

REPRESENTATION

Interested Party Reference: [REDACTED]
Application by National Grid Electricity Transmission (NGET)
Norwich to Tilbury Project

Procedural Note

This submission builds upon our clients' earlier Relevant Representation (27 November 2025) and Additional Written Representation (26 February 2026).

This document consolidates and refines those submissions and responds directly to National Grid's "Comments on Relevant Representations" [REP2-023].

Interested party reference numbers are [REDACTED] and [REDACTED].

Our client respectfully reserves the right to supplement this submission should further evidence become available.

Continued Opposition to the Proposed Development

Our client maintains their objection to the proposed overhead line alignment and associated works, with particular concern regarding the proposed temporary construction compound at Plot G-4/53, located adjacent to their home.

Response to National Grid [REP2-023]

We wish to respond to National Grid's ('NG') "Comments on Relevant Representations" [REP2-023].

NG asserts that concerns raised by affected parties have already been considered within its application documentation, including the Equality Impact Assessment.

In the context of our clients' household, this response is not adequate.

Their previous submissions raised detailed, site-specific and household-specific concerns including:

- Highway safety risks arising from the road layout
- Significant topographical level differences
- Immediate proximity to residential properties
- Presence of individuals with protected characteristics
- Lack of clarity regarding compound use and operation
- Absence of evidence demonstrating the necessity of this location

These are not generic concerns. They are fact-specific matters requiring site-specific assessment.

National Grid has not addressed these points individually. Instead, it relies on generalised assertions that impacts have already been considered.

This gives rise to a fundamental concern:

A generic response, without undertaking case-specific assessment or engagement, is not sufficient to demonstrate lawful decision-making.

- No direct engagement has taken place with our clients' household.
- No evidence has been provided to justify the siting of the compound at this location.
- No meaningful detail has been provided regarding operation, duration, or mitigation.

This represents a significant evidential gap.

Inadequate Consultation, Equality Impact Assessment and the PSED

We refer to our earlier representations [REP1-322, REP1-323, RR-0725 and RR-3431] in which we raised that members of the household have "protected characteristics" as defined in the Equality Act 2010.

The above information has been before NG for a long time and more recently before the Examining Authority ('ExA'). We raised the same issues more recently - representations submitted on 26 February 2026.

We put in red text below information which is sensitive/confidential and ask that this is redacted in publicly-available documentation.

[REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Three occupiers are resident the vast majority of the time (i.e. they have no periods where they are elsewhere, at school, at work etc).

Notwithstanding that all three occupiers are present at the property most of the day/evening – hence more exposed to the Scheme and its effects/impacts.

Impact on the Household and Disproportionate Effects

[REDACTED]
[REDACTED]
[REDACTED]

The occupiers are present at the property for the vast majority of the day. Exposure to impacts would therefore be continuous and unavoidable.

The proposed compound, located within close proximity to the home and garden room [REDACTED] [REDACTED], would introduce constant noise, vibration, lighting and activity.

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]
[REDACTED]

There is no realistic mitigation capable of removing unpredictability or intermittent disturbance.

The family is unable to relocate due to the property being, at present, effectively unsellable as a result of the Scheme. This creates a situation where the family is unable to leave, yet unable to remain without harm.

Personal Statement – [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

The level of disturbance from a construction compound within a few feet of our home would not be something we could adapt to. It would affect us all day, every day. Even during times when the compound or works are not being carried out, the disturbance from the partial road closure and road layout pressures would [REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

We are considering moving, but we have not been able to sell our home as yet. This leaves us unable to leave, yet unable to stay without harm.

We have never been contacted by National Grid to understand our situation and we believe that once they fully understand the situation, they would agree that the compound is not in a suitable location for the reasons we have set out and that other much more appropriate locations exist which are not immediately next to residential homes or sensitive receptors.

Site-Specific Constraints and Missing Assessments

Road Layout and Highway Safety

The road network around our clients' property is already constrained, with narrow lanes, blind bends, poor visibility and unsafe driver behaviour.

Construction traffic would materially worsen these conditions.

Topography

The property sits approximately 1.5–2 metres below the road level. This increases noise, light intrusion, and visual dominance.

Structural and Subsoil Concerns

No evidence has been provided regarding property condition surveys or structural assessments. This is particularly concerning given retained ground and proximity to works.

Lack of Clarity

No clear information has been provided regarding:

- Compound purpose
- Duration
- Operating hours
- Noise or lighting

Without this, impacts cannot be assessed.

Equality Act and PSED

National Grid has failed to engage with the household or gather sufficient information to assess impacts on individuals with protected characteristics.

The Equality Impact Assessment is generic and does not reflect the specific circumstances of this household.

The Public Sector Equality Duty requires informed, case-specific assessment. This has not occurred.

We invited NG to liaise with us as to these issues – they did not and have not. We believe that this is a fundamental issue for reasons set out below.

The ExA is subject to the Public Sector Equality Duty ('PSED') which requires public bodies to not only eliminate discrimination but also advance equality of opportunity and foster good relations between people who share protected characteristics and those who do not.

We understand that the PSED needs to be complied with in substance and not simply given "lip service". We also understand that the relevant case law confirms, when it comes to the PSED, that:

- The assessment of the risk of discrimination must be done before the decision (and not as a "rear guard action");
- The duty must be discharged with sufficient rigor and with an open mind;
- There is a duty to acquire all relevant information, which in some cases may or will mean undertaking further consultation with appropriate persons or classes of person;
- The decision-maker should ensure it is properly informed by undertaking a proper analysis of all relevant material; and
- The steps taken to fulfil the PSED should be recorded.

