

National Grid

In the preliminary environmental impact assessment in April 2024, National Grid concluded that the potential negative residual effect from construction, operation and maintenance is likely to be significant on the landscape, visual and historic environment of Great and Little Waltham.

In no other location will there be permanent negative effects on this scale, it contains:

- The only two conservation areas along the whole route that will be permanently negatively
- The only registered parkland along the route to be permanently negatively affected
- Out of 5 schedule monuments affected on the whole route.

It is likely there will be 70 permanent negative effects from the project in this area.

The presence of two Conservation Areas in one short section is not coincidental; it reflects the historic cohesion and sensitivity of this landscape.

Rule 2 of the Holford Rule states: Avoid smaller areas of high amenity value, or scientific interests by deviation. Where possible choose routes which minimise the effects on the setting of areas of architectural and historic interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments. In section F, between pylons TB132 and TB144 there are the following within 1 km of the pylons:

- 2 - Grade 1 listed buildings,
- 2 – Grade 2* listed building
- 73 – Grade 2 listed buildings,
- 1 - Grade 2 listed parkland
- 1 - schedule monument,
- 2 - conservation area
- 3 - ancient woodlands

For these reasons, I strongly support the Great Waltham alternative set out in the Design and Development Report 2023. This alignment would move the pylons into open farmland, reducing impacts on heritage buildings and avoiding both Great Waltham and Little Waltham.

Through the consultations (statutory and non-statutory) The pylon height has changed between tall and short pylons. This has made replying to the consultations more difficult. In the landowners consultation in June 25, there was no indication on the maps as to the heights on the pylons. It took Fisher German 9 days to confirm the heights. Hidden amongst the 552 documents for the DCO, (APP-130) National Grid have stated “flexibility has been retained to revert to standard lattice pylons – this may include removing one of the three pylons and a slight change to the locations of the remaining two pylons.” In the consultation feedback (APP-066) document on page 5236 it states that the project will progress using the tall pylons. This is a fundamental change and has not been made obvious though all the documents and maps leading to people being misinformed and could potentially seem deceiving that they have hidden it in only two documents.

In many of the project documents, National Grid appears to rely heavily on the Grade I listed status of [REDACTED] to justify the use of lower pylons. However, I am the owner of [REDACTED] and our views as the long-term custodians of the estate have been largely ignored. Instead, National Grid has chosen to prioritise Historic England's position, despite the fact that Historic England has not engaged with us directly or submitted a response to the DCO.

If the current route is to be kept, we would prefer tall pylons TB136- TB142 rather than the currently proposed low high pylons. And that TB143 is moved further north to help mitigate the impact on grade 2 listed Balls Farm House.

To summarise,

The question is not whether grid reinforcement is needed.

The question is whether this particular alignment, through this particular historic landscape, represents the least harmful reasonable option.

Given the concentration of assets, given the availability of an alternative, and given the scale of permanent change proposed, I respectfully submit that it does not.

I therefore ask the Examining Authority to conclude that:

Either the Great Waltham Alternative should be adopted,
Or further modification of Section F is required to properly comply with Holford Rule 2 and statutory heritage duties.

Section F warrants different treatment because it is demonstrably more sensitive.

Once these pylons are erected, this landscape is changed for generations.

My family has cared for [REDACTED] for over 300 years, preserving and enhancing the house and its surrounding landscape. It is therefore deeply disappointing that decisions about how best to protect the estate are being made by people in offices who have not visited the property or spoken to us. As the custodians of the estate we should have a decisive role in determining what is best for the house and its setting. For this reason, I strongly urge that no low-height pylons be placed through the estate.

