

'Save our Valley'
c/o 11 Bucklands View
Nailsea
BS48 4TZ

4th January 2010

Hinkley C Connection Project
Consultation Response
PO Box 5689
London
W1A 4FG

Dear Sir/Madam

'SAVE OUR VALLEY' RESPONSE TO CONSULTATION ON ROUTE CORRIDOR OPTIONS FOR HINKLEY C CONNECTION PROJECT

Summary

'Save Our Valley' is a campaign group formed in October 2009 to raise awareness in the Nailsea-Backwell-Wraxall valley of National Grid's unexpected announcement of its proposed Hinkley C Connection Project. We have over 1,050 registered supporters, drawn from Nailsea, Wraxall, Backwell and beyond, and are reaching a wider community of groups, families and individuals through our website, events and other communication activities.

We have very serious concerns about National Grid's plans to link the new Hinkley nuclear power station into the UK's transmission network through installation of 400kV overhead cables to Avonmouth. These concerns are in relation to acknowledged risks to public health and safety, and to the potential damage to the natural environment, wildlife and our North Somerset landscape - with consequential impacts for biodiversity in the area, and on the quality of people's daily lives and the value of their properties.

'Save Our Valley' believes National Grid's proposition of two alternative route corridors for the new power lines risks presenting a false choice. Before resorting to above-ground routes, the company should be obliged to investigate other options, including undersea and underground corridors, fully and properly; the Optioneering Report is not sufficient for this purpose. Above all, we struggle to understand why it is being recommended that two coastal points should be linked by over-land power lines, noting elsewhere that National Grid's Chief Executive has described the proposed 'Western Undersea Grid' (linking Merseyside and Scotland) positively as a 'no-brainer'. The feasibility of an undersea route along the Severn Channel must be explored. Money should not be the critical factor in determining this matter (or other route options), particularly when costs can ultimately be shared across all the UK consumers who will benefit from the grid connection.

If the planning authorities nevertheless conclude that land-based routes can be adopted, we would like to be assured that other, less obviously damaging corridors – including along the M5 – have been properly considered. Here again, the consultation documentation contains many assumptions that we do not feel have been properly tested. Undergrounding of lines through key sensitive areas also needs greater consideration (although this clearly depends on local environmental assessments). Associated costs could again be shared nationally among all National Grid's customers.

Summary (continued)

Of the two corridors proposed in the consultation, we believe it would be wholly inappropriate to adopt Corridor 2, to the south and east of Nailsea and across to Wraxall. Here, as National Grid's own study shows, the impact on residential dwellings and settlements would be most severe, not least because in places the corridor is very narrow and the area is tightly constrained. The negative effects on wildlife, including bats and waterfowl that rely on access to Backwell Lake, would be significant. Loss of visual amenity and impacts on recreational access to the countryside for all in the area would be the most marked. Implementing a Corridor 2 option would also have the unacceptable and deeply unwelcome effect of encircling Nailsea with high voltage overhead transmission lines and this should be avoided.

Corridor 1, by contrast, is evidently wider, and we believe would offer greater scope for positioning the pylons and cabling more sympathetically, in terms both of line of sight and immediate impact on residents. The landscape effects, although significant, would be less severe, and we understand that this route would be less damaging overall to the natural environment. The option of placing cables underground for a short stretch on this route deserves serious consideration and assessment of benefits, impacts and costs. We could not support the addition of a 400kV line parallel to the two existing 132kV lines (Option 1B). Indeed, if this corridor were to be adopted we would argue that not only should Western Power Distribution's (WPD) existing Bridgwater-Avonmouth line be removed (as proposed in Option 1A), but the opportunity should be taken to re-site WPD's other 132kV line away from houses, following consultation with local residents. This, at least, would provide some benefit to our wider community, which will otherwise be suffering for others' benefit. The associated costs would be minor in the context of the overall connection project, and the building of the new Hinkley power station.

