



15 June 2022

East Anglia GREEN@nationalgrid.com

Dear Sirs

The East Anglia Green Energy Enablement Project

The Country Land and Business Association (CLA) represents over 26,000 members in England and Wales, and is the leading authority on the rural economy. Our members both live and work in rural areas, operating a wide variety of enterprises, and in the East of England, the CLA represents nearly 5,000 rural businesses. In Norfolk, Suffolk, and Essex, several hundred CLA members - who own and/or manage farms, estates and rural businesses - will be directly affected by the East Anglia GREEN project.

Impacts of the scheme

We recognise the need for the electricity supply network to be reinforced, given that with new nuclear, offshore wind, and interconnectors, generation will greatly exceed the capacity of the network. However, this project will have a considerable adverse visual impact on the landscape and on property values along the route and on some distance either side of it, and will cause significant local disruption during construction.

CLA members who have diversified their businesses into tourism make an extremely significant contribution to the local economy, providing employment and offering holiday accommodation, camping and glamping sites, wedding and event venues, and visitor attractions including heritage properties. Some of those in the preferred corridor are justifiably very worried about the visual impact of the proposed pylons, and the effect this will have on the surroundings; their clients and customers are influenced by the environment in which the venue is situated, including views and backdrop, in choosing to visit or use it.

Much of the route crosses high quality productive arable farmland, and while recognising that compensation will be payable, CLA farming and landowning members are concerned about loss of land to the pylons themselves, the “sterilisation” of the strip of land under the pylon line (meaning that, for example, farm development will be restricted), the effect on field-scale farming operations, and the reduction in value and amenity of the land itself. There will be considerable disruption during construction, again affecting farming operations.

Where substations will be constructed, or where existing substations are to be extended, their obtrusive height and area will again have an adverse impact on the surrounding area and on rural businesses nearby, as will construction traffic on narrow country roads.

Consultation on alternatives

We are very concerned that the presentation of this proposed overland route for consultation gives the public no chance to express their views on the comparative merits of an overground or an alternative viable undersea cable route. Indeed there appears to have been no public engagement or consultation on National Grid's decision to reject an offshore route, or for that matter, on an underground route; major underground electrical cable routes are proposed, or are already under construction in Norfolk.

As you will be aware, the Gunning principles, first set out in the case of *R v London Borough of Brent ex parte Gunning*, and subsequently reinforced in other cases, now form a strong legal foundation by which the legitimacy of public consultations is assessed. They are often referred to as a legal basis for judicial review decisions, and a key principle sets out that for a public consultation to be legitimate, proposals should still at a *formative* stage. In other words, *a final decision has not yet been made, or predetermined*, by the decision makers.

Since National Grid appears to have already decided upon its preferred option, and has rejected an offshore cable alternative, this consultation appears to run counter to the Gunning principles, and given the level of local opposition, is likely to be challenged in the courts.

We believe that alternatives to intrusive overhead pylons have not been adequately considered by National Grid, and should have been included in this consultation, and therefore:

- (1) further active consideration should be given to the installation of an offshore ring main which could form part of an offshore grid (to which the Government is committed) around the East Anglian coast, so that generation from offshore wind farms and continental supplies can be connected to it, reducing the need for further onshore electricity infrastructure. Indeed, we understand that National Grid itself has estimated savings of £6 billion per year for consumers from a coordinated offshore grid system. We have responded to a consultation on a viable offshore alternative, Sea Link 2 (SCD2). This is being actively supported by at least six MPs whose constituents are affected by the East Anglia GREEN proposals, and who believe, as do we, that an offshore grid network is better than the current piecemeal approach, and will ultimately prove cheaper. Although an offshore link would still be more expensive than an onshore alternative, the planning process would be quicker, there would be less environmental damage, and rural businesses and communities would be largely unaffected. When compensation, planning, and mitigation costs are taken into account, there may be very little cost difference at all.
- (2) if technical challenges mean that an offshore ring main cannot be developed in time to avoid the East Anglia GREEN project from going ahead, then the presumption should be that the cables are laid underground. This is what is proposed in the Dedham Vale Area of Outstanding Natural Beauty (AONB). We accept, however, that this is *not* the best alternative: the installation of underground cable routes is notably more expensive, involves considerable disturbance to owners and occupiers, and as well as requiring a significant working width while the laying of cables is carried out, can adversely affect soil structure, soil fertility, and field drainage systems.

(3) that the information provided by National Grid for its consultation is inadequate and lacking in detail. Providing maps of a corridor which varies widely in width along its length, and utilising a “graduated swathe”, gives rise to considerable uncertainty, and owners of land and property along the proposed route are unable to assess how much they will be affected. In the absence of more detailed information, they have to assume the worst.

In conclusion, we would ask for more information to be provided on the route itself, to enable those likely to be affected to assess the likely impact on them, that the consultation be extended to allow the public to express their views on the alternatives to this damaging scheme, and that a breakdown of estimated costs for each option be produced.

Yours faithfully

Tim Woodward MSc FRICS
Regional Surveyor
CLA East