

## **Planning Inspectorate Hearing HCC project 18 march 2015 - 19.00 hrs -Methodist Hall - Nailsea**

I am Chris Ambrose a Chartered Engineer and representing as a Councillor, Wraxall and Failand Parish Council (WFPC).

I am a retired director of Arup. Arup, brought about the change of route for the Channel Tunnel Rail Link, now known as HS1. So I know that change is possible.

To assist you, and to keep to time, I have taken the liberty of providing supporting documents (SD) where I make reference to quotes etc.

Hinkley C is still delayed. The Government are putting a decision off until after the election?

The Austrian government has challenged the legitimacy of subsidies with the EU. The Chinese and EDF are clashing over funding being dependent on equipment being supplied from China.

Therefore ***The making of a decision at the "last most responsible moment" has extended.*** Consequently there is time to revisit the alternatives and offer fully proposed solutions.

National Grid ( NG) make statements in their "**business case**" and publication "**Doing the right thing**" (*please see support documentation*) (SD) in which they say the sort of things we would expect of a major company but they did not deliver.

The 1989 Electricity Act also makes clear what matters need to be considered (see SD) as does National Grid's own Environmental Guidance (SD)

***So why are we disappointed that these stated intentions are not demonstrated in the development proposal?***

***Is it to satisfy their shareholders?***

Well of course they want to satisfy their shareholders their business plan says so and profit is of course necessary for a business to survive but it should not be the highest motive it should not be the bottom line and the major driver at the expense of "**Doing the right thing**".

Yet this is not the only reason. In addition, they believe, mistakenly, that ***they are constrained to lowest first cost.*** They are "fearful" not to appear to take advantage of their monopoly by appearing to "over engineer" or increase costs. Yet in a letter from Ofgem to Chris Ambrose dated 27 November 2009. Ofgem disagree. (see SD)

Cost is clearly important. However, it is what is included in the cost that is more important. Presently NG are only costing for initial capital costs and operating costs. This distorts the best value solution. NG need to include all the environmental, socio-economic and countryside costs.

The way NG procure the works is also important as from my experience it can have a significant impact on quality, time and the bottom line. As at today, we do not know how NG will procure the works. I would recommend the Institution of Civil engineers as an excellent starting point.

So, if that is not the reason why did they not "**consult**" as we understand the term and as we expected from their "**Doing the right thing**"?

Because they mistakenly believe that *they are only obliged to consult on their preferred option and route*.

A decision in my opinion made probably as early 2007 but certainly in 2009 with support from a consultants study which confirmed the route 1A.

NG having already established which overland route was most beneficial to them decided that the "Consultation" was to be only about the route not the system.

Even at this initial stage the consultation was "fraudulent" as their consultant had already made clear which route was environmentally the most acceptable and NG had therefore predetermined the outcome. NG's offer of an alternative route was effectively a "straw man" to be knocked down to give the impression of a "Consultation".

Consultation was therefore a sham.

From this time NG's "Consultation" became no more than, a presentation of information to the public as the scheme developed.

These decisions taken before "Consultation" began ensured that no substantive consideration was given to alternative solutions as these had already been considered by NG's Strategic Optioneering Reports, however, these take the form of a desk top study which by its very nature is extremely limited.

What NG should have pursued were the three obvious solutions of Sub Sea, M5 tunnel and Overland, such that each solution received full consideration in as great a detail as the overhead proposals, fully supported with well documented and costed designs, costed environmental, costed socio-economic and countryside impacts.

Following which all their detailed information should have been available to independent expert scrutiny to guarantee transparency.

This approach would have offered proper and credible consultation for residents.

Because of the frustration with the "Consultation" process W&FPC commissioned a report from Professor Claus Neumann, an expert in the design and installation of Gas Insulated Lines (GIL). His report was published in June 2013. This majored on the comparison of GIL with other solutions. However, no reference to this document could be found on NG's web site at the time of my search.

So why then do they say they will *lobby and advocate change* and not do it.

National Grid is a top performing FTSE 100 company. They were the CEGB, a nationalised industry. They have a monopoly position which leads to a persistent one sided study. The UK Government being their major supplier of business. They receive a fixed percentage return based on the value of the works undertaken for the Government. The reason they don't lobby and advocate change is because they have no history or culture of innovation there is a lack of imagination, or the need for a wider interpretation of the legislation and regulation.

