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Subject: Supplemental submission in response to question LV1.14

Importance: High

INTERESTED PARTY REFERENCE NUMBER: [REDACTED] (VILLAGES AGAINST PYLONS)

This is a supplemental submission in response to your question LV1.14 in which you ask about the special qualities of the Dedham Vale and the lasting impact of the proposed project.

We refer to our previous submissions which are relevant also to this question.

The Special Qualities

The Dedham Vale National Landscape covers 90 square kilometres on the Essex/Suffolk border and is designated for the outstanding natural beauty of its landscape, formally assessed against six natural beauty factors. These factors — and the specific qualities they produce in this particular landscape — are set out inter-alia in the Dedham Vale AONB Natural Beauty and Special Qualities report (Alison Farmer Associates, 2016), a Countryside Commission report 'The Dedham Vale Landscape, An Area of Outstanding Natural Beauty' dated 2017, and numerous public comments and statements from those living within, visiting, using and enjoying the Vale and its setting.

Those qualities are:

Landscape quality and scenic quality. An intimate, ancient lowland broad river-valley character. Gently undulating plateau dissected by the Stour valley and its tributaries; traditional irregular field patterns; species-rich hedgerows; meadows, mills and historic villages. Much of the eastern end of the National Landscape is associated with the celebrated landscape artist John Constable RA, and many of the views he painted remain recognisable today.

Relative tranquillity. The Vale is characterised by quietness and freedom from modern development. As National Grid's own baseline assessment records, the National Landscape's tranquillity is a defined and formally assessed special quality, identified through the Natural Beauty indicators framework.

Traditional Character. Contributed to by red brick tile and timber-thatch farm houses set in open landscape, evocative of Constable's time and historic rural England, especially in the area in the vicinity of Wormingford.

Long-distance views and large skies. The plateau edges — at Little Horkesley, Wormingford, Langham, East Bergholt, Stratford St Mary and along the northern and southern valley ridges — afford wide, open views across the vale floor and outward across the surrounding countryside. These elevated viewpoints, with their characteristic "large sky" quality, are integral to the designation. They were specifically identified by the Dedham Vale National Landscape Authority in the EIA scoping process as requiring assessment through the ZTV study.

Natural and cultural heritage. The valley floor's functioning river, grazing marshes, ancient woodland, traditional field boundaries, and the buried and visible archaeology of millennia of human settlement. The village of Stratford St Mary, the hamlet of Flatford, the church plateau at East Bergholt and the mill complex at Flatford are among the most intensely heritage-significant groupings in lowland England.

How the Project Causes Lasting Harm

The project includes approximately 159 km of new overhead line supported on approximately 510 steel lattice pylons at approximately 50 metres in height, with approximately 25 km of underground cabling, some of which is located through the Dedham Vale National Landscape, and six new Cable Sealing End (CSE) compounds.

The underground section through the boundary of the National Landscape is presented as the primary mitigation. But the overhead line does not simply stop at the designated boundary. It transitions, via Cable Sealing End compounds, to underground cable — and those compounds, together with the pylons immediately beyond them, stand within direct sightlines of the protected landscape and its most valued viewpoints. We have previously highlighted the failings in National Grids approach and their wilfully narrow interpretation as to the requirements of National Policy. As set out, their interpretation is objectively wrong. National Grid are estopped from arguing cost as a reason to use Pylons in any location which would cause even residual harm to the National Landscape. We reiterate those points here.

National Grids own documents illustrate significant and lasting harm to all of these qualities:

- **APP-244: 6.13.f8:** It is outrageous that National Grid have chosen to split the view of the Dedham vale across several pages, presumably this is intentional and designed to obscure understanding. Piecing the views back together it becomes clear that between 9 and 23 pylons will be visible in approximately half of the Vale, that 23-37 pylons will be visible along both ridges at the boundary, and that if to 52 pylons will be visible in particular locations within the Vale

- **APP-245: 6.13.f9:** Once more split across several pages, these diagrams clearly illustrate that the FULL HEIGHT of 50m pylons will be visible from extensive viewpoints within the Vale, on both sides of the Valley, and especially along the ridges. The zones from within which full height of Lyons will be visible extends to approximately 25% of the Vale. This view is an extremely conservative (in the sense that it minimises the perceived impact) interpretation of the problem as it requires visibility of a FULL pylon. The “reverse one of theoretical visibility” methodology — documented in diagram A13.5.3 lately provided by National Grid — is the most appropriate measure of visual intrusion, because it includes partial views of the top half of pylons above an open agricultural horizon.

- **APP-255: 6.13.f19:** This document is better prepared, illustrating the whole of the Vale on one page. In doing so it demonstrates that the proportion of the Vale from which no infrastructure will be visible is less than 20 percent of its area and is restricted to just the very bottom of the valley immediately adjacent to the Stour. The statement that the Vale will not be impacted during operation is outrageous. The Stour itself is one, but only one, of the special qualities. The idea that it exists in isolation and that people would wish to look directly at it from its banks and not be impacted by what they see as they walk, bicycle or drive through the Vale towards it is nonsense.