National Policy Statement EN-1 (Overarching National Policy Statement for Energy) requires that the Examining Authority should give **great weight** to the conservation of designated heritage assets, including listed buildings and conservation areas, and should only grant development consent where any harm is clearly and convincingly justified. This includes harm to the **setting** of heritage assets. (EN-1, paras 5.10.10–5.10.14)

National Policy Statement EN-5 (Electricity Networks Infrastructure) similarly requires that the Examining Authority must take into account the need to **protect nationally important heritage assets**, and must ensure that any impacts are fully justified. (EN-5, para 2.6.1)

The **National Planning Policy Framework (NPPF)** states that when considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to its conservation, and any harm should require clear and convincing justification. The NPPF also states that harm to the setting of a heritage asset is a form of harm and must be treated as such. (NPPF, paras 199–202)

Representation to the Examining Authority – Section F (Great and Little Waltham) by Charles Nicholas Micklem – [REDACTED]

In the Preliminary Environmental Impact Assessment (April 2024), National Grid identifies that the most significant residual effects arising from the construction, operation and maintenance of the scheme would occur within Great and Little Waltham. The assessment concludes that significant adverse effects on landscape character, visual amenity and the historic environment are likely in this location.

No other section of the route contains a comparable concentration of designated heritage assets subject to permanent adverse impact. Within this section are:

- The only two Conservation Areas along the entire route that would experience permanent adverse effects
- The only Registered Park and Garden on the route to be permanently negatively affected
- One of five Scheduled Monuments affected by the scheme as a whole

Approximately 70 permanent adverse effects are identified within this area.

The proximity of two Conservation Areas within a short stretch of route reflects the historic cohesion, architectural integrity and particular sensitivity of this landscape. This is not an incidental concentration of assets but a historically evolved and designated environment of acknowledged significance.

Policy Context

Holford Rule 2 provides clear strategic guidance:

“Avoid smaller areas of high amenity value, or scientific interest, by deviation. Where possible choose routes which minimise the effects on the setting of areas of architectural and historic interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.”

Importantly, the Holford Rules as a whole have been subject to subsequent clarification by Scottish Hydro Electric Transmission Ltd (SHETL), which confirms that the Rules are not merely general guidance but are intended to be applied rigorously and sequentially at the route selection stage.

The clarification emphasises that:

- The Rules require proactive avoidance of sensitive areas where reasonably possible;
- The presence of nationally designated heritage assets signals an area of recognised constraint in strategic routing;
- Route selection should seek to minimise impacts at a strategic level rather than rely primarily on later-stage mitigation;
- Design mitigation (such as tower height, reduced scale structures or micro-siting) does not substitute for proper route avoidance where a materially less harmful alignment exists; and

- The Rules should be read as a coherent framework, with early strategic choices taking precedence over subsequent detailed design responses.

This clarification affects not only Rule 2, but the interpretation of the wider Holford Rules. National Grid are arguing about rule 3, however our historic argument is now covered by rules 1,2 and 7

The effect of the SHETL clarification is therefore that mitigation through reduced pylon height, micro-siting, or landscape planting cannot compensate for a strategic routing decision that passes directly through an area of exceptional heritage concentration where alternatives exist.

Within Section F (pylons TB132–TB144), the following designated assets lie within 1 km:

- 2 Grade I listed buildings
- 2 Grade II* listed buildings
- 73 Grade II listed buildings
- 1 Grade II listed parkland
- 1 Scheduled Monument
- 2 Conservation Areas
- 3 areas of ancient woodland

This concentration of designated assets is exceptional along the route. It is precisely the type of historically cohesive and sensitive landscape that the Holford Rules — particularly Rules 1, 2 and 5 when read together and as clarified — seek to avoid where reasonably possible.

The clarification makes clear that the Rules operate at the strategic alignment level. They are not satisfied simply because mitigation has reduced impacts from “substantial” to “less than substantial.” Where a viable alternative exists that materially reduces harm to Conservation Areas, Listed Buildings and Registered Parks, the expectation under the Holford framework is that such an alternative should be preferred unless demonstrably unfeasible.

This approach aligns directly with the statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which require special regard to be given to the desirability of preserving listed buildings and their settings, and preserving or enhancing the character or appearance of Conservation Areas. The statutory duty applies with particular force in areas of high asset concentration and cannot be displaced by reliance on design mitigation alone.

