

TO: The Examining Authority
Norwich to Tilbury Electricity Transmission Infrastructure
Development Consent Order Application
Applicant: National Grid Electricity Transmission plc
FROM: Karl Owen

Registered Interested Party : [REDACTED]

DATE: 8 June 2026

WRITTEN REPRESENTATION TO THE EXAMINING AUTHORITY

Further Submission Following the February 2026 Hearing

1. Introduction and Standing

I am a registered Interested Party in the examination of the Norwich to Tilbury Development Consent Order application. I have been a resident of [REDACTED] for thirty years. I spoke at the February 2026 hearing and make this further written submission in advance of the Chelmsford hearing on 23 June 2026.

The household at [REDACTED] comprises myself, my wife, and four children [REDACTED]. [REDACTED] is owned by the wider farm estate and we occupy it under a lifelong peppercorn tenancy, with the assurance of both landowners that we will never be required to leave and that upon our deaths the property will pass to our children — in particular our daughter with [REDACTED] — on the same terms. [REDACTED] is our permanent, generational family home. The impact of this proposal is therefore not confined to our lifetimes. It affects the futures of our children and the generations that will live here after us.

This submission sets out eight categories of concern which I respectfully submit the Examining Authority must consider before any recommendation is made to the Secretary of State. I also formally request an opportunity to meet with the Applicant to seek to resolve these matters, as contemplated by the examination process.

2. Systematic Breach of the Holford Rules

National Policy Statement EN-5 requires that applicants embody the Holford Rules in proposals for new overhead lines. They are not optional design aspirations — they are the established framework against which routing decisions must be assessed. National Grid's own published guidance states that it continues to use the Holford Rules as the basis for its approach to overhead line routing.

I was therefore deeply concerned when, during a personal visit to my home by National Grid Project Leader [REDACTED] — attended also by a National Grid colleague and witnessed at close range by Suffolk County Councillor [REDACTED] — [REDACTED] acknowledged that the proposed route, as it crosses near my property, breaks the Holford Rules, and then characterised those rules as just guidelines rather than actual rules. This is legally and procedurally incorrect. It contradicts National Grid's own published position and the requirements of EN-5. I ask the Examining Authority to note this and to require the Applicant to respond to it in writing.

I set out below the specific rules breached at this location:

Holford Rule 2: Avoid smaller areas of high amenity value or scientific interest by deviation.

The proposed route fails to deviate around the high amenity value of this rural mid-Suffolk landscape and the ancient woodland known as The Thickett, in close proximity to Gipping Little Wood and Gipping Great Wood, approximately one mile south-west of Mendlesham. No adequate justification has been provided for why deviation was not possible.

Holford Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible.

[REDACTED] sits alone on flat, open Suffolk farmland with unobstructed sightlines for miles in every direction. Pylons are visible against open sky to the north, west, and south. No use has been made of available woodland or topographical screening. This was acknowledged by [REDACTED] in person.

Holford Rule 5: Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees.

The route ignores available woodland corridors that could have substantially reduced visual dominance. The clarification notes explicitly require the Applicant to protect existing vegetation and safeguard visual and ecological links with the surrounding landscape. The current route does not comply.

Holford Rule 6: In flat, sparsely planted country, keep high voltage lines independent of smaller lines and other infrastructure to avoid a wirescape.

The proposed route creates precisely the wirescape that Rule 6 exists to prevent across this characteristic flat mid-Suffolk farmland, compounding the visual intrusion of existing infrastructure.

Holford Rule 7: Approach residential areas through industrial zones where possible; consider undergrounding when pleasant residential land intervenes.

The route passes in close proximity to our home without routing through or near any industrial zone. The Holford Rules are explicit: avoid routing close to residential areas as far as possible and avoid dominating isolated houses or small-scale settlements. Our home is a small-scale isolated rural dwelling that the current proposal dominates entirely. The Applicant has not adequately demonstrated that undergrounding or re-routing was considered and rejected on evidenced grounds. The cumulative effect of these multiple breaches at a single location is a matter the Examining Authority should treat as a significant concern.

