

This submission concerns whether the Applicant has fully demonstrated compliance with its duties under Schedule 9 of the Electricity Act 1989 when selecting the alignment through Section F between TB132 and TB144. In particular, it raises the question of whether the Applicant has shown that the chosen route represents the least harmful reasonable option, having regard to the exceptional concentration of heritage assets in this location and the availability of a viable alternative alignment.

1. Response to the Applicant's treatment of submissions

I note that my comments from the Open Floor Hearing have been addressed within Document 8.5.4 Applicant's Response to the Open Floor Hearings. However, my submission appears to have been grouped together with comments made by other participants across several hearings. As a result, a number of the specific points I raised were not addressed directly and instead received a generalised response.

In particular, on page 12 the Applicant again relies heavily on the position attributed to Historic England as justification for not making further changes to this section of the alignment.

However, as the landowners directly affected between pylons TB132 and TB144, [REDACTED], we consider ourselves to be key stakeholders whose views should be given appropriate weight alongside those of national heritage bodies.

Neither the Applicant nor Historic England have visited the site to engage with us regarding the proposed infrastructure and its effect on the historic landscape. The Applicant's reliance on views derived largely from desk-based assessments is therefore difficult to reconcile with the limited direct engagement with those who have owned and managed this historic landscape for approximately 300 years.

The historic character now being assessed has been shaped in large part by the stewardship of the Micklem and Tufnell families over several centuries. Without that stewardship, the landscape that is now considered to have heritage value may well look very different today. It is therefore surprising that those responsible for maintaining this landscape appear to have had little influence on the design decisions affecting it.

2. Clarity of design and consultation responses

The Applicant's response also appears very similar to that provided during the statutory consultation stage. This gives the impression that the Applicant's position has largely remained unchanged despite the concerns raised during consultation and examination.

There also remains uncertainty regarding the final infrastructure design. The Applicant states that the project will proceed using tall pylons "subject to confirming certain technical details", meaning that the precise design solution has not yet been fully confirmed.

If the Applicant is unwilling to adopt the Great Waltham western alternative, our preference would be for standard-height pylons rather than low-height pylons, as these would result in fewer structures within the landscape.

The repeated changes between tall pylons and low-height pylons throughout consultation, combined with the absence of clear mapping showing pylon heights during the June 2025 landowner consultation, has created significant uncertainty for those directly affected. In that instance it required nine days for the Applicant's land agents to confirm the proposed heights.

For affected landowners, responding to this process requires considerable personal time reviewing extensive documentation and preparing responses outside normal working hours. It is therefore particularly disappointing when the responses provided fail to address the specific issues raised.

3. Exceptional heritage sensitivity of Section F

The Applicant's response does not meaningfully address the central issue raised in my submission: the exceptional concentration of heritage and landscape assets within Section F between pylons TB132 and TB144, and whether the alignment properly reflects the routeing principles set out in the Holford Rules for Overhead Line Routeing, particularly Rule 2. Taken together, this demonstrates that a disproportionate share of the project's permanent heritage and landscape impacts are concentrated within this single section of the route.

The Applicant's own environmental assessment identifies significant residual effects on the landscape, visual and historic environment within the Great and Little Waltham area.

This section of the route contains:

- the only two Conservation Areas along the entire route that will experience permanent negative effects
- the only registered parkland along the route to be permanently affected
- one of only five Scheduled Monuments affected across the whole project

Within approximately 1 km of the alignment there are also:

- 2 Grade I listed buildings
- 2 Grade II* listed buildings
- 73 Grade II listed buildings
- 1 Grade II registered parkland
- 3 areas of ancient woodland

This concentration of heritage assets is unique along the route. The presence of two Conservation Areas within such a short section reflects the historic cohesion and sensitivity of this landscape.

Rule 2 of the Holford Rules states that smaller areas of high amenity or historic value should be avoided where possible, and that routes should minimise impacts on the setting of Conservation Areas, listed buildings, historic parks and gardens, and ancient monuments. Section F clearly represents the type of landscape where deviation should therefore be carefully considered.

4. Consideration of the Great Waltham Alternative

The Applicant states that no new evidence has been identified to justify reconsideration of route alternatives. However, the issue raised is not simply a preference for an alternative alignment. Rather, it concerns the demonstrably higher concentration of heritage constraints in this particular location, which distinguishes it from other parts of the route.

The Great Waltham Alternative, identified within the Design Development Report 2023, would move the alignment into open farmland and avoid both Great Waltham and Little Waltham. This would significantly reduce impacts on designated heritage assets and their setting.

The Applicant's response instead focuses on whether the impacts of the current alignment are "acceptable" in policy terms. However, the planning framework for electricity infrastructure requires more than simply demonstrating policy acceptability.

Under National Policy Statement for Electricity Networks Infrastructure (EN-5), decision-makers must give great weight to the conservation of designated heritage assets. In addition, under Schedule 9 of the Electricity Act 1989, transmission operators must have regard to the desirability of protecting sites, buildings and objects of architectural or historic interest and must do what they reasonably can to mitigate effects on them.

Taken together, these requirements mean that the relevant question is whether the Applicant has demonstrated that the selected alignment represents the least harmful reasonable option.

While the Applicant notes that the Great Waltham Alternative would increase the route length by approximately 2.5–3 km, a modest increase in route length must be balanced against the long-term and irreversible impact on a historic landscape containing multiple designated heritage assets.

5. Conclusion

The question before the Examining Authority is not whether electricity network reinforcement is required.

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

Given:

- the exceptional concentration of heritage assets in Section F
- the availability of a viable alternative alignment
- and the permanent change proposed to the historic landscape

I respectfully submit that this has not yet been clearly demonstrated.

I therefore request that the Examining Authority consider whether:

- the Great Waltham Alternative should be adopted, or
- further modification of Section F is required in order to better reflect the routing principles within the Holford Rules and the heritage protection framework within EN-5.

Section F is demonstrably more sensitive than other parts of the route, and therefore warrants particular consideration.