National Grid reply on Historic England for a lot of their evidence, I think the following needs clarification from Historic England

1. Historic England has provided advice on this application, correct?
2. Did Historic England meet directly with all affected heritage asset owners within Section F before forming its position?
3. In particular, did Historic England meet with the long-term custodians of the Grade I listed [REDACTED] estate?

4. Did Historic England undertake any independent site visit from within the affected Conservation Areas?
5. How many site visits were undertaken within Section F specifically?
6. Were those visits undertaken during leaf-on or leaf-off conditions?
7. Did Historic England commission any independent landscape or visual modelling, or did it rely on the Applicant's visualisations?

Alternative Alignment

The Great Waltham Alternative, as identified in the Design and Development Report (2023), would relocate pylons into open farmland, materially reducing impacts on heritage settings and avoiding both Great Waltham and Little Waltham.

Given:

- the concentration of designated assets in Section F,
- the scale of permanent residual effects identified,
- and the existence of a viable alternative alignment,

there is a strong planning case that the current alignment has not demonstrated compliance with Holford Rule 2 in this section.

Design Changes and Consultation Clarity

During both statutory and non-statutory consultation phases, the proposed pylon heights have varied between tall and shorter designs. This has materially affected the ability of consultees to assess landscape and heritage impacts.

In the June 2025 landowners' consultation, pylon heights were not indicated on the maps provided. Confirmation required follow-up correspondence. Within the DCO documentation (APP-130), National Grid retains "flexibility" to revert to standard lattice pylons, including potential relocation. However, the Consultation Feedback document (APP-066, p.5236) indicates that the project will proceed using tall pylons.

This represents a fundamental design parameter. Where scheme parameters materially affect landscape and heritage impact, clarity and consistency are essential to allow fair consultation and robust examination. The Examining Authority may wish to consider whether the parameterisation of pylon height has been presented with sufficient transparency.

We had a meeting with Fisher German on the 25th February, where we were shown more design maps. This included a lot more detail than we have seen before. Including drainage ponds, compounds which aren't included in the DCO, digging of electric cables and other features. How are we to accurately respond to any consultation without all the detail. It is often felt that

we always have one arm behind our back. As every meeting with Fisher German seem to bring more information to light that we haven't had a chance to comment on. Once again with National Grid, these maps are hidden from us and can only be seen in meeting. I have requested that we receive ordinate survey maps of all features on our land on the 25th February which at least will allow us to get soil testing done in preparation for the work to begin.

If the Current Route Is Retained

Should the Examining Authority conclude that the Section F alignment is to remain, further mitigation should be secured. In particular:

- Consideration should be given to the use of tall pylons between TB136–TB142 rather than lower-height pylons, if this reduces heritage setting harm.
 - Pylon TB143 should be repositioned further north to reduce impact on the setting of the Grade II listed Balls Farm House.
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Conclusion

Section F is demonstrably more sensitive than any other part of the route. It contains the highest concentration of designated heritage assets and the only Registered Park and Garden affected by the scheme.

The key planning test is whether this alignment represents the least harmful reasonable option in heritage and landscape terms.

Given:

- the exceptional concentration of assets,
- the scale of permanent residual harm identified,
- and the availability of an alternative alignment,

there is a clear basis for concluding that:

- Either the Great Waltham Alternative should be adopted;
- Or Section F should be modified to ensure proper compliance with Holford Rule 2 and statutory heritage duties.

The decision in this section will determine the long-term character of this historic landscape. Once constructed, the harm would be permanent and experienced for generations.

I would also like to attend and talk at any future open hearing session, and would like to ask for an site visit to our section, accompanied by one of the Micklem family to show the harm that it will cause to this historic area

Submission ID: S38C0478B

I think because of the holford rules protecting historic sites, more consideration should be given to the alternative route north west of great waltham