

Response to National Grid's Summary of the Open Floor Hearings  
Project: Norwich to Tilbury Electricity Transmission Project (EN020027)  
Interested Party: Caroline Homewood – [REDACTED], Aldham and Fordham in Colne Valley  
Interested Party Reference number: [REDACTED]

## 1. Introduction

I spoke at the Open Floor Hearing on 10 February 2026 and subsequently submitted written comments summarising the issues raised in relation to the section of the proposed overhead line between pylons TB047–TB052 affecting Ford Street, Aldham and Fordham.

Having reviewed Document 8.5.4 – National Grid's Response to the Open Floor Hearings, I am concerned that National Grid's summary does not adequately address the substance of the evidence presented about this section of the route.

The response largely relies on generalised statements regarding efficiency and cost while failing to engage with the site-specific landscape, heritage and environmental concerns raised during the hearing.

These omissions are important because the route selection process must demonstrate compliance with the statutory duties and policy framework governing electricity transmission infrastructure, including:

- a) the Electricity Act 1989 (Schedule 9)
- b) National Policy Statement EN-1 (2024)
- c) National Policy Statement EN-5 (2024)
- d) the Holford Rules for the Routeing of Overhead Lines
- e) the National Planning Policy Framework (NPPF).

## 2. Contradictory statements in National Grid's response to the open floor hearings

National Grid states that moving the alignment westwards would bring the route closer to the Ford Street Conservation Area and therefore rejected that alternative. However, the preferred alignment places multiple 50-metre pylons on elevated ridgelines immediately surrounding Ford Street, creating prominent skyline structures that will tower above and visually encircle the historic village. It is therefore unclear how proximity to the Ford Street Conservation Area was considered a constraint in rejecting alternative routes, while the chosen alignment places highly visible ridge-top pylons directly around the settlement. In addition, it has come to light National Grid want to erect a construction compound in the Ford Street Conservation Area.

This raises a question as to whether the route selection here has properly applied the **Holford Rules, particularly the guidance to avoid skylines and hill ridges where possible**, and the duty under **Schedule 9 of the Electricity Act 1989 to minimise impacts on landscape, heritage assets and settlements wherever reasonably possible**

## 3. Failure to Address Site-Specific Evidence Raised at the Hearing

National Grid's response groups comments into thematic topics rather than addressing the specific issues raised by speakers.

My submission identified several key concerns, including:

- a) the placement of 50-metre pylons on elevated ridgelines, breaking the skyline above villages
- b) harm to the setting of designated heritage assets including Fordham Church (Grade I), Aldham Church (Grade II\*) and the Ford Street Conservation Area
- c) potential impacts on Roman archaeological remains near pylon TB047
- d) impacts on the Essex Way long-distance path and recreational landscape
- e) fragmentation of habitats within the Colne Valley landscape
- f) the cumulative visual impact of pylons encircling the village of Ford Street.

None of these site-specific issues are addressed in National Grid's response document.

#### **4. Over-Reliance on Efficiency and Cost Considerations**

In addressing alternatives for the Colne Valley (Ford Street, Aldham and Fordham) National Grid states that a western alignment could reduce residential amenity effects but was rejected because it would be longer, require additional pylons and be less efficient.

This reasoning is inconsistent with the policy framework governing electricity transmission infrastructure.

Under NPS EN-5, overhead lines may be the starting presumption for transmission technology; however the policy also requires that routing and siting to minimise adverse effects on the environment and communities wherever reasonably possible.

Similarly, Schedule 9 of the Electricity Act 1989 places a statutory duty on transmission licence holders to have regard to the desirability of preserving natural beauty, conserving flora and fauna and protecting sites, buildings and objects of architectural, historic or archaeological interest.

Efficiency and cost considerations cannot, in themselves, justify a route that creates avoidable environmental, heritage and community harm.

#### **5. Failure to Demonstrate Compliance with the Holford Rules**

The Holford Rules, recognised within NPS EN-5, provide established principles for the routing of overhead transmission lines.