With the support of our local MP, Liam Fox, we recently organised a Public Meeting in Nailsea that attracted some 400 attendees, with several hundred being turned away for lack of space. Had it not been for our actions we do not believe National Grid would have felt it necessary to come and explain its plans properly to local residents. Although exhibitions are included by the Infrastructure Planning Commission (IPC) as a potentially suitable method of informing people, we hope that National Grid will now acknowledge that exhibitions are an insufficient and inadequate method of engaging in dialogue with people at the start of a major projects such as this. Many people feel that the consultation process has been unsatisfactory and that National Grid must do more to communicate and debate what is proposed. The Hinkley C Connection Project has significant implications for all of us living in the Nailsea valley.

In short our priorities for the connection from Hinkley C to Avonside are:

- 1. National Grid must undertake a full investigation of the undersea option in which financial cost should not be the determining factor;***
- 2. Corridor 2 must be rejected outright;***
- 3. If and only if National Grid can demonstrate that the undersea route is not viable and Corridor 1 has to be used, then National Grid, in conjunction with Western Power, must realign all the existing cables and pylons so that all power lines are moved well away from existing houses and National Grid must underground cables as determined appropriate in consultation with local residents and environmental advisers.***

Lastly, Save Our Valley is aware that, even with Government regulation, National Grid's first duty as a plc is to its shareholders. We would welcome reassurance that profit will not be put before public good in deciding the way forward.

About 'Save Our Valley'

1. Save Our Valley (SOV) was established in October 2009 by residents of Backwell, Nailsea and Wraxall who were alarmed by National Grid's unexpected announcement of plans to build high voltage power lines around Nailsea. SOV has a well organised Action Committee, able to call upon experts in such areas as planning, law, electrical engineering, natural environment protection, and the health implications associated with large infrastructure projects such as the Hinkley C connection proposals.
2. SOV's initial focus was to raise awareness of National Grid's proposals and to seek a better outcome for our community. We are working closely with the recently formed residents' group in West Nailsea called "Save Nailsea West" (SNW) who are forming their own view of what is in the best interests of that part of our community. The hierarchy of preferred outcomes from SOV and SNW are exactly the same. This response to National Grid presents SOV's hierarchy of preferred outcomes with particular attention paid to the impacts of Corridor 2; SNW will present detailed arguments covering the impacts of Corridor 1.
3. In addition to over 1,050 registered supporters and donors, SOV has links to action groups along the affect route and as well as further afield in Suffolk and Essex. We are working closely with the various tiers of local government in our area. We have the support of all of our local MPs as well as a host of other high profile individuals. We are fully equipped and prepared to continue to fight any attempt by National Grid to impose any corridor not endorsed by the majority of the local community.

Issues and Concerns

4. SOV has serious concerns about the effects of installing more overhead high voltage power lines (and particularly the larger 400kV cabling and pylons) across our countryside, an approach to electricity distribution that now dates back over 100 years. Our key concerns, which relate most particularly to the proposed Corridor 2, are detailed below.

■ *Impact on the Natural Environment and Biodiversity*

- a) The TEP report prepared for National Grid covering the area to the East of Nailsea from Backwell Lake to Wraxall School did not mention Backwell Lake as an area of high environmental amenity value. TEP were not briefed to assess the impact on local amenities such as Backwell Lake but the narrowness of Corridor 2 at this point should have over-ridden the brief and led to the inclusion of Backwell Lake in the study.
- b) The TEP report ignores English Nature's report 442, which clearly indicates that various bat populations including Greater Horseshoe Bats use Backwell Lake and the surrounding valley from Young Wood Farm to the Green Belt areas just after Moorside Farm as a foraging, roosting and feeding area.
- c) Backwell Lake and the immediate area is an important habitat for water birds (over 50 different species such as kingfishers, swans, geese, moorhens, mallards and little egrets have been noted). As National Grid has no efficient or effective methods to deter birds from hitting power lines, SOV believes that any development of Corridor 2 will result in a significant number of bird strikes and hence a loss of biodiversity, as well as directly endangering local residents and energy security.

■ *Impact on the Landscape and Recreational Amenity*

- d) The size of the proposed pylons is 46 metres; in relation to the width of Corridor 2 (in places less than 400 metres) these will be out of all proportion with the standard

rules on acceptable development.

