

# **Compton Bishop Parish Council**

## **National Grid Consultation**

### **Hinkley C Connection Project Stage 4**

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Approved by Compton Bishop Parish Council 22nd October 2013

## **1. Compton Bishop**

### **1.1. Description of the Parish**

The ancient Parish of Compton Bishop is situated within the western area and foot slopes of the Mendip Hills. The majority of the parish lies within the designated Area of Outstanding Natural Beauty (AONB). The prominent feature in this area of Mendip is Crook Peak, a popular vantage point with spectacular 360 degree views. The visual aspect ranges from Cheddar Gorge and Glastonbury Tor to the east; the flat Somerset Levels, the flood plain of the River Axe, the Axe Yeo and Brent Knoll to the south ; the Somerset Levels combining with Steep Holm and Flat Holm in the Bristol Channel to the west ; the Lox Yeo Valley rising to Banwell Plain and Banwell Hill, to the to the north. The western border of the Parish is host to the M5 motorway which cuts through the Lox Yeo Valley. Motorists visiting the West Country are introduced to the spectacular vista of the Somerset Levels and Brent Knoll as they travel south. The proposals will introduce a massively intrusive and unwelcome scar on the landscape which produces high levels of noise pollution.

### **1.2. National Grid's Proposal for Compton Bishop**

Compton Bishop is located in Section C of National Grid's proposed Hinkley C Connection route. As this is an AONB, the connection will be placed underground throughout the Parish. Sealing End Compounds (SEC) are planned to be constructed outside this parish. To the north, a SEC is planned for Sandford and would not be visible from Compton Bishop Parish. To the south, a SEC is planned for Biddisham located adjacent to the M5 motorway. This, and the associated pylons and overhead lines running from Biddisham to Mark and beyond, will be a significant visual and detrimental feature on the flat Somerset Levels. The views from the Mendip Hills will be compromised.

### **1.3. Compton Bishop Parish Council Mandate**

Compton Bishop Parish Council has been fully engaged in the consultation process since 2009, attending all meetings and Community Forums. This Council has been aware of its responsibilities to other parishes that would be affected by National Grid's proposals and has, where possible, liaised with and supported common views. A purposeful dialogue has been maintained with both Sedgemoor District Council and Somerset County Council.

This Council is mandated to object to the installation of overhead lines because of the blight on the unique landscape of the Somerset Levels. The opportunity to enhance our landscape should be grasped and, by using the right technology of today, we could protect and enhance our precious countryside and landscapes.

This Council supports the less intrusive options of a sub-sea cable route via the Bristol Channel or, alternatively, Gas Insulated Line (GIL) technology for a land based route. Conventional undergrounding, as proposed for the AONB, would be the last acceptable choice because of the social and environmental damage it would cause.

## **2. The Consultation Process -comment**

- 2.1. The Consultation, as a whole, has followed a prescribed process which has failed to respect the socio economic and environmental values of the parishioners living within the areas of the proposed route.
- 2.2. The vast number of public responses to Stage 1 consultation called for sub-sea or undergrounding. National Grid (NG) has not adequately addressed this public demand which has persisted throughout all stages of the consultation process.
- 2.3. NG's response to sub-sea and undergrounding is seen as unreliable and dismissive. Such a response has disillusioned many of the early consultees and members of the public who concluded that the consultation process is flawed and meaningless. NG has not demonstrated any significant deviation from its original proposals and disregarded the voice of the public
- 2.4. NG has shown that they believe statutory policies and law are not satisfactory. However they have refrained from dealing with the expectation, from the public, to engage in a public dialogue with Government, Ministers and Ofgem to review the process with a view to reaching an adequate response which may include amending Government policies and law to provide a more equitable solution.
- 2.5. Where statutory policies exist there is a perception that these are not equitably applied, for example the 'National Policy Statements for Energy Infrastructure' states:
  - It (NPPF) specifies three roles for the planning system in achieving this goal:*
    - *An economic role – contributing to building a strong, responsive and competitive economy;*
    - *A social role – supporting strong, vibrant and healthy communities; and*
    - *An environmental role – **contributing to protecting and enhancing our natural, built and historic environment;***

## **3. National Grid Consultation**

Stage 4 of the consultation assumes that the previous three stages have addressed the issues which are of concern to the Consultees and Compton Bishop Parish Council. This is not the case for many issues as described in Appendix 1: Consultation Critique Stages 1 & 2 and Appendix 2: Consultation Critique Stage 3 which includes comments and identifies unresolved issues.

## **4. Stage 4 Consultation - comment**

- 4.1. The general public would not have the time, motivation or background knowledge to review all the documentation made available on National Grid's web site or DVD. The distributed Project News, Overview Report and feedback document will have formed the responses from most of the general public.
- 4.2. For Parish Councils, the full DVD material has been reviewed. The sheer volume of information and complicated navigation may, possibly, mean that some relevant articles have been missed, wrongly interpreted or misunderstood.
- 4.3. The perceived emphasis on responding to the **process** rather than content has not been accepted. Compton Bishop PC considers that instances of ambiguous, misleading, incorrect or irrelevant information have compromised the consultation process.

- 4.4. There are some instances of misleading or incorrect statements in the Project News, Overview Report and the PEIR report. This may affect the validity of statements made by the public.
- 4.5. At this stage of the overall consultation, prior to a DCO application, we would expect to comment on details such as the impact of the construction and the long term effect on people being forced to live with, the massive structures and also the cumulative impact on our roads, Drovers, soil structure, water courses, underground trenches, compaction from heavy plant and pile-driven pylons, all of which has not been described adequately. There are no publicised transport, freight or workforce management details. The use of local rural roads and Drovers, for work service access points, raises significant safety issues which should be identified and addressed. There is no reference to the supply of aggregates which will be a significant operation impacting local roads and dangerous junctions.
- 4.6. Work and transport plans, required for the removal of the 132 kV pylons, lines and aggregates used for tracks and compounds, are omitted.
- 4.7. We are of the opinion that Stage 4 of the Consultation lacks detailed information which makes it difficult to provide a fully reasoned response as required for the consultation process.

## **5. Stage 4 Consultation - Response**

In response to this Stage 4 consultation, We refer to the supporting documentation, from NG, which has been made available to the general public, either by mail, at Information points or via the Internet.

### **5.1. Project News – September 2013**

- 5.1.1. The first two pages give the public the impression that the new 'T' pylons are shorter than the existing 132 kV lattice towers. The general perception is that the quoted 'traditional pylons' are those currently in place and not the 400kV lattice towers. The same information appears on National Grid's (NG) website in the article 'T time in the Southwest.
- 5.1.2. Page 2 considers involvement. There is insufficient clarity that public feedback has been severely constrained by Government policy and legislation which, effectively, renders any of the connection options, other than overhead line (OHL), unacceptable. I refer to the NG's cost evaluations produced for their Optioneering Report.
- 5.1.3. The request for feedback channels the public into responding to the five issues stated in the document. Adequate consideration of NG's proposal is not possible because of the enormity of the full documentation available on the consultation web site or in the Document DVD.

### **5.2. Overview Report – September 2013**

This short document has a number of misleading statements which may influence the reader to reach incorrect conclusions.

- 5.2.1. Page 10 states that *"..we took on board your views....We proposed that the connection would be mainly overhead..."* **NG failed to take on board our views that the overwhelming response to Stage 1 consultation was for sub-sea or undergrounding. The general public assumed that NG**

would respond to Parliament and The Secretary of State rather than pressing ahead with the scheme. This is the point where public involvement started to decline, they had lost faith in the consultation process and became apathetic and considered the process a 'done-deal' and not worth being involved.

- 5.2.2. Page 12 states "*What you have told us – Keeping our distance* : "You felt that the new connection should be as far as possible away from homes. The connection has been designed to do this." This is a misleading statement. The close proximity of the proposed OHL to residents and businesses in Tarnock and Mark are examples.
- 5.2.3. Page 13 – Construction : "*Some people are worried about the heavy traffic on local roads during construction....We will work closely with communities along the length of the connection to minimise any disruption.*" There is no travel and access plan. Local communities should be made fully aware with a proper travel and access plan, prior to the submission to the Planning Inspectorate (PI). The impact of the construction work is not understood by the vast majority of those living close to the proposed construction path. Each Parish should have had a public meeting with explanations before the submission to the PI.
- 5.2.4. Page 15 – *Socio-economics and land use* – "- we have assessed the potential effects of our plans on people, local businesses and communities." The impact of construction on some businesses may have been assessed but the outcome has not been made clear, to the public, on businesses which are severely impacted or made unviable. The 3 – 5 year period of construction and regeneration of land has an impact on people's investment. House prices will be affected but compensation has been specifically scoped out of the process.
- 5.2.5. Page 17 – Pylons : "*..... the pylon can stand at just 35 metres, 10 to 15 metres shorter than the traditional lattice pylons.*" The general public thinks that the 'traditional pylon' refers to the **existing** 132 KV lattice towers and not the 400KV towers.
- 5.2.6. Page 42 – *What happens once the application has been submitted?* There is a need for better clarity. Respondents to Stage 4 consultations may not understand that their responses are not the "*last chance to have your say*", as stated on page 1. Their final chance to comment will be during the PI's examination process, after this Stage 4 consultation, provided their name is registered. Also there is no explanation on how the DCO differs from a Planning Application, and the scope and repercussions of a DCO being granted.

### 5.3. Preliminary Environmental Information Report (PEIR)

#### 1.3 Purpose of the PEIR.

- 1.3.3 Schedule 4 part 1 of the 2009 EIA regulations – schedule 4 includes  
*An outline of the main alternatives considered and the main reasons for the applicant's choice taking into account the environmental effects*  
*A description of the aspects of the environment likely to be significantly affected....including population...* .The socio-economic issues for the population, such as 3 to 5 years of disturbance by construction, devaluation of property, etc. have not been addressed

## **2 Background to the Project.**

2.3.4 *The remaining options were assessed in more detail using assessment criteria that included: technical complexity; constructability; cost; and whether the option was acceptable on amenity grounds. Amenity grounds did not include impact, disruption devaluation of property and the views of the public*

2.3.5 *The assessment discounted all options except overhead line options; of these most were discounted as they did not satisfy transmission need; some were parked as being more costly for no greater benefit than others. In conclusion, two possible options were taken forward, for an overhead line connection between Hinkley Point and Seabank - to build a new 400kV overhead line route, or to use the existing 132kV overhead line route, replacing the pylons with 400kV pylons and improving the route where necessary. There was a failure to address honestly and thoroughly the option for sub-sea which was requested by the vast majority of respondents. The reasons given, by NG, were inadequate and have not been accepted.*

### **Stage 1a consultation.**

2.3.17 *"...the comparison of costs associated with each underground and subsea HVDC option was sufficient to discount them prior to the consultation on the potential route corridors." Community Forum (CF) members did not agree with the cost figures, their presentation and the fact that the impact on socio-economic elements made the OHL option acceptable.*

### **Back-check review.**

2.3.26 *The economic review confirmed that overhead line technology remained the most economic of the options. Underground cables or gas insulated lines (GIL) would be less economic but could be used in sensitive locations. Economic assessment was challenged but ignored. Somerset Levels is a sensitive location which should be afforded the same protection as the AONB*

2.3.28 *An evaluation of socio-economic factors considered the potential impacts of each connection option on the main areas of economic importance in planning policy terms and on the tourism and agricultural business sectors. It concluded that it was not possible to discriminate between options on the basis of the socio-economic evaluation. Totally unacceptable, the impact on individuals and communities has been ignored.*

## **3 Project Description.**

3.2.12. *Construction Programme from June 2015 to December 2020 There is an inconsistency of dates. Current publications indicate 3 years for construction but OHL indicates a 5 year period.*

### **3.3. Limits of deviation.**

3.3.2 *The proposed lateral limits of deviation ( subject to constraints) are:  
Overhead line lattice 400kV and 132kV pylon – 60m (30m either side of the centre line);*

Overhead line T-pylon – 80m (40m either side of the centre line);  
Underground 400kV cables – 100m; and.  
Underground 132kV cables – 60m.

The maximum deviation of works should have been made public at the outset because some properties, formerly considered adequately distant from the installation will be in closer proximity - the public has been misled

- 3.3.3 The vertical limit of deviation is +4m. The final design of pylons may be lower in height. Maximum heights of all pylons should have been made public at the outset - the public has been misled
- 3.5.2 There are three variants of each pylon design (see Figure 3.9), to allow for different requirements along the route:. The figure names suspension (4 types) but no tension or terminal pylons are named or shown
- 3.5.21 From the CSE compound, the 400kV underground cables route would run northeast and would be routed under (or over via a bridge) the River Axe and follow to the east of the M5, before entering the Mendip Hills AONB. The 400kV underground cables would be installed either beneath the river by a trenchless technique of horizontal directional drilling, thrust boring or using a cable bridge across the River Axe. If cabling beneath the River Axe is carried out, the 400kV underground cables would be installed deeper and with greater separation from each other than where they are installed by open trenching. This is a detail of planning which should be in the open for this consultation phase – the preferred method should be identified.
- 3.5.22 The works associated with the removal of the 132kV overhead line would be largely confined within the works for the 400kV connection and would use the same construction access routes. The 400kV connection route deviates from the F Route at East Huntspill and, for a stretch north to Mark, separate construction access points are proposed for the 132kV overhead line removal. These accesses would run from the B3139 (Church Road) in East Huntspill and Southwick Road, Southwick. There would also be a separate construction access route for the removal of the 132kV line from Biddisham Lane, Biddisham. Details of the modifications to Biddisham Lane should be made available as this is a dangerous junction onto the A38.