They advise that transmission lines should:

- a) avoid areas of highest amenity value
- b) avoid skylines and hill ridges where possible
- c) follow natural landform and contours.

The alignment between TB047 and TB052 appears to conflict directly with these principles by placing pylons on elevated ridgelines above settlements within the Colne Valley.

National Grid's response does not explain how the Holford Rules were applied in determining this alignment.

## **6. Heritage Impacts Not Properly Addressed**

My submission raised concerns about the effect of the proposed pylons on the setting of several important heritage assets including Fordham Church (Grade I), Aldham Church (Grade II\*) and the Ford Street Conservation Area.

Under NPS EN-1 and the Planning (Listed Buildings and Conservation Areas) Act 1990, decision-makers must give great weight to the conservation of heritage assets and their settings.

National Grid's response does not address these concerns or demonstrate that the chosen alignment represents the least harmful option.

## **7. Archaeology and Environmental Concerns Not Addressed**

The presence of Roman archaeological remains near the proposed location of pylon TB047 was raised during the hearing.

Under NPS EN-1 and the NPPF, significant archaeological remains should be conserved in a manner appropriate to their importance.

National Grid's response does not address this issue.

Similarly, concerns regarding ecological connectivity within the Colne Valley corridor and potential impacts on wildlife habitats are not addressed.

## **8. Pylon and cables next to Fordham All Saints Primary School**

In my submissions to National Grid and during my attendance at the open days, I expressed concerns regarding the placement of a pylon in close proximity to a primary school. However, these concerns have been overlooked and remain unaddressed.

## **9. Consultation and Transparency**

National Grid states that a wide range of alternatives has been considered.

However, residents were not presented with any alternative route alignments in the Colne Valley.

Communities were presented with a single overhead route option, with consultation focusing primarily on pylon design rather than route location or viable alternatives such as HVDC cabling or an off shore grid.

## **10. Construction Compound and Flood Risk**

Following the hearing, I received a plan indicating that land behind The Maltings in Ford Street is proposed for compulsory purchase for a construction compound.

This location is known locally to flood each year.

The proposed siting of a construction compound within the Ford Street Conservation Area and on land subject to seasonal flooding raises further planning concerns which are not addressed in National Grid's response and contradicts the statement it makes in its response.

## **11. Conclusion**

Given the harms to the conservation area, heritage, archaeology, the special landscape area of the Colne Valley, the risks of flooding and the habitat destruction on the selected route in this Parish, how can National Grid justify this and not seriously consider options including HVDC underground cables laid by cable plough, not open-trenching, and an offshore solution?

National Grid's summary of the Open Floor Hearing submissions does not adequately respond to the issues raised regarding the section of the route between TB047 and TB052.

In particular, the response:

- a) does not address ridge-top siting of pylons and skyline impacts
- b) does not provide a substantive response to heritage concerns
- c) does not address archaeological and ecological issues
- d) does not address loss of public amenity land
- e) does not address concerns about locating a pylon so close to a primary school
- f) relies primarily on efficiency and cost arguments rather than demonstrating that environmental harm has been minimised.

## **12. Requested Action by the Examining Authority**

I respectfully request that the Examining Authority require National Grid to:

- a) Provide a clear explanation of how the Holford Rules were applied in selecting the alignment through the Colne Valley.
- b) Provide a comparative assessment of alternative alignments including the western option referenced in National Grid's response.
- c) Demonstrate how the chosen route complies with Schedule 9 of the Electricity Act 1989 and the relevant provisions of NPS EN-1 and EN-5.
- d) Provide a detailed assessment of heritage, archaeological, landscape, community and amenity impacts affecting Ford Street, Aldham and Fordham.
- e) Clarify the justification for the proposed construction compound within the Ford Street Conservation Area and its flood-risk implications.

Submitted respectfully,  
Caroline Homewood