, (transmission towers and overhead power lines), would visually mar the pristine countryside that residents cherish. These imposing structures would disrupt panoramic views of the surrounding fields and skyline, detracting from the rural beauty that attracts residents and visitors alike. This plan will also detrimentally impact the value of local properties.

Furthermore, the construction process itself would cause significant disturbance to the tranquility of our rural environment. Heavy machinery, construction vehicles, and increased human activity would disrupt the peace and quiet that residents value, creating noise pollution and visual eyesores amidst the serene landscape.

Additionally, the potential disruption to agricultural activities cannot be overlooked. Offton's economy relies heavily on farming. The construction of the grid update could encroach upon valuable farmland and disrupt farming operations.

We have separately called out that the introduction of new infrastructure may have adverse ecological impacts on local wildlife habitats and biodiversity. The disruption to natural ecosystems could result in the loss of habitats for native wildlife, flora and fauna, further eroding the rural character of our community.

With National Grid’s own documentation calling out that:

The LCT would be directly affected by construction activity at RG185, southwest of Willisham Tye, between RG189 and RG190, west of Offton, between JC013 and JC018 near Washbrook Street, and along the proposed cable route north-west of Stratford St Mary, within Dedham Vale National Landscape.

There would be construction activity and equipment associated with the construction of the overhead line as well as the temporary diversion and undergrounding of existing 132 kV overhead lines to accommodate the Project, between Offton and Somersham, to the south-east of Bramford Substation and north of Washbrook Street. The introduction of temporary construction compounds, temporary and permanent access tracks, temporary drainage works, trenchless crossings, temporary road crossing protection and material storage areas, cathodic protection of pipelines and works to third party infrastructure would also have direct effects. There would be disturbance to arable farmland, including the loss of some hedgerow trees, and the margins of woodland blocks. The LCT (Landscape Character Types) would also be indirectly affected by construction activity.

In view of the heritage in and around Offton, and with National Grid calling out the significant impact – Offton & Willisham Parish Council requests:

* Further Assessment: Conduct a detailed assessment of alternative routes that may have a lesser impact on Offton and surrounding areas. This would include evaluating the feasibility of underground cabling in specific sections to minimize visual and environmental disruption.
* Mitigation Strategies: Develop comprehensive mitigation strategies to address the impacts on the LCT, including but not limited to the restoration of affected farmlands, replanting of hedgerows and trees, and measures to protect the integrity of woodland margins.
* Community Engagement: In view of the wholly lacking Consultation process, engage in ongoing dialogue with Offton & Willisham Parish Council and other local individuals, to ensure their concerns are continuously addressed and that they are kept informed of any changes or developments in the project plan.
* Environmental Monitoring: Implement a robust environmental monitoring program to track the impacts of construction and ensure compliance with all environmental protection standards throughout the project duration.

Offton & Willisham Parish Council are also taking an opportunity to remind National Grid that within the Preliminary Environmental Information Report, the following is stated:

“the LCT would be directly affected by the Project at RG185, south-west of Willisham Tye, between RG189 and RG190, west of Offton, between JC13 and JC18 near Washbrook Street, and along the proposed cable route north-west of Stratford St Mary, within Dedham Vale….. The effect on the LCT would likely be significant (negative) within approximately 0.5 km of the Project”

In view of comparisons being made to impact to that of Dedham (where undergrounding is being proposed), the same proposal should apply to Offton. Offton & Willisham Parish Council would like to specifically understand why the impact of overgrounding is being mitigated different for two areas where the impact is the same.

Offton & Willisham are also taking the opportunity to remind National Grid that the majority of Offton is serviced by a single track road with limited passing opportunities or footpath. The increase in proposed traffic during construction (as identified by National Grid as part of its preliminary assessment) will mean a 50% increase is road use for a road that is wholly unsuitable to large vehicles and will increase the risk to pedestrians who have no pathways.

**3. Public Footpaths and Bridleways:**

Offton boasts ancient public footpaths and numerous public bridleways that are integral to the recreational and cultural life of our residents. These pathways not only provide routes for walking, cycling, and horse riding but also serve as conduits through which the natural beauty and heritage of our parish can be experienced. The proposed development will likely necessitate the closure or rerouting of these paths, disrupting community access and enjoyment. The potential for long-term or permanent closure is a grave concern.

**4. Community and Social Impact:**

Our parish is characterized by its rural tranquility, which fosters a close-knit community atmosphere. The presence of large-scale infrastructure projects and the associated increase in noise, traffic, and industrial activity will disturb this peace and diminish the quality of life for our residents. The impact on mental well-being and community cohesion cannot be understated.