### **Section C: Mendip Hills AONB.**

- 3.5.24 In this section, the 400kV underground cables would continue to travel for a short distance alongside the M5, and then enter the Mendip Hills AONB at Loxton Gap, at the foot of Crook Peak which is designated as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).
- 3.5.25 The cables would then extend through the low lying land in the valley of the Lox Yeo River, a Site of Nature Conservation Importance (SNCI), broadly following the route of the existing 132kV overhead line but occasionally detouring to avoid woodland, development and environmental features. In this area the 400kV underground cables would travel in a north easterly direction, crossing the Lox Yeo River and the A371 Banwell road, to the north of the settlement of

Winscombe. A cable route construction compound is proposed on an area of land west of Banwell Road, to the south of the cable route. **The value of this SSSI and SNCI should be protected. The use of sub-sea cabling would protect this area**

- 3.5.27 A cables **installation working area approximately 65m wide** would be created along the length of the underground cables route, protected by post and wire fencing. Where there are 'pinch points' along the cable route, the working area would be reduced. **Visual impact of fencing – what height and construction?**
- 3.5.28 For construction access, a temporary haul road would continue along the length of the underground cables as far as possible so that construction traffic can run on dedicated routes and avoid public highways. Post and wire fencing would be installed along both sides of the entire temporary haul road. **The use of the term 'as far as possible' is much too loose. Details of access points from Biddisham Lane and Barton Road need to be defined..**
- 3.5.29 The works associated with the removal of the 132kV overhead line would be confined within the works for the 400kV connection and would use the same construction access routes **.Does this explain the stated 3 – 5 years for construction, i.e. 3 years to construct and 2 years to disassemble the 132kV lines?**

#### **4 Planning Policy Context.**

##### **4.2 National Policy Statements for Energy Infrastructure.**

4.3.3 It (NPPF) specifies three roles for the planning system in achieving this goal:

- An economic role – contributing to building a strong, responsive and competitive economy;
- A social role – supporting strong, vibrant and healthy communities; and
- An environmental role – **contributing to protecting and enhancing our natural, built and historic environment**; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy **.The NPS specifies a requirement to enhance the environment. Placing massive pylons over the Somerset Levels and near to property does not conform to this role.**

#### **5 EIA Approach and Method.**

5.2.5 Section 8 (1) of the 2009 EIA Regulations (as amended) states that 'a person who proposes to make an application for an order granting development consent may ask the Commission to state in writing its opinion as to the information to be provided in the environmental statement'. **The Secretary of State statement includes scoping out impact on house prices. This does not accord with addressing socio-economic issues.**

**5.2.10 The Scoping Opinion from PINS (see Appendix 5A).  
Note on Scoping Opinion 130530\_EN20001 .**



- 2.11 The proposed development crosses or runs close to a number of main roads. This does not appear to include the A38 as a main road which the development crosses or runs close to.
- 2.19 Further environmental designations within 15km of the proposed development site include: Note that the Somerset Levels are not mentioned as a proposed world heritage site

**P14 Operation and Maintenance.**

- 2.50 Pylons have a life expectancy of approximately 80 years, the conductors approximately 60 years and insulators and fittings approximately 40 years. Underground cables have a life expectancy of approximately 40 years, as do sealing end compounds and substations. Can cables be re-run without excavation?
- 2.51 Vans would usually be used to transport workers to and from the site while lorries would be used to carry materials where necessary. The use of the word 'usually' is not a satisfactory and complete description. A travel plan is required. (See also comments against 3.5.28 above)
- 2.52 Overhead lines would be subject to an annual inspection either from the ground or by helicopter. Underground cables would be inspected via the kiosks above ground at the joints. Further monitoring would be carried out via the fibre optic cables installed with the underground lines. Infrequent visits to sealing end compounds would be required to monitor underground cables and carry out maintenance and checks on the electrical equipment. Substation maintenance would be undertaken approximately every 3 years. Written confirmation is needed that maintenance for T pylons only needs access for a van and not lorries or heavy plant, as per verbal statement by NG on 21.09.13

**Matters to be Scoped Out.**

- 3.7 The Applicant has identified in the relevant sections of the Scoping Report (Table 15.1) the matters proposed to be 'scoped out' are:.
- Effects on climate change;.
  - Effects on air quality from eutrophication during operation;.
  - Effects on flooding from sewers.
  - Effects from vibration during operation Mention should be made about mitigation against damage to old buildings and stone walls with no foundations, septic tanks, etc.
  - Effects on the transport network during operation;.
  - Effects on property prices; The Secretary of State statement has scoped this out.
  - Effects of noise during operation; A work plan is required to define working hours
  - Electro-magnetic compatibility..

**Socio-economics and land use (see Scoping Report Chapter 13).**

- 3.75 The SoS welcomes the overall approach taken by Applicant and the fact that they have already discussed the scope of the report with local authorities and the National Farmers Union. The SoS recommends that the assessment is developed through further consultation with these bodies; the Applicant may also find it useful to engage in discussions with the relevant parish councils, particularly when considering potential effects on the tourism economy and local amenities. Discussions with

Parish Councils have not been specific to each Parish and necessary detail on the short term and cumulative longer term impact on the local business community has not been presented.

## Document 2.2 Landscapes and Visual Effects.

### **6 Landscape.**

6.1.7 A new 400kV overhead line on the proposed alignment using the 400kV steel lattice pylon (standard and low-height) has been assessed, as well as a new 400kV overhead line on the same proposed alignment using the T-pylon. There would be no substantive difference between the effects on landscape character from the proposed 400kV overhead line using a steel lattice pylon (standard and low-height) and from the proposed 400kV line using the T-pylon. Where a pylon type would be likely to give rise to lower levels of effect this has been identified as part of the assessment of the proposed 400kV overhead line in Sections A to G (excluding Section C), and a brief summary is provided to explain why lower levels of effect are anticipated. This is a highly misleading statement. T pylons have a larger span and are more obtrusive being a solid structure. The first trial T pylon was erected only in February 2013 and no experience exists of installations on strata such as that found the Somerset Levels. T pylons require permanent service roads with resulting impact on the landscape.

NG appears to be promoting these 'new designs' as some form of mitigation. There is no experience of the visual intrusion caused by a line of these structures.

6.1.9 The landscape assessment also refers to a landscape mitigation strategy for the Proposed Development that will be provided in the ES, and considers preliminary landscape mitigation proposals to minimise adverse effects on landscape (and views) of site-specific development including proposed cable sealing end compounds and substations. Likely effects on landscape (and views) following establishment of mitigation planting, approximately fifteen years after completion, have been considered. Mitigation will not be complete for 15 years.

### **Consultation.**

6.1.11 Since 2011 National Grid has engaged with consultees with an interest in landscape (and views) through a series of meetings known as Landscape and Views Thematic Group meetings. Meetings during 2012 included discussions on the method for the landscape and visual appraisal work required as part of identifying a draft alignment for the proposed Hinkley Point C Connection. The method was agreed with the Landscape and Views Thematic Group and the findings of the appraisal work were discussed with the Thematic Group and later summarised and presented in the Connection Options Report, which identified a draft alignment for consultation in late 2012. Before the formation of Thematic Groups, a workshop on 10<sup>th</sup> Dec 2010 put forward views on connection which have been ignored.

Thematic Group TOR is restrictive. Community Forums and Parish Councils have been refused joint meetings and workshops by NG project team.

## **6.2 Policy.**

6.2.12 *The NPPF identifies that it is important that developments enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils, recognising the wider benefits of ecosystems, minimising the impacts on biodiversity and increasing the net gains in biodiversity, and preventing risk from unacceptable levels of effects on soil, air, water, noise pollution and land instability .NG has not addressed their need to enhance the natural and local environments but is promoting a solution which has a very negative and detrimental impact on the visual amenity.*

## **6.3 Method.**

6.3.14 *Undesignated landscapes and features are also valued. Consideration of condition, quality, rarity, representativeness, perceptual aspects and associations are considered in the identification of valued landscapes. Consultation with the Landscape Thematic Group and the Community Forums has been used to help identify locally valued landscapes and features. The landscape across the project study area is recorded as being of national, regional and or local value. Note NG deliberately isolated the Thematic Group and CF.*

## **Susceptibility to Change.**

6.4.352 *The Somerset Levels and Moors are a large scale flat landscape with a lower susceptibility to change as a result of larger structures such as a 400kV overhead line, compared to the more exposed ridge landscapes including Puriton Ridge in the south and Tickenham Ridge further north. It is unclear what this statement means. The visual impact of large pylons will impact both the levels and Ridges.*

## **Source of Effect(s) During Construction.**

6.5.6 *Occasional works at night would usually take the form of erection and subsequent dismantling of scaffolding and netting over major roads or railways where routes cannot be closed during the day due to traffic volumes. This would take approximately 3 to 4 hours and would usually be early morning. The public needs to be aware of any possible out of hours working prior to consultation and the possible proximity to housing.*

6.5.7 *Normal work on overhead lines does not usually take place during hours of darkness and typically gangs will finish work at around 17:00 in winter. Occasional planned night time working may be required if particular operations such as the jointing process overruns, and this may include some lighting. Underground cables installation would involve lighting during the early morning, late afternoon and evening during winter. This statement is not concise and potentially misleading. Words such as 'usually, typically, occasionally, may' allow unfettered work times and patterns.*

## **400kV Overhead Line Construction.**

6.5.11 *Construction of a 400kV overhead line would include working areas at tower bases. Piling or excavation would be undertaken for pylon foundations. Tower assembly in sections would be undertaken on the*

ground prior to erecting pylons by a crane which would access site and lift assembled steel work sections into position. The crane would be positioned close to the pylon base on a crane pad. This would usually take 1-3 days per pylon. Pulling sites for stringing conductors (the wires on an overhead line) would be set up at either end of each section of up to twelve pylons. Stringing conductors would then be undertaken using pilot wires laid across land with temporary scaffolding constructed over roads, structures and other obstacles. This would involve vehicle movements at pulling sites at either end of the section of pylons. On completion reinstatement of access roads and working areas would be undertaken and temporary scaffolding removed. At-height works would typically only be undertaken over 1-3 days for each pylon. **The piling of pylons needs explanation. We understand unofficially that the T pylons will need to be driven to a depth of 18m. The resulting noise and vibration over an undefined period per pylon needs to be brought to the attention of the public.**

#### **400kV and 132kV Underground Cables Construction.**

- 6.5.15 Construction of underground cables would include a **working area of approximately 65m wide** for 400kV underground cables and 30m wide for 132kV underground cables created along the length of the underground cables route. The working areas would be protected by post and wire fencing. Vegetation would be cleared and topsoil would be stripped and stored separately along the working area. **The public have not grasped the fact that the deviation of 40m from the centre line may bring the construction work very close to residential properties.**
- 6.5.16 **Underground cable trenches** (four for 400kV and two for 132kV underground cables) with three cables in each would be excavated up to approximately **2m deep and 2.2m wide**. The underground cables would be delivered to the working areas on drums. In places trenchless techniques may be used where ducts are installed and the cables are pulled into the ducts. **The transport plan should be available to consultees. What route is proposed for the drums?**
- 6.5.17 Once the cables have been laid and trenches backfilled reinstatement work would be undertaken including removal of temporary haul road and any temporary access tracks and replacement of stored soil, with any surplus soil taken off site. The post and wire fencing would be removed. Where possible, hedgerows would be replanted or replaced although trees cannot be planted on top of the cables. Where trees have been removed from the cables swathe and planting elsewhere has been agreed, this would be undertaken. **Could the soil be used as a noise protective bund against M5 motorway traffic noise? A clearer understanding of this impact would be to define the areas where hedgerow and tree re-planting will not be possible. The term 'where possible' is not adequate.**

#### **Cable Sealing Ends Compound Construction.**

- 6.5.20 The temporary site installation facilities would then be removed and, where required, temporary working areas would be restored. **Does this include the mobile crane stone pad?**

### **Section B: Somerset Levels and Moors South: Operational Effects.**

6.5.91 A 400kV overhead line on the proposed alignment would have a moderate adverse magnitude of effect on the Levels and Moors landscape. **What is the magnitude of effect for a CSE?**

6.5.96 The Proposed Development in the northern part of Section B would have an overall moderate to minor adverse significance of effect on the Somerset Levels landscape in part of the setting of the Mendip Hills AONB. **'Minor adverse' is only when viewed from a southerly aspect – the northerly view would have a higher detrimental effect**

### **Section C: Mendip Hills AONB: Construction Effects.**

6.5.102 Compounds would be set up in two locations along the route in Section C. The first would be to the west of Barton Road close to the M5 and the second to the west of Banwell Road. Compounds would comprise vehicle parking, welfare facilities and site cabins. **Detailed access plans are required showing routes from main highways. It is not clear what the access points in Barton Road are to be used for and the impact on other small roads in the area.**

6.5.103 Cables installation would result in disruption to the field pattern of the landscape. The route is through fields where boundary hedgerows are generally low with few hedgerow trees. Tree loss would be limited to occasional lines of trees along some hedgerows. There would be some unavoidable loss of hedgerows and trees (including hedgerow trees) along the Lox Yeo River resulting from an underground cable route through this landscape. Trees and hedgerow loss would be minimised through the reduction of the working width of the cable swathe at hedgerows and replacement hedgerow planting within the cable swathe will be implemented, subject to landowner agreement. There are no substantial areas of trees or woodlands in this Section which would require removal to allow the construction of overhead lines. Where trees require removal the change to landscape character would be barely perceptible due to the generally scattered nature of trees across the landscape. Effects of vegetation clearance would have minor adverse effects on landscape character these effects would be limited to close to the location of removal. **Any removal of trees and hedges would not have a "barely perceptible" impact because of the contrast between the random field patterns and the linear nature of the tree and hedge removal.**

6.5.106 The greatest effects on landscape character during construction would be the noticeable linear swathe of land used for the underground cables and working areas across the river valley and the two locations where compounds would be set up. These compounds would be a notable change to the landscape pattern of the river valley. These would be particularly noticeable in close proximity and also from the hills such as Loxton Hill, Banwell Hill and Crook Peak where there are panoramic views along the Lox Yeo river valley. The construction operations and activity would introduce movement and a clustering of vehicles and machines that typically are not associated with a rural farmed landscape. This activity would be a notable alteration to the

rural landscape which, in combination with a prominent linear swathe for cable trenches, would result in a **high adverse magnitude of change**. This is a landscape of high sensitivity which would experience a high magnitude of change; the significance of effect would be major adverse. However this effect would be temporary for the duration of the works. **The effect will not be “temporary for the duration of the works”.** The changes to the field patterns will be for the 3 – 5 year period and for considerably longer during the period of re-planting and regrowth.