3. Failure to Discharge the Public Sector Equality Duty — Equality Act 2010

I have a daughter, [REDACTED], who lives with us at [REDACTED]. She has been formally assessed by medical and psychiatric professionals and has documented diagnoses including [REDACTED] and associated conditions involving [REDACTED]. She holds letters and reports from qualified doctors and psychiatrists confirming her conditions and is registered with the relevant authorities. Her conditions constitute [REDACTED] under the Equality Act 2010. Given the lifelong peppercorn tenancy described in Section 1, [REDACTED] is also her permanent future home — the impact of this proposal on her is therefore lifelong, not merely for the duration of construction.

Prior to the route being finalised, my family had concrete plans to convert an existing barn on the eastern side of our property into an annexe for our daughter — a space where she could live independently but remain close to the care

provided by her parents, along a short path from the main house. This plan was described to [REDACTED] in person, on site, during his visit. Suffolk County Councillor [REDACTED] was present during this part of the conversation. When [REDACTED] visited, I informed him explicitly of my daughter's [REDACTED] and of the severe impact the proposals had already had on her [REDACTED]. I told him she had been [REDACTED] so severely that she has been permanently scarred. I also told [REDACTED] directly that we were genuinely fearful of losing our daughter [REDACTED]. This was not a general expression of distress — it was a specific and serious warning communicated to a senior representative of the Applicant about the risk to our daughter's life caused by this project.

[REDACTED] response was to relocate the haul road — removing it from the eastern annexe site — but simultaneously, as confirmed in National Grid's own Suffolk 3 realignment report, to move the nearest pylon closer to our home. The net effect, taken after being explicitly informed of [REDACTED], was to increase the adverse impact on our property and our daughter's permanent home.

My daughter's bedroom looks south over what is currently the finest view from our home — miles of open Suffolk countryside. The proposed construction and completed pylon route will dominate that view permanently. Garden hedges and trees provide partial seasonal screening in summer, but in winter and whenever the family is in the garden there are clear unobstructed views in every direction. The house is old with old windows and provides no meaningful sound insulation. In still air, 400kV lines crackle and fizz. The impact on my daughter — whose conditions make her [REDACTED] to her environment and who will live here for the rest of her life — will be daily, year-round, and permanent. The Public Sector Equality Duty under Section 149 of the Equality Act 2010 requires public bodies to have due regard to the need to eliminate discrimination and advance equality of opportunity. The sequence of events described raises serious questions about whether the Applicant has properly discharged this duty. I ask the Examining Authority to require the Applicant to produce evidence of any equality impact assessment carried out following [REDACTED] visit, and to confirm whether such an assessment took place before the decision to move the nearest pylon closer to our home was made.

4. Impact on the Wider Household — Four Children and Seven Dogs

[REDACTED] is home to four children ranging in age [REDACTED], and to seven springer spaniels. The proposed construction programme will subject this household to up to three years of heavy construction activity, with pylons dominating the skyline permanently. The north-south alignment across flat open farmland means there is no direction from which this family will not see the infrastructure. Garden hedges and trees provide partial seasonal screening in summer but offer no protection in winter or from the garden. This is total and permanent visual domination of an isolated rural family home that will be lived in by this family and their descendants for generations.

Our son, [REDACTED]:

Our [REDACTED] son is completing his A levels this month with predicted grades of A and A* in Mathematics, Media and History. He works part time, holds an Ipswich Town FC season ticket, and has a long-standing relationship of three years. He and his girlfriend have planned a gap year working and travelling before both attending university. He will be at home for the majority of the construction period, which falls directly across his most exciting and formative early adult years.

Our daughter, [REDACTED]:

Our younger daughter has just completed her degree in Design, finishing top of her class, and will be returning home permanently in August 2026. She will be living and working at [REDACTED] throughout the construction period and is directly affected as an adult occupier in her own right. She also has a long-standing condition called [REDACTED] - a [REDACTED] disorder in which specific repetitive sounds trigger acute and involuntary [REDACTED], including intense [REDACTED]. This is a recognised and documented condition that significantly affects her daily life. Three years of continuous construction noise - machinery, reversing alarms, HGV movements and the permanent crackle and fizz of 400kv overhead lines - will be a serious and specific trigger for her condition throughout the construction period and beyond. We believe the annexe to the east of the property, shielded from the construction zone by the main house, would provide her with a quiet retreat away from the worst of the noise when she is triggered - and we ask that this is taken into account as an additional reason why the annexe conversion constitutes reasonable and necessary mitigation measure to this household.

