

Submission ID: S4080CD6C

I attended the hearing in Essex and would like to understand the response from NG

# WRITTEN REPRESENTATION TO THE PLANNING INSPECTORATE

## OBJECTION TO THE DEVELOPMENT CONSENT ORDER

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### 1. Introduction and Summary of Objection

I submit this Written Representation in objection to the proposed Development Consent Order (DCO).

I recognise the national need for offshore energy infrastructure and accept that electricity generated offshore must be brought onshore. However, that necessity does not remove the Applicant's statutory duty to select the option that results in the least harm to heritage, landscape and the natural environment.

My objection is grounded in the following principal concerns:

1. Failure to give genuine consideration to reasonable alternatives.
  2. Failure to properly discharge statutory duties under Schedule 9 of the Electricity Act 1989.
  3. Significant and enduring harm to designated heritage assets and their setting in Great Waltham.
  4. Unjustified loss of trees, hedgerows and established green infrastructure.
  5. Failure to properly adopt the Great Waltham alternative route identified in the Design and Development Report (2023).
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### 2. Inadequate Consideration of Alternatives

The consultation process focused on the Applicant's preferred option. Alternatives — including integrated offshore solutions, HVDC undergrounding, and T-pylons — were not presented on an equal footing for public consideration.

Consultation is not meaningful if realistic alternatives have effectively been discounted before engagement begins. The public has therefore been asked to comment on what appears to be a largely predetermined outcome. That approach constrains informed participation and limits the scope of genuine debate.

Where reasonable alternatives exist that may materially reduce environmental and heritage harm, they must be properly and transparently assessed.

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### **3. Statutory Duties Under Schedule 9 of the Electricity Act 1989**

Schedule 9 imposes a clear statutory duty on National Grid to:

- Have regard to the desirability of preserving natural beauty;
- Conserve flora and fauna; and
- Protect sites, buildings and objects of architectural or historic interest.

This duty is mandatory. It is not subordinate to cost, convenience, or delivery efficiency.

The approach taken by the Applicant suggests that cost minimisation has been given determinative weight. In particular, the Treasury Green Book methodology does not appear to have been applied to capture the full economic cost of environmental and heritage harm. By failing to internalise these wider impacts within an economic framework, alternative routes appear artificially less favourable.

If options are rejected primarily because they are longer or more expensive, without robustly quantifying environmental and heritage harm, then the statutory obligations under Schedule 9 risk being marginalised.

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### **4. Impact on Heritage Assets in Great Waltham (pylons TB132-TB144)**

Within one kilometre of the proposed pylon alignment in Great Waltham there are 83 listed buildings. This represents an exceptionally high concentration of nationally significant heritage assets within a rural landscape.

The introduction of large-scale industrial pylons into this historic setting would permanently alter the character and visual context of these assets. The setting of a listed building contributes to its significance. Once that setting is eroded, the resulting harm is enduring and irreversible.

I reside in a Grade II listed property. My family also owns Grade I and Grade II listed buildings and registered Parkland that would be adversely affected by the proposed route.

Historic England's submission (Environmental Statement, Document Reference 6.11) was not made publicly available prior to its inclusion within the DCO application in August 2025. I was required to submit a Freedom of Information request to review it.

In Chapter 11 (Historic Environment) of the Environmental Statement, Historic England states:

“A number of high-value heritage assets would experience a significant effect from the erosion of the rural landscape at this location, and we recommend further consideration of the approach here.”

Despite this clear recommendation, the Applicant has responded by:

- Reducing pylon height to 40 metres;
- Increasing the number of pylons; and
- Retaining the ability to revert to the original 50-metre alignment.

This does not constitute meaningful reconsideration of the identified harm. Nor does it demonstrate adherence to the Holford Rules (1959), which emphasise the avoidance of high-amenity and sensitive landscapes wherever possible.

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## **5. Loss of Trees and Hedgerows (pylons TB132-TB144)**

The proposal involves the removal of significant green infrastructure in Great Waltham, including:

- 67 trees to be felled;
- A further 24 trees potentially to be removed;
- 26 trees to be managed;
- Extensive lengths of established hedgerows to be destroyed.

These are mature landscape features forming wildlife corridors and contributing to biodiversity, carbon sequestration, and rural character.

The removal of established hedgerows and mature trees results in immediate and long-term ecological harm. Replacement planting cannot replicate the environmental or landscape value of mature features within a meaningful timeframe.

It is difficult to reconcile the avoidable destruction of established landscape assets with the broader objective of delivering environmentally responsible energy infrastructure.

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## **6. The Great Waltham Alternative (Pylons TB132-TB144)**

An alternative route for Great Waltham has already been identified in the Design and Development Report (2023).

This alternative would:

- Reduce harm to designated heritage assets;
- Better preserve the historic rural landscape setting;
- Reduce environmental and community impacts.

If overhead pylons are to be used, this alternative alignment would demonstrably cause less lasting harm.

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## **7. Conclusion**

This objection is not made in opposition to national infrastructure in principle. It is made on the basis that, where alternatives exist, the route selected must be the one that results in the least environmental and heritage harm.

I respectfully request that the Examining Authority give full and proper weight to:

- The statutory duties under Schedule 9 of the Electricity Act 1989;
- The identified significant effects on high-value heritage assets;
- The permanent alteration of historic landscape setting in Great Waltham;
- The loss of mature trees and hedgerows; and
- The availability of the Great Waltham alternative route.

For these reasons, I ask that the current alignment through the Waltham Gap not be approved and that the Great Waltham alternative be required unless and until less harmful options have been properly and transparently reconsidered.

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all further information/additional submissions affect me so I would like to know what they are

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This is what I believe the Norwich to Tilbury pylon line is all about - it is not as proposed designed to get more power to London, but to make a spine across East Anglia to branch off from for other projects. Hence the reason the off shore option is being ignored

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These reports will affect Great Waltham

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Everything that NG does needs further consultation, which cannot be achieved without the information