**5. Tourism and Local Economy:**

Offton & Willisham’s natural beauty and historical significance attract visitors, contributing to the local economy. Middlewood, the public footpaths, and our Grade 2 listed properties are key attractions. The degradation of these assets will likely result in a decline in tourism, adversely affecting local businesses that depend on this influx of visitors.

**6. Local Traffic**

As a rural community characterized by single-track roads, Offton & Willisham is ill-equipped to accommodate the influx of construction traffic and ongoing maintenance vehicles associated with the proposed grid update. The narrow roads and limited passing places present serious safety hazards, particularly when encountering large construction vehicles or heavy machinery.

Furthermore, the increased traffic volume would not only disrupt the daily lives of residents but also pose risks to pedestrians, cyclists, and equestrians who very frequently utilize these roads. The safety of the village residents must be prioritized. The anticipated surge in vehicular activity will have a devasting impact on the villages.

Moreover, the potential for road damage and degradation of rural roads, due to the heavy construction traffic poses long-term concerns for the maintenance and upkeep of our already strained single track local roads. Any deterioration in road conditions would further exacerbate safety risks and impose financial burdens on the local council for repairs and maintenance.

Turning now to the Statutory Consultation Process, in view of the significant proposed impact to Offton & Willisham, the Offton & Willisham Parish Council wishes to express its concerns regarding the effectiveness of the Statutory Consultation conducted by National Grid for the proposed Great Grid Update. Our community has raised several significant issues that we believe must be addressed to ensure a fair and comprehensive consultation process:

1. **Overreliance on Digital Media:**

The consultation heavily relies on digital media to disseminate information and collect feedback. This approach is problematic in a community where not everyone is digitally literate or has reliable internet access or tools to review the information provided. Many residents, particularly older individuals, struggle with navigating digital platforms, which has led to their exclusion from the consultation process.

Many residents have found the paper information provided by National Grid to be insufficient and lacking in clarity. The materials available do not adequately explain the full scope and impact of the project, making it difficult for the community to make informed responses.

1. **Inaccessible Drop-in Events:**

The drop-in events organized for the consultation have not been accessible to a significant portion of our population. Many of these events were held in locations that were difficult for immobile residents to reach. Additionally, the timings of these events were not conducive to individuals who work full-time, which significantly impacted the ability of residents to take part in the drop in event.

Individuals with disabilities or those without reliable internet access faced significant barriers to participation, thereby limiting the inclusivity of the consultation process.

The consultation process has not adequately reached all affected parties

1. **Inadequate Consideration for Rural Demographics:**

The consultation process does not adequately account for the unique demographics of rural communities like Offton and Willisham. A rural population and with residents with limited digital skills requires alternative methods of engagement, such as detailed printed materials and in-person consultations, to ensure their voices are heard. This has not been done therefore the evaluation of the impact and considerations of the plans would not have been done effectively for Offton & Willisham

1. **Timing and Scheduling Issues:**

The scheduled times for consultation events have been inconvenient for many working residents, preventing them from attending and participating fully which has resulted in our community not being able to engage with the consultation.

1. **Inadequate Consideration of Feedback:**

There is a prevailing concern that the feedback gathered from the public to date as part of the non statutory consultation did not genuinely consider feedback provided and that feedback was not integrated into the decision-making process.

1. **Bias Towards Approval:**

Offton & Willisham residents feel that the consultation process appears biased towards justifying the project rather than objectively evaluating its potential impacts based on public input. This perception undermines trust in the consultation's integrity and fairness.

1. **Alternative Options**

No alternative have been presented as part of the consultation process - a single preferred route corridor option is being consulted upon. Alternatives, in particular those involving no or considerably fewer new pylons (including underground and/or undersea cabling and/or upgrading existing infrastructure), have already been discounted by National Grid.

National Grid have confirmed as part of the Consultation document “We will continue to back-check and review the performance of all our options at each stage of our proposals to understand if there has been a material change”. The reference to “back-checking” further indicates that decisions have already been made to discount alternative options and National Grid’s approach is now confined to after-the-event rationalisation.

Offton & Willisham Parish Council would also highlight, fairness requires that interested persons be consulted not only upon the preferred option but also upon arguable yet discarded alternative options. For example, in R (Medway Council) v Secretary of State for Transport, Local Government and the Regions [2003] JPL 583 , the court held that, in consulting about an increase in airport capacity in South East England, the Government had acted unlawfully in consulting upon possible development only at Heathrow, Stansted and the Thames estuary and not also at Gatwick; and see also R (Montpeliers and Trevors Association) v Westminster City Council [2006] LGR 304, para 29.

This ‘fairness’ requirement has not been met and is wholly missing from the Consultation process.