Our son, [REDACTED]:

Our [REDACTED] child holds a 100% attendance record at school and is among the top academic performers in his year. He displays [REDACTED] consistent with [REDACTED], though he has not yet received a formal diagnosis. Three years of construction noise, dust, and disruption will fall directly across his most critical years of secondary education. We ask that his situation be specifically considered under the Equality Act even in the absence of a formal diagnosis. He takes a bus to school from Mendlesham every school morning. That bus leaves at [REDACTED] and he needs to be driven into Mendlesham, travelling along Lamberts Lane. The haul road will make catching that bus a daily challenge, not knowing whether we have access to travel along Lamberts Lane or whether it is being used by HGV's.

Our daughter, [REDACTED]:

As set out in full in Section 3 above, our [REDACTED] daughter has [REDACTED] under the Equality Act 2010 and her situation has been addressed there in detail.

Seven springer spaniels:

The household keeps seven springer spaniels, which have been trained as working dogs and as guard dogs alerting to the approach of strangers. Three years of daily construction activity, HGV movements, and the presence of large numbers of unfamiliar workers will be deeply distressing and disorienting for the dogs throughout the construction period. Of particular concern is that the dogs occasionally leave the garden and run in the adjacent fields — fields which will become an active construction site and HGV haul route. The risk of injury or death to the dogs from construction traffic on what is currently open farmland they freely use is real and serious. We ask the Examining Authority to require the Applicant to address dog safety specifically in its construction management plan, including fencing, signage, and speed restrictions on any haul route adjacent to the property.

I ask the Examining Authority to recognise that this is a household of six people and seven dogs, living within 100 metres of the proposed route in their permanent generational family home, with construction visible from every aspect of the property and permanent infrastructure dominating the horizon in all directions for the lifetimes of everyone who will ever live here.

5. Construction Traffic, Road Safety and the Bacton Gas Pipeline

[REDACTED] is accessed via two single-track public highways country lanes, Lambert's Lane, and Stonham Road.

Lambert's Lane becomes Stonham Road at a bend; Wimble Lane (also designated as U5239) spurs off at that same bend; our home lies along Wimble Lane which is a no-through road. These roads form our only route of vehicular access. There is no alternative.

The household currently makes a minimum of ten vehicular journeys per day along these roads, rising to a minimum of sixteen from August 2026 when all four children are at home. The Applicant's proposals include the use of Lambert's Lane and parts of Stonham Road as haul routes for up to three years — roads entirely unsuited to the volume and weight of construction traffic of this scale.

At the bend where Lambert's Lane becomes Stonham Road, the Bacton high pressure gas pipeline runs underground — a pipeline originating on the Norfolk coast that supplies gas to London, passing within approximately 50 metres of [REDACTED]. The proposed pylon route crosses this pipeline in the adjacent field to the west. The simultaneous presence of a 400kV overhead line crossing a high pressure gas pipeline, in close proximity to a public road and an active construction haul route, raises serious safety questions requiring specific and transparent consideration by the Examining Authority. I ask the Examining Authority to confirm that the Health and Safety Executive has been specifically consulted on this interaction and that its response is on the examination record, and to secure a legally binding resident access protocol, reinstatement bond, and guaranteed access arrangements as conditions of consent.

6. Severance from Ancient Woodland and Loss of Essential Heating Fuel

Within the landholding of the farm estate, there is an area of ancient woodland known as The Thickett, situated approximately one mile south-west of Mendlesham, close to Gipping Little Wood and Gipping Great Wood. I have managed this woodland personally for many years and derive from it the firewood that is the sole source of heating for [REDACTED]. Our wood burner is not supplementary — it is the only means by which we heat our home.

The construction works will physically sever my access to The Thickett for the duration of the construction period, leaving a family of six — including four children, seven dogs, and a daughter with [REDACTED] whose health is adversely affected by cold — without any means of heating their home during one or more winters.

I ask the Examining Authority to direct that the status of The Thickett be confirmed in the Applicant's environmental assessment, and that the Applicant provide a specific mitigation plan securing my right of access throughout construction. In the absence of such access, I request that the Applicant funds an alternative heating solution for the full duration of any period during which access is severed.