- e) In the area of Backwell Lake, houses sited in Nailsea or Backwell are separated from each other by no more than 200 metres. Placement of pylons and the associated power lines in this area will either mean they are placed directly over Backwell Lake or within 50 metres of existing houses, a figure closer than the minimum distance suggested by SAGE (the Department of Health's Stakeholder Advisory Group on Extremely Low Frequency Electromagnetic Fields). Development of this tightly constrained area would therefore seem completely at odds with Holford Rule 2.
- f) Development of Corridor 2 in the vicinity of Nailsea, Backwell and Wraxall would involve significant infringement of the green buffer zone, including substantial areas of Green Belt between the three settlements, particularly since this would require the development of new infrastructure instead of using the existing infrastructure to the west of Nailsea. Such a move would seem to be in conflict with stated National Grid policy.
- g) The TEP report hypothesised that overhead lines are not inappropriate development in the Green Belt. SOV would point out that this view is open to challenge as these lines could not avoid having a significant negative impact on Green Belt openness and the separation of the settlements of Backwell and Nailsea.

■ **Health and Safety**

- h) SOV recognises the issues concerning the impact of electric and magnetic fields (EMFs) are complicated and potentially open to a range of interpretations. Given the confused nature of the advice currently available we believe that it would be sensible for National Grid to adopt a cautious stance (the 'precautionary principle'), avoiding the positioning of pylons and power lines in close proximity to homes, public rights of way, community routes and schools and colleges. With this in mind SOV notes particularly that:
 - (i) Corridor 2 passes unusually close to Wraxall Primary School. Such development would certainly lead to the demise of this school as a popular choice of local families.
 - (ii) Corridor 2 passes over Station Road – the main commuter route between Nailsea and Backwell to the A370 – and close to the railway station and Backwell Comprehensive School. SOV estimates that as many as 1,000 pedestrians walk up and down Station Road each working day, making it an ill-considered place to site either pylons or overhead high voltage power lines, especially with regards to the presence of significant number of children and teenagers travelling to and from school.
 - (iii) The noise impacts of high voltage transmission lines can be very pronounced, particularly given corona effects in poor weather conditions. Wind patterns in the Nailsea-Backwell- Wraxall valley mean that sounds can travel significant distances. This must also have a significant bearing on the proximity of lines to local populations.

■ **The Consultation Process**

- i) The study documents clearly show that National Grid have been working on this project for up to 18 months and yet it was only in October 2009 that local residents were made aware of the possible development. The "to the householder" mail-shot generated more questions than it purported to answer. Advertised 'public

consultation events' did not transpire to be focussed and formally chaired meetings, as most residents inferred (and indeed expected) would be the case. The "public exhibitions" held at short notice and in too few venues – with Nailsea an obvious and regrettable early omission - were frequently either unsuitable for the numbers attending or gave insufficient disabled access. Many attendees reported eliciting several slightly different answers to exactly the same question from the handful of staff involved, leaving doubt as to which was the true National Grid 'party line' on a particular issue. As a result, an impression of vagueness was created and then amplified; this in turn implied either that National Grid were not serious about engaging in true discussion with the public, or, worse, that the company had something to hide.

- j) This apparent lack of interest in effective public consultation has recently been confirmed by David Mercer's letter to Dr Liam Fox MP, in which National Grid not only fails to answer any of the questions asked previously by Dr Fox, but also appears to dismiss the public consultation exercise itself. We would observe that National Grid would not have come and given account of itself to the local community had it not been for the efforts of SOV to organise a public meeting on 27th November, and for the kind agreement of Dr Fox to chair the discussion. We would further point out that several hundred people had to be turned away from that event for lack of space, while some 400 people filled the meeting room and available spill over space – a clear demonstration of the strength of feeling locally about National Grid's plans.

Options Appraisal

5. National Grid's divisive proposals, which many interpreted as an attempt to split our local community by inviting respondents to choose between two proposed route corridors, have not divided us. Local people are all united in the view, also held by the local councils, that this consultation does not offer a true choice and that National Grid has failed to investigate a number of other important options that would avoid the need for pylons and overhead power lines.

