
Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – rule 8 and 9
Application by National Grid Electricity Transmission for an order granting development consent for the Norwich to Tilbury project

Representation by Ingatestone & Fryerning Parish Council (Interested Party Reference number: [REDACTED])
Ingatestone & Fryerning Parish Council submits this formal objection to the above application and makes the following representation.

Summary of Objection

The Council recognises the national imperative to upgrade electricity transmission infrastructure and does not object to reinforcement in principle. However, it strongly opposes the proposed use of overhead transmission lines supported by 50-metre high lattice pylons through Ingatestone & Fryerning parish and the Wid Valley landscape.

The proposed structures would cause substantial, long-term and irreversible harm to landscape character, visual amenity and the setting of heritage assets. The Council considers that viable and materially less harmful alternatives exist — namely offshore routing, undergrounding, or the use of lower-impact overhead structures such as the T-pylon — and that these alternatives have not been given adequate, transparent or proportionate consideration.

Grounds of Objection

1. Severe Landscape and Visual Harm

The Wid Valley east of Ingatestone is an area of exceptional local landscape quality, characterised by open valley views, mature vegetation, historic field patterns and a relative absence of modern infrastructure.

The introduction of 50-metre lattice pylons (TB187–TB199) would:

- Dominate the skyline and interrupt long-established views;
- Introduce overtly industrial vertical elements into a predominantly rural landscape;
- Create substantial cumulative visual impact in an area currently largely free from overhead transmission lines;
- Permanently erode the tranquillity and undeveloped character of the valley.

The magnitude of change would be profound and irreversible. The scale of the proposed lattice structures is wholly discordant with the existing landscape context.

2. Heritage and Local Amenity Impacts

The proposed pylons would adversely affect:

- The setting of heritage assets within and around the valley;
- Conservation areas and historic rural settlement patterns;
- Public rights of way and recreational routes where open views form a key component of user experience;
- The wider appreciation of the parish's rural character.

The industrial form of traditional lattice pylons would be visually intrusive within historic and rural settings and would materially diminish public enjoyment of valued community spaces.

3. Failure to Give Adequate Weight to Less Intrusive Alternatives

The Council is concerned that alternatives — particularly offshore routing and underground cabling — have been discounted primarily on cost grounds.

While cost is clearly a material consideration, it cannot in itself justify proposals that would result in significant and permanent environmental harm. National policy requires a balanced assessment of environmental, social and economic factors. A purely financial comparison, without transparent cost-benefit and environmental impact analysis specific to sensitive locations such as the Wid Valley, is insufficient.

Similarly, the apparent dismissal of modern, lower-impact overhead designs — most notably the T-pylon — has not been convincingly or transparently justified.

4. Evidence Supporting Lower-Impact Pylon Designs

The T-pylon is materially shorter than a conventional 400kV lattice pylon, has a smaller footprint, and presents a more streamlined and less visually intrusive form.

National Grid's own published material acknowledges that the reduced height and contemporary design of the T-pylon can lessen visual impacts in sensitive landscapes.

In the Norwich to Tilbury Design and Access Statement (August 2025), paragraphs 5.4.16–5.4.18 state that T-pylons were discounted on the basis that they would cost approximately 2 to 2.5 times more than conventional lattice pylons. The Council considers this assertion to be inconsistent with available evidence.

An analysis by Ofgem in 2020 of the Hinkley–Seabank transmission project — where T-pylons were used for much of the route — concluded that the overall cost differential was approximately £25 million within a £655 million project. This equated to roughly £0.2 million additional cost per T-pylon. Furthermore, experience and economies of scale would reasonably be expected to reduce cost differentials in subsequent projects.

Even applying that differential, deployment of 13 T-pylons within the most sensitive Wid Valley section (TB187–TB199) would be expected to increase overall project costs by approximately £2.6 million — a marginal addition within a nationally significant infrastructure scheme.

The Council therefore considers the targeted use of T-pylons within the Wid Valley to be a proportionate, reasonable and deliverable mitigation measure.

Request to the Planning Inspectorate

In light of the significant and permanent landscape, visual and heritage harm identified, the Council respectfully requests that the Planning Inspectorate:

1. Require National Grid to produce a clear, transparent and location-specific comparative appraisal of:

- o Offshore routing;
- o Underground cabling; and
- o Lower-impact overhead alternatives, including T-pylons;

Such appraisal should include full cost-benefit analysis and environmental impact assessment specific to the Wid Valley and other sensitive sections.

2. Require National Grid to demonstrate, with detailed engineering, environmental and financial evidence, why T-pylons or other less intrusive technologies are not suitable for pylons TB187–TB199 and similarly sensitive locations, rather than relying on high-level or generalised cost assumptions.

Conclusion

The Council accepts the strategic need to increase transmission capacity. However, that need does not justify permanent and avoidable damage to valued landscapes, heritage settings and community amenity where viable alternatives exist.

The Council therefore asks the Inspectorate to ensure that the Secretary of State and National Grid undertake a proper, transparent and evidence-based reassessment of offshore routing, undergrounding and T-pylon alternatives before any consent is granted for traditional lattice overhead infrastructure within this parish.

Only through such scrutiny can confidence be maintained that the least harmful and most proportionate solution has been selected.