7. The Annexe — A Reasonable Adjustment Under the Equality Act

As described in Section 3, my family had concrete plans to convert the existing barn on the eastern side of our property into an annexe for our daughter with [REDACTED]. The barn sits on the quietest, most secluded part of the property, with the main house between it and the entire construction zone and pylon corridor to the west. It is oriented away from the new route and looks out over undisturbed countryside. It is the one place on this property where our daughter could have her own home without waking every morning to what has been done to her family's land.

The conversion of the barn into an annexe for our daughter was a firm family plan, deferred only on financial grounds until we were in a position to fund it. National Grid's proposal has fundamentally changed that position. The construction corridor on the western side of our property makes the annexe - situated to the east, with the main house between it and the entire construction zone - not merely desirable but urgently necessary. Our daughter needs that space now, during the construction period, more than ever. We are not in a financial position to build it without assistance. That position has been directly caused by the uncertainty, stress and financial impact of this proposal on our family over the past years. We are asking National Grid to fund the construction of the annexe not because our original plans were made unviable but because their proposal has created an urgent need we cannot meet ourselves - and because providing our daughter with a quiet, sheltered, independent space away from the construction is the single most meaningful reasonable adjustment they could make for a person with [REDACTED] whose home is directly in the path of this project. I ask the Examining Authority to note that funding the conversion of this barn into an appropriate annexe for my daughter, with suitable soundproofing and insulation, constitutes a reasonable adjustment under the Equality Act 2010 — a proportionate measure to mitigate the specific and documented impact of this project on a person with [REDACTED] who will live at this address for the rest of her life. We believe it could also provide a vital safe haven - from the construction and pylons noises - for our [REDACTED] daughter and [REDACTED] son.

8. Request for Meeting with the Applicant

I wish to formally record my request, through the Examining Authority, for an opportunity to meet with the Applicant to seek resolution of the matters set out in this submission. I approach this constructively and in good faith.

I have specific and costed proposals regarding reasonable adjustments for my daughter, the annexe conversion, the ecological restoration of affected land through Boudicca Rewilding Ltd, and the resident access protocol. I consider it more appropriate to present those proposals directly to the Applicant in a meeting rather than in a public submission, in order to give the best opportunity for a practical and agreed resolution.

I ask the Examining Authority to facilitate or encourage such a meeting at the earliest opportunity before the close of the examination on 10 August 2026.

9. Summary of Requests to the Examining Authority

I respectfully ask the Examining Authority to:

1. Note the lifelong peppercorn tenancy and the generational nature of this family's connection to [REDACTED], and consider the impact of this proposal accordingly — not merely for the current occupiers' lifetimes but for the generations who will live here after them.
2. Note that the Applicant's Project Leader acknowledged in person — with Suffolk County Councillor [REDACTED] present and within earshot — that the proposed route breaches the Holford Rules, and dismissed those rules as mere guidelines, contrary to EN-5 and National Grid's own published position.
3. Require the Applicant to provide a full written response to each of the Holford Rules breaches identified in Section 2.
4. Require the Applicant to produce evidence of any equality impact assessment carried out following [REDACTED] visit — at which he was explicitly informed of [REDACTED] — and before the subsequent decision, confirmed in the Suffolk 3 realignment report, to move the nearest pylon closer to our home.
5. Give specific consideration to the impact on all four children, the household's seven dogs, and the permanent generational nature of the impact on a family whose home will pass to their children in perpetuity.
6. Confirm that the HSE has been specifically consulted on the interaction between the proposed overhead line, the

Bacton high pressure gas pipeline, and the proposed construction haul route, and that its response is on the examination record.

7. Secure a specific requirement that construction traffic shall not use Wimble Lane (U5239), Lambert's Lane, or Stonham Road as haul routes, or impose binding reinstatement and resident access protocol conditions including dog safety provisions.

8. Direct the Applicant to confirm the status of The Thickett ancient woodland and provide a mitigation plan securing access and protection throughout construction.

9. Note that the conversion of the eastern barn into an annexe for my daughter with [REDACTED] constitutes a reasonable adjustment under the Equality Act 2010 and should be considered as such in any mitigation planning.

10. Facilitate or encourage a meeting between me and the Applicant to seek resolution of all outstanding matters ahead of the close of the examination on 10 August 2026.

I confirm that the facts stated in this submission are true to the best of my knowledge and belief.

Signed: ___Karl Owen_____

Karl Owen

[REDACTED]
Date: 8 June 2026