6. SOV is perplexed by the Optioneering Report recently published by National Grid. This document, while being comprehensive in nature, suggests that the choice of Corridors 1 and 2 came into the process very late on and the process by which these choices came into being is not clearly explained.

■ *The Missing Options*

- (i) The Optioneering Report shows that National Grid discarded a number of undersea options before the public consultation started. Despite asking for further information about the technical, environmental and cost considerations of placing the cables undersea we still have not been given answers which explain clearly why two coastal points should be linked by over-land power lines, noting elsewhere that National Grid's Chief Executive has described the proposed 'Western Undersea Grid' (linking Merseyside and Scotland) positively as a 'no-brainer'. The feasibility of an undersea route along the Severn Channel must be explored. Money should not be the critical factor in determining this matter (or other route options), particularly when costs can ultimately be levelled out across all the UK consumers who will benefit from the grid. We understand that there are technical issues but, if these can be overcome elsewhere, then why not here too? National Grid's depreciation policy states that assets such as cables and pylons are depreciated over a period of up to 50 years so investment needs to be assessed not as initial cost but spread over all consumers and over 50 years.

- (ii) Furthermore, although parts of the Bristol Channel are designated environmental RAMSAR sites and Special Areas of Conservation, none of these would appear to impede a central channel cable. While we understand that regular dredging of the Channel would need to be taken into account, we are also conscious that various power generation options (such as the Severn Barrage or tidal lagoons) are being explored for and within the Severn Estuary which will presumably need connecting to the Grid. National Grid needs to take a more far-sighted view of this option.
- (iii) Following a route close to the M5 Motorway is a logical option but this does not appear to have been examined at any stage. We recognise that there could be significant environmental impacts (e.g. in the Gordano Valley) but the omission of this option is again remarkable.

Answering The Consultation Question

7. If we are to be forced to choose between the options as laid out in the TEP report then our views are as follows.

■ *Corridor 1*

- (i) Like National Grid, SOV recognise that Corridor 1 is an 'opportunity corridor' involving as it does the adoption of the existing WPD 132kV line route. Within Corridor 1 there are two options 1A and 1B, with 1A leading to a replacement and hopefully repositioning of one of the existing 132kV lines and 1B leading to a completely new 400kV line parallel to the exiting 132 kV line.
- (ii) We do not support the addition of a 400kV line parallel to the two existing 132kV lines (Option 1B).
- (iii) Our community has been told for many years that the existing lines will be moved away from their homes and now is the time to make good on those promises. We recognise that National Grid does not own the existing lines but it must work with WPD to ensure that the opportunity is taken to remove the existing Bridgwater-Avonmouth line (as proposed in Option 1A) as well as re-positioning WPD's other 132kV line away from houses, following consultation with local residents. This, at least, would provide some benefit to our wider community, which will otherwise be suffering for others' benefit. The associated costs would be minor in the context of those for the overall connection project, and the building of the new Hinkley power station. Furthermore the "Draft National Policy Statement for Electricity Networks Infrastructure: EN-5" encourages the reconfiguration or rationalisation of existing electricity network infrastructure to obtain material benefits in just the way that would occur by replacing both 132kV lines.
- (iv) The option of placing cables underground for a short stretch on this route deserves serious consideration and assessment of benefits, impacts and costs.
- (v) Corridor 1 offers scope for sitting the pylons and cabling more sympathetically, in terms both of line of sight and immediate impact on residents who are currently badly affected by proximity to the 132kV lines.
- (vi) SOV note that the TEP report suggests that option 1A "would minimise the scale of change in the landscape." We also note that the TEP report goes on to suggest that Corridor 1A is considered distinctly preferred in terms of landscape effects.