**Table 6.4 Potential for Cumulative Effects with Other Projects.**

Hinkley C Power Station – There is no mention of the cumulative impact on the usage of the A38. EDF has stated that 20% of aggregates used for Hinkley Construction would be transported by road. Cheddar is an obvious source and the route would impact the dangerous A371 and A38 junction at Cross.

The Bristol Water – Cheddar Reservoir 2 project has not been mentioned but is significant

**Site-Specific Mitigation.**

6.7.4 Preliminary landscape mitigation proposals are illustrated on the following

Figure 7.10.2 South of the Mendip Hills Cable Route 400kV Cable Sealing End Compound Preliminary Landscape Mitigation; **Figure group Part 1 : 1.1 to 7.10.4 has figures up to 7.8.10 i.e. 7.10.2 is not available on DVD**

6.7.6 A ‘Landscape Strategy’ for mitigation planting along the proposed 400kV overhead line route in Sections A to G will be produced as part of the ES. This will include indicative proposals for tree and shrub planting that will assist in reinforcing landscape character in certain areas and separately that would provide screening of some views of the new overhead line. The development of the Landscape Strategy will form part of discussions with the Landscape and Views Thematic Group and other consultees between September and December 2013. **Parish Councils and CF members should have had a part in these discussions but have been previously been prevented access to the Thematic Groups by NG.**

**Section B: South of the Mendip Hills Cable Route 400kV Cable Sealing End Compound.**

6.7.17 In the northern part of Section B, siting the proposed CSE compound in the field adjacent to the minor road bridge and the M5 motorway would help minimise the influence of this new structure in the surrounding landscape (and in views) due to screening by the motorway and bridge embankments, by embankment trees and shrubs, and by field boundary hedgerow and trees. Preliminary landscape mitigation proposals aim to reinforce existing low level screening of the proposed CSE compound, and are illustrated at Figure 7.10.2. **7.10.2 is not available. Screening would not be adequate for some considerable time.**

## **7 VISUAL EFFECTS.**

**7.9.11. Shows T pylons at the SEC to be significantly higher and more obtrusive than the lattice**

### **Section C: Mendip Hills AONB: Assessment of Construction Effects on Views.**

#### **Cumulative Effects.**

7.10.34 *There is the potential for cumulative effects in Section B if either of the proposed wind turbine projects (ref 14 and 22) were developed on the Somerset Levels and Moors. The turbine applications, if successful at appeal, would result in the introduction of additional tall structures (up to 130m high) into the flat Levels landscape where cumulative effects could arise from the intervisibility of the turbines and the Proposed Development. The wind turbines would however form taller vertical structures than the overhead line pylons and would give rise to the greater effect . The combination of wind turbines and pylons would destroy the business of a camping/caravan business in Tarnock which has been developed by hard work over many years.*

### **Section C: Mendip Hills AONB: Preliminary Assessment of Visual Effects.**

#### **Construction Effects.**

7.10.39 *Generally properties, businesses and settlements would experience effects on views ranging between moderate to minor adverse significance. Moderate adverse significance of effect on views would be experienced by receptors that have open views of the cables construction along the Lox Yeo Valley or across rising ground between Banwell and Sandford Hills..*

7.10.40 *Effects on views of minor to negligible adverse significance are anticipated for the remaining receptors where views of ground level working along the cable route and 132kV removal would be heavily filtered; occupy an oblique view or a limited extent of the view. Receptors include the Strawberry Line; PRoW on Barton Hill (AX29/39 and AX29/40); PRoW east and west of Winscombe; Webbington Road which has southerly views across the Somerset Levels and Moors; and valley side roads including Christon Road, Barton Road; a section of Banwell Road between Christon and Yarberry Farm; properties on Webbington Road, within Sandford and Winscombe; and Webbington Hotel. Webbington Hotel and Webbington Farm Holiday cottages are both businesses and therefore should be classified as moderate. Barton Camp is also not mentioned.*

7.10.42 *Moderate adverse significance of effect on views is anticipated from PRoW on Sandford Hill (AX29/42 and 68) where views are to the north across Section D and would include the substation, 132kV and 400kV overhead lines. Development at Webbington and Webbington Hotel would also experience moderate adverse effects on southerly views across Section B of the CSE compound and 400kV overhead line crossing the Somerset Levels and Moors. No mention of affected Webbington Hotel and Webbington Farm Cottage businesses. No mention of impact on the visual aspect from Crook Peak*

## 2.3 Biodiversity and Nature Conservation : Ground Environment: Hydrology and Water Resources.

### Section C – Mendip Hills.

10.4.9 The River Axe catchment covers an area of approximately 206km<sup>2</sup>. The source of the Axe lies in the Mendip Hills where underground rivers drain the area to Wookey Hole where the Axe flows westward before discharging into the Severn Estuary at Weston Super Mare. The proposed 400kV underground cables will pass beneath the River Axe to the south of Webbington (ST 37925 54887)...

10.4.10 The Lox Yeo River catchment is approximately 20.5km<sup>2</sup> and flows from its source to the north of the town of Winscombe south westerly to its confluence with the River Axe. The proposed 400kV underground cables will pass beneath the Lox Yeo River to the east of Loxton (ST 37977 55264) and to the south of Banwell (ST 40053 57890)...

No mention of the Axe Yeo which runs from Cheddar into the River Axe at Webbington

### Construction Effects - Haul Roads.

#### Overall Project.

Hydrology and Flood Risk.

## 2.4 Historic Environment Traffic and Transport .

(P60 of local interest).

## 2.5 Air Quality and Emissions, Noise and Vibration, Socio-Economics and Land Use, Electric and Magnetic Fields, Preliminary Conclusions and Next Steps.

### 10 Hydrology.

#### 10.5.20 Section B

The haul roads in this Section cross some local ditches and drains, which will need to temporarily culverted. These culverts could contribute to increased localised flooding as a result of blockages at the culverts or high intensity, short term rainfall (greatest potential for mobilisation of pollutants) increasing the upstream flow in each ditch.

Potential flooding here – what about the cumulative impact on the Levels as a whole?

10.10.21 There is no intention to abstract water from or discharge water into watercourses or water bodies adjacent to the working areas including groundwater. We would need information on where abstraction for water for washing vehicles would occur and where the contaminated water will be passed to settling beds/filtration units

0.5.110 There are no foundation pads to be located within 250m of the River Axe as this is part of the 400kV underground section, therefore there is no impact on increase flood risk in the Axe. Do SEC's have foundation pads? These will be within 250m of the River Axe.

10.5.231 For harmful pollutants entering the Rivers Axe, the sensitivity of the receptor is medium, with a medium magnitude due to the type of pollutant and longevity of the effects. Therefore the overall significance spillages into these watercourses would be Substantial adverse in



nature. Contaminated water ingress into trenches from, for example lead, and should therefore not be expelled into the River Axe. Where will this be discharged and cleaned? How would rainfall accumulation in trenches be disposed?

Appx 10b - This model was produced to assess our flood risk management assets and the results are fit for this purpose. We have MODERATE confidence in its input data, and subsequently its results. The reason that we have MODERATE confidence in the model and its results is because the model requires verification against a known flood event.

EA letter says : Further Information - We advise that you also contact the drainage engineer, Richard Dunn, on 01278 435435 at Sedgemoor District Council as he may be able to provide further advice with respect to localised flooding and drainage issues. This challenges the accuracy of the assessment.

### **13 Air Quality.**

Section B Trackout **High Risk Site.**

Table 13.27 (p 42) Traffic data –shows no increase in traffic on ATC 10 – A38 south of Churchill, A38 near Rooks Bridge shows 1.3% increase AADT. No data supplied for the A38 at Cross – 50% of traffic runs off the A38 at the A371 – increase in traffic would be detrimental at a known problem junction.

Table 13.32 Potential for Cumulative Effects with Other Projects (p51).

Does not include Bristol Water Cheddar Reservoir 2, Cheddar and Wedmore developments and impact on the A38

13.8.3 Appropriate mitigation measures will be proposed to minimise any adverse effects during construction, potentially including:

Using wheel washers; Where does this water supply come from?

Watering unsurfaced working areas when necessary.

### **14 NOISE AND VIBRATION.**

Table 14.7 Construction Traffic Assessment.

A38 near to Rooks Bridge 2016:0.19 /2017:0.22 /2018:0.34 /2019:0.41 /negligible.

A38 south of Churchill 2016:0.11/ 2017: 0.18/2018: 0.32/2019: 0.39/ negligible.

What about access roads from A roads onto Biddisham Lane and Barton Road

### **15 SOCIO-ECONOMICS AND LAND USE.**

**Tourism and Recreation.**

15.3.59 The Mendip Hills AONB provides the principal focus of tourism and recreation activities within the study area, with the key tourism sites of Cheddar Gorge, Wookey Hole, and Wells Cathedral, none of which is located within 2km of the Proposed Development. In 2006, the Mendip Hills AONB installed visitor counters at 22 access points on PRow within the AONB. None of the counter points were within 2km of the Proposed Development. The findings, reported in the State of the AONB Report 2009-2014 were as follows .The figures used relating to casual walkers from Kings Wood-Crook Peak, frequent local and

visitors, are misleading. Regular patrolling of this area by NT Rangers (who take counts of visitors) shows that around 60 or more people walk these PROW's and permissive paths in the duty period of 3 hour s.

Mountain Bikes: 10,070 people;

Horse Riders: 6,271 people; and.

Walkers: 139,615 people..

Table 15.25 Visitor Attractions and Areas for Recreation within Local Area of Influence. **This list omits Barton Camp**

15.3.66 During June 2013, count surveys were conducted at 11 locations within the Local Area of Influence to ascertain an indication of typical off-peak usage of the PROW. Each location was surveyed constantly on one day between 08:00 and 18:00 hrs. Mendip Way to north of Webbington Hotel on a route from Crooks Peak Adult pedestrian 23: Children Ped 0: Adult cycling : 30: Equestr(A) 0 : C) 0: 0 Adult dog walker 1 0 : total **54**. National Trust warden duty counts casual walkers from Kings Wood-Crook Peak. Known (my) counts while on Ranger duties at weekends average around 60 in each 3-hour period in contrast to the lower NG count over 10 hours.

15.4.16 From experience, National Grid anticipates that of the non-local staff employed during construction of OHL works, the following percentage breakdown of demand on different accommodation types is likely. Comparable information is not currently available for the underground cable and substation workforce or that associated with the WPD works: **When will workforce information on numbers be available – we need this number to assess the real impact.**

OHL workforce:.

50% stay in caravan and camping accommodation;

20% stay in short term let properties;

20% stay in serviced accommodation (B&Bs, hotels); and.

10% travel to the area from home..

### **Construction Effects – Agricultural Land and Operations.**

15.4.28 The Proposed Development will require the temporary use of land currently used for agricultural operations throughout the proposed route corridor through the requirement to provide elements such as access roads, site compounds and the trenching corridor for the underground cable. This will also have the potential to cause severance within the agricultural operations, reduce land availability and affect access. National Grid's compensation scheme will address these temporary impacts on the viability of the agricultural operations. However, the level of severance or land take required during the construction activities is currently anticipated to significantly affect the viability or functionality of two agricultural operations. One may be required to implement a change in farming practices to remain operational during the 3 year construction period due to severance. The other will have land essential to the farming practice acquired permanently and taken out of agricultural use as it is required in the long term for the operation of the Proposed Development.

Whilst this loss will be compensated for, it is unlikely the operators would be able to continue with the current agricultural operation. **There**

is a loss of one farm – does this include housing? What about associated holiday businesses at farms and their ability to continue over the construction and re-instatement period?

When will landowners and farmers know what level of compensation they will receive? As of 8<sup>th</sup> October 2013 we are aware that the timetable has been delayed from the original target by NG

### **Operational Effects – Agricultural Land and Operations.**

15.4.31 ..... Easement arrangements will be agreed to allow access for maintenance. Definition of need required also the dimensions for access and size of vehicle

### **16 ELECTRIC AND MAGNETIC FIELDS.**

16.1.12 Underground cables were acknowledged in this assessment but it was not considered necessary to perform measurements on these. The electric fields from these cables are screened; however power frequency magnetic fields are always present. Power frequency magnetic fields reduce very quickly with distance (see section) and are not a source of radio frequency emissions themselves The referred 'section' has no reference number identified.