NG says that the PSED can be discharged and refers to its Equality Impact Assessment ('EqIA') [APP-352] in support of its case. NG also says that the use of compulsory purchase powers is appropriate.

The response by NG is inaccurate and the approach taken by NG is far too broad brush.

At no stage do NG, or the EqIA confirm that direct attempts have been made with persons with protected characteristics such as our family. Instead, the approach is to broadly categorize impacts and in the main say words to the effect of "its all fine". When it comes to noise the EqIA does acknowledge that "*significant effects are predicted at a number of sensitive receptors*" but there is no specificity in how these will be prevented or mitigated. Nor an explanation as to why there are not alternative proposals and/or locations to avoid these "*significant effects*".

Our clients' personal experience is that at no time have NG contacted them to understand the circumstances and concerns of the two individuals within the household with protected characteristics and what those protected characteristics are. Therefore, NG have no understanding of relevant facts and, in consequence, do not know what provisions or mitigations are reasonably required. There has been no direct, or follow-up, consultation with them.

There has also been no consultation or communication with them to explain what the proposed compound adjacent to their home is, what it will be used for, how long it will be used for, when it will be used for and what are the consequences of that. Further, there has been no liaison about the suitability of the proposed compound given those with protected characteristics on the doorstep, or what mitigation measures may mitigate any impact upon them/their household.

More widely, given the existence of occupiers with protected characteristics within their home, there has been no discussion or reasoning as to alternative sites/locations for this proposed compound. Our clients consider that there are, or will be, better alternative locations for it – but NG simply have not considered these.

We suspect, but cannot directly evidence, that their experience is far from unusual. Clearly, this is a concern because it is unclear whether NG have evidenced and properly understand the impact of their proposals on others, to include vulnerable individuals.

In our experience, NG are very much “shooting in the dark”.

In turn, we say that there has been inadequate consultation with our clients which has resulted in a shortfall/absence of relevant material/evidence to demonstrate the EqIA as sufficiently robust but, further, an unsound basis upon which to discharge the PSED. The ExA cannot be satisfied that the PSED can or will be discharged in the circumstances

It is also noted that the findings within the EqIA are predicated upon the use of “Best Practicable Means”/“Best Available Technique” (‘BPM/BAT’) albeit we understand that NG are now striving for a lower standard/requirement of “Best Available Technique Not Entailing Excessive Cost” (‘BATNEEC’). We are therefore concerned that the latter – BATNEEC - will mean

that the impacts, notably to include construction noise and dust, are materially greater than if BPM/BAT were applied. In consequence, we have concerns that the EqIA is based on assumptions that are, or will be, incorrect. In turn, we believe that any assumptions or conclusions reached in the EqIA will also be unsound, if not outright wrong.

For all the above reasons we invite the ExA to heed to current failures in consultation but also that the current evidence/information relied upon (i.e. the EqIA) is insufficient for the ExA to safely conclude that the PSED can or will be met.

We also say, that NG should be required to fulfil BPM/BAT. However, if NG is to proceed with BATNEEC then we say that its evidence base is misleading and/or inaccurate/misleading as to the nature and extent of the impacts of the scheme (notably during its construction and operation phases) but also the stated effectiveness of proposed mitigation measures.

Article 8 – Right to Home

The proposal represents a serious interference with the family's right to private and family life.

The home is essential to our clients' well-being and education. The impact would be continuous and severe.

No evidence has been provided to demonstrate that this interference is proportionate.

Compulsory Purchase

In terms of the use of compulsory purchase powers (or ability to impose rights on/over our land compulsorily), NG assert that this is proportionate. We note that in "Comments on Relevant Representations" [REP2-023] it is said that such powers "*will be justified as necessary and proportionate to deliver the Project and associated mitigation works and where appropriate*" and that "*engaging with landowners of affected land parcels to explain the requirement for additional land and to seek the consent of those landowners to the inclusion within the draft*

DCO of compulsory acquisition powers for new land rights in respect of the land affected by the proposed change”.

We believe that NG may require part of our client’s title/land - [REDACTED] – to deliver the Scheme, but this is not clear to us. We invite National Grid to confirm the position (and hope they do when contacting our client about the vulnerable occupiers, as above). In any event, we believe our client has subsoil rights in plot G-4/53 and therefore believe that they have qualifying statutory rights.

Insofar as compulsory powers are engaged, our clients have not seen any assessment of how the use of such powers will not have a disproportionate impact upon their family. We repeat comments above to the effect that, when it comes to their property/household, there has been no communication/engagement. The result is, again, that NG have insufficient information before them to boldly assert that the use of compulsory powers is proportionate in our client’s case and, in consequence, we believe that more information and a proper assessment is required before NG should be allowed to impose the compound on our client/their family unilaterally.

No case-specific assessment has been undertaken to justify compulsory powers affecting this property.

Without understanding the impact on this household, proportionality cannot be established.

Request for Site Inspection and Hearing

Additional request for a site visit and the opportunity to participate in a hearing have been made.

Conclusion and Requests

We respectfully submit that the current proposals are not supported by sufficient evidence.

We request that the Examining Authority:

1. Require direct engagement with this household
2. Require full clarity on compound use and operation
3. Require evidence justifying this specific location
4. Require assessment of alternative sites
5. Require site-specific impact assessment
6. Consider relocation or refusal of the compound at this location

It is not acceptable to respond to detailed, individual representations with a generic assertion that matters have already been considered, where the underlying work has not been undertaken.

We invite NG response.