1. **Lay Public Assessment**

The consultation falls short in light that the lay public consultees have not been provided with anything approaching a sufficient level of information in a language that is easy to understand, to enable them to make an intelligent comparison of the impacts of the option presented. Lay members of the public are not in a position to be able to assess the proposal or be able to commission an expert to do so on their behalf. The alternatives have been discounted without members of the public having been given a fair opportunity to scrutinise the rationale for that decision or having been given sufficient information about the alternatives to have a fair opportunity to advocate for those instead.

In closure, the Offton & Willisham Parish Council is turning its commentary to meeting the requirements of the Holford Rules.

The Great Grid Update fails to meet the requirements of the Holford Rules due to several key shortcomings:

1. **Necessity:**

There is insufficient evidence to justify the necessity of the Pylons in its current format. National Grid has not adequately demonstrated that the proposed changes are essential to address pressing energy demands or enhance grid resilience, especially considering alternative solutions such as undergrounding is a viable alternative.

1. **Economic Viability:**

The economic viability of the update is questionable. The project's costs may not outweigh its benefits, particularly if alternative, more cost-effective solutions are available. Furthermore, there is uncertainty surrounding the long-term financial implications for consumers and taxpayers.

1. **Public Interest:**

The update may not serve the public interest as intended. The lack of transparent decision-making processes and meaningful public engagement raises doubts about whether the project truly aligns with the broader interests and priorities of Net Zero

1. **Environmental Considerations:**

The update may have adverse environmental impacts that are not adequately addressed. Construction activities, habitat destruction, and landscape alteration could harm biodiversity, degrade ecosystems, and contribute to climate change, undermining the project's environmental sustainability.

1. **Community Engagement:**

National Grid's consultation process may fall short of meaningful engagement with affected communities. Concerns about accessibility, transparency, and the incorporation of public feedback raise doubts about the legitimacy of the decision-making process and the extent to which community interests are considered.

**Conclusion**

In summary, the Great Grid Update does not meet the requirements of the Holford Rules due to concerns about its necessity, efficiency, economic viability, alignment with public interest objectives, environmental impact, and community engagement practices.

All of the above issues need to be addressed as they are crucial for ensuring that the consultation process is fair, transparent, and effective in capturing the true sentiment and concerns of our community.

In R v North and East Devon Health Authority*, Ex pCoughlan [2001] QB 213 , para 108* concerned the closure of a home for the disabled, the Court of Appeal,in a judgment delivered by Lord Woolf MR, elaborated, at para 112:

“It has to be remembered that consultation is not litigation: the consulting authority is not required to publicise every submission it receives or (absent some statutory obligation) to disclose all its advice. Its obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.”

The Statutory Consultation to date has not met this requirement.

In addition, the Proposal needs to be re-evaluated, properly considered with viable alternatives options tabled with fully costed plans for all proposals submitted.

**Appendix:**

**Proposal to be properly considered and tabled as a viable alternative option to the current proposal**

In view of the concerns raised above, Offton & Willisham Parish Council request for the proposal to be revised and u**nderground High-Voltage Direct Current (HVDC) cables** to be used through the parish. We believe undergrounding of the HVDC cables offer several benefits over traditional Alternating Current (AC) cables, particularly in specific contexts such as long-distance transmission or undersea cables as below:

1. Reduced Transmission Losses: HVDC cables are more efficient over long distances. They experience lower electrical losses, making them suitable for transmitting power over large distances without the need for multiple substations along the route.
2. Stability and Control: HVDC systems offer better control over power flow, improving the stability of the network. This is particularly beneficial in connecting asynchronous grids or integrating renewable energy sources.
3. Lower Electromagnetic Fields: in view of the rural community that is Offton & Willisham, underground HVDC cables produce lower electromagnetic fields compared to AC cables and therefore less impact on the environment, farming and habitats.
4. Space and Visual Impact: Because HVDC cables can transmit more power over the same diameter of cable compared to AC, they can be more compact. This is particularly beneficial for underground or undersea routes, where space is at a premium and visual impact needs to be minimized. As is the case for Offton & Willisham
5. Technical Challenges with AC: For AC cables, especially when buried underground or laid underwater, the cable capacitance can lead to high reactive power generation. This can necessitate the use of compensating equipment along the route, increasing complexity and cost. HVDC does not have this issue, making it more efficient for such applications.
6. Flexibility in Network Design: HVDC allows for the transmission of power between grids that operate at different frequencies or are not synchronized. This flexibility can be crucial in integrating energy markets and renewable energy sources across borders.
7. Cost-Effectiveness for Long Distances: For very long distances, the lower operational costs and reduced transmission losses of HVDC can offset the higher initial costs associated with HVDC converter stations. This makes HVDC more cost-effective for long-distance and undersea cable projects.