Read together, these figures establish the following, on National Grid's own modelling:

Between 11 and 30 pylon structures are simultaneously visible from many locations within the National Landscape. From the most exposed elevated positions on the northern plateau — including the high ground at Langham and around East Bergholt — between 50 and 60 structures are visible simultaneously. This is acknowledged in National Grid's own Preliminary Environmental Information Report figures 13.8.1 and 13.8.2, the predecessor documents to F8 and F9, which the PEIR produced prior to the DCO application: referenced at [ES Chapter 13, Section 13.3](#).

The worst-affected and worst-impacting locations are:

Langham plateau. Langham sits on the valley rim — the elevated ground from which the classic “large sky” views across the vale floor are obtained. From here, the overhead line approaching from the north via the Wenham Grove Cable Sealing End Compound (north of Stratford St Mary) is visible in the middle distance. Multiple full structures are within the ZTV for this location. This is one of the locations from which Constable himself painted.

East Bergholt plateau. The birthplace of Constable, on the northern plateau, commands westward views across the Stour Valley. The ZTV maps show that project structures are theoretically visible from this position in those westward views.

The southern ridge from Ardleigh to Great Horkesley. At the southern end of the underground section, the line re-emerges above ground from the EACN to Great Horkesley. The EACN together with Pylons in these locations great contribute to the view falls across the easter half of the Vale.

Little Horkesley / Great Horkesley (Tilbury Side). At the southern end of the underground section, the line re-emerges above ground via the Great Horkesley (Tilbury side) Compound which is in fact in Little Horkesley. This is effectively the southern gateway to the protected landscape approaching from Colchester. The compound and associated pylon re-emergence are within sightlines of the National Landscape boundary, introducing industrial structures into the approach corridor and into views looking back into the Vale, and the infrastructure there also being greatly visible from within the Vale along higher ground on both sides of the river. There were very straightforward opportunities to reduce harm here by removing the CSE further from the Vale into lower ground near to TB42 which National Grid considered but rejected on the grounds of cost alone. (Which is not in itself consistent with the acceptable reasons set out in NPS-EN5 in the context of a National Landscape).

National Grid's Own Assessment Conclusion

National Grid's Environmental Statement records, at ES Chapter 13, Section 13.7 — Residual Effects, that the project produces significant adverse landscape and visual impacts on the National Landscape and its setting that are not considered to be adequately mitigated or compensated. This is not a characterisation made by objectors. It is the applicant's own professional conclusion in its own Environmental Statement. This is the same conclusion National Grid reached in their document 'Corridor Preliminary Routeing and Substation Siting Study' of 2022 which detailed extensive and lasting harms to the Dedham Vale in Chapters 5 and 7, the damage due to pylons along the boundaries being considered so significant and the harm so unavoidable that it was better to route through the Vale itself and to reduce infrastructure on the boundary. Whilst infrastructure on the boundary was reduced, the current submissions clearly demonstrate that the reduction has gone nowhere near far enough.

Policy Requirements

NPS EN-5, paragraph 2.11.5, as quoted at ES Chapter 13, Section 13.2.14, states that the general presumption in favour of overhead lines is reversed whenever part of the route crosses nationally designated landscapes to favour undergrounding. That reversed presumption, combined with National Grid's own assessment of significant adverse residual harm, makes the case in the applicant's own words. Importantly the policy does not state 'within' the designated landscape, it focusses on harm 'to' the landscape and further sets out that 'even residual damage is unlikely to be acceptable in planning terms'.

This is an intentionally high bar. National Grid have instead focussed on sentences like 'not significant'. That in itself is a matter of opinion. Residents, users and Councils in the area of the Dedham vale have all represented to you the opposite: that the harm will be dramatic, highly significant, and lasting. Important as that is, it remains the case that 'not significant' is greater than 'residual' and even residual is 'unlikely to be acceptable in planning terms'.

The tranquillity, the large skies, the Constable viewpoints, the valley approaches, the uninterrupted views from and of thatch or red tile and timber farmhouses — all suffer lasting harm. A 50-metre lattice pylon has an operational life of at least 40 years but those erected in the 1950s are still in operation - some 75 years. The harm is not temporary. It is generational.

National Grid should have 'avoided altogether' the National Landscape of the Dedham vale in bringing forward their proposals. They have demonstrated in their Strategic options Lookback and Review that other routes were possible, as have numerous independent authors including NESO.

That they have chosen not to is unfortunate, but not in itself sufficient grounds to override National Policy and recommend approval of this project as submitted.

Remedy

The proper remedy is to reroute entirely.

Failing this, undergrounding for significantly greater distance either side of the Vale would be the absolute minimum acceptable solution. Given that the Colne Valley itself is of special quality, any such undergrounding would need to progress beyond Aldham.

Kind regards



Villages Against Pylons