■ **Corridor 2**

- (vii) SOV notes that adoption of Corridor 2 would result in a completely new 400kV overhead line, which is not in keeping with National Grid's stated policy of utilising existing infrastructure where possible. SOV also notes that construction of any new line in Corridor 2 would not, in contrast to Corridor 1A, result in the removal of any of the existing pylons in West Nailsea.
- (viii) SOV notes that within the area of Yatton/Nailsea/Backwell/Wraxall the Corridor 2 option crosses the southern and eastern extents of Kenn Moor SSSI before running almost parallel to the Bristol to Weston railway through a very small (400 metre) gap along the busy commuter route of Station Road between Nailsea and Backwell. As acknowledged in the TEP report this is a tightly constrained area. However, the TEP report fails to identify the presence or importance of Backwell Lake as a highly valued amenity area. The TEP report also fails to note that Corridor 2 would require the power lines either to traverse the lake waters or be positioned over or very near to existing housing. SOV also notes that once it has passed Backwell Lake the line would pass north across the Green Belt separating Nailsea and Backwell and including scattered properties, towards a highly constrained "pinch point" consisting of Wraxall Primary School, a deserted medieval settlement, a Grade 1 Listed church and Wraxall Court. In addition at this point Corridor 2 passes within 400 metres of the National Trust property at Tyntesfield. Adoption of Corridor 2 would seriously affect the views from Tyntesfield and would therefore significantly affect the visitor experience. SOV understands that the National Trust will make strong representations to National Grid against Corridor 2.
- (ix) SOV agrees with the TEP report with regard to its conclusion that the "least constrained" corridor is Corridor 1 (option 1A) whilst Corridor 2 would "result in greater effects on residential dwellings and settlements at Yatton and Nailsea". Hence "this option is considered more environmentally constrained" than Corridor 1A, primarily due to the effect on landscape and amenity.

Conclusions

1. National Grid has not carried out as thorough and adequate consultation with the public as would seem appropriate for a decision of this magnitude. Should it be the case, following this consultation exercise, that an inappropriate decision (that does not meet the community's and the environment's needs) is reached, we believe National Grid's approach would be challengeable.
2. Using the information provided by National Grid it is SOV's opinion that a Severn Estuary route or a route underground or along the M5 cannot be ruled out on purely costs grounds. These options should be properly explored and communicated.
3. If, after full investigation, these and other possible routes are ruled out for reasons other than cost, SOV would agree in principle with the views and conclusions expressed to date by North Somerset Council, Nailsea Town Council and Backwell Parish Council that Option 1A of Corridor 1 would be preferable to the others proposed in the consultation - replacing the current 132kV line through the district with a 400 kV line, with undergrounding of the line through the Mendip Hills Area of Outstanding Natural Beauty and potentially undergrounding in other parts of the Corridor. We believe strongly, however, that if this option were to be pursued, there should be a commitment from National Grid to work with Western Power Distribution, and in close consultation with local residents, to re-site all existing or proposed power lines away from the housing on the western edge of Nailsea.

4. SOV, along with all of the local councils and, as far as we can gauge, the vast majority of residents within North Somerset, totally rejects Corridor 2 as an option in our area for the following reasons:

- (i) The inevitable proximity of any new high voltage power lines to the settlement boundaries of Nailsea, Backwell and Wraxall and the visual impact of 46-metre pylons, exaggerated by the tightly constrained nature of the area and the landscape, would be unacceptable – a clear issue of consideration within the Holford Rules.
- (ii) Development of Corridor 2 would result in the town of Nailsea being surrounded by pylons.
- (iii) Corridor 2 would result in the effective destruction of Backwell Lake as a vital public amenity. Such an act of environmental and community vandalism would not be tolerated by either the local councils or the local residents.

5. SOV would contest the adoption of Corridor 2 vigorously and with every means at our disposal.

For further information, please contact Keith Edwards, Chairman, Save Our Valley at 11 Bucklands View, Nailsea BS48 4TZ.

Yours faithfully



Professor K J Edwards
Chairman

CC: Dr Liam Fox (MP for Woodspring Constituency)
Cllr Nigel Ashton (Leader, North Somerset Council)
Cllr Mary Ponsonby (Chairman, Nailsea Town Council)
Cllr Roger Sykes (Chairman, Wraxall and Failand Parish Council)
Cllr Colin Pope (Chairman, Backwell Parish Council),
Mr Steve Holliday (Chief Executive, National Grid UK).