16.1.14 The T-pylon is a new tower type and was therefore not explicitly included in the TCF. However, it is made up from basically the same subsystems (conductors system, insulators, and fittings) as existing tower designs.....

16.1.16 This extra information justifies EMC being scoped out of the PEIR and Environmental Statement. As T pylons are lower and not operational it should not be scoped out. PINS give no valid reason to scope out.

### **Underground Cable Sections.**

16.4.11 Magnetic fields produced by direct buried cables fall quickly with distance **as you move away** and the highest magnetic fields are observed directly above the cables. **How far do you have to move away?**

## **17 PRELIMINARY CONCLUSIONS AND NEXT STEPS (P100).**

### **17.1 Preliminary Conclusions.**

Landscape.

17.1.1 The land in which the Proposed Development would take place does not comprise one single landscape character area or recognised 'landscape unit'. There is no unifying characteristic or aspect of landscape which applies to the area in which the Proposed Development would occur because it is determined by the extent of development necessary to make the connection to the high voltage electricity transmission system and the other works that are necessary as a result of that connection. The Proposed Development will affect landscape character as manmade structures will be installed in a predominantly rural landscape and also in the urban industrial area of Avonmouth.

***Biodiversity and Nature Conservation.***

This does not consider the impact of the removal of grasslands and hedgerows on bees, butterflies and moths.

Hinkley C Connection Project  
Statement of Community Consultation  
**Consultation Critique Stages 1 & 2**

**Introduction**

This document collates the views of Badgworth Parish Council (BPC), Compton Bishop Parish Council (CBPC), Mark Parish Council and Wraxall & Failand Parish Council and those of residents and Parishioners on the consultation to date including campaign groups. It also reflects the comments made by Parish Councils at consultation meetings and Community Forums. This document was compiled in September 2012.

The authors are mindful of the requirements of the Planning Act 2008 ;

- The Planning Act 2008 Guidance Note, paragraph 39, concerns LA's key role. It states that under section 55 of the Act, LA's may make representations to the IPC concerning the adequacy of the promoter's consultation. Section 55(5) defines an adequacy of consultation representation as a representation about whether the applicant has complied with section 42, 47 and 48 of the Act.
- Any such representation must therefore be about how the promoter has carried out the consultation, and may not be about how the promoter has had regard to responses to consultation.

It is acknowledged that the LAs have helped and advised National Grid to develop their Consultation Strategy. This document does not criticise that process. It addresses issues experienced by Parish Councils and their parishioners in National Grid's delivery of that Strategy.

**Setting in context the expectations from Consultation**

- 1) The definition of Consultation; *Meetings for discussion and deliberation on a matter with a view to arriving at a decision by removing any difficulties.*
- 2) Stated brief from EDF to NG to achieve objective.
- 3) Presentation of fully detailed and explained options.
- 4) Agree possible solutions.
- 5) Agree likely best solution.
- 6) Review as project progresses and amend as appropriate.

## **What was presented by NG**

\* The statutory consultees and the public were presented with a choice of two corridor options for Overhead Lines.

## **Structure of this critique**

The document referred to in this critique is:- Hinkley Point C Connection Project Consultation Strategy (Statement of Community Consultation) – published 8<sup>th</sup> October 2009

- Column one of the table references the section and sub-section from the above SOCC.
- Column two represents the critique from Parish Councils.

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Date : Created September 2012  
Revised May 2013

# Hinkley Point C Connection Project Consultation Strategy (published October 2009) Section 1: Project Information

Statement of Community Consultation	Parish Council/Residents Comment
<b>SECTION 1: PROJECT INFORMATION</b>	
<b>1 INTRODUCTION</b>	
1.1.1 Section 2 of this document contains National Grid's Statement of Community Consultation for the Hinkley Point C Connection Project. The preceding sections provide background information about National Grid and the project and outlines the purpose of and principles underpinning the Statement of Community Consultation.	
<b>2 BACKGROUND TO NATIONAL GRID</b>	
2.1.1 National Grid owns and operates the high voltage electricity transmission network in England and Wales.	
2.1.2 When developing proposals for new network infrastructure, we have a duty under the Electricity Act 1989 to do so in an efficient, co-ordinated and economical way. As a statutory undertaker we also have environmental responsibilities which may shape how our network develops. How we set out to meet those environmental responsibilities, including our commitment to carrying out early consultation about major project proposals, is explained in our Stakeholder, Community and Amenity Policy (Appendix 1).	The Stakeholder, Community and Amenity Policy had not been published when the consultation began on the Hinkley C Connection Project (it was issued for consultation on 31.3.2009 and responses were requested by 23.6.2009). It was subsequently published in February 2010, almost 5 months after consultation on the HCC project had started, and finished. Thus there was no prospect that interested parties could judge whether the company was following its own policy; a fundamental part of the statement made by the developer in its Statement of Community Consultation. National Grid stated that they will consider the socio-economic effects before deciding on a route corridor. The Energy Minister at the time, Charles Hendry, dated 11 June 2011 emphasised again that National Grid has a duty

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	<p>to consider environmental and social costs. To date these costs are not available. The IET report, which was finally published long after this SOCC had expired, specifically stated that environmental and social costs were outside its scope. In our view this remains a fundamental flaw in the consultation process.</p>
<b>3 THE PROJECT</b>	
<p>3.1.1 We anticipate that in summer 2011 we will be applying to the Infrastructure Planning Commission for a Development Consent Order for a new double circuit 400 kilovolt (kV) overhead electricity transmission line connection between Bridgwater substation in Somerset and Seabank substation, north of Avonmouth in Bristol. The new connection will be approximately 56 km in length.</p>	<p>At the outset, NG clearly stated its intention to install overhead transmission lines, prior to any consultation. When, in 2007, NG received an application from EDF to connect Hinkley C Power Station, NG carried out an initial study. This study of options identified three potential connections. All overhead lines. Hinkley Point to Seabank was considered the best option in light of its licence obligations.</p> <p>The TEP Route Corridor Study Report of 2009 was limited to overhead lines, by National Grid and recommended Route 1a as the route with the least number of constraints. It was published before consultations began. The public was not made aware of its existence or informed of its content. It is noted that NG's consultations for the Mid Wales Connection Project (which post-dated that for both the Hinkley C Connection and the Sizewell, Bramford to Twinstead, connection) included a range of options, both in terms of the routeing of the connection and of the method of connection. This is quite different from the arrangements for the HCC proposal. Those interested in or affected by it were given no choice at all about the method of connection and a choice of only 2 overhead route corridors. Suggestions made by attendees at 'Exhibitions' in the Stage One consultation about alternative routes (e.g. the M5 corridor) or methods of connection (e.g. sub-sea in the Bristol Channel) were dismissed out of hand. It therefore seems probable that in designing the consultation process for Mid Wales NG may well have had regard to 'Commitment 8' of its 'Stakeholder, Community and Amenity Policy' having realised the extent of the problems that have been caused by its approach to the HCC.</p> <p>Action Groups and affected Parish Councils could not understand how the SOCC was fair when National Grid were only consulting on the two</p>



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	overhead route corridors. The concerns were raised by Dr Liam Fox in parliament in an adjournment debate in December 2009. These concerns were also raised with local councillors and as a consequence Somerset County Council wrote a letter dated 19.3. 2010 stating 'the Statement of Community Consultation is fundamentally flawed'.
3.1.2 In addition, we will be undertaking minor line entry modifications to the existing overhead lines at Hinkley Point to connect a new proposed gas-insulated (GIS) substation on the site of EDF's proposed new nuclear power station at Hinkley Point in Somerset. Further works will also be required including the construction of a new 400kV substation at Aust in South Gloucestershire and an extension to the existing Seabank substation. If Route Corridor One (Option A) of the two route options identified (see 3.1.6 for further details) were to be chosen, a new grid supply point substation at Churchill in North Somerset and a new 4km length of 400kV overhead line to connect it with the new Bridgwater to Seabank overhead line would also be required.	The 'Minor line entry modifications' have not been properly explained.
3.1.3 The proposed new infrastructure is needed to connect EDF's proposed new nuclear power station at Hinkley Point in Somerset to the National Grid high voltage electricity transmission system by September 2017. Our application for a Development Consent Order will be made under the Planning Act 2008 ('the 2008 Act').	Misleading information – CF's were told in May 2012 that even if Hinkley is not built there would still be a need for the 400kV link to provide resilience in the SW power network. All consultation with the general public was based around the need for Hinkley C only, latterly, PCs and Groups have been made aware that the line update will be needed if Hinkley C doesn't progress. This is an example of how NG has failed to give relevant/accurate information to those who have an expectation that salient facts are passed on to the interested parties.
3.1.4 The proposed development is Environmental Impact Assessment (EIA) Development and as such the application will be accompanied by an Environmental Statement under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.	It is not clear whether Parish Councils and Local Groups will be deemed to be interested parties in the EIA statement and whether they will be able to respond to its findings.

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<p>3.1.5 Two broad route corridor options for a new line between Hinkley Point and Seabank have been identified by National Grid, taking account of its statutory duties:</p>	<p>Two broad overland routes were identified at the outset, in the 2007 and 2009 TEP Route Corridor Study reports, and no change to these options, in the light of the ‘consultations’ has been considered. IPC website said “approach being taken by NG could be seen as <b>predetermining the choice of routes</b> and cloud the approach to all subsequent consultation”.</p>
<p>3.1.6 <b>Route Corridor 1 Option A</b> - involves the removal of an existing Western Power Distribution (WPD) 132kV overhead line and the construction of a new 400kV overhead line in its place which travels in a broadly south-to-north direction between existing National Grid substations at Bridgwater in Somerset and Seabank, north of Avonmouth in Bristol, via Portishead in North Somerset. This option would also require a new grid supply point substation at Churchill in North Somerset and a new 4km length of 400,000 volt overhead line to connect it with the new Bridgwater to Seabank overhead line.</p>	
<p>3.1.7 <b>Route Corridor 1 Option B</b> – considers the construction of a new 400kV overhead line parallel to the existing Western Power Distribution (WPD) 132kV overhead line either to the east or west. The existing WPD 132kV overhead line would not be removed.</p>	
<p>3.1.8 <b>Route Corridor 2</b> – involves the construction of a new 400kV overhead line between Bridgwater and Seabank substations, as far as possible from the existing Western Power Distribution (WPD) 132kV overhead line. This corridor seeks to avoid paralleling of overhead lines, although this may not be possible in certain locations due to environmental constraints and urban areas. The existing WPD 132kV overhead line would not be removed.</p>	
<p><b>4 PURPOSE OF THE STATEMENT OF COMMUNITY CONSULTATION</b></p>	

Statement of Community Consultation	Parish Council/Residents Comment
<p>4.1.1 Whilst our proposals are still at an early stage in their development we would like to hear the views of communities and interested parties in the area and to see whether and how their feedback can shape the further development of our proposals. The 2008 Act requires us to undertake public consultation with people living in the vicinity of the proposed works in advance of any Development Consent Order application to the Infrastructure Planning Commission and ultimately to explain how feedback from our consultations has influenced the proposal that goes forward to the Infrastructure Planning Commission.</p>	<p>Whilst the feedback from communities and interested parties has been overwhelming and consistent, NG has failed to address the public concern – the public feel ignored. The Feedback Report does not provide an explanation to the groups or forums on how the feedback has influenced NG’s proposals on their preferred route.</p> <p>The workshop with Statutory Consultees and NG, on 10<sup>th</sup> December 2010, appears to support the protection of landscape with undergrounding. Consultations following this workshop have not informed the various groups of this outcome and no attempt has been made, by NG, to recognise or incorporate this work into the project.</p>
<p>4.1.3 As our proposals evolve and develop there will be other stages during which local communities and interested parties in the area will be invited to express their views. The main consultation stages and a provisional timetable (including publicity once the Development Consent Order application has been submitted to the Infrastructure Planning Commission) are set out in the Statement of Community Consultation and described below.</p>	
<p><b>4.2 Consultation Stage One</b></p>	
<p>4.2.1 We will invite the views of people, local communities and interested parties living in the vicinity of the proposed works about:</p> <ol style="list-style-type: none"> <li>1. broad route corridor and substation siting options which National Grid has identified taking account of its statutory duties; and</li> <li>2. the next steps – how your comments will be taken into account, how we envisage taking forward the development of our proposals, when we anticipate reaching a decision about our preferred option, anticipated further consultations and timescales.</li> </ol>	<p>Views are freely given but these are not demonstrably given due consideration by NG. Views and proposals have not been openly discussed at Community Forums, delayed until the next meeting and then not appearing on the agenda e.g. Community Benefits/welfare. The Planning Inspectorate (formerly the IPC) had been made aware of the inadequate consultation and several meetings were held with interested parties and NG to act as mediator in order to progress the consultation, (see 5.1.9).</p>
<p><b>4.3 Consultation Stage Two</b></p>	