The regulations were never intended to limit the solution to overhead lines. NG needed to challenge presumptions. They needed to step out of their comfort zone and come up with workable solutions that fitted with their own stated values and not demonstrate blinkered adherence to the written word and blinkered adherence to the approach they had always taken.

NG could have done more research, could have been more innovative instead of spending so much money on public relations and marketing.

In this respect, NGs lack of proactively engaging with these regulatory issues is very disappointing and clearly demonstrates that NGs actions do not follow their rhetoric

WFPC recognises the need for the new installation and crucially that it will be in place for 100 years.

So a decision to go overland with cables supported on pylons will inevitably have a detrimental affect and a long term adverse effect on our countryside, on residents, visitors and the economy.

This is not necessary when better alternatives exist.

It begs the question why, when we keep pace with advances in technology in all other aspects of our lives, from improving the environment, reducing CO2, advances in medicine, transport etc, through to personal communication does NG persist with 19th century technology?

The same advances are seen in engineering - but may be not in transmission lines?

However, NGs engineers are highly cable people. They could have proposed a better solution. When asked the question—"how would you connect power lines from Hinkley to Seabank?" the answered at a public meeting by all NG's engineers was "via the shortest and easiest route - which is up the channel or the M5". The follow up question - which is likely to be the cheapest route? - OHL, in as straight a line as possible.

This takes us right back, to why didn't they do more research and be more innovative to develop what they knew to be the best solutions?

It is therefore our opinion, that NG allowed self interest to over rule the public interest and it is not in the public interest for NG to mistakenly believe they are driven by lowest first cost as the only guarantee of progressing a development to approval. Ofgem make that quite clear. ( SD)

The overhead line proposals have already had an adverse impact on communities with 6 years of uncertainty and will most definitely continue to have an adverse impact on those communities particularly affected, and also on the wider community and with even more intensity during the 8 year construction period and then to a lesser but no more beneficial extent, for the remainder of the century and beyond.

We have commented on these adverse affects in detail in our written representation under Principal issues.

However, I would like you to consider some aspects of the proposed T pylon.

It is possibly a more elegant design in its simplicity, it is also more complex and costly to design, construct, erect and ensure it stays in place.

It is likely to be 35m high and up to 30m wide at its widest point.

The monopole will be tapered to a diameter of 2.5m at the base with either a single driven pile up to 20m deep or a concrete raft of some 14m x 7m x 1.5m deep on mini piles to support it.

Compare that to a 3m dia tunnel which satisfies all the environmental and public needs and is beneficial to NG. ( SD)

We would like to draw the Planning Inspectorates attention to an aspect of NGs approach to residents of and business in Wraxall and Failand.

We understand that at Noah's Ark Farm Zoo the adverse effects of overhead lines and pylons on the site were offered to be mitigated by NG but by only one solution, undergrounding. This would consist of removing a strip of earth as wide as a motorway to place the cables underground. That was a worse and a more frightening offer to the owner than the overhead lines. The point I am making is that there was a better way by tunnel or even a different route but they weren't offered. NG wanted their overhead lines and pylons.

The other aspect impacts on a domestic property only some 50 /60 metres away from the transmission lines and pylons and the existing 132KV being rerouted under the property. In this instance no alternative was suggested. The best was a "shrug of the shoulders" to the problem.

This overpowering of a resident is not acceptable and it is suggested that the human rights act should be invoked.

In addition a major economic benefit was on offer from Siemens to manufacture GIL in UK, (SD) generating employment in manufacturing, a sector of our economy in desperate need of a boost and creating wealth with export potential and revenue to the exchequer. This approach has been discouraged by NG, a decision which is hardly in the public interest or the national interest. It could provide jobs for employment black spots in the north of England.

In preparation for this hearing I came across an article : Positive Contribution by Stuart Bailey, National Grid's Head of Sustainability & Climate Change (dated April 2014) of which the following is an extract

***"I'm encouraging people to think and do things differently, to innovate and, when they're making decisions, to consider the environmental impact of their options."***

***"The strategy puts National Grid on the path to reduce greenhouse gas emissions, better manage its consumption of resources and protect biodiversity and ecosystems".***

We would like to hope that NG respond to the initiative and **do the right thing**.

There is more than sufficient time to produce fully proposed alternatives.

We are therefore asking the Planning Inspectorate to request the Secretary of State to require of NG, the further and better information outlined above and covered in more detail in our representation.

Thank you for listening to me.

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