Statement of Community Consultation	Parish Council/Residents Comment
<p>4.3.1 Once your views on the route corridor options have been taken into account and we have decided upon a preferred option, we will develop route alignments for the proposed electric line within the preferred route corridor and carry out further consultations with local communities and interested parties living in the vicinity of those more precise alignment options. A final choice about our preferred route alignment will only be taken after feedback obtained at this stage has been taken into account.</p>	<p>There is no demonstrable evidence that views given have been constructively taken into account. Refer to 4.1.1 and section 2 'Community Forums'. NG does not provide an explanation, to the groups or forums, on <u>how the feedback has influenced</u> NG's proposals</p>
<p>4.3.2 Consultation will also be undertaken at this stage on the preliminary environmental information gathered as part of the EIA.</p>	<p>The consultative parties are not defined for this consultation</p>
<p><b>4.4 Provisional timetable</b></p>	
<p>4.4.1 The timetable set out below is our best estimate at this stage and may be subject to change as the project progresses. Changes to the overall programme will be communicated through the methods outlined in Section 5 below.</p> <p><i>October 2009</i> Publication of final Statement of Community Consultation</p> <p><i>12th October 2009 to 8th January 2010</i> Stage One - Consultation on Route Corridor Options <i>February 2010 to 31st March 2011</i></p> <p>Stage Two - Consultation on Route Alignment and Preliminary Environmental Information</p> <p><i>Summer 2011</i> Submit Development Consent Order application, Environmental Statement and Consultation Report to the Infrastructure Planning Commission and thereafter publicise, giving the opportunity for interested parties to comment to the Infrastructure Planning</p>	<p>Factors which caused a delays in the timetable ;</p> <ul style="list-style-type: none"> <li>• These stages and their programmed dates were significantly changed as challenges made it clear that there was insufficient information given on the proposal and the discounted options.</li> <li>• Costs were exaggerated and not consistent. The public had little trust in the information being provided. Independent cost report commissioned, still not clear</li> <li>• Challenges during consultations resulted in revision of National Policy Statements 1, 5 and 6.</li> <li>• A report commissioned by W&amp;FPC ( Ambrose/Pratt report), following meeting in November 09 in Nailsea (chaired by Dr Liam Fox), was issued January 2010</li> <li>• NG were instructed to go back to the Strategic Optioneering Report and produce a new document to explain further about more favoured options, i.e. sub-sea and undergrounding. This was eventually produced in June 2010. It took 6 months to issue. Meanwhile, the consultation deadline of 23<sup>rd</sup> July 2010 was not changed and it was considered that there was insufficient time for the councils and groups to analyse its contents. A further SOR was published in August 2011.</li> </ul>

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Commission.	<ul style="list-style-type: none"> <li data-bbox="1106 188 1921 220">• NG was required to revise their undergrounding policy.</li> </ul>
<b>4.5 Consultation zones</b>	
<p data-bbox="91 363 450 395"><b>Consultation Zone One</b></p> <p data-bbox="91 400 1021 619">4.5.2 Zone One extends at least 1 km either side of the broad overhead line route corridor options or at least 1 km around the broad substation siting locations. Households in Zone One will be contacted by letter with a project summary leaflet and details of planned public exhibitions in addition to being covered by the more general communications outlined in Section 5.</p>	
<p data-bbox="91 654 450 686"><b>Consultation Zone Two</b></p> <p data-bbox="91 691 999 943">4.5.3 Zone Two encompasses those households that are more than 1km from the broad overhead line route corridor or broad substation siting locations, but still within the same Town and Parish Council areas. Within Zone Two, we will offer briefings to all of the Town and Parish Councils. Communities within Zone Two will also be covered by the more general communications outlined in Section 5.</p>	
<p data-bbox="91 981 987 1126">4.5.4 As our proposals are refined from broad route corridor options to specific detailed alignments, the same criteria will be applied to define consultation zones at Stage Two. We will redefine our consultation zone around the preferred corridor.</p>	
<p data-bbox="91 1161 880 1230"><b>5 HOW ARE WE CONSULTING AND HOW CAN YOU PARTICIPATE?</b></p>	
<p data-bbox="91 1265 954 1334"><b>5.1 Consultations with people living in the vicinity of our proposals</b></p>	

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<p>5.1.1 Throughout the consultation process, we will be inviting communities and interested parties to view, discuss and comment on the development of our proposals and the project team can be reached in a number of different ways. We will endeavour to ensure that public consultation is effective to ensure that all members of the community have the opportunity to express their views. We will endeavour to provide clear and concise information about the project and its impacts throughout the pre-application consultation process to enable constructive debate to take place.</p>	<p>We are advised that Stages 2 and 3 are limited to Community Forums with a qualification that attendees are either Parish/Town Councillors or members of formal groups of 5 or over in number. The general public are not included. Only one representative is allowed to attend from PC's and Groups under the TOR - the consultation fails in its purpose when that one member is absent. The Forums have failed to provide information about/address issues that are fundamental to those who are interested in or affected by the overhead connection. The meetings are considered to be poorly organised, the notes of the meetings are incomplete and/or erroneous and there has been little attempt to report on identified Action Points. This is evidenced by the fact that at the Strategic Community Forum meeting held in May 2012 there was sufficient dissent among the members about the veracity of the notes that a vote had to be taken on this issue. Members felt the Forums were a 'tick-box' exercise to meet the requirement set out in the Planning Act 2008.</p>
<p>5.1.2 We have identified the following ways in which the public can express their views but these will evolve during the consultation process and will be tailored to the needs of each of the project development stages leading up to the submission of our application for a Development Consent Order to the Infrastructure Planning Commission.</p> <p><b>Inspection Copies</b></p> <p>5.1.4 Inspection Copies of the project summary information, the Statement of Community Consultation and other relevant technical documents will be made available to view free of charge at the following locations during the opening hours indicated and at appropriate local libraries.....</p>	<p>Stage One consultation documents deposited in the library in Burnham-on-Sea (the main library for East Huntspill and Mark (affected villages on the Somerset Levels) were not easy to find without the help of the librarian and consisted only of a single copy of the Statement of Community Consultation and the initial leaflet sent to householders, housed in a plastic folder. There was no information that could be taken away by an interested party without their paying for its reproduction. This was in marked contrast to the information provided by EDF on the proposed Hinkley C Power Station. EDF had a large display of leaflets covering different aspects of the proposal. There was no information in the travelling library that could have reached several residents (especially the elderly) that have no transport or who have difficulty accessing public transport.</p>

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<p><b>Other Public Stakeholder Groups</b>            5.1.9 Where invited, and where possible, we will attend meetings of relevant existing public stakeholder groups affected by our proposals. This may include community interest groups, area panels, amenity /area focused groups and resident/neighbourhood groups.</p>	<p>A meeting was requested by the Protest Groups and held on 8<sup>th</sup> March 2010 with the aim of getting detailed answers to technical questions raised during the consultation to date, and to build a dialogue and understanding of each other's position            The meeting ended in an impasse as Paul Hipwell's letter dated 10<sup>th</sup> March 2010 to Peter Bryant refers. It states that "Mr Holliday or any other senior staff at NG have declined to meet with the Protect Groups". We noted that at Monday's discussion only one member of NG staff was present, the others present being consultants who were constrained to the brief given them by NG. Consequently it was not possible to have a meaningful discussion on the broader issues and it is not surprising that the meeting ended in an impasse'.</p>
<p><b>Community Forum</b>            5.1.10 As we build our relationship with local communities, we will consider, in consultation with relevant Town and Parish Councils, whether there is benefit in establishing a Community Forum, to which we would invite local community nominated representatives to discuss our proposals. If a similar forum is established by our customer, EDF Energy, we will participate when invited to.</p>	<p>See 5.1.1 above</p>
<p><b>Specific Consultation Approaches</b></p>	
<p>5.1.11 Sometimes local planning authorities and/or organisations representing the interests of particular 'hard to reach' groups may identify a need to communicate our proposals perhaps in a slightly different way to parts of the community who may otherwise find it difficult to effectively engage with us through the methods outlined above. Through our consultations with Somerset County Council, West Somerset District Council, Sedgemoor District Council, North Somerset Council, South Gloucestershire Council and Bristol City Council it has been identified that certain 'hard to reach' groups exist within the project area and guidance has been given to us on how best to</p>	<p>Consultation that primarily relies upon access to and understanding of 'new technology' (i.e. on-line computer access to the internet) disenfranchises the elderly in the population and those in low income groups who cannot afford the equipment. National Grid had been told this on several occasions but had not modified its approach.            In addition, those people who wish to comment on issues via the internet are required to make a full registration of their details on the website, which promises that any updated information and new consultation periods will be sent to the registrant. The promised communication had not been forthcoming.</p>

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engage these groups through the consultation methods explained in this document and in the SOCC.	
5.1.12 Where, through consultation with the public and/or local authorities, other bodies with a potential interest in our proposals are identified, such as local schools or businesses, we will consider how best to make contact with and engage these groups in our consultations.	Where schools are concerned, what process has NG taken to ensure that out of area parents of affected schools were consulted? It would appear that parents of children from Mark Church of England V.C. First School (where 40% are from out of the immediate catchment area) have not been consulted. Also, despite not being formally asked to respond, the Governors have responded to the consultation, but without the benefit of knowing any mitigation for the School
<b>5.2 Statutory Consultations</b>	
5.2.1 These public consultations form an important part of our wider project-related consultations. There are consultations taking place throughout the pre-application process with a wide range of statutory and non-statutory organisations such as relevant local authorities, the Environment Agency, Natural England, English Heritage for example. Once a route corridor has been identified, consultations with landowners, occupiers and persons with an interest in the land will also take place. A map showing all the local authorities, with whom we are consulting, is shown at Appendix 2.	The Actions of National Grid's Land Agents suggest that approaches are being made there: unannounced, inappropriate, pestering, no mention of the compensation for disturbance and recently threatening a £5k fine if a landowner did not comply with their request for land ownership details and access. In addition the records of Bruton Knowles appear to be inaccurate in several cases where a landowner was not available or has declined to participate at this stage. These issues are replicated in the Suffolk and Essex area. People have land rights and NG has a responsibility to ensure consultations carried out on their behalf are done so professionally.
<b>6 NEXT STEPS</b>	



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<p>6.1.1 Feedback and comments made at all stages of the consultation process will be recorded and carefully considered by the project team. Where appropriate, our project team will respond directly on the points that people make. Should other potentially viable options be raised during our consultations, we will consider their relative merits and report on them.</p>	<p>Feedback and comments, particularly at CF, are in the form of 'Notes' or Chair's Notes' and not professionally minuted and are not entirely accurate.</p>
<p>6.1.2 How feedback has been taken into account will be explained in a number of ways and it will be explained at subsequent public consultations. Where appropriate, feedback will also be provided by direct communications, local meetings and media and project updates. Ultimately, how comments received have shaped and influenced our proposals will be reported to the Infrastructure Planning Commission in a Consultation Report prepared by us, which will accompany our Development Consent Order application as required by Section 37(3)(c) of the 2008 Act. The Development Consent Order application to the Infrastructure Planning Commission, including that the proposed development is EIA development, will be publicised and the Consultation Report and the Environmental Statement (or a summary as appropriate) will be made available on our website and at inspection locations.</p>	<p>Feedback is not explained. Individuals are spending a considerable amount of their private time on this 'consultation' and at no time has there been a satisfactory debate on how the publicly stated concerns have been taken into account. It would appear that NG listens but does not choose to hear. The public feel that NG are 'getting a tick in the box' when they listen but ignore serious concerns. There is little example of NG providing an explanation, to the groups or forums, on <u>how the feedback has influenced NG's proposals</u>.</p>
<p>6.1.3 We anticipate taking a decision about which option to take forward for detailed Environmental Impact Assessment in February 2010 and ultimately which option will form the Development Consent Order application to the Infrastructure Planning Commission.</p>	

Statement of Community Consultation	Parish Council/Residents Comment
<p>6.1.4 Between February 2010 and March 2011, consultation will take place on the preliminary environmental information (PEI) that informs the preparation of the Environmental Statement. The scope of the EIA will be discussed in a series of scoping meetings with the local authorities and organisations like Natural England. We will then apply to the IPC for a Scoping Opinion in November 2009. The scope of the EIA will then be published on our website with a schedule of the surveys we expect to undertake, giving an indication, where known, of the dates and periods of time over which such surveys will be undertaken. On completion of the surveys and information gathering, consultation, by the methods outlined in this document and the SOCC, will be carried out around each of the subject areas as appropriate where it is considered consultation will bring a value to the project and where a decision is to be made. The programme for the consultation will be communicated via the project website, by direct communications and media and project updates once the EIA scope has been agreed and a preferred route corridor has been chosen.</p>	<p>The feed-back on and from Thematic Groups to Community Forums has been informal, weak and incomplete. A brief summary has been given but no detail given which can be used to form opinions and assist the Local Community Forum in, for example, Landscape amenities. There does not appear to be a satisfactory dialogue or exchange of information between the Local Community Forums and the Thematic Groups. NG appears to be controlling and restricting the information flow and thereby giving the view that NG is controlling both groups for its own objectives. As a consequence, a request was made by affected Parish Councils that a joint meeting between representatives of the Thematic Group on Landscape and the Strategic Community Forum be held. This request was subsequently refused by National Grid.</p>
<p>6.1.5 Presently, we anticipate that a Development Consent Order application to the Infrastructure Planning Commission would potentially be ready for submission around summer 2011.</p>	
<p><b>Section 2: Statement of Community Consultation</b></p> <p><b><u>Introduction</u></b></p> <p>National Grid Electricity Transmission plc is publishing this Statement of Community Consultation in connection with a proposed new 400kilovolt (kV) overhead electricity transmission line between Bridgwater Substation in Somerset and Seabank Substation, North of Avonmouth in Bristol plus associated 400kV substation works at Aust, Seabank and possibly Churchill (which would also require an additional 4km overhead line connection</p>	

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<p>from the proposed new line). The Statement sets out how National Grid proposes to consult people living in the vicinity of the proposed infrastructure works.</p> <p>The proposed electricity infrastructure is needed to connect EDF's proposed new nuclear power station at Hinkley Point in Somerset to the National Grid high voltage electricity transmission system by September 2017. Following selection of a preferred option and detailed environmental impact assessment, an application for a Development Consent Order will be made to the Infrastructure Planning Commission under the Planning Act 2008 accompanied by an Environmental Statement under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009, which we anticipate will be in summer 2011. Consultation with people living in the vicinity of the proposed development will be undertaken in two main stages and throughout the course of the project as follows:</p>	
<p><b>Consultation Stage One October 2009 to 8th January 2010 (12 weeks):</b> Consultation on the proposed overhead line route corridor options and substation siting options and consultation on people's preferred method for receiving information during Consultation Stage Two.</p>	<ul style="list-style-type: none"> <li>• Public felt consultation had begun half-way through the process: only route corridors for overhead line options were up for discussion, all other options were ruled out by NG. The TEP Route Corridor Study (dated 2009) ruled out all other methods of connection and identified which of the three overhead line routes was the least constrained.</li> <li>• Optioneering report was weak, limited, broad brushed and flawed. Inaccurate cost assumptions, options were rejected, by NG, on the basis of incorrect costs.</li> <li>• Public did not understand why the M5 corridor was not included as a viable route for consideration. Reasons given in the TEP Strategic Optioneering report were spurious, i.e. the report mentions the proximity to Burnham on Sea and Weston Super Mare and the archaeological features at Puriton and Bridgwater as reason for not following M5.</li> <li>• IPC website said "...approach being taken by NG could be seen as</li> </ul>

Statement of Community Consultation	Parish Council/Residents Comment
	<p>predetermining the choice of routes and cloud the approach to all subsequent consultation”</p> <ul style="list-style-type: none"> <li>• The Planning Act 2008 requires NG to undertake public consultation with people living in the vicinity of the proposed works [...] and ultimately explain how feedback from their consultations has influenced the proposal. No feedback of this nature has been forthcoming.</li> <li>• Consultation with parents of out-of-area: Over 40% of the children who attend Mark Church of England V.C. First School come from outside the school catchment area (from Highbridge and from outlying villages). NG is presumed not to have consulted their parents?</li> <li>• Not all residents received a letter. Likely that some were thrown away as “junk mail”. Legal requirements of consultation not met.</li> <li>• Parish Council in Sedgemoor DC, Compton Bishop were not invited to the initial briefing. Legal requirements of consultation not met.</li> <li>• Alternative technologies stated as being incapable of delivering NGs requirements or not technically feasible.</li> <li>• Costs of alternative technologies provided by NG (undergrounding claimed to be 12-17 times more expensive). IPC requested that information on costs be obtained. Key to their assessment of eventual application by NG.</li> <li>• Extract from Sedgemoor DC Executive Meeting (contained in email dated 27.7.10) that SDC was to “submit an additional interim response to NG which makes it clear that the Council strongly believes it is premature to move to Stage 2 consultation and the selection of a preferred route corridor in advance of more detailed analysis of options and the sub-sea route and other strategic alternatives need to remain open as options.</li> <li>• Subsea cable was included as not part of consultation for Stage 1. When asked about it at Exhibitions NG told the public it was not technically feasible.</li> </ul>

Statement of Community Consultation	Parish Council/Residents Comment
<p><b>Consultation Stage Two February 2010 to 31st March 2011 (13 months):</b> Consultation on the positioning of towers (detailed alignment) along the chosen preferred route corridor and consultation on the preliminary environmental information prepared as part of the Environmental Statement. We will endeavour to provide clear and concise information about the project and its impacts throughout the pre-application consultation process to enable constructive debate to take place. We are publishing a Stakeholder, Community and Amenity Policy which sets out our commitments to consultation.</p>	<ul style="list-style-type: none"> <li>• Still being offered an overhead line with potential part-underground in the most sensitive areas. Those areas not yet identified. Partial undergrounding not panacea: brings sealing-end compounds in its wake: consequences for other areas.</li> <li>• People still don't understand why, subsea route is not pursued as has the least impact on land based issues, M5 connection was said, by NG, not possible even though it is very suitable for a surface GIL, land-take easy as all in ownership of DTP, area already affected by industrial blight of the motorway itself. Preferable to use of open countryside.</li> <li>• There is no change in NG's pre-determination of choice of routes. NG has produced regular glossy literature but has not been prepared to go back and re-evaluate the options. Technology changes quite a lot in 2.5 years.</li> <li>• No evidence that feedback from public consultation has influenced NG. NG resisted all attempts to persuade them to revisit options at SCF meeting on 28 February 2012. NG will not consider M5 corridor or subsea cable.</li> <li>• Despite not being formally asked to respond, the Governors have responded to the consultation, but without the benefit of knowing any mitigation for the School.</li> <li>• IET/BK report published 31.1.12 after Preferred Route Corridor for o/h line announced. Showed that costs considerably lower than those claimed by NG. (undergrounding costs in range of 4.7 to 8 times greater).</li> <li>• NG has never wavered from their proposal for an overhead line, albeit they may provide some amount of undergrounding. Revised undergrounding policy published 2011. Schemes to have 10% of undergrounding as a general rule. [Somerset Alliance Against Pylons (SAAP) assess this as through the AONB in the Loxton Gap and the areas of highest population density].</li> <li>• Subsea cable is possible according to the Strategic Optioneering Report of August 2011. Subsea cables will be required for the Atlantic Array and the Marine Energy Park. Opportunity for NG to have a radical rethink of the connection options that takes account of the</li> </ul>

Statement of Community Consultation	Parish Council/Residents Comment
	<p>report of the Energy Networks Strategy Group February 2012 report. NG not looking at the big picture: just looking at the Hinkley C Connection scheme.</p>

**Consultation during stages one and two will be undertaken by the following means:**

Method	Detail	Comment
<p><b>Public Exhibitions</b></p>	<p>Open exhibitions where you can view our proposals, talk to our project team representatives and record your comments will be held at suitable publicly accessible venues / locations at approximately 6 km intervals along the length of the proposed route and where such venues / locations are available in the vicinity of the proposed substations. Notice of the public exhibitions will be given on our project website, by direct communications, and media and project updates, when the venues and dates have been finalised. Feedback forms will be available at the exhibitions for you to record your comments.</p>	<ol style="list-style-type: none"> <li>1. NG's exhibitions were staffed in part by PR people who didn't have the expertise to answer questions in depth or correctly, for example, a response was that mitigation of Sealing End Compounds could be achieved by hiding them in forests and against a backdrop of ridges, which is the common practice. The exhibition staff explained that she was brought in from PR to help with the exhibition and was not familiar with the Somerset Levels and Moors. Depending on which NG staff member you spoke to, different answers were given, particularly about costs. This gave a confused picture to most attendees. Feedback forms had been given to attendees at these public exhibitions. The feedback forms were based solely on the overhead line option and the two route corridors. Question 3 for example asks 'Please tell us which option you prefer and why?' Residents were encouraged to fill in the feedback forms before they left the exhibition venue. Not everyone fully understood all the implications of the proposal.</li> <li>2. As a result of the confusion, at least two Parish Councils (Mark and Badgworth) subsequently held a public meeting to explain fully and</li> </ol>

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		<p>simply the proposal and the issues involved. Many residents hadn't appreciated the effects of the impact locally and further afield. Decided to hold a public meeting to hear accounts and swop information so feedback forms can reflect opinions on the proposals clearly. As a result, those that had already filled in a form at the venue completed another one and presumably, both feedback forms will have been counted</p> <p>3. Residents were told that undergrounding resulted in the land being made sterile. This was very misleading. The Parish Councils had to explain that this was not correct it just meant that buildings or trees and hedges (root interference) could not be positioned over the cable.</p>
<b>Letters</b>	At Consultation Stage One people living within about 1km of the proposed route corridor options will be contacted by letter with a project summary leaflet and details of planned public exhibitions.	<p>1. At Badgworth Parish Council's public meeting, several residents said they had not received letters.</p> <p>2. Loxton Parish Council reported that Barton Lane residents were not informed (Barton Lane runs from The Webbington Hotel through the Loxton Gap to Barton/Winscombe and is in the Parish of Compton Bishop whose Parish Council was also not informed).</p> <p>3. Residents of Nailsea either ignored the letter or contacted EDF to ask about the works. EDF assured them it was probably some local remedial works.</p>
<b>Parish and Town Briefings</b>	Parish and Town Councils within whose area the proposed works will be constructed will be offered briefings at Consultation Stage One to discuss our proposals.	<p>1. This was held on 9<sup>th</sup> November 2009 in Mark Village Hall. Misinformation - Looking at the maps, it appeared to most Councillors that sub-sea was a viable option and asked why this was not offered. We were told the technology wasn't available it was too costly because of the converter stations and the environmental protection constraints at the water's edge. It has since been proved that the technology is available and has been used elsewhere in the UK. NG firmly stated that Undergrounding was not an option and only briefly mentioned in the text of the original SOR (only six lines).</p> <p>2. Compton Bishop Parish Council was not invited to any briefing. They</p>

Statement of Community Consultation		Parish Council/Residents Comment
		only knew through word of mouth.
<b>Other public stakeholder group meetings</b>	When invited and where it is possible to do so, we will attend meetings of local community groups affected by our proposals.	<ol style="list-style-type: none"> <li>1. Meeting requested by Groups and held on 8<sup>th</sup> March 2010 with aim of getting detailed answers to technical questions raised during consultations. No senior members of NG present, only 1 member of staff and some consultants who had been constrained to the brief given by NG. Not possible to have meaningful discussion on broader issues so meeting ended in impasse.</li> <li>2. IPC minutes dated 18<sup>th</sup> May 2010– IPC suggested that a meeting be held to move on the impasse in the consultation process.</li> <li>3. Minutes of an IPC meeting held on 5<sup>th</sup> July 2010 Feedback forms - Moving forward with options - Nick Winser (NW), Executive Director, Transmission, asked how NG could achieve a balance to meet the needs of local community without disproportionate consultation on unviable options. Sir Michael Pitt (MP) suggested that in other situations looking at issues from a community perspective have been shown to be helpful. MP also suggested that sometimes he finds it helpful when thinking through matters to start with a clean sheet of paper and look afresh at situations without being encumbered with what has gone on before.</li> <li>4. NW asked what this meant to NG's process of consultation, considering Stages 1 and 2. JB reflected feedback from local communities and LAs, that Optioneering tended to be skewed to emphasise technical and economics in Stage 1. Jan Bessell (JB) reflected on the balance being requested by different interested parties on the approach to an equitable and balanced comparison of the options across technical, environmental, social and economic considerations.</li> <li>5. JB also reflected on wider established planning practice of external and independent scrutiny and/or audit to provide confidence on the information being provided help demonstrate robustness.</li> <li>6. NG agreed to reflect on their processes'.</li> <li>7. National Grid (David Mercer) publically stated at the Nailsea public</li> </ol>



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		<p>meeting (November 2009) chaired by Liam Fox, that it was not technically feasible to put the cables underground or undersea. It took over a year before National Grid admitted that underground and undersea were both technically feasible. At the November 2009 meeting, National Grid was asked by Liam Fox to provide the whole life costs. This request was subsequently raised in Parliament by our local MPs in December 2009. Nothing happened and as a consequence a meeting took place between interested parties and Sir Michael Pitt, (CEO of the IPC, now the Planning Inspectorate). Sir Michael Pitt requested National Grid commission the KEMA report. KEMA failed to establish the costs and a new report under the auspices of the IET was commissioned by DEFRA. This report has been published but still fails to address whole life costs and does not consider social and environmental costs.</p>
<b>Community Forum</b>	<p>As we build our relationship with local communities, we will consider, in consultation with relevant Town and Parish Councils, whether there is benefit in establishing a Community Forum, to which we would invite local community nominated representatives to discuss our proposals. If a similar forum is established by our customer, EDF Energy, we will participate when invited.</p>	<ol style="list-style-type: none"> <li>1. Inception meeting took place 22<sup>nd</sup> July 2010.</li> <li>2. The deadline to inform NG of intention to join the CF was 10<sup>th</sup> September 2010 – over the summer holidays.</li> <li>3. There is a basic mistrust of this process. It appears to be NG led.</li> <li>4. CFs cannot be appropriate if the principle of the project is OHL and the participants represent communities that have said overwhelmingly that they do not want OHL. Hence CF's are only relevant to siting of OHLs and associated equipment.</li> <li>5. The CF is perceived to be a tool for NG to further the tacit acceptance of their only proposal. Refer to 'Chair's note of 19<sup>th</sup> and 22<sup>nd</sup> July 2010 Inception meeting <i>"concern that agreeing to CF's would legitimise a solution communities do not want."</i></li> <li>6. The draft TORs for CF's were drawn up by Planning Aid and NG.</li> <li>7. Participants were expected to commit to membership prior to TORs being agreed. Some action groups refused to attend (NMPs).</li> <li>8. Attendance at CF meetings could not be taken as an endorsement of the consultation proposal or for approval of OHLs.</li> <li>9. The Community Forum Framework document states -</li> </ol>

Statement of Community Consultation		Parish Council/Residents Comment
		<ol style="list-style-type: none"> <li>1. The objectives of the CFs 'Are as a mechanism by which NG ensure that issues of interest and concern to the community are reflected and considered in this next stage of consultation on the route alignment'.</li> <li>2. The role of the CFs is to 'inform the decision that needs to be taken by NG and this includes being able to challenge and review the basis and information on which these decisions are being made'</li> </ol> <p>10. At the CF held on 13<sup>th</sup> December 2011 NG announced that they had proceeded to Stage 3 of the Consultation Process without waiting for the IET/PB independent cost analysis report and therefore cannot have fully explored all options and technologies. Attention was drawn to their document entitled 'Our Approach to the design and routing of new electricity transmission lines' where they, on page 9 paragraph 'Consult Stakeholders and Communities', state '<u>At the end of Stage 2</u> we will carry out a full public consultation, which examines all of the options we have considered, and asks for views both on our preferred strategic option and the potential route corridors we have identified to achieve this'.</p> <p>11. This has not been done. Stage 2 was to announce the preferred route corridor so the full consultation referred to above should have taken place after the announcement. Despite this, NG still insisted that they had already begun Stage 3. NG has announced that Stages 1 &amp; 2 were merged at some point, and this still remains a confused picture for both the Parish Councils and the public. NG are to change the text in their Approach document to avoid this confusion in any future projects.</p> <ol style="list-style-type: none"> <li>1) The IET Report was presented by NG at the CF meeting held on 28<sup>th</sup> February 2012.</li> <li>2) The presentation was very technical with NG claiming the costs were in line with their original estimates. This is clearly incorrect. Note NG 11-17 times more and IET 4.7 - 8 times more) The slides of this presentation are on the NG website but some slides are missing, in particular the composite cost</li> </ol>

Statement of Community Consultation	Parish Council/Residents Comment
	<p>slide for all technologies.</p> <ol style="list-style-type: none"> <li>3) The IET report presents the OHL and UGC in considerable detail but is limited in its provision of information for GIL and Subsea, particularly for the subsea HVAC option. It recognises, but doesn't include, the socio economic costs and environmental cost etc, which would have formed the basis for the "whole life cost comparison" originally part of the IET brief. These costs originally requested by Dr Liam Fox at a meeting in November 2009 still remain unanswered.</li> <li>4) CF attendees were urged to join the Local Community Forums (LCFs) (Stage 3) in the groups determined by NG. (note : . Refer to 'Chair's note of 19<sup>th</sup> and 22<sup>nd</sup> July 2010 Inception meeting "...operational framework and membership should be determined by the community and not NG..."")</li> <li>5) These are North, Mendips and Adjacent Parishes, and South.</li> <li>6) These forums are to consider the effects OHLs on local areas and communities. Attendees did not agree that Stage 3 had been reached because a public consultation on the Stage 2 conclusions has not been presented. A letter by NG was issued to all attendees at the CF meeting held on 28<sup>th</sup> February 2012. This letter indicated the dates for the 1st Local Community Forums of 26/27/28<sup>th</sup> March 2012.</li> <li>7) After considerable discussion it was agreed that Parish Councillors go back to their councils to ask for a mandate on how to proceed since they represent communities who overwhelmingly do not want an overhead line. Since the meeting, NG has issued the invitations despite the fact that some councils may not meet before the scheduled LCF dates 26/27/28 March 2012.</li> <li>8) Previously, there had been some discussion to combine the small 'Mendip' Section with the 'South' section to balance numbers in both 'North' and 'South' sections. It was also considered that those councils and groups that comprise the Mendips section would have the opportunity to attend both north and south LCFs as issues affecting the Mendips AONB</li> </ol>

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		<p>will be discussed in each forum. These matters have been disregarded. Costs quoted at CF meeting 28<sup>th</sup> February 2012 NG claimed that, even with the IET report, undergrounding across Levels still 17 times more expensive even when IET costs appear to be only 4.7 to 8 times more to underground.</p> <p>9) The foregoing suggests UGC will prove to be too expensive and the OHL default position will prevail.</p> <p>The meeting came to an impasse between CF members and NG and the meeting was abandoned because Parish Councillors were obliged to report back to their councils and seek a decision as to whether they should continue to support the Community Forum process.</p>
<b>Project Update</b>	<p>Between now and the submission of our Development Consent Order application to the Infrastructure Planning Commission, project updates will be produced according to key project milestones, but at least every six months, providing an update on our proposals and the consultation process, and reporting on the outcome of the consultation process. These will be distributed to residents and website and provided on request by our project team who wish to receive them. Copies will be made available on our communications on our website, and to Parish and Town Councils community groups, by e-mail to those registering for further communications on our website, and to Parish and Town Councils who wish to receive them. Copies will be made available on our website and provided on request by our project team.</p>	<ol style="list-style-type: none"> <li>1. NG states 'Between now and the submission of our DCO application to the IPC, project updates will be produced according to project milestones, <u>but at least every six months</u> providing an update on our proposals and the consultation process, and reporting on the outcome of the consultation process'.</li> <li>2. It also states that 'These will be distributed as appropriate to residents and community groups in Consultation Zone One, by email to those registering for further communications, on our website and to Parish and Town Councils who wish to receive them. Copies will be made available on our website and provided on request by our project team'.</li> <li>3. A registered resident, and a Parish Councillor, state that they have not had updates every six months. There was the glossy magazine 'Project News' dated summer 2010. In that publication, page 8 states under the title 'Next Steps', that 'We will be providing a further National Grid Project News update when we announce the preferred route corridor, which will have taken everyone's feedback into account. That announcement was of course severely delayed. In that period there were no updates. Therefore, they haven't updated Zone One residents or PC/TCs every six months as stated in the Consultation Strategy document.</li> </ol>

Statement of Community Consultation		Parish Council/Residents Comment
		<ol style="list-style-type: none"> <li>4. A Project Update was recently posted and given out at the SCF 28<sup>th</sup> February 2012, (this being in NGs declared Stage 3).</li> <li>5. Not everyone in Zone One has access to a computer so they rely on hard copy information. Somerset and North Somerset Counties have a large incidence of the older generation. Many elderly or those of retiring age have moved to these Counties to enjoy their facilities and landscapes &amp; do not have use of a computer.</li> <li>6. The website is confusing, difficult to navigate and muddled Some documents, e.g. Community Forum slides, are incomplete.</li> <li>7. The document 'Guidance on pre-application consultation, paragraph 78 states 'It may be necessary from time to time for a promoter to proceed with project options significantly different from those consulted on (for example because new information arises which renders all previous options unworkable or invalid for some reason). Where a proposed application changes to such a degree that the legitimacy of the consultation may be in question, promoters should consult the community again on the new options. In such circumstances promoters should supply consultees with sufficient information to enable them to fully understand the nature of the change (but not necessarily the full suite of consultation documents), and allow at least 28 days for consultees to respond.'</li> <li>8. Parish Councils believe that inadequate consultation, together with the information that has been submitted by various groups and councils on technology feasibilities and differing costs, there are significant questions and issues that still have not been consulted or addressed. For these reasons this application should not be accepted by the Infrastructure Planning Commission when submitted for a Development Consent Order.</li> </ol>

## General Comments

### 1) **Challenges that caused delay -**

- a) NGs apparent lack of knowledge of technology advances and costs were exaggerated and not consistent. The public had little trust in the information being provided. Independent cost report commissioned, still not clear as costs appear to be only 4.7 to 8 times more to underground. However, costs quoted at CF meeting 28<sup>th</sup> February 2012 NG claimed that to underground across Levels still 17 times more expensive because of rivers and ryhnes for reasons that demonstrated their landscape knowledge to be weak.
- b) The public are still unclear as to how the overhead lines will be mitigated particularly across places of flat terrain like the Somerset Levels. It has not been answered but a response at the public exhibitions was that they will hide them in forests and against ridges! ( trees do not grow to 50m even after 40 years and in some areas will not grow at all)
- c) The Holford rules are inadequate for landscapes like the Levels and Moors.
- d) The Electricity Act 1989 – should have regard to landscapes.

### 2) **Further questions remain unanswered-**

- a) **Property Blight** – At the time of this report, there is evidence that the owners of properties for sale within the announced preferred corridor have experienced difficulties in selling their houses. House buyers do not want to buy property within the corridors. Estate Agents have indicated that property values within close proximity of the overhead line will fall significantly and this could be in excess of 25%. There is no compensation for these owners. Any loss of asset value has to be borne by the owner.
  - b) **Health issues** – This is a very sensitive issue that many feel has not been dealt with adequately. The concerns are not helped in the knowledge that other countries have recognised that there may well be health implications associated with overhead lines and the effects of Electro Magnetic Fields (EMFs). It is acknowledged that NG have to seek advice from Government sources, but at the very least it would be prudent to use a precautionary approach until such times that the issues of these fears have been proven one way or another.
  - c) **Mitigation options** are mentioned in stage 1 and NG states “...*At the next stage there will be more detailed consideration of the precise positioning of any alignment and consideration of the range of mitigation options....*”. No details have been forthcoming in stage 2 consultations.
  - d) **Socio-economical** queries have been referred by NG to their web site which only contains references to socio-economics specifically within EMF studies.
- 3) Costs** – NG continues to state that OFGEM and The Electricity Act requires NG to propose the most cost efficient and least regret solution. This defaults to an only OHL option. The costs used for OHL does not appear to include any allowance for any sections which appear eligible for consideration of undergrounding, e.g. AONB area. The exclusion of a budgetary cost figure for this may skew the base figures used in the Optioneering and IET reports and artificially inflate the cost difference between OHL and undergrounding.

### 4) **Other Issues**

- a) The majority of members of Community Forums are frustrated by the lack of open consultation with NG who appear to follow their pre-determined option and disregard the majority public views. This 'box ticking' mentality is at odds with the IPC's guidelines. The IPC document entitled 'Engaging with Communities' published 17.2.2011, states 'Good community engagement is about more than just 'ticking the box'. If there is no real commitment, all the key decisions, have been made, not enough time is allowed or there are insufficient resources to engage properly, it is likely that at best little will be achieved and at worst, the exercise may add to the frustrations of a community increasing the risk of objections. If the consultation is inadequate, the IPC may decline to accept the subsequent application. There is no 'perfect recipe' for good community engagement. Consultation is not about selling a scheme it is about working with local people to understand how it can be designed to limit the impact on the local area'.
- b) At the First Stage public briefings, NG was asked by several members of the public why the line couldn't go underground. They were told that it made the land sterile. Some Parish Councils and parishioners felt they could not support undergrounding for that reason. NG's statement was corrected by a Parish Councillor that only trees and hedging could not be planted over the cable because of the roots, but the land itself recovers in under 2 years. This information is contained in the NG publication 'Undergrounding high voltage electricity transmission - The technical issues'.
- c) Parish Councils were misled by being advised, by NG, that undergrounding will result in the land becoming sterile. This was supported by David Mercer's response to Liam Fox's Commons speech when he said "*undergrounding can restrict the use of land in the long term*".
- d) At the LCF meeting on 26<sup>th</sup> March 2012, National Grid revealed an alarming lack of basic knowledge of the structure of the Somerset Levels and its patchwork of Rhynes, ditches and rivers when attempting to explain and justify their statement on the factors that cause a significant increase in costs for the possible undergrounding on The Somerset Levels.
- e) The general public have been misled, by the name of the project, that the installation of a 400kV line to Seabank is required purely for the Hinkley C power station. Members of the Community Forum were advised that the line is also required for the security of supply in the south west network.
- f) *NG maintained that the publication 'Selection of Preferred Corridor Report (published August 2011)' they concluded that "the option of constructing an overhead transmission line would best meet National Grid's technical, economic and environmental obligations and should remain the preferred option to take forward for further investigations."* (David Mercer April 2012. NG displays a predetermination of the results from the Thematic Groups and Local Community Forums.
- g) P157 of Consultation feedback says "the duty to consult the local community contained in Section 47 of the 2008 Act is a duty to consult about the Proposed Application formulated by National Grid and not a duty to consult on all possible technical solutions for connecting Hinkley Point C. National Grid considered a wide range of options and, having regard to its legal duties, initiated its pre-application consultation on an overhead line between Bridgwater and Seabank." This was not made clear and the public are not fully aware of this constraint.
- h) The Consultation appears to be flawed because all options have not been considered. The challenge to sub-sea costs and undergrounding did not elicit a review of the preferred options.
- i) National Grid has given Parish Councillors their view that The Electricity Act is an obstacle to them and prevents them from promoting socially acceptable alternatives to OHL's. At a discussion with Parish Councillors and Tessa Munt M.P. at a CF meeting NG blamed the Government for "not allowing" sub-sea or undergrounding on the basis of costs which exclude and socio-economic costs.

Hinkley C Connection Project  
Statement of Community Consultation

**Consultation Critique Stage 3**

**Introduction**

This document sets out the views of Badgworth Parish Council (BPC), of Compton Bishop Parish Council (CBPC), Mark PC (MPC) and those of Parishioners on the consultation to date. It also reflects the comments made by Parish Councils at consultation meetings and Community Forums.

The authors are mindful of the requirements of the Planning Act 2008 ;

- The Planning Act 2008 Guidance Note, paragraph 39, concerns LA's key role. It states that under section 55 of the Act, LA's may make representations to the IPC concerning the adequacy of the promoter's consultation. Section 55(5) defines an adequacy of consultation representation as a representation about whether the applicant has complied with section 42, 47 and 48 of the Act.
- Any such representation must therefore be about how the promoter has carried out the consultation, and may not be about how the promoter has had regard to responses to consultation.

**Structure of this critique**

The document referred to in this critique is :- Hinkley Point C Connection Project Consultation Strategy version 3 – published 28<sup>th</sup> February 2012

- Column one of the table references the section and sub-section from the above SOCC.
- Column two represents the critique from Parish Councils.

Authors : Sue Hayes - Badgworth PC: Richard Parker - Compton Bishop PC: Eileen Corkish – Mark PC: Chris Ambrose - Wraxhall & Failand PC

Created : April 2012



## Hinkley Point C Connection Project Consultation Strategy

<p>File : SOCC Response to NG Consultation Strategy Stage 3 V4 April 2012 7<sup>th</sup> April 2012 <b>Statement of Community Consultation</b></p>	<p><b>Parish Council/Residents Comment</b></p>
<p>Beginning in June 2009 with initial discussions about the strategic options for the Project, the first phase of public consultation ran from October 2009 until July 2010 and asked for people's views on a shortlist of three overland connection options within two proposed route corridors. National Grid announced its preferred route corridor on 29 September 2011.</p>	<p>People's views given rejecting Overhead lines, but NG has not given adequate consideration or justification for ignoring those views. They failed to revisit these views in this stage 1, Three o/h routes were proposed because of either a bad optioneering assessment or a predetermined position. They should have reviewed their preferred route after their 'Additional Information' and the IET report to include sub-sea and underground. Repeated requests to provide social costs have not been forthcoming. As a consequence, no adequate cost balance can be achieved with capital costs. National Grid has stated that it is not possible to provide social costs in monetary form. Impossible to balance monetary capital costs to narrative social costs. This is not compliant with the requirements of NPS EN5, paragraph 2.8.9</p> <p>Undergrounding 2.8.9 The impacts and costs of both overhead and underground options vary considerably between individual projects (both in absolute and relative terms). Therefore, each project should be assessed individually on the basis of its specific circumstances and taking account of the fact that Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or sub-sea line if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable. In this context it should consider:</p> <ul style="list-style-type: none"> <li>● the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads)</li> <li>● the additional cost of any undergrounding or sub-sea cabling (which experience shows is generally significantly more expensive</li> </ul>

		<p>than overhead lines, but varies considerably from project to project depending on a range of factors, including whether the line is buried directly in open agricultural land or whether more complex tunnelling and civil engineering through conurbations and major cities is required. Repair impacts are also significantly higher than for overhead lines as are the costs associated with any later uprating.); and 13 Proposed underground cables do not require development consent under the Planning Act, but they may form part of a scheme of new infrastructure which is the subject of an application under the Act, and requirements or obligations regarding undergrounding may feature as a means of mitigating some of the adverse impacts of a proposal which does require and is granted development consent.</p> <p>Consultees are unable to establish if the costs of dismissed alternative options would be more favourably compared with the Overhead line option should all the costs for this method of transmission be included.</p>
1.7	Our current phase of consultation - Stage 3 - is intended to engage consultees in the process of shaping the detailed design of the connection.	Phase 2 is incomplete (see item 1.12, below)
1.8	The final stage of public consultation - Stage 4 - will be on National Grid's proposed scheme and preliminary environmental information.	If Thematic groups haven't given feedback then how can the likely and/or detailed locations of pylons, SEC, etc.. be established ? This data will also have an impact on costings. Will PC's be appraised of the 'preliminary' information?
1.12		Stage 2 isn't finished. In their document ' <i>Our approach to the design and routing of new elect. Transmission lines</i> ' they committed to providing, among other things, a report including how they intend to take feedback into account. Page 9 of this document also states that at the end of Stage 2 National Grid will undertake a public consultation. This did not take place.

<b>1.14</b>	To align the Project with this approach going forward, the first phase of public consultation now sits within Stage 2.	Really? What consultation on this change? Shouldn't the document "Stage 1 Consultation feed back Report Aug 2011, note, same date as SOR, now be updated to include Stage 2 That is comments from new SOR and the IET report.
<b>2.3.1</b>	While our proposals are still at the development stage, we would like to hear the views of communities and interested parties in the area so that they can be taken into account in Project development.	Communities gave their views. They were not taken into account. Had they done so they would not be pursuing this connection method or route. From experience, NG will only include proposals that suit them. They need to respond fully to all proposals- what does 'taken into account' mean?
<b>2.3.2</b>	This Project is classed as a Nationally Significant Infrastructure Project (NSIP) and as such, the Planning Act 2008 requires us to undertake consultation with people living in the vicinity of the proposed work.	If we don't know whether underground obviates the need for pylons is the consultation realistic or worthwhile. Can be done when details are known.
<b>2.3.3</b>	National Grid aspires to engage positively with stakeholders and communities. We are committed to the benefits of involving stakeholders and communities effectively in our work and recognise the benefits of doing this.	No evidence that NG has engaged "positively". NG needs to define their intention of 'engagement'. The benefits must be to communities being able to influence NG's 'preferences'. Has the Consultation Feedback Report fulfilled this need? Is it comprehensive enough?
<b>2.3.5</b>	In developing our strategy for Stage 3, we have considered a broad variety of guidance from central government, affected local authorities and statutory consultees, together with feedback from consultees during our first stage of consultation.	NG's 'consideration' seems shallow and strengths of local feedback have not received due consideration.
<b>2.4.21</b>	Local authority officers are invited to attend both the Thematic Groups and Community Forums. In addition, specialists from the authorities are encouraged to attend the Thematic Groups specifically to provide focused input on specific areas of interest.	
<b>2.5.1</b>	Stage 1, strategic options and Stage 2, outline routeing and siting - including public consultation on route corridors – are now complete.	Disagree (see item 1.12 above)
<b>2.5.2</b>	We are currently in Stage 3 of the Project. At this stage, we gather information that will help find the alignment of the transmission line within the preferred route corridor.	Disputed by attendees at the SCF Stage 2 not complete.

3.3.5	In order to allow the strategy to be responsive and to build on the experience of working with communities within the route corridor, National Grid will monitor the effectiveness of its activities and use the information obtained to evolve the strategy.	Local groups should also be involved. No evidence of monitoring. No feedback of monitoring given. No LCF between Nov 12 and March 13
3.3.6	Monitoring provides a mechanism by which it will be possible to demonstrate to the Planning Inspectorate in the consultation report that the 'wider' community has been involved, and if not, the actions which have been put in place to address the gaps.	Does monitoring only report back on who was invited to be consulted rather than what the consultation entailed, i.e. listening but not responding? No evidence of monitoring. Info at Bridgwater Exchange wrong place, very few visitors, needs car journey as it's out of town.
3.5.1	During the strategy development workshops, National Grid sought the views of the local authorities on our outline plans for local, site specific consultations.	All these require local involvement via Parish Councils or local interest groups The post-it sticker exercise/workshop was held at a CF meeting and was restricted (by NG) on the attendance of only one allowable CF member to be in attendance at that meeting. Badgworth PC registered representative was absent so the map was issued on the website and in printed form without any details of Badgworth Parish villages, Tarnock and Biddisham
3.5.2	These may be required as part of our Stage 3 Consultation in order to gather feedback on issues which are distinct from the overall route alignment.	
3.7.1	National Grid will continue to work with the local authorities to develop this strategy and an accompanying programme of activities to ensure effective engagement and consultation on our developing proposals.	
3.7.2	A workshop, to which all the affected authorities were invited, was held on 24 January 2012. The objective was to generate initial feedback on a consultation strategy for Stage 3.	Involvement of SCF and LCF's should have been taken into account for the development of this strategy given the experiences in phase 1 and 2.
4.1.3	<p>The main objectives of Stage 3 are:</p> <ul style="list-style-type: none"> <li>• To maintain a strong exchange of information with our stakeholders during the development of the detailed alignment</li> <li>• To engage and seek the views of local communities close to the potential route</li> </ul>	A 'best guess' scenario needs to be made available from NG rather than having 'preferred options' imposed on LCF's and parish councils. Landowners have been approached but no affected householders close to the line proposal where concerns of devalued house prices, difficulties in selling houses etc. are experienced.
<b>Within this stage, a number of steps have been identified that move the design from a 'preferred route corridor' to a 'draft preferred alignment' within that corridor.</b>		
4.2.4	These stages are also applied to site specific proposals such as Aust and Hinkley Point line entries.	

<b>4.2.5</b>	During this process, Thematic Groups and Community Forums will discuss issues and provide information to National Grid that will feed into the identification of study areas and the development of options.	There appears to be an omission that NG would be open to guidance from these expert groups.
<b>4.2.8</b>	National Grid will review all the outputs from these activities and document how they have influenced the proposals.	To satisfactorily achieve this minutes must be taken and made available (not meeting notes) to ensure local issues are properly dealt with. Does the feedback report answer this? Will the new feedback report answer this?
<b>4.5.19</b>	A Strategic Community Forum has also been established, to discuss the Project-wide issues that are common to all the communities affected by National Grid's proposals.	SCF cannot function until May 15 <sup>th</sup> – is this an issue which delays phase 3?
<b>4.5.20</b>	The Strategic Community Forum met in December 2011 to debate a structure for Local Community Forums.	This was not completed.
<b>4.7.5</b>	Other specialists, such as local interest groups, will be invited to attend specific 'topic' meetings e.g. water, as they have a good knowledge of the local area.	Who define the local interest groups? PC's or LCF's are the obvious choice Do they mean drainage board and EA?
<b>4.8.1</b>	An EIA will be undertaken on our preferred connection option to inform the design of the scheme and ensure that environmental and community impacts are minimised wherever possible.	The use of the word 'inform' implies that NG can ignore their responsibility to achieve an equitable solution
<b>4.8.2</b>	Temporary work, including work related to construction, will be considered as part of the EIA.	Has Highways Dept been involved with advice?
<b>4.8.3</b>	The scope of the EIA will be discussed in a series of meetings called Thematic Groups (described above).	Surely PC's and local interest groups have valid information.
<b>4.8.4</b>	Following these discussions, an EIA scoping report will be submitted to the Infrastructure Planning Commission, who will consider and consult on our proposed approach in summer 2012.	PC's have heard nothing about the EIA. Is 'summer 2012' not too soon – or will this be steamrolled in?
<b>4.10</b>	What we do with your feedback	

<b>4.10.1</b>	<p>During Stage 3, National Grid will consider views and feedback received from all parties including:</p> <ul style="list-style-type: none"> <li>• Output from engagement and consultation with local authorities, parish councils and landowners</li> <li>• Issues raised and information provided by the Community Forums and Thematic Groups</li> <li>• Feedback from members of the public, businesses and community groups</li> </ul>	<p>All views and feedback need to be accurately recorded in minutes. This will address the perception that NG chooses to ignore some views and feedback and provides no explanation.</p>
<b>4.10.2</b>	<p>All representations received will be analysed and taken into account as appropriate when developing the proposals.</p>	<p>....and properly documented</p>
<b>4.10.3</b>	<p>To this end National Grid encourages consultees to utilise the feedback methods promoted by National Grid to ensure proper analysis.</p>	<p>Needs to be defined and agrees with consultees to ensure the method is fair</p>
<b>4.10.4</b>	<p>At the end of Stage 3 Consultation, National Grid will provide a summary of the representations received, the key issues raised and how they have shaped our proposals.</p>	<p>Although NG only have to present a summary to the IPC. It is up to the IPC to decide whether the summary is acceptable or flawed and whether they need to investigate the consultation process in more depth. If the IPC so wish they can ask to see all the responses within their 28 day acceptance period. This suggests that the summary should include ALL representations and details.</p>
<b>5.3.4</b>	<p>Feedback and comments made at all stages of the consultation process will be recorded and carefully considered by the Project team.</p>	<p>.... Accurately recorded (agreed with the consultee) and made publically available. Feedback Report Stage 1 and 2 published - Feedback Report Stage 3 due March 2013</p>
<b>5.3.5</b>	<p>Where appropriate, our Project team will respond directly on the points raised. Should other potentially viable options arise during our consultation, we will consider their relative merits and respond accordingly.</p>	<p>All points raised should be transparent and therefore accurately recorded (agreed with the consultee) and made publically available.</p>

## Comments

- 1) Following issue of IET/PB report, a revised SOR should be produced which should then influence the Feedback Report responses. Social costs should be included for the overhead option. .
- 2) Clause 2.4.13 - 3.3 Are probably correct as a strategy but leave a lot to be desired in terms of their implementation, with criticism of the methods used by the land agents and reliance on websites which are not easy to use for everyone. Not everyone has a computer which appears to be discriminatory.
- 3) Clause 3.3.4 refers to "business sector" however it is not clear whether NG ever formally consulted with all the schools affected or parents living outside a catchment area or other local authority organisations.
- 4) Clause 3.6.3 and 4.1.3 are linked to the extent that NG continues to confuse the term '*consultation*' with the provision of information about what they are doing. These are completely different and independent activities. In 4.1.3 they even use the expression " ..... a strong exchange of information..." which is meaningless.
- 5) Clause 3.7.3 What technical input has been provided by Local Authority Officers?
- 6) From Clause 4.0 on, the clauses are all predicated on the presumption of the Selected Route Corridor